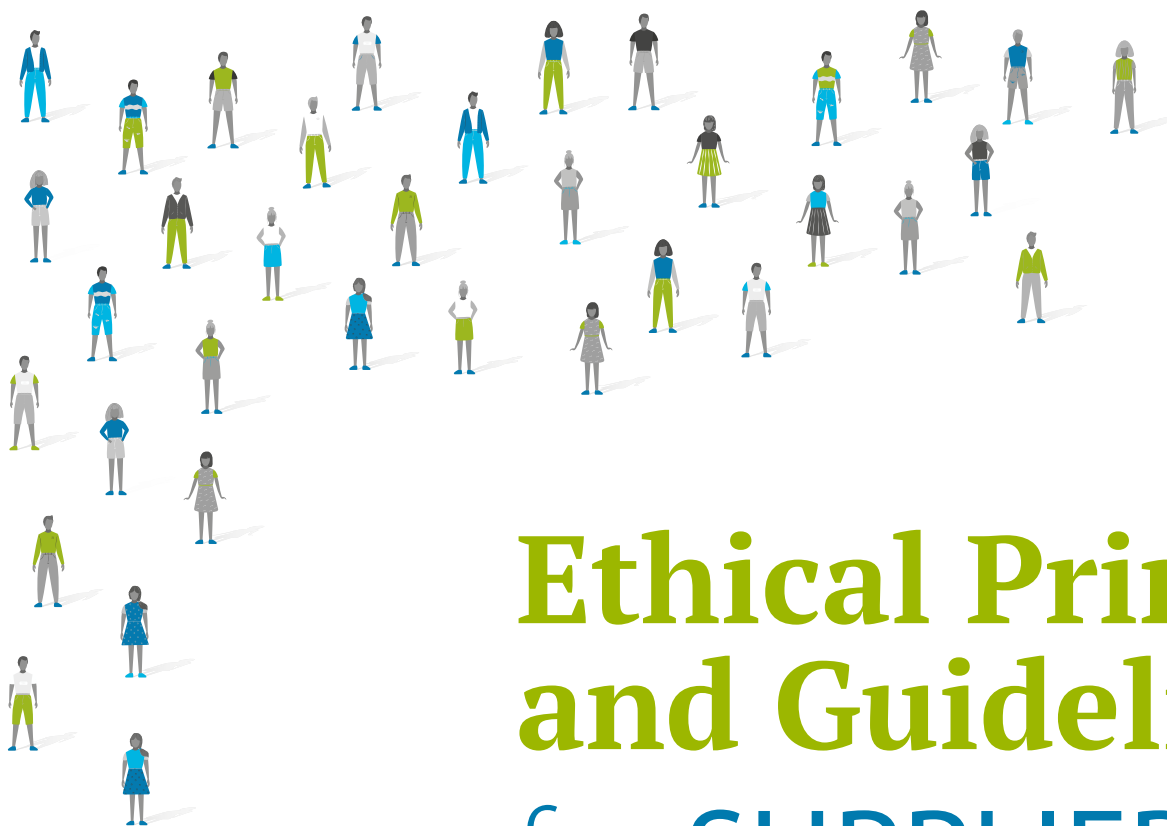


December 2023



Ethical Principles and Guidelines for SUPPLIERS of the Enagás Group



Ethical Principles and Guidelines

for SUPPLIERS

of the Enagás Group

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**Ethical Principles
and Guidelines**
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The Code of Ethics reflects **Enagás' ethical culture** and is to be applied by the company's contractors and suppliers in their areas of relationship with the company and by those collaborating with Enagás and acting on its behalf.

In this regard, as reflected in the Enagás Group Code of Ethics, the company sets out the principles and guidelines of conduct for its suppliers and contractors that are described below.

All Enagás' suppliers and contractors are in possession of the Enagás Group's Code of Ethics and explicitly confirm their commitment to becoming familiar with it and complying

and enforcing compliance with it through the acceptance of the contractor general conditions.

