

**Audit Report on Financial Statements  
issued by an Independent Auditor**

**ENAGÁS, S.A. AND SUBSIDIARIES  
Consolidated Financial Statements and  
Consolidated Management Report  
for the year ended  
December 31, 2024**



Building a better  
working world

Ernst & Young, S.L.  
C/ Raimundo Fernández Villaverde, 65  
28003 Madrid

Tel: 902 365 456  
Fax: 915 727 238  
ey.com

## AUDIT REPORT ON CONSOLIDATED FINANCIAL STATEMENTS ISSUED BY AN INDEPENDENT AUDITOR

Translation of a report and financial statements originally issued in Spanish. In the event of discrepancy, the Spanish-language version prevails (See Note 4.10)

To the shareholders of  
ENAGÁS, S.A.:

### Audit report on the consolidated financial statements

---

#### Opinion

We have audited the consolidated financial statements of ENAGÁS, S.A. (the parent) and its subsidiaries (the Group), which comprise the consolidated balance sheet at December 31, 2024, the consolidated income statement, the consolidated statement of other comprehensive income, the consolidated statement of changes in equity, the consolidated cash flow statement, and the notes thereto, for the year then ended.

In our opinion, the accompanying consolidated financial statements give a true and fair view, in all material respects, of consolidated equity and the consolidated financial position of the Group at December 31, 2024 and of its financial performance and its consolidated cash flows, for the year then ended in accordance with International Financial Reporting Standards, as adopted by the European Union (IFRS-EU), and other provisions in the regulatory framework applicable in Spain.

---

#### Basis for opinion

We conducted our audit in accordance with prevailing audit regulations in Spain. Our responsibilities under those standards are further described in the *Auditor's responsibilities for the audit of the consolidated financial statements* section of our report.

We are independent of the Group in accordance with the ethical requirements, including those related to independence, that are relevant to our audit of the consolidated financial statements in Spain as required by prevailing audit regulations. In this regard, we have not provided non-audit services nor have any situations or circumstances arisen that might have compromised our mandatory independence in a manner prohibited by the aforementioned requirements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

## Key audit matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the consolidated financial statements of the current period. These matters were addressed in the context of our audit of the consolidated financial statements as a whole, and in forming our audit opinion thereon, and we do not provide a separate opinion on these matters.

### *Recovery of financial assets related to Gasoducto Sur Peruano, S.A.*

**Description** The Directorate General for Hydrocarbons of the Ministry for Energy and Mines, on January 24, 2017, terminated the "Improvements to the National Energy Security and Development of the South Peruvian Pipeline" concession agreement and the National Institute for the Defense of Competition and Intellectual Property requested that Gasoducto del Sur Peruano, S.A. (GSP) file for bankruptcy.

On July 2, 2018, the Parent Company, filed with the International Centre for Settlement of Investment Disputes (ICSID) to initiate arbitration against the Peruvian State regarding its investment in GSP and after going through different phases, on December 20, 2024, Enagás, S.A. was notified that the arbitration award considers that the Republic of Peru has violated its obligations under Articles 4.1 and 5 of the Peru-Spain APPRI. Consequently, Peru is ordered to pay Enagás 176 million dollars, plus annual interest of 1.44%, calculated on a simple basis from January 24, 2018 up to the date of the award, and capitalised semi-annually from then until the compensation is actually paid. This results in a total of 194 million euros, in addition to covering 75% of the legal costs.

Taking into account the fair value of the investment in GSP as recognised by ICSID, the value of the financial investment stands at 159,670 thousands of euros as of December 31, 2024. This resulted on recording under "Impairment and gains (losses) on disposals of financial instruments" and "Change in fair value of financial instruments" of the Consolidated Income Statement amounting to 294,966 thousand euros and 31,292 thousand euros, respectively.

We have considered this area as a key audit matter since due to the relevance of the amounts involved and the uncertainty that has existed throughout the process regarding the outcome of the arbitration, which has required the making of estimates by the Directors of the Parent Company based on the opinions of the Group's legal advisors.

The information regarding the valuation standards applied and the corresponding breakdowns is included in notes 3.3 and 3.3.a of the consolidated financial statements.

### **Our response**

Our audit procedures regarding this area included, among other, the following:

- ▶ Understanding of the process established by Group Management for the recoverability of this asset, evaluation of the design and implementation of the relevant controls established in the aforementioned process and verification of the operational effectiveness of said controls.
- ▶ Evaluating compliance with the terms and conditions of the contracts and agreements between shareholders of GSP.
- ▶ Analyzing recent relevant notifications between Peruvian official bodies and the GSP Group, as well as the documents included in the claim filed by the Parent Company with the ICSID, specifically, the award issued by said body on December 20, 2024.

