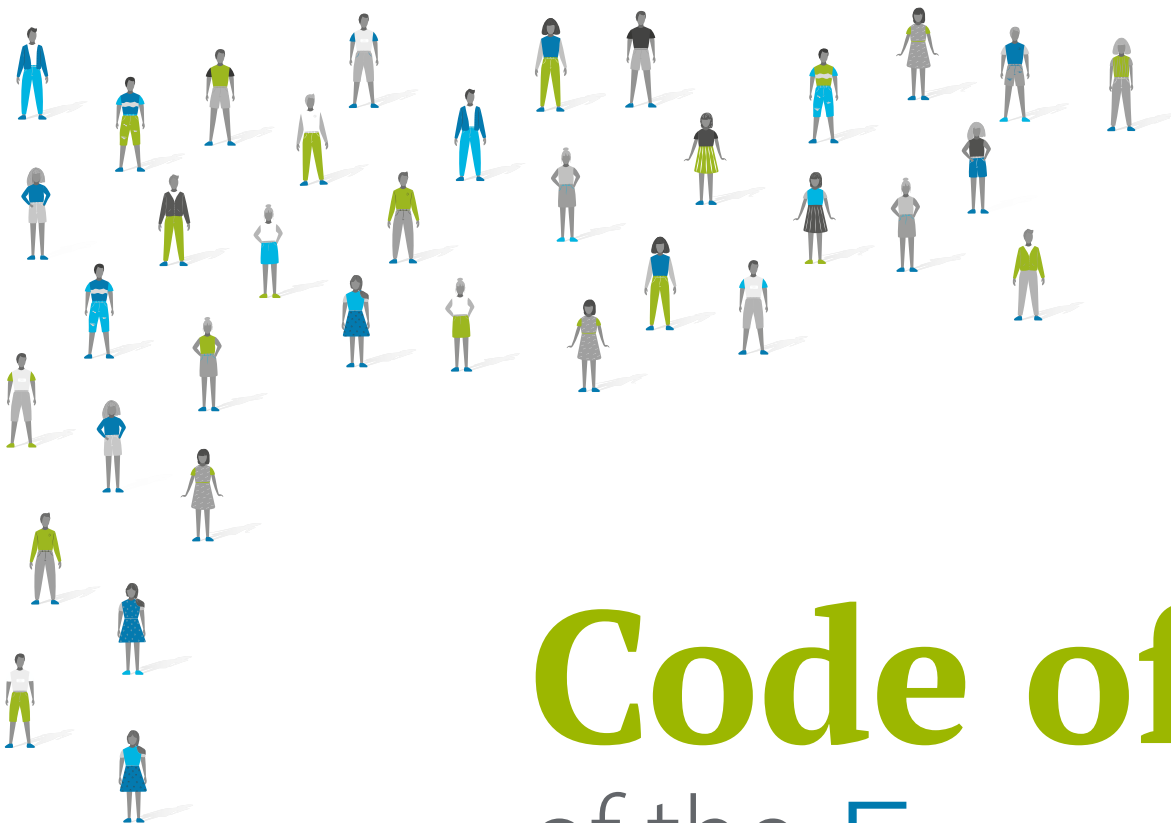


December 2023



# Code of Ethics

of the Enagás Group



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## Letter from the Chief Executive Officer



**E**thics comes from the Greek “ethos”, meaning “character, moral nature”. Ethics must guide our behaviour, but it must also emanate from us and shape our character, becoming evident in our actions.

In the case of a company with the history of Enagás, ethics has been part of its trajectory

since its birth in 1972 and is present in our values, our culture as an organisation and our actions.

The new Code of Ethics that we are presenting is a fundamental pillar of the Enagás Governance Model and responds to two relevant Enagás commitments: to always incorporate the best practices and ethical standards of Good Governance and, at the same time, to be a company that is in line with its time in all areas, which has to respond to present and future challenges. It is a living document that updates its guidelines, adapting them to new demands and realities.

This new edition addresses more transversal, flexible and collaborative ways of working in line with our Transformation Plan, brings a humanistic approach to challenges such as Artificial Intelligence and, most especially, contemplates the growing importance

of Sustainability. This Code of Ethics is perfectly integrated with our purpose and our Strategic Plan 2022-2030 which, as you know, has decarbonisation and security of energy supply as its main axes.

The Enagás Code of Ethics is also a reflection of the good practice that characterises the company. It sets out the behaviour expected of all of us, no matter where or in what environment we work. We need to learn it, understand it and put it into practice, starting with the Board of Directors and the management team to lead by example. It is everyone's responsibility to ensure that it is also understood by our stakeholders: contractors, suppliers, collaborators and partners. We want integrity to extend throughout our entire value chain, to the actions of all the people with whom we interact in our professional activity. This must continue to be Enagás' hallmark, now and in the future.

# 1. Our Code of Ethics

**T**he Code of Ethics is a fundamental pillar of the Governance Model and reflects Enagás' ethics culture and sets out the guidelines that determine the behaviour of its employees, managers and directors (hereinafter referred to as "professionals") and of third parties that have connections with the group.

Compliance with the Code of Ethics is obligatory for all professionals of the companies making up the Enagás Group, irrespective of the geographic location, including any subsidiaries under its effective control, within the limitations established in the applicable regulations.

It is also obligatory in their respective areas of relationship with the Group companies for

contractors, suppliers, those collaborating with Enagás or acting in the company's name, and the company's business partners. In subsidiaries in which the Enagás Group does not hold effective control, the company shall encourage principles and guidelines that are consistent with those set out in this Code of Ethics.

The Code of Ethics was approved in 2008 and

revised in 2012, 2014 and 2019. The current version was approved by the company's Board of Directors at its meeting held on 18 December, 2023.

This Code of Ethics shall be kept up to date in accordance with the proposals made by the Ethical Compliance Committee, which shall review its content at least once a year. The Code of Ethics must be updated within three years of the previous update.