Enagás' suppliers and contractors who provide the company with products or services procured from third parties must ensure that this activity complies with the conduct principles and guidelines set out by Enagás in its Code of Ethics as regards their relationship with third parties.

1. Commitment to Enagás' values

The following describes the corporate values of Enagás and the guidelines of conduct expected of Enagás' suppliers and contractors:



Integrity

Crime prevention

Suppliers and contractors are aware of Enagás' firm commitment to combating and preventing criminal risks.

Fight against fraud, corruption and bribery

In their relationship with the company, Enagás' suppliers and contractors understand and respect the express prohibition of Enagás' employees on:

- Accepting and/or making improper payments, such as facilitation payments, payments in-kind or commissions, or advantages, benefits or privileges of any kind for unethical purposes.
- Making, offering and/or receiving, either directly or indirectly, gifts or hospitality from third parties, including public representatives, which go beyond the purely symbolic or which are outside the reasonable limits of ordinary business practice that may reasonably alter the conduct of the commercial, administrative or professional relations in which they are involved.
- Accepting cash or cash equivalents, such as gift cards, regardless of the amount.

Management of conflicts of interest

In their relationship with the company, Enagás suppliers and contractors must avoid situations or decisions in which there may be a conflict of interest, a conflict of interest being understood to mean that a decision taken or to be taken in the course of work may benefit the supplier, contractor or any of its employees, directly or indirectly, or a person with whom they have a family, emotional or business relationship.

Free competition

Enagás' suppliers and contractors respect free competition and comply with applicable national and international regulations in the course of their professional activity by avoiding any behaviour that may be considered an abuse or restriction of competition.

Sanctions

Enagás suppliers and contractors comply with the international sanctions regimes established by the relevant national and international institutions.

Protection of the company's reputation

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

Supply chain management

Suppliers and contractors are aware of the environmental, social and ethical commitments and principles promoted by Enagás, in order to improve their sustainability performance, and are committed to respecting the Universal Declaration of Human Rights.

Transparency

Transparency and reliability of information

Enagás suppliers and contractors must act in a clear and transparent manner and must ensure that none of their actions may be interpreted as a deception.

Enagás suppliers and contractors must disclose information in a truthful and complete manner and not deliberately provide Enagás with incorrect or inaccurate information, or imprecise information that could mislead the person receiving it. Furthermore, they do not conceal information for the purpose of evading compliance with Enagás' obligations and commitments to third parties. Nor do they withhold information of interest to Enagás for their own benefit.

Prevention of money laundering

Enagás suppliers and contractors reject all forms of money laundering and pay special attention to situations where the unlawful origin of funds or payments is suspected.

Fiscal responsibility

Enagás' suppliers and contractors shall avoid tax evasion or obtaining unjustified tax advantages at all times.



Security

Human rights - Respect for persons

Enagás is committed to the protection of human and labour rights. Enagás suppliers and contractors must be aware of and comply with the principles set out in the Enagás Human Rights Policy.

Enagás promotes compliance among its suppliers and contractors 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.

Enagás suppliers and contractors do not tolerate child labour or forced labour, and must ensure respect for freedom of association and collective bargaining in the workplace. Moreover, they expressly reject abuse of authority, harassment, and any other behaviour that could create an intimidating, offensive, or hostile work environment.

Health and Safety protection

Enagás suppliers and contractors are aware of the Enagás' health and safety requirements, including those that comprise the Health and Safety Policy, Environment and Quality Policy and the General Policy on Integral Safety in Strategic Infrastructures, and act in accordance with the applicable regulations.

Enagás has policies and procedures in place to protect health and safety at work and promotes the development of preventive measures that our suppliers must put into practice when carrying out their activities at or for Enagás, ensuring that they protect their own safety and that of those who form part of their environment.