- ▶ Holding meetings with external and independent experts in Peruvian and international law engaged by the Group Management.
- ▶ Reviewing the analysis reports of this matter prepared by various Peruvian and international law experts (bankruptcy, criminal and administrative law, inter alia) and the Group's internal legal consultants.
- ▶ Evaluation of the fair value of the financial asset registered in relation to the compensation established in the award issued by the ICSID on December 20, 2024, as well as the impairment recorded in the Consolidated Income Statement.
- ▶ Reviewing the disclosures included in the notes to the consolidated financial statements in conformity with the applicable financial reporting framework.

#### *Regulatory framework including recognition of income and amounts receivables from the gas system*

---

**Description** The Enagás Group's main revenues as explained on note 2.1 of the consolidated financial statements, are derived from regasification, storage, and transportation of natural gas that are regulated under the framework that started as of January 1, 2021 until 2026 (as explained on Appendix III of the accompanying consolidated financial statements). Consequently, the Group's activities are notably affected by the current regulation (local, regional, national, and European).

The abovementioned factors have caused us to consider this area a key audit matter.

The information regarding the valuation standards applied and the corresponding breakdowns is included in notes 2.1 and 2.2 and Appendix III of the consolidated financial statements.

**Our response**

Our audit procedures regarding this area included, among other, the following:

- ▶ Understanding of the process established by Group Management for the recognition of income from regulated activities and receivable balances, evaluation of the design and implementation of the relevant controls established in the aforementioned process and verification of the operational effectiveness of said controls.
- ▶ Reviewing the regulations from January 1, 2021 and evaluating the degree of compliance therewith.
- ▶ Testing revenue recognition, verifying its reasonableness in terms of each year's regulatory developments.
- ▶ Verifying the gas system's accounts payable and receivable by examining conclusions and final settlements with the CNMC during the year.
- ▶ Reviewing the disclosures included in the consolidated financial statements in conformity with the applicable financial reporting framework.

#### *Impairment analysis of equity method investments*

---

**Description** The Group's Management makes significant estimates when analyzing the impairment of investments accounted for using the equity method, the balance of which at December 31, 2024 amounts to 1,226 million euros and contain significant implicit goodwill. The possible loss of value is determined by analyzing the recoverable value of the investment accounted for using the equity method.

We have considered this area as a key issue in our audit due to the complexity inherent in the estimation process, the significant impact that changes in the assumptions considered could have on the accompanying consolidated annual accounts, as well as the relevance of the amounts involved.

The information regarding the valuation standards applied and the corresponding breakdowns is included in notes 1.6 and 2.7 of the consolidated financial statements.

#### Our

#### response

Our audit procedures regarding this area included, among other, the following:

- ▶ Understanding of the process established by Group Management for the recoverability of these assets, evaluation of the design and implementation of the relevant controls established in the aforementioned process and verification of the operational effectiveness of said controls.
- ▶ Reviewing, in collaboration with valuation specialists, the reasonableness of the methodology used by the Group's Management for preparing the discounted cash flow statements of each investment accounted for using the equity method, focusing particularly on the discount rate and long-term growth rate applied.
- ▶ Analyzing the financial information projected in the business plan of each investment accounted for using the equity method by analyzing historical financial information, current conditions, and expectations regarding their future performance.
- ▶ Checking the mathematical accuracy of impairment models and reviewing the sensibility analysis performed by the Group's Management.
- ▶ Reviewing the disclosures included in the notes to the consolidated financial statements in conformity with the applicable financial reporting framework.

#### Other information: consolidated Management report

Other information refers exclusively to the 2024 consolidated Management report, the preparation of which is the responsibility of the parent company's directors and is not an integral part of the consolidated financial statements.

Our audit opinion on the consolidated financial statements does not cover the consolidated Management report. Our responsibility for the consolidated Management report, in conformity with prevailing audit regulations in Spain, entails:

- a. Checking only that the consolidated non-financial statement and certain information included in the Corporate Governance Report and in the Board Remuneration Report, to which the Audit Law refers, was provided as stipulated by applicable regulations and, if not, disclose this fact.
- b. Assessing and reporting on the consistency of the remaining information included in the consolidated Management report with the consolidated financial statements, based on the knowledge of the Group obtained during the audit, in addition to evaluating and reporting on whether the content and presentation of this part of the consolidated Management report are in conformity with applicable regulations. If, based on the work we have performed, we conclude that there are material misstatements, we are required to disclose this fact.

Based on the work performed, as described above, we have verified that the information referred to in paragraph a) above is provided as stipulated by applicable regulations and that the remaining information contained in the consolidated Management report is consistent with that provided in the 2024 consolidated financial statements and its content and presentation are in conformity with applicable regulations.