As Enagás professionals, we must understand and comply with the Code of Ethics and the rules that implement it. When required by Enagás, we must accept knowledge of the Code of Ethics and confirm compliance with it.



The Code of Ethics is a fundamental pillar of the Governance Model. Enagás has a **Sustainability and Good Governance Policy** that sets out its commitments in this area, as well as a **Compliance Policy** that includes a commitment to develop, with a corporate approach, a Compliance Model to facilitate its effective implementation.

## I. The ethics and compliance model

The Code of Ethics formalises Enagás' model of ethics and compliance and is developed through policies, standards, processes and controls. Enagás has the necessary organisation and resources to ensure that this model is followed. In this regard, all professionals must follow the training plans that Enagás makes available to them on this Code of Ethics and the rules that implement it, involving themselves in its development and undertaking to keep their knowledge of it up to date.

The Board of Directors is the body with ultimate responsibility for ensuring Enagás' ethical culture and the effectiveness of the ethics and compliance model. The Ethical Compliance Committee, which reports to the Audit and Compliance Committee, assumes the competences related to the ethics and compliance model. For its part, the Audit and Compliance Committee is responsible for supervising the implementation of the ethics and compliance model and for ensuring that the Ethical Compliance Committee has sufficient resources, autonomy and independence.

Any non-compliance with the Code and with the regulations that implement it shall be analysed by the Ethical Compliance Committee. When it is found that a person has contravened the Code

of Ethics, the Ethical Compliance Committee, together with the Human & Transformation Department, will propose the corresponding disciplinary measures based on the internal regulations in force and the applicable labour framework.

In the event that a director commits a breach, it will be managed in accordance with the provisions of the Regulations of the Board of Directors or other applicable rules.

In relations with third parties, Enagás transfers its values and ethical commitments to suppliers, customers and business partners with whom it collaborates through acceptance of this Code of Ethics. Enagás reserves the right to collaborate with those third parties whose ethical performance is not consistent with the established standards.

Enagás has a Code of Ethics for Suppliers, which is mandatory for all third parties that are suppliers to Enagás.

**The Operating Procedure of the Ethical Compliance Committee defines its membership, responsibilities and basic rules of organisation and operation.**

## II. Ethics Channel (whistleblowing line)

In our day-to-day work, we must inform Enagás of any reasonable indication of irregularity, act contrary to the law or behaviour contrary to the commitments set out in the Code of Ethics that we observe. We must also report breaches by third parties with whom we interact, such as suppliers, contractors or business partners.

Also, if we have questions about the interpretation of the Code of Ethics and the rules that implement it, or we want to express any concerns, we must send them to the organisation.

In order to guarantee ease in the formulation of communications, as well as to ensure that

they are presented and managed effectively, favouring the fact that the organisation itself is the first to learn of any possible irregularity, Enagás makes the Ethics Channel available to all Enagás professionals, and to those third parties related to it, to make use of through the following means:



Email  
[canal.etico@enagas.es](mailto:canal.etico@enagas.es)



**Corporate intranet**  
**Corporate website**



**Post to:**  
Paseo de los Olmos 19  
28005 – Madrid, Spain  
  
(to the Secretary and  
Chairman of the Ethical  
Compliance Committee.



At the request of the informant, made through any of the above channels, it may also be submitted by means of a face-to-face meeting within a maximum period of seven days.

The Ethical Compliance Committee is the body responsible for processing the communications and queries received through the Ethics Channel, which may be supported by the Enagás management as it deems appropriate in each case. If a communication concerns a member of the Ethical Compliance Committee, such person shall not participate in its processing.

The Ethical Compliance Committee shall offer a guarantee of independence, so that any possible conflicts of interest or personal or professional ties that could affect the good judgement or credibility of those involved in the communications management process are beyond suspicion. Notifications will be managed on the basis of what is established in the Procedure for managing Notifications and Consultations regarding irregularities or breaches of the Ethics and Compliance Model.

Communications may be anonymous and will be treated confidentially and in accordance with the provisions of current legislation on data protection as well as in relation to persons reporting breaches of regulations and anti-corruption. Therefore, the identity of the person making a communication will not be disclosed to the person concerned or to any third party without their consent, thus guaranteeing the confidentiality of

the identity of the communicator. Without prejudice to the foregoing, the data of persons making communications may be disclosed to administrative or judicial authorities to the extent that they are required by such authorities as a result of any proceedings arising from the subject matter of the communication.

If we send an enquiry or notification, we will provide all the necessary information and actively cooperate in any investigations or inquiries by Enagás, either directly or indirectly through third parties. Communications made through the Ethics Channel must always comply with criteria of truthfulness and proportionality, and may not be used for purposes other than those that

**The persons concerned by a communication shall be entitled to the presumption of innocence and the right of defence, while ensuring the confidentiality of the matter.**



Enagás has an **Internal Information System Policy** that sets out its principles and commitments in this area.

pursue compliance with this Code of Ethics or the applicable regulations.

Enagás will not permit any type of retaliation against any person who, in good faith, uses the Ethics Channel to raise questions or to bring possible breaches of the Code of Ethics or applicable regulations to light, or against those who collaborate in investigations into alleged irregular actions.

Retaliation means any act or omission prohibited by law or which, directly or indirectly, results in unfavourable treatment that places the person who suffers it at a particular disadvantage in the employment or professional context solely because of their status as a reporting person or because of their cooperation in the handling of information.

With regard to possible disciplinary measures to be applied to affected persons who have committed an irregularity, these shall be proposed in accordance with current internal regulations and the applicable labour framework and, in the event of affecting Enagás professionals, the Ethical Compliance Committee shall have the support of the People and Transformation Department to analyse their appropriate implementation within the applicable labour framework.

## 2. Commitment to our values

All Enagás professionals must set an example of rigour and professionalism. We ensure that our example is positive and that we transmit the values of the organisation in our day-to-day work, both among our colleagues and with the third parties with whom we interact in our professional activity.