Enagás suppliers and contractors take advantage of the resources that the company makes available to them to carry out their activities with respect to Enagás in a safe and healthy manner, promoting physical and emotional well-being.



Sustainability

Environmental protection

The environmental performance of Enagás' suppliers and contractors is aligned with the commitments included in the company's policy. In this regard, in the event of environmental impacts, they must inform the company promptly. Enagás suppliers and contractors undertake to preserve natural capital, controlling and minimising the environmental impact of the activities they carry out at Enagás facilities, taking into account aspects such as energy efficiency and the reduction of atmospheric emissions, waste management and recovery, the preservation of nature and its biodiversity, pollution prevention and efficiency in the use of resources, among others.

Enagás has environmental commitments in its Health and Safety, Environment and Quality Policy, which all its suppliers must be aware of and respect.



Efficiency

Use of company assets

Enagás' suppliers and contractors use resources that the company makes available to them responsibly, limiting their use to professional activities, always according to established standards.

Information confidentiality

The information handled by suppliers and contractors in the course of their professional activity for the company must be considered confidential and treated as such except when its disclosure is expressly authorised.

Regarding the handling of confidential information, they:

- Do not disclose company information to the outside world unless authorised to do so.
- Do not use it for their own benefit or that of third parties.
- Do not share information which they have accessed in the performance of their activities and that may be considered sensitive.
- The confidentiality obligation will remain in place indefinitely, even after the contractual relationship with Enagás has concluded.

Authorisations to use information must respond to specific requests, must be concrete and specific, and must have a specific time frame.

Suppliers and contractors with access to insider information must make responsible and professional use of it, preserving its confidentiality. They must also comply with current data protection legislation and adequately protect the personal information to which they have access.

Use of artificial intelligence

Enagás suppliers and contractors shall not use disruptive technologies in the devices that the company makes available to them without prior approval from Enagás, respecting at all times the rights of individuals, the legislation in force in this regard, and the UNESCO Recommendation on the Ethics of Artificial Intelligence.



Teamwork

Collaboration and teamwork

The company's suppliers and contractors must treat third parties with whom they interact in the exercise of their professional activity for Enagás in a respectful and professional manner.

Enagás suppliers and contractors do not discriminate and will not consent to situations of discrimination.

Equal opportunities

Enagás suppliers and contractors do not discriminate and will not consent to situations of discrimination for any reason, specifically on the grounds 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.

Diversity and inclusion

Enagás suppliers and contractors shall not allow any discriminatory conduct by their employees.



Innovation

Promotion of innovation and entrepreneurship

Enagás has a positive attitude towards new projects and is open to new business initiatives that may flourish in its relationship with suppliers and contractors in the area of their professional relationship.

2. The Ethics Channel (whistleblowing line)

In their daily work, suppliers and contractors must inform the company of any behaviour contrary to the commitments set out in the Code of Ethics.

Also, if any supplier or contractor has questions about the interpretation of the Code of Ethics and its implementing rules, or if they want to express any concerns, they must send them to the company.

For this purpose, Enagás has the Ethics Channel, which suppliers and contractors may use as follows:

The Ethical Compliance Committee is the body in charge of processing the communications and queries received through the channel.

Notifications will be managed on the basis of what is established in the Procedure for managing notifications and queries regarding irregularities or breaches of the Ethics and Compliance Model.

In accordance with Law 2/2023 regulating the protection of persons reporting regulatory and anti-corruption violations, communications may be anonymous and will be treated confidentially and in accordance with the provisions of current data protection legislation.

Any enquiry or notification must be accompanied by all the necessary information and there must be active cooperation in any investigations or inquiries by Enagás, either directly or indirectly through third parties.

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.



Email
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.

3. Enagás' main regulations

Enagás has a series of policies and guidelines that implement the matters set out in the Enagás Code of Ethics and in this extract. These documents can be consulted on the company's website via the following link:

<https://www.enagas.es/es/conocenos/quienes-somos/etica-integridad/>



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