---

### **Responsibilities of the parent company's directors and the audit committee for the consolidated financial statements**

The directors of the parent company are responsible for the preparation of the accompanying consolidated financial statements so that they give a true and fair view of the equity, financial position and results of the Group, in accordance with IFRS-EU, and other provisions in the regulatory framework applicable to the Group in Spain, and for such internal control as they determine is necessary to enable the preparation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the consolidated financial statements, the directors of the parent company are responsible for assessing the Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the directors either intend to liquidate the Group or to cease operations, or has no realistic alternative but to do so.

The audit committee is responsible for overseeing the Group's financial reporting process.

---

### **Auditor's responsibilities for the audit of the consolidated financial statements**

Our objectives are to obtain reasonable assurance about whether the consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion.

Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with prevailing audit regulations in Spain will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these consolidated financial statements.

As part of an audit in accordance with prevailing audit regulations in Spain, we exercise professional judgement and maintain professional skepticism throughout the audit. We also:

- ▶ Identify and assess the risks of material misstatement of the consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- ▶ Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control.
- ▶ Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by Management.

- ▶ Conclude on the appropriateness of the directors' use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Group to cease to continue as a going concern.
- ▶ Evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- ▶ Plan and perform the Group audit to obtain sufficient appropriate audit evidence regarding the financial information of the entities or business units within the Group as a basis for forming an opinion on the consolidated financial statements. We are responsible for the direction, supervision and review of the audit work performed for the purposes of the Group audit. We remain solely responsible for our audit opinion.

We communicate with the audit committee of the parent company regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide the audit committee of the parent company with a statement that we have complied with relevant ethical requirements, including those related to independence, and to communicate with them all matters that may reasonably be thought to bear on our independence, and where applicable, actions taken to eliminate threats or safeguards applied.

From the matters communicated with the audit committee, we determine those matters that were of most significance in the audit of the consolidated financial statements of the current period and are therefore the key audit matters.

We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter.

## **Report on other legal and regulatory requirements**

---

### **European single electronic format**

We have examined the digital files of the European single electronic format (ESEF) of ENAGÁS, S.A. and subsidiaries for the 2024 financial year, which include the XHTML file containing the consolidated financial statements for the year, and the XBRL files as labeled by the entity, which will form part of the annual financial report.

The directors of ENAGÁS, S.A. are responsible for submitting the annual financial report for the 2024 financial year, in accordance with the formatting and mark-up requirements set out in Delegated Regulation EU 2019/815 of 17 December 2018 of the European Commission (hereinafter referred to as the ESEF Regulation). For this reason, the Annual Corporate Governance Report and the Annual Report on Remuneration of Directors have been included in the consolidated management report for reference.

Our responsibility consists of examining the digital files prepared by the directors of the parent company, in accordance with prevailing audit regulations in Spain. These standards require that we plan and perform our audit procedures to obtain reasonable assurance about whether the contents of the consolidated financial statements included in the aforementioned digital files correspond in their entirety to those of the consolidated financial statements that we have audited, and whether the consolidated financial statements and the aforementioned files have been formatted and marked up, in all material respects, in accordance with the ESEF Regulation.

In our opinion, the digital files examined correspond in their entirety to the audited consolidated financial statements, which are presented and have been marked up, in all material respects, in accordance with the ESEF Regulation.

---

### **Additional report to the audit committee**

The opinion expressed in this audit report is consistent with the additional report we issued to the audit committee on February 17, 2025.

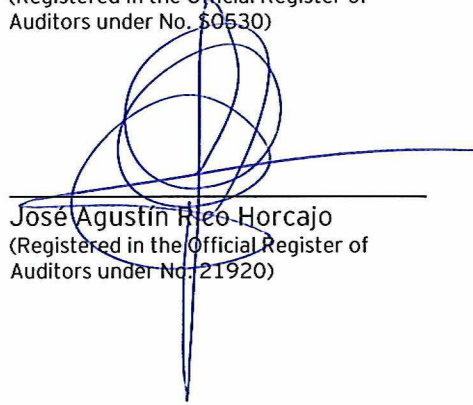
---

### **Term of engagement**

The ordinary general shareholders' meeting held on March 31, 2022 appointed us as auditors for three years, commencing on December 31, 2022.

Previously, we were appointed as auditors by the shareholders for two periods of 3 years and we have been carrying out the audit of the financial statements continuously since December 31, 2016

ERNST & YOUNG, S.L.  
(Registered in the Official Register of  
Auditors under No. 50530)



José Agustín Rizo Horcajo  
(Registered in the Official Register of  
Auditors under No. 21920)

February 17, 2025

# CONSOLIDATED ANNUAL

# ACCOUNTS 2024

Translation of consolidated financial statements originally issued in Spanish and prepared in accordance with International Financial Reporting Standards as adopted by the EU, in conformity with Regulation (EC) No. 1606/ 2002. In the event of a discrepancy, the Spanish-language version prevails.