Before acting, we must reflect on whether or not our behaviours are aligned with the Enagás purpose, the 2030 vision and our values.

At Enagás, we are committed to continuously improving our corporate governance framework in accordance with best practices in this area, always bearing in mind the interests of our shareholders and the creation of value.

### Purpose

Our purpose is twofold:

- To contribute to ensuring the security of energy supply, an essential service for the well-being of society.
- Accelerating decarbonisation, driving innovation and creating value for our stakeholders.

### 2030 vision

- To be the benchmark operator in the decarbonisation of gas infrastructure and to contribute to the security of supply in Spain and Europe.
- To become the future operator of dedicated hydrogen transmission infrastructure.
- To promote the deployment of renewable gases throughout the entire value chain.
- All this, developing innovative solutions in work organisation and technologies that will be key in a context of emission neutrality.

### Values



INTEGRITY



TRANSPARENCY



SECURITY



SUSTAINABILITY



EFFICIENCY



TEAM WORK



INNOVATION



## I. Integrity: we show integrity

### Crime prevention

Enagás is categorically opposed to the perpetration of any criminal offence and is firmly committed to combating and preventing criminal risks, in line with the principle of “zero tolerance” towards the commission of crimes.

Enagás has implemented a Crime Prevention Model that serves as a means of preventing the commission of crimes at Enagás, on the basis of which Enagás exercises the supervision, monitoring and control functions required by Spanish criminal law to avoid being held criminally liable.

In this regard, Enagás has established internal control elements, including financial and accounting, sustainability and corporate governance, to prevent and, if necessary, detect and eradicate possible criminal practices.



Remember that Enagás has a **Crime Prevention Policy**, which implements the commitments and management model of the Group companies in this area.

### Fight against fraud, corruption and bribery

At Enagás, we conduct our activities with ethics and integrity, and expressly reject fraud, corruption and bribery.

In line with the principle of “zero tolerance”, we are aware of and respect the Group’s rules against fraud, corruption and bribery, and we are strongly opposed to and committed to combating and preventing illegal or irregular acts. In the event of doubt about the applicable regulations, we raise our queries through the Ethics Channel.

Enagás implements a specific training plan on corruption prevention for all its professionals, taking into account the risk of corruption arising from the activities carried out by them.

In the exercise of due diligence, we thoroughly record all payments to third parties. We do not accept or make improper payments, such as facilitation payments, payments in-kind or commissions, or advantages, benefits or privileges of any kind for unethical purposes.



Remember that Enagás has a **Policy against Fraud, Corruption and Bribery**, which reflects the commitments of the Group companies in this area.

## Some key concepts

### ■ **Fraud**

Intentional action using deception to obtain an undue benefit or advantage.

### ■ **Corruption**

Impairment of the decision-making process in which the decision-maker deviates or demands deviation from the criteria that should govern his or her decision-making, in exchange for a reward or for the promise or expectation of an undue reward or advantage.

### ■ **Bribery**

Direct or indirect offer, promise, delivery, acceptance or request of any value as an inducement or reward for a person to act or refrain from acting in connection with the performance of his or her duties for the purpose of obtaining improper advantage.

### ■ **Facilitation payment**

Small payments or gifts made to third parties for favourable treatment, such as speeding up an administrative procedure, obtaining a permit, licence or service, or preventing an abuse of power.

## How do we act with respect to third parties?

- We ensure that third parties with whom we have dealings, i.e. suppliers, contractors, customers and business partners, act ethically and with integrity. In the processes of analysis and selection of third parties, we check their reputation and professional solvency and ensure that their models of ethics and compliance are aligned with those of Enagás.
- Any suspicious actions by third parties with whom we have dealings, i.e. suppliers, contractors, customers, business partners or others who collaborate with Enagás or act on its behalf, must be reported to the Ethical Compliance Committee or through the Ethics Channel.
- The relationship with public administrations and their representatives is the responsibility of the personnel of the company formally identified and authorised to do so.

In the exercise of their professional activity and outside the reasonable limits for the normal practice of the business, Enagás professional are not allowed to engage in any action aimed at obtaining advantages or benefits in the award of a business or contract. In this regard, this prohibition extends, on a non-exclusive basis, to contributions or donations to political parties, governmental and non-governmental organisations, including charitable organisations, which have not been subject to the authorisation processes provided for in Enagás' regulations.

**Remember to record gifts accepted or given on the basis of the provisions of Enagás' internal rules.**

## What is considered a gift or hospitality?

Gifts and hospitality can be any type of benefit, whether monetary or not, such as delivery of material goods, free participation in conventions, courses, conferences or seminars, invitations to events, trips, hotel stays, meals in restaurants, promises of job offers, etc.

## This is how we must act in response to gifts and hospitality

In some circumstances, gifts, presents or hospitality may affect our objectivity and impartiality, especially if they occur frequently or if their value may be perceived as conditioning a business decision.

We must not make, offer or receive, either directly or indirectly, gifts or hospitality from third parties, including public representatives, that go beyond the purely symbolic or that are not proportionate to the circumstances and social customs, in accordance with the provisions of the Enagás gift offering and acceptance management procedure. If in doubt, we should consider whether we would feel comfortable if such a gift were publicly known and consult with the Legal and Compliance Department.

We must never accept cash or equivalent gifts, such as gift cards, regardless of the amount.

## Management of conflicts of interest

In our work, we always act in the best interests of the Group and avoid situations or decisions where a conflict of interest may exist, acting with full transparency in this area. Our directors are subject to the rules on conflicts of interest established in the Regulations of the Board of Directors and the applicable regulations.

We avoid conflicts of interest in relationships with suppliers, contractors, business partners and customers and promote principles and guidelines consistent with the **Enagás Conflicts of Interest Policy**.