## ENAGÁS, S.A. AND SUBSIDIARIES

Consolidated Balance Sheet at December 31, 2024	<b>1</b>
Consolidated Income Statement at December 31, 2024	<b>2</b>
Consolidated Statement of Comprehensive Income at December 31, 2024	<b>3</b>
Consolidated Statement of Total Changes in Equity at December 31, 2024	<b>4</b>
Consolidated Cash Flow Statement at December 31, 2024	<b>5</b>
<b>1. Group activities and presentation bases</b>	<b>7</b>
1.1 Group activity	8
1.2 Presentation bases	9
1.3 Consolidation principles	10
1.4 Estimates and accounting judgements made	13
1.5 Changes in the consolidation scope	14
1.6 Investments accounted for using the equity method	15
1.7 Diluted earnings per share	16
1.8 Dividends distributed and proposed	17
1.9 Commitments and guarantees	17
1.10 New accounting standards	20
<b>2. Operational performance of the group</b>	<b>21</b>
2.1 Operating profit	23
2.2 Trade and other non-current and current receivables	27
2.3 Trade and other payables	31
2.4 Property, plant, and equipment	32
2.5 Intangible assets	37
2.6 Non-current assets held for sale	40
2.7 Impairment of non-financial assets	41
2.8 Other non-current liabilities	43
2.9 Provisions and contingent liabilities	44
<b>3. Capital structure, financing and net financial gain/(loss)</b>	<b>46</b>
3.1 Equity	48
3.2 Result and variation in minority interests	49
3.3 Financial assets and liabilities	51
3.4 Financial debts	58
3.5 Net Financial Gain/(Loss)	61
3.6 Derivative financial instruments	62
3.7 Financial and capital risk management	63
3.8 Cash flows	66
<b>4. Other information</b>	<b>67</b>
4.1 Investment properties	67
4.2 Tax situation	68
4.3 Related party transactions and balances	72
4.4 Remuneration to the members of the Board of Directors and Senior Management	74
4.5 Other information concerning the Board of Directors	79
4.6 Other information	80
4.7 Information by segments	83
4.8 Inventories	86
4.9 Subsequent events	87
4.10 Explanation added for translation to English	82
Appendix I. Subsidiaries at December 31, 2024	<b>89</b>
Appendix II. Joint ventures and associates	<b>90</b>
Appendix III. Regulatory framework	<b>95</b>



# ENAGÁS, S.A. AND SUBSIDIARIES

## Consolidated balance sheet at December 31, 2024

(In thousands of euros)

ASSETS	Notes	12.31.2024	12.31.2023
<b>NON-CURRENT ASSETS</b>		<b>5,483,156</b>	<b>7,346,585</b>
Intangible assets	2.5	80,480	83,866
Goodwill		17,521	17,521
Other intangible assets		62,959	66,345
Investment properties	4.1	—	17,380
Property, plant, and equipment	2.4	3,823,846	3,983,862
Investments accounted for using the equity method	1.6	1,226,366	2,589,974
Other non-current financial assets	3.3.a	351,423	669,852
Deferred tax assets	4.2.f	1,041	1,651
<b>CURRENT ASSETS</b>		<b>2,012,779</b>	<b>1,160,685</b>
Non-current assets held for sale	2.6	30,294	504
Inventories	4.8	47,438	55,033
Trade and other receivables	2.2	463,495	224,653
Current tax assets	4.2.a	44,031	10,623
Other current financial assets	3.3.a	124,680	22,550
Short-term accruals		7,173	8,839
Cash and cash equivalents	3.8.a	1,295,668	838,483
<b>TOTAL ASSETS</b>		<b>7,495,935</b>	<b>8,507,270</b>

EQUITY AND LIABILITIES	Notes	12.31.2024	12.31.2023
<b>EQUITY</b>		<b>2,392,144</b>	<b>2,999,761</b>
<b>SHAREHOLDERS' EQUITY</b>		<b>2,305,360</b>	<b>2,968,155</b>
Subscribed capital	3.1.a	392,985	392,985
Issue premium	3.1.b	465,116	465,116
Reserves	3.1.d	1,863,503	1,962,388
Treasury shares	3.1.c	(18,131)	(15,982)
Profit/(loss) for the year		(299,309)	342,528
Interim dividend	1.8.a	(104,443)	(181,841)
Other equity instruments	4.4	5,639	2,961
<b>ADJUSTMENTS FOR CHANGES IN VALUE</b>	<b>3.1.e</b>	<b>70,402</b>	<b>15,531</b>
<b>EQUITY ATTRIBUTABLE TO THE PARENT COMPANY</b>		<b>2,375,762</b>	<b>2,983,686</b>
<b>MINORITY INTERESTS (EXTERNAL PARTNERS)</b>	<b>3.2</b>	<b>16,382</b>	<b>16,075</b>
<b>NON-CURRENT LIABILITIES</b>		<b>3,719,721</b>	<b>4,388,565</b>
Non-current provisions	2.9.a	245,838	241,716
Financial debt and non-current derivatives	3.3.b	3,358,309	3,979,294
Deferred tax liabilities	4.2.f	78,011	131,441
Other non-current liabilities	2.8	37,563	36,114
<b>CURRENT LIABILITIES</b>		<b>1,384,070</b>	<b>1,118,944</b>
Current provisions	2.9.a	7,292	4,755
Financial debt and current derivatives	3.3.b	765,231	504,240
Trade and other payables	2.3	598,872	604,297
Current tax liabilities	4.2.a	12,675	5,652
<b>TOTAL EQUITY AND LIABILITIES</b>		<b>7,495,935</b>	<b>8,507,270</b>

The accompanying Notes 1 to 4.10 constitute an integral part of the Consolidated Balance Sheet at December 31, 2024



# ENAGÁS, S.A. AND SUBSIDIARIES

## Consolidated Income Statement at December 31, 2024

(In thousands of euros)

	Notes	12.31.2024	12.31.2023
Revenue	2.1.a	905,546	907,570
Income from regulated activities		892,255	896,636
Income from non-regulated activities		13,291	10,934
Other operating income	2.1.a	7,672	12,071
Personnel expenses	2.1.b	(142,680)	(137,063)
Other operating expenses	2.1.c	(195,704)	(201,778)
Amortisation allowances	2.4 and 2.5	(287,108)	(273,343)
Impairment losses on disposal of fixed assets	2.4, 2.5 and 4.1	(5,471)	2,117
Result of investments accounted for using the equity method	1.6	146,474	147,304
<b>OPERATING PROFIT</b>		<b>428,729</b>	<b>456,878</b>
Financial income and similar	3.5	62,936	45,962
Financial expenses and similar	3.5	(119,839)	(128,192)
Impairment and gains (losses) on disposals of financial instruments	3.5	(653,298)	45,450
Exchange differences (net)	3.5	(1,565)	782
Change in fair value of financial instruments	3.5	(29,642)	214
<b>Net Financial Gain/(Loss)</b>		<b>(741,408)</b>	<b>(35,784)</b>
<b>PROFIT/(LOSS) BEFORE TAX FROM CONTINUING OPERATIONS</b>		<b>(312,679)</b>	<b>421,094</b>
Income tax	4.2.c	13,942	(78,086)
<b>PROFIT/(LOSS) FOR THE YEAR FROM CONTINUING OPERATIONS</b>		<b>(298,737)</b>	<b>343,008</b>
Profit attributable to minority interests	3.2	(572)	(480)
<b>PROFIT ATTRIBUTABLE TO THE PARENT COMPANY</b>		<b>(299,309)</b>	<b>342,528</b>
<b>BASIC EARNINGS PER SHARE (in euros)</b>	<b>1.7</b>	<b>(1.1467)</b>	<b>1.3112</b>
<b>DILUTED EARNINGS PER SHARE (in euros)</b>	<b>1.7</b>	<b>(1.1467)</b>	<b>1.3112</b>

The accompanying Notes 1 to 4.10 constitute an integral part of the Consolidated Income Statement at December 31, 2024.



# ENAGÁS, S.A. AND SUBSIDIARIES

## Consolidated Statement of Comprehensive Income at December 31, 2024

(In thousands of euros)