### What do we mean by a conflict of interest?

Conflicts of interest exist when a decision we make or are required to make in the course of our work may directly or indirectly benefit ourselves or a person with whom we have a family, emotional or business relationship, and therefore there is a direct or indirect conflict between our personal interest and the interest of the Group companies.

We pay special attention to:

- Situations involving friends and family.
- Business opportunities arising in the course of your work.
- Other professional activities outside your activity at Enagás.



Remember that Enagás has a **Conflicts of Interest Policy** that regulates this matter.

### This is how we act in the face of a possible conflict of interest

We comply with the following general principles for dealing with a conflict of interest:

- We have a duty to abstain from deliberations and decision-making. It is very important to refrain from intervening in or influencing any decision that may affect the parties with whom the potential conflict exists.
- We also have a duty to refrain from accessing confidential information.
- We must act with transparency and ensure the proactive disclosure of conflicts of interest. We must report any situation that we believe may involve a potential conflict of interest to the Legal and Compliance Department or through the Ethics Channel.
- We must cooperate in resolving conflicts of interest.

In the area of Technical Management of the Gas System (GTS), we comply strictly with the guidelines contained in the **GTS Code of Conduct** without exception.

## Separation of activities

Enagás carries out the technical management of the gas system (Enagás GTS) and the transport, storage and regasification of natural gas (Enagás Transporte), each of these subsidiaries independently ensuring non-discriminatory treatment between the users of the networks that form part of the system or between the different agents that participate in it.

In this regard, Enagás GTS and Enagás Transporte act at all times in strict compliance with the criteria of legal, accounting and functional separation established for this type of activity by the sector regulations in force.

Enagás applies the commitment to functional separation, not only between the regulated and non-regulated activities currently carried out by the Group, but also to new activities, such as the development of hydrogen transmission infrastructures that, where appropriate, are initiated by the Group or with its affiliate companies, including the production or sale of renewable gases.

## How do we act?

- We establish appropriate measures to protect sensitive information from the regulated environment and we do not use it for the benefit of any party in the gas system or other Enagás subsidiaries.
- We avoid cross-subsidisation and implement regulators' recommendations on the provision of common intra-group services.
- Enagás professionals act objectively and transparently in the performance of their duties and avoid the emergence of possible conflicts of interest between incompatible activities, applying internal regulations in this area.
- We do not disclose confidential information to which we have had access in the course of our work, nor do we share it with our colleagues. We only share information that is strictly necessary to perform our functions.
- In addition, independence is guaranteed and appropriate measures are established to protect the interests and sensitive commercial information of Enagás GTS through the **GTS Code of Conduct**.
- Enagás also has an action protocol to guarantee the independence of the activity of developing hydrogen and other renewable gas transport infrastructures with respect to Enagás Renovable, S.A.



Remember that Enagás has a **Policy of Separation of Activities**, through which we promote the principles and commitments in this area.

## Free competition

We respect free competition and comply with applicable national and international regulations in the performance of our professional activity, avoiding any behaviour that could be considered an abuse or restriction of competition.

Enagás has the appropriate tools so that its professionals can carry out their activities without being exposed to anti-competitive risks. It also encourages the use of existing participation and consultation processes it has for any ethical or legal issues related to the application of antitrust regulations.

## How do we act with respect to third parties?

- We do not refuse, manipulate or delay the provision of any information required by the competition authority or regulatory bodies and actively cooperate with them in the course of examination procedures.
- We do not discredit the reputation of our competitors or the third parties with whom we do business.
- We obtain information from third parties, including from competitors, according to the law.
- We ensure the principle of non-discrimination and equal treatment of our customers who are in identical conditions.



Enagás has an **Antitrust and Competition Policy** that regulates the Group's commitments and management model in this area.

## Sanctions

We comply with applicable national and international sanctions and embargoes, as well as other restrictions on foreign trade established by law.

Companies operating internationally should be aware of the sanctions regimes that apply to them and how to comply with these.

We comply with economic sanctions regulations and programmes imposed by the European Union and the United Nations Security Council, as well as the US Treasury Department's Office of Foreign Assets Control (OFAC) and similar economic sanctions, anti-terrorism laws, money laundering prevention laws and anti-boycott laws. These sanctions programmes can be comprehensive or targeted and can target countries as well as individuals suspected of involvement in activities related to terrorism, drug trafficking, proliferation of weapons of mass destruction and other security threats.

### What are the most prominent types of sanctions for companies?

- Financial sanctions generally involve asset freezing measures that affect the availability of funds and economic resources to certain entities or individuals (sanctioned person). They may also include restrictions on the use of property by sanctioned persons, receipt and transfer of funds from certain types of persons, and prohibitions on the provision of funding or financial assistance in connection with designated persons and prohibited transactions.
- Trade sanctions prohibit trade for certain products from sanctioned countries - usually arms and products such as oil, timber, gold and diamonds, as well as equipment - for use in the nuclear, oil and gas or petrochemical sectors. Activities related to this type of trade may, in some cases, be directly prohibited.

**Enagás undertakes to ensure compliance with international sanctions regimes vis-à-vis third parties, established by the relevant national and international institutions, in all markets in which it operates.**

## Political neutrality

Enagás is a neutral organisation in its relations with governments, public authorities, institutions and political parties. We do not finance, directly or indirectly, political parties or their representatives or candidates.

Enagás recognises the right of its professionals to participate in political activities, provided that such activities do not interfere with their professional performance, do not give rise to a conflict of interest and are conducted in a personal capacity.

## Protection of the company's reputation

Enagás professionals protect the company's image and the reputation of Enagás, both in the course of their professional activities and in those situations where their actions may be associated with the company's name.

We are particularly careful in our use of social networks, we act with prudence and common sense and avoid behaviour that could be a risk to Enagás' reputation.

In our dealings with the media, and whenever we participate in our capacity as professionals or as a result of our work at Enagás, we will do so with

the authorisation and under the coordination of the Communications, Institutional and Investor Relations Department, and we will comply with the guidelines established by the organisation.

With regard to public appearances at forums or events in our capacity as Enagás professionals, we shall have the authorisation of our hierarchical superior and we shall coordinate in advance with the Communications, Institutional Relations and Investor Relations Department to ensure that our positioning, messages and image are aligned with those of the Group.

We will use the Enagás logo, brand and name appropriately in our professional activities, especially in public interventions, and we will ensure that contractors and collaborating companies use them correctly.

## How do we act with respect to third parties?

The relationship with public administrations and their representatives is the responsibility of the people of the company formally identified and authorised to do so.

## This is how we make use of social media



- Our participation in social networks must be in a personal capacity and we will be especially careful if we do so on behalf of Enagás.
- We must not disclose confidential company information.
- We must avoid intervening in discussions involving conflict, especially if they deal with any Enagás-related issues.



## Supply chain management

Enagás Group companies carry out supplier selection processes based on the criteria of objectivity and impartiality, avoiding any conflict of interest in their selection and undertaking to comply with the internal procedures established for the award processes, including, in particular, those relating to the approval of suppliers, carrying out the relevant due diligence analyses.

The selection of suppliers is based mainly on criteria of quality, cost and compliance with deadlines, also promoting sustainable and local purchases, which enable local development and economic inclusion.

The selection processes shall ensure the confidential treatment of prices and information provided by participating suppliers and shall not be disclosed to third parties, except with the consent of the interested parties, or by legal obligation, or in compliance with judicial or administrative rulings.

## How do we act with respect to third parties?

Enagás promotes environmental, social and ethical commitments and principles among its suppliers, striving to improve their sustainability performance. Enagás has a **Code of Ethics for Suppliers**, which is mandatory for all third parties that are suppliers to Enagás. In addition, sustainability requirements are established in the approval process for suppliers depending on the inherent risk of the product and service families in which the approved supplier is involved.

The Group's companies take the necessary steps to collaborate with their suppliers in order to increase their competitiveness and sustainability, establishing the appropriate programmes in each case, promoting partnerships in line with Sustainable Development Goal (SDG) seventeen approved by the United Nations (UN).

Suppliers undertake to respect the Universal Declaration of Human Rights.

## II. Transparency: We are transparent

### Transparency and reliability of information

Enagás professionals act in a clear and transparent manner and ensure that none of our actions can be interpreted as a deception.

We convey information truthfully and completely. We do not knowingly provide incorrect, inaccurate or imprecise information that may mislead the person receiving it. We do not conceal information for the purpose of

evading compliance with Enagás' obligations and commitments to third parties. Nor do we use misleading or false information for the purpose of obtaining grants, relief or other aid or advantages, or conceal information of interest to the organisation for our own benefit.

The control mechanisms include the Internal Control over Financial Reporting System (ICFR) and the Internal Control over Non-Financial Reporting System (ICNFR), with Enagás' professionals providing the necessary collaboration to ensure that the control system is continually updated.

With regard to the preparation, recording and review of financial and non-financial information, we ensure its reliability and rigour, and we apply the accounting policies, control systems and supervision mechanisms defined by Enagás in order to reflect a true and fair view of the organisation.

## Communications with shareholders and investors

Enagás is committed to the principles of transparency and maximum quality of information and declares the truthfulness of information as a basic principle in all its actions, with the aim of preserving the confidence of its shareholders and investors.

To this end, Enagás shall report truthfully, objectively, appropriately and reliably to its stakeholders on the organisation's performance,

under conditions of equality, to facilitate decision-making for all its shareholders.

Enagás maintains its aim of continuous and sustained value creation for its shareholders and will make those channels of communication and consultation that allow them to have adequate, useful and complete information on the evolution of Enagás permanently available to them.

Likewise, Enagás undertakes to develop the necessary bases for the participation of its shareholders in the decisions that correspond to them.

Relations with the media and with shareholders and investors will be channelled through the General Communication, Institutional and Investor Relations Department.



Enagás has a **Policy on Communication of Information, Contacts and Involvement with Shareholders, Institutional Investors and Proxies and other stakeholders**, which sets out the principles and channels for communication.

## Prevention of money laundering

Enagás' professionals reject all forms of money laundering and pay special attention to situations where we suspect the unlawful origin of funds or payments by the persons or entities with which Enagás has relations.

Unless expressly authorised and supported by documentation, we do not make or receive cash payments.

### What is money laundering?

Money laundering is the set of mechanisms or procedures designed to give the appearance of legitimacy or legality to property or assets of criminal origin.

### This is how we act when dealing with a possible suspicion of money laundering

We must report any suspicious actions to the Ethical Compliance Department or use the Ethics Channel.

## How do we act with respect to third parties?

- We pay special attention to suspicious payments from third parties, such as payments by bearer cheques, payments in currencies other than agreed currencies, payments from persons or entities domiciled in tax havens, payments from entities where it is not possible to identify the parties or the final beneficiaries, among others.
- We collaborate with the authorities if they require our help to investigate possible cases in the markets in which we operate and we provide the information they may request in a transparent manner.

## Fiscal responsibility

We transparently report the company's tax contributions and do not make use of structures whose purpose is to conceal information from the tax authorities. We at all times avoid evading payments and obtaining undue benefits for the company.

Public grants, subsidies and other public funds obtained by Enagás are used exclusively for the purpose for which they were granted. Regarding tax assessments, we carry them out in accordance with the tax regulations in force.

Enagás assumes as its own the commitments contained in the codes of good practice defined by the tax authorities.

We collaborate with the tax administrations and transparently provide the information they may request.



Enagás has a **Fiscal Policy** that includes the commitments undertaken in this area.

## Lobbying

With regard to the representation of interests before public or private entities, an activity commonly known as lobbying, we comply with current legislation and publish the information requested in the European Union Transparency Register. Enagás has also adhered to the Register's code of conduct and complies with the principles and rules described therein.