	Notes	12.31.2024	12.31.2023
<b>CONSOLIDATED PROFIT FOR THE YEAR</b>		<b>(298,737)</b>	<b>343,008</b>
Attributed to the parent company		(299,309)	342,528
Attributable to minority interests		572	480
<b>INCOME AND EXPENSES RECOGNISED DIRECTLY IN EQUITY</b>		<b>111,422</b>	<b>(99,705)</b>
<b>From companies accounted for using the full consolidation method</b>		<b>30,297</b>	<b>(15,052)</b>
From cash flow hedges	3.1.e	7,742	2,480
From translation differences	3.1.e	24,491	(16,912)
Tax effect	3.1.e	(1,936)	(620)
<b>From companies accounted for using the equity method</b>		<b>84,411</b>	<b>(83,345)</b>
From cash flow hedges	3.1.e	1,742	(13,016)
From translation differences	3.1.e	82,930	(71,851)
Tax effect	3.1.e	(261)	1,522
Non-current assets held for sale		—	(901)
From translation differences		—	(901)
Of equity instruments at fair value, net	3.1.e	(3,286)	(407)
<b>AMOUNTS TRANSFERRED TO THE INCOME STATEMENT</b>		<b>(56,551)</b>	<b>(10,568)</b>
<b>From companies accounted for using the full consolidation method</b>		<b>8,421</b>	<b>437</b>
From cash flow hedges	3.1.e	(2,706)	583
From translation differences	3.1.e	10,450	—
Tax effect	3.1.e	677	(146)
<b>From companies accounted for using the equity method</b>		<b>(12,510)</b>	<b>(10,775)</b>
From cash flow hedges	3.1.e	(14,195)	(12,229)
Tax effect	3.1.e	1,685	1,454
<b>Non-current assets held for sale</b>		<b>(52,462)</b>	<b>(230)</b>
From translation differences		(52,462)	(2,056)
From cash flow hedges		—	2,609
Tax effect		—	(783)
<b>TOTAL OTHER COMPREHENSIVE INCOME</b>		<b>54,871</b>	<b>(110,273)</b>
<b>TOTAL RECOGNISED INCOME AND EXPENSES</b>		<b>(243,866)</b>	<b>232,735</b>
<b>Attributed to minority interests</b>		<b>572</b>	<b>480</b>
From attributable to results	3.2	572	480
<b>Attributed to the parent company</b>		<b>(244,438)</b>	<b>232,255</b>

The accompanying Notes 1 to 4.10 constitute an integral part of the Consolidated Statement of Comprehensive Income at December 31, 2024. IAS 1 requires that items to be reclassified in the Consolidated Income Statement are broken down separately from those that will not be reclassified. All of the aforementioned cases are considered susceptible to reclassification in the income statement.



# ENAGÁS, S.A. AND SUBSIDIARIES

## Consolidated Statement of Total Changes in Equity at December 31, 2024

(In thousands of euros)

	Share capital (Note 3.1.a)	Issue premium and reserves (Note 3.1.b and Note 3.1.d)	Other equity instruments (Note 4.4)	Treasury shares (Note 3.1.c)	Profit/(loss) for the year	Interim dividend (Note 1.8.a)	Adjustments for changes in value (Note 3.1.e)	Equity attributable to the Parent Company	Minority interests (Note 3.2)	Total Equity
<b>BALANCE AT DECEMBER 2022 AND AT THE BEGINNING OF 2023</b>	<b>392,985</b>	<b>2,502,037</b>	<b>3,731</b>	<b>(18,366)</b>	<b>375,774</b>	<b>(179,684)</b>	<b>125,804</b>	<b>3,202,281</b>	<b>16,021</b>	<b>3,218,302</b>
<b>Total recognised income and expenses</b>	—	—	—	—	<b>342,528</b>	—	<b>(110,273)</b>	<b>232,255</b>	<b>480</b>	232,735
Transactions with shareholders	—	—	—	—	(269,627)	(181,841)	—	(451,468)	(2,090)	(453,558)
- Distribution of dividends	—	—	—	—	(269,627)	(181,841)	—	(451,468)	(2,090)	(453,558)
Transactions with treasury shares	—	—	—	1,010	—	—	—	1,010	—	1,010
Other changes in equity	—	(74,533)	(770)	1,374	(106,147)	179,684	—	(392)	1,664	1,272
- Payments based on equity instruments	—	(604)	(770)	1,374	—	—	—	—	—	—
- Transfers between equity items	—	(73,537)	—	—	(106,147)	179,684	—	—	—	—
- Differences due to changes in consolidation scope	—	—	—	—	—	—	—	—	—	—
- Other changes	—	(392)	—	—	—	—	—	(392)	1,664	1,272
<b>BALANCE AT DECEMBER 2023 AND AT THE BEGINNING OF 2024</b>	<b>392,985</b>	<b>2,427,504</b>	<b>2,961</b>	<b>(15,982)</b>	<b>342,528</b>	<b>(181,841)</b>	<b>15,531</b>	<b>2,983,686</b>	<b>16,075</b>	<b>2,999,761</b>
<b>Total recognised income and expenses</b>	—	—	—	—	<b>(299,309)</b>	—	<b>54,871</b>	<b>(244,438)</b>	<b>572</b>	(243,866)
Transactions with shareholders	—	—	—	—	(272,478)	(104,443)	—	(376,921)	(1,204)	(378,125)
- Distribution of dividends	—	—	—	—	(272,478)	(104,443)	—	(376,921)	(1,204)	(378,125)
Transactions with treasury shares	—	—	—	(6,206)	—	—	—	(6,206)	—	(6,206)
Other changes in equity	—	(98,885)	2,678	4,057	(70,050)	181,841	—	19,641	939	20,580
- Payments based on equity instruments	—	—	2,678	4,057	—	—	—	6,735	—	6,735
- Transfers between equity items	—	(111,640)	—	—	(70,201)	181,841	—	—	—	—
- Differences due to changes in consolidation scope	—	—	—	—	—	—	—	—	—	—
- Other changes	—	12,755	—	—	151	—	—	12,906	939	13,845
<b>BALANCE AT DECEMBER 2024</b>	<b>392,985</b>	<b>2,328,619</b>	<b>5,639</b>	<b>(18,131)</b>	<b>(299,309)</b>	<b>(104,443)</b>	<b>70,402</b>	<b>2,375,762</b>	<b>16,382</b>	<b>2,392,144</b>