Enagás cooperates with legislators, regulatory bodies, public administrations and other entities with full transparency and in accordance with the principles described in this Code of Ethics and the code of conduct of the European Union Transparency Register.

The relationship with public administrations and their representatives is the responsibility of the people of the company formally identified and authorised to do so.

### How is interest management carried out vis-à-vis public and private entities?

Interaction, either directly or indirectly through third parties, with relevant authorities or entities to promote a specific cause, takes place, among other channels and forms, through debates or information actions.

Through these activities, Enagás contributes its experience, knowledge and resources to the decision-making processes of public policies and contributes to the legislative and regulatory developments that might apply.

### III. Safety: We care about people and safety

#### Human rights - Respect for persons

We are committed to the protection of human and labour rights.

Enagás promotes compliance with the United Nations International Charter of Human Rights, the OECD Guidelines for Multinational Enterprises, the International Labour Organisation (ILO) Declaration and its fundamental conventions and the European Convention on Human Rights.

We do not tolerate child labour or forced labour and we ensure respect for freedom of association and collective bargaining in the workplace.

We explicitly reject the abuse of authority and all forms of harassment and behaviours that may create an intimidating, offensive or hostile work environment.

Human Rights are addressed using a continuous improvement approach aligned with our Sustainable management system. Enagás has a global system in place to identify risks of human rights violations and impacts, both in its own operations and with suppliers, customers and affiliates.

Enagás shall implement the necessary measures to ensure that the working conditions of its professionals (working time, decent salary, physical conditions, other benefits, etc.) are adequate, do not harm the health of its professionals, and benefit their well-being and work-life balance.

#### What do we mean by harassment?

Any verbal or physical behaviour that violates the dignity of a person, and in particular when it creates an intimidating, offensive, degrading or vulnerable environment.

The different forms of harassment include harassment at work, psychological or moral harassment, sexual harassment, or harassment based on sex, among others.



Remember that Enagás has a **Human Rights Policy** that sets out the organisation's principles and commitments in this area.

## Health and Safety protection

Enagás promotes and encourages health and safety policies, ensuring the protection of people, facilities and those who form part of our environment, identifying, assessing and managing risks and opportunities in compliance with the legislation in force in each case.

We must report situations that could endanger people's safety as soon as possible, together with any damage to protective equipment.

Enagás provides its professionals and collaborating companies with the necessary guidance and resources so that they can carry out their activities in a safe and healthy manner, promoting physical and emotional well-being, informing our suppliers, contractors, business partners and customers of our health and safety requirements.

Enagás professionals, as well as all persons related to the company, must understand and comply with the procedures to protect occupational health and safety and promote the development of preventive measures, ensuring their own safety, that of other professionals, customers, suppliers, collaborators and, in general, of all persons who may be affected by the development of their activities, fostering participation, dialogue and consultation processes.

Enagás encourages a culture of change management that guarantees health and safety in new processes, facilities or organisational changes, guaranteeing our professionals greater resilience in the new challenges facing the Group's companies.



Enagás has a **Health and Safety, Environment and Quality Policy**, and a **General Policy on Integral Safety in Strategic Infrastructures**, which sets out the principles and requirements in health and safety matters.

## IV. Sustainability: We promote sustainable development, energy and natural resource efficiency and the just transition

### Energy transition

In line with our purpose, we are committed to ensuring that our actions contribute to guaranteeing the energy supply of the regions in which we are present. Our actions are also aligned with the adaptation and transformation of our business in line with the decarbonisation of the energy sector and our commitment to be a carbon neutral company by 2040.



Enagás also has a **Climate Action Policy**, which includes commitments in this area aimed at moving towards decarbonisation and thus contributing to the energy transition process.

### Environmental protection

We are committed to preserving natural capital by controlling and minimising the environmental impact of our activities. To this end, we develop initiatives aimed at climate action through energy efficiency and the reduction of atmospheric emissions, promoting the transition towards a circular economy, waste management and recovery, the preservation of nature and its biodiversity, the prevention of pollution and efficiency in the use of resources, among others.

In line with the minimisation of environmental impact, Enagás defines neutrality objectives for the most significant environmental aspects and dedicates the human, material and economic resources necessary to achieve them.

Enagás identifies, evaluates and manages the impacts, risks and opportunities of its significant

environmental aspects. In this regard, we implement measures to prevent, mitigate and control impacts and, in the event of environmental impacts, we inform the company promptly and ensure that we activate the action protocols so that they can be corrected immediately.

The Enagás Group is committed to ensuring compliance with applicable environmental regulations and laws, as well as with the commitments adopted on a voluntary basis.

**Enagás has internal environmental regulations consisting of policies, procedures and controls that all professionals must be aware of, including the Sustainability and Good Governance Policy.**



## How do we act with respect to third parties?

- We promote the adoption of environmentally friendly guidelines in our value chain: suppliers, contractors, collaborating companies and other third parties with whom we interact, and we ensure that their environmental performance is aligned with the commitments included in our policy.
- We diligently deal with any possible environmental queries or complaints from communities neighbouring Enagás facilities or other affected third parties, and bring them to the attention of the organisation as soon as possible through the established channels so that they can be resolved.

## Environmental commitment

Enagás contributes to the socio-economic development of local communities in the environments in which it operates through initiatives that foster positive impact and help meet the needs of society.

For sponsorships, patronages, donations and collaborations we follow the principles established by the Group. We have the relevant authorisations, we perform them under objective criteria and in a transparent manner, and we accurately reflect them in the Group companies' books and records.

## How do we act with respect to third parties?

- Our relationship with local communities is based on trust, mutual respect and dialogue.
- If a third party requests Enagás' collaboration with a cause through sponsorship, patronage or donations, we inform the General Communication, Institutional and Investor Relations Department, the area responsible for the coordination and management of these initiatives.