The accompanying Notes 1 to 4.10 constitute an integral part of the Consolidated Statement of Total Changes in Equity at December 31, 2024.



# ENAGÁS, S.A. AND SUBSIDIARIES

## Consolidated Cash Flow Statement at December 31, 2024

(In thousands of euros)



	Notes	12.31.2024	12.31.2023
<b>CONSOLIDATED PROFIT BEFORE TAX</b>		<b>(312,679)</b>	<b>421,094</b>
Adjustments to consolidated profit		895,306	163,422
Amortisation of fixed assets	2.4 and 2.5	287,108	273,343
Other adjustments to profit	3.5	608,198	(109,921)
Change in operating working capital		(73,710)	205,726
Inventories		(2,523)	(22,393)
Trade and other receivables		(126,580)	208,658
Trade and other payables		55,393	19,461
Other cash flows from operating activities		(53,925)	(221,403)
Payment of interest	3.8.c	(62,869)	(101,750)
Interest received		50,343	31,762
Income tax receipts (payments)	4.2.c	(46,174)	(151,415)
Other proceeds /(payments)		4,775	—
<b>NET CASH FLOWS FROM OPERATING ACTIVITIES</b>		<b>454,992</b>	<b>568,839</b>
Payments for investments		(140,048)	(368,172)
Group companies and associates	1.6	(26,281)	(187,791)
Fixed assets and real estate investments	2.4 and 2.5	(97,892)	(156,967)
Other financial assets		(15,875)	(23,414)
Proceeds from disposals		910,968	94,128
Group companies and associates	1.5	910,035	1,599
Non-current assets held for sale		933	92,529
Other financial assets		—	—
Other cash flows from investing activities		160,055	192,213
Other receipts (payments) from investing activities	1.6	160,055	192,213
<b>NET CASH FLOWS FROM INVESTING ACTIVITIES</b>		<b>930,975</b>	<b>(81,831)</b>
Proceeds from and (payments) on equity instruments		(6,206)	763
Acquisition of equity instruments		(6,206)	—
Sales of equity instruments		—	763
Proceeds from and payments on financial liabilities		(531,627)	(600,969)
Issues	3.8.c	611,617	74,756
Repayment and amortisation	3.8.c	(1,143,244)	(675,725)
Other cash flows from investing activities		(45,848)	61,870
Other receipts from financing activities	3.4	—	99,942
Other payments from financing activities	3.4	(45,848)	(38,072)
Dividends paid	1.8.a	(378,886)	(451,822)
<b>NET CASH FLOWS FROM FINANCING ACTIVITIES</b>		<b>(962,567)</b>	<b>(990,158)</b>
Effect of exchange rate fluctuations		33,785	(17,651)
<b>TOTAL NET CASH FLOWS</b>		<b>457,185</b>	<b>(520,801)</b>
Cash and cash equivalents at beginning of period		838,483	1,359,284
<b>CASH AND CASH EQUIVALENTS AT END OF PERIOD</b>	<b>3.8.a</b>	<b>1,295,668</b>	<b>838,483</b>

The accompanying Notes 1 to 4.10 constitute an integral part of the Consolidated Cash Flow Statement at December 31, 2024.