**Enagás supports the participation of Enagás Group professionals in volunteer initiatives.**

## V. Efficiency: we are efficient

### Use of company assets

We use the organisation's resources responsibly, limiting their use to professional activities and always according to established standards.

In our professional activity, we refer to the sources and respect the intellectual and industrial property, making sure that we have the permits or rights to the material used.

We are alert to possible attacks or manipulation of computer security. If we observe any dubious activity that could put the security of Enagás' assets at risk, we will inform Enagás as soon as possible.

We are committed to keeping our information systems secure, preventing and responding to threats. We tailor our security measures to meet

the needs of each business area, ensuring that information is always kept confidential, complete and accessible. If security is threatened, we act immediately to resolve the problem.

We are diligent and responsible in cybersecurity matters. We know and apply the protection instructions defined by Enagás, as well as internal regulations, and we carry out the training provided by Enagás in this area.

**Enagás may, on the basis of legal criteria and the provisions of corporate policies, carry out the relevant investigations and controls of company-owned equipment.**



Enagás has a **Cybersecurity Policy**, which sets out its principles and commitments in this area.

## This is how we use Enagás' technological equipment

- We will not use the organisation's equipment for illegal purposes or for any other activity that could damage Enagás' reputation or affect the operation of its computer systems.
- We must have Enagás' authorisation for the installation or use of programmes on the organisation's equipment, as well as for access to third-party equipment.
- We cannot download, view or distribute material that is illegal, that infringes people's rights or may be offensive.
- At the end of the professional relationship with Enagás, we will return the goods that the company has provided us with in the condition in which they were delivered.
- The use of personal devices to carry out our professional activity is not permitted, otherwise the Digitalisation and Information Technologies Department must be notified in order to implement the necessary cybersecurity measures.



## How do we act with respect to third parties?

If we make assets owned by Enagás available to our suppliers, customers and business partners, we ensure that they are used appropriately.

## Information confidentiality

The information that we handle in our professional activity, except when its disclosure is expressly authorised, must be considered confidential and treated as such.

We are all responsible for protecting the confidentiality of information, whether it relates to Enagás or to third parties with whom we have dealings, such as customers, suppliers, contractors or business partners, potential job applicants or any third party with whom we have a relationship in the course of our business.

Any reasonable indication of leakage of confidential or inside information shall be



Remember that Enagás has an Internal Code of Conduct in matters **relating to Securities Markets, which regulates compliance with legislation on market abuse, insider trading and other securities market-related issues.**

reported by those who become aware of it to their immediate superior and to the Legal and Compliance Department.

Authorisations to use information must respond to specific requests, must be concrete and specific, and must have a specific time frame. In addition, staff with access to insider information must make responsible and professional use of it, preserving its confidentiality.

## What is considered to be insider information?

Any information of a specific nature that has not been made public, which refers directly or indirectly to Enagás or any of its subsidiaries or to listed securities, and which, if made public, could have an appreciable influence on the prices of such securities.

## This is how we manage confidential information

- We do not disclose information about Enagás Group companies to third parties unless we are authorised to do so.
- We do not use it for our own benefit or that of third parties.
- Nor do we share with our colleagues information that we have had access to in our professional capacity and that may be considered sensitive.
- We only share information that is strictly necessary to perform our functions.
- Remember that the confidentiality obligation will remain in place indefinitely even after the labour relationship with Enagás has concluded.

We will comply with current data protection legislation at all times. In our daily work, we must adequately protect the personal information to which we have access.

### What do we understand by information of a personal nature?

Any alphanumeric, graphic, photographic or any other type of information relating to identified or identifiable natural persons.

### This is how we protect personal data

- We only use personal data for the purposes for which they have been legitimately collected and of which the data subjects have been informed. We do not store data for longer than necessary to fulfil the purpose for which they were collected or the limits that are legally established. Use shall be made with respect for the individual rights of persons and in compliance at all times with the legislation in force.
- In case of doubt or if we detect a possible fraudulent use or any event that affects the security of information and personal data, we will inform the data protection officers of the organisation via email to [protecciondedatos@enagas.es](mailto:protecciondedatos@enagas.es)
- We apply the principle of data minimisation and we only access the necessary personal information.
- If we need to send sensitive information of a personal nature, we must encrypt it and send the password through a means other than the file.
- We never share our passwords.
- We do not leave our devices or documents unattended.
- When we do not need certain information, we destroy it in a secure way.

## **Use of artificial intelligence and other disruptive technologies**

At Enagás we promote the digitalisation and efficiency of processes.

We place special emphasis on encouraging the responsible use of technology to ensure that digital tools have a positive impact on both the company and the third parties with whom we interact.

Thus, we do not use disruptive technologies in corporate devices without prior approval from

Enagás and we only use them to achieve Enagás' objectives while respecting people's rights and current legislation. In the event of detecting possible malicious use, we will inform those responsible.

Enagás is firmly committed to promoting ethics in the development of artificial intelligence,

ensuring that its application is fair and guarantees that the results are free of discriminatory bias. In this regard, we take into consideration the "Recommendation on the Ethics of Artificial Intelligence", the first global standard on the ethics of Artificial Intelligence, prepared by UNESCO in November 2021, which was adopted by all 193 Member States, including Spain.

**Enagás offers continuous training to its professionals in order to make efficient use of technologies, and these professionals are committed to keeping up to date in these matters.**

## **VI. Teamwork:** We work in teams

### **Collaboration and teamwork**

At Enagás we treat our colleagues, managers and subordinates with respect and professionalism.

We promote a favourable working environment based on dialogue and transparency, we work as a team and give the best of ourselves

to contribute to achieving the objectives of the Group companies, committing to the transformation of ways of working and promoting the transversality of the teams, in line with the company's strategy.

Professionals among whose responsibilities include team management within Enagás drive change, develop the capabilities and potential of our teams, and show a receptive attitude.

### **How do we act with regard to third parties?**

We maintain a collaborative attitude and respectful treatment with all third parties with whom we interact in our professional activity.

Enagás promotes working environments based on trust, collaboration and teamwork.

## Equal opportunities

At Enagás, we are committed to fostering a working environment of trust and respect for all the people with whom we have dealings in the performance of our activities. For this reason, situations of discrimination for any reason and specifically for reasons of gender, nationality, race, disability, sexual orientation, gender identity, age, religious beliefs, political opinions, or any other personal, family, economic or social circumstance that may be a cause of discrimination will not be allowed.

The processes of selection, recruitment, performance evaluation and promotion of professionals are always based on merit and on objective and transparent criteria related to their abilities and the added value they bring to their work. Under no circumstances are actions that show favouritism tolerable.

## Training

Enagás is committed to promoting the continuous training of professionals, encouraging the growth of human capital, providing learning and development opportunities to improve their professional skills and knowledge. We value individual growth and believe in developing a highly skilled and motivated team.

**We aim to foster an environment of learning and collaboration, driving both personal and organisational success.**



## Work-life Balance

Enagás is committed to promoting policies and measures that encourage co-responsibility and work-life balance among its employees.

At Enagás we promote the adoption of flexible and collaborative ways of working, prioritising the creation of value and providing professionals with tools that favour agility and transversal work. At Enagás, there are hybrid work models that enable a work-life balance and increase productivity by optimising the use of technology.

Enagás professionals shall observe the Corporate Guidelines on the Right to Digital Disconnection.



Remember that Enagás has a **Diversity and Inclusion Policy**, which sets out the commitments and lines of action to position management of diversity and inclusion as key elements of the organization's global strategy.

## Diversity and Inclusion

### This is how we promote diversity and inclusion



- We promote a working environment where mutual respect and integration prevails.
- We value the richness offered by the combination of different knowledge, abilities and experiences.
- We believe that all professionals which make up the Enagás Group are essential in achieving the objectives of the organisation.
- We respect different points of view.
- We generate a working environment in which all people are able to develop their skills and carry out their roles in the best possible way, regardless of gender, culture, generation or any other factor.

### How do we act with respect to third parties?

- Enagás will not permit any discriminatory conduct by employees from any supplier, contractor, business partner or customer. Any professional who may have knowledge of facts of this type must inform Enagás through the established channels.
- All third parties will be treated equally in the selection and recruitment processes. Persons with responsibilities in relationships with third parties shall act with impartiality and objectivity and shall follow the procedures established by the group.

## VII. Innovation: We are committed to innovation

### Promotion of innovation and entrepreneurship

At Enagás we are aware that we work in a changing market and environment. For this reason, all Enagás Group professionals maintain a proactive attitude, promote innovation and change, and act in a receptive and collaborative manner in the face of new ideas.

We support and promote innovative projects that, in accordance with the Group's strategy, allow us to generate value and diversify our business, as well as to position ourselves in

ground-breaking technologies aligned with the improved efficiency, competitiveness and sustainability and decarbonisation of the energy sector with the incorporation of renewable gases.

We understand the important impact that open innovation can generate, so we show a proactive attitude towards new projects and are open to new business initiatives that could flourish in our relationship with other institutions, companies or stakeholders.

Ethics must be a central component at all stages of the innovation process, from the conception of an idea to its implementation and scaling up.

At Enagás we promote responsible innovation by seeking to balance the drive for progress and value generation with consideration of the ethical and social impacts that may arise along the way.

Enagás actively encourages behaviour focused on the integration of personal and professional life and is actively committed to promoting professional well-being, as factors that help people to become involved and develop their innovative capabilities.

Using the means that Enagás makes available to us, we collaborate in the development of initiatives that contribute to improving our products, services, processes and working methods. We share with the organisation those ideas that we consider to be transformative with the company.

**Enagás generates a suitable and monitored learning environment, encouraging the development of the organisation's existing entrepreneurial talent to generate differentiating ideas and new businesses, always in line with Enagás' principles and values.**

## Policies

- [Anti-fraud, Corruption and Bribery Policy](#)
- [Internal Reporting System Policy](#)
- [Climate Action Policy](#)
- [Cybersecurity Policy](#)
- [Compliance Policy](#)
- [Policy on Communication of Information, Contacts and Involvement with Shareholders, Institutional Investors, Proxy Advisors and other stakeholders](#)
- [Conflicts of Interest Policy](#)
- [Antitrust Policy](#)
- [Human Rights Policy](#)
- [Diversity and Inclusion Policy](#)
- [Sustainable Management Policy of the General Shareholders's Meeting](#)
- [Data Governance Policy](#)
- [Corporate Defence Policy](#)
- [Health and Safety, Environment and Quality Policy](#)
- [Fiscal policy](#)
- [General Policy on Comprehensive Security of Strategic Infrastructures](#)
- [Human Capital Management Policy](#)
- [Sustainability and Good Governance Policy](#)
- [Major Accident Prevention Policy](#)
- [Activity Separation Policy](#)
- [Risk Control and Management Policy](#)

## Guidelines, procedures and protocols

- Corporate Guidelines on the Right to Digital Disconnection
- Corporate Biodiversity Guidelines
- Sustainable Mobility Guidelines
- Corporate Road Safety Guidelines
- Social Action Strategy
- GTS Code of Conduct
- Procedure on the Functioning of the Ethical Compliance Committee
- Procedure for the management of consultations and reporting regarding irregularities or breaches of the Ethics and Compliance Model.
- Procedure for managing sponsorships, patronage and donations
- Procedure for managing the offer and acceptance of gifts
- Protocol for the prevention of harassment
- Equality plan
- Reconciliation measures
- Decalogue of inclusive language
- Crisis Management Regulations
- Internal Code of Conduct



**Code of Ethics**  
of the Enagás Group