# 1. GROUP ACTIVITIES AND PRESENTATION BASES

## Relevant aspects

### Results

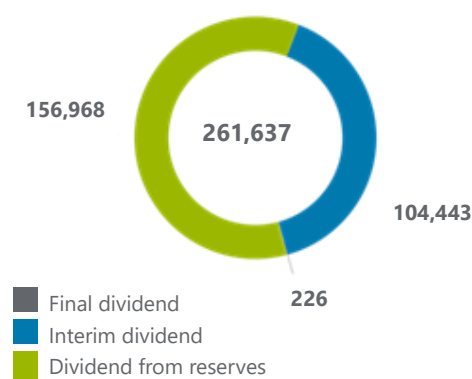
- The net profit attributed to the parent company amounted to (299,309) thousands of euros ([Note 1.7](#)).
- This amount includes the impact of the closing of the Tallgrass Energy transaction ([Note 1.5](#)), which resulted in a net income/loss of (364) million euros as of December 31, 2024, and the GSP award, which resulted in a net income/loss of (246) million euros ([Note 3.3](#)).
- Basic earnings per share and diluted earnings per share at December 31, 2024 were the same and amounted to -1.1467 euros per share. At December 31, 2023, basic earnings per share amounted to 1.3112 euros, which coincided with diluted earnings per share ([Note 1.7](#)).
- The proposed dividend payment per share for 2024 amounts to 1.00 euros per share (1.74 euros per share in 2023) ([Note 1.8](#)).
- The Board of Directors has proposed the following distribution of net profit corresponding to 2024 for the parent company, Enagás, S.A., as well as the distribution of a dividend charged to reserves for a total of 156.9 million euros ([Note 1.8.a](#)):

### Working capital

- At December 31, 2024 the Consolidated Balance Sheet presents a positive working capital of 628,709 thousands of euros (41,741 thousands of euros at December 31, 2023).

### Other information

- The Enagás Group has made a net divestment of 770,920 thousands of euros in 2024, as reflected in the Cash Flow Statement. The most noteworthy transactions are the following:
  - On July 29, 2024, the Enagás Group closed the transfer of the shareholding it held in Tallgrass Energy, L.P. for 1.1 billion dollars ([Note 1.5](#)).
  - Investments were made in regasification, transmission and storage facilities, with the aim of expanding and improving them to adapt to future demand forecasts amounting to 97,892 thousands of euros in relation to the investment additions indicated in [Note 2.4](#).





## 1.1 Group activity

Enagás, S.A. (hereinafter the Company or the Parent Company), a company incorporated in Spain on July 13, 1972 in accordance with the Spanish Corporate Enterprises Act, is the head of a group of companies (Appendix I and II) that form the Enagás Group (hereinafter the Group or the Enagás Group) and which are engaged in the transmission, storage and regasification of natural gas, as well as the development of all functions related to the technical management of the gas system.

On December 28, 2023, Royal Decree-Law 8/2023 of December 27 was published, providing that Enagás, as natural gas transmission system operator, may operate as provisional operator of the hydrogen backbone network.

### a) Corporate purpose

- i. Regasification, basic and secondary transmission as well as storage of natural gas, via the corresponding gas infrastructure or facilities, of its own or of third parties, and also the performance of auxiliary activities or others related to the aforementioned activities.
- ii. Design, construction, start up, exploitation, operation, and maintenance of all types of complementary gas infrastructure and facilities, including telecommunications networks, remote control and control of any nature, and electricity networks, whether its own or of third parties.
- iii. Development of all functions relating to technical management of the gas system.
- iv. Transmission and storage activities for carbon dioxide, hydrogen, biogas, and other energy-related fluids, via the corresponding facilities, of its own or of third parties, as well as the design, construction, start up, exploitation, operation, and maintenance of all types of complementary infrastructure and installations necessary for said activities.
- v. Activities for making use of heat, cold, and energies associated with its main activities or arising from them.
- vi. Rendering of services of a diverse nature, among them, engineering, construction, advisory, and consultancy services in connection with the activities relating to its corporate purpose as well as participation in natural gas markets management activities to the extent they are compatible with the activities permitted for the Company by law.

The above activities can be carried out by Enagás, S.A. itself or through companies with an identical or analogous corporate purpose in which it holds interest, provided they remain within the scope and limitations established by legislation applicable to the hydrocarbons sector. In accordance with said legislation, the activities related to transmission and technical management of the system which are of a regulated nature must be carried out by two subsidiaries entirely owned by Enagás, S.A. (Enagás Transporte, S.A.U. and Enagás GTS, S.A.U., respectively). Consequently, the corporate purpose includes:

- i. Management of the corporate group comprised of the interest held in share capital of companies belonging to the group.

- ii. Rendering of assistance or support services to affiliates, including the provision of appropriate guarantees and reinforcement for them.

### b) Other information

Its registered address is located at Paseo de los Olmos, 19, 28005, Madrid. The Articles of Association and other public information about the Company and its Group may be consulted on its web page, [www.enagas.es](http://www.enagas.es), and at its registered office. The name of the Parent Company has not changed with respect to the previous year.



## 1.2 Presentation bases

The Consolidated Annual Accounts of the Enagás Group for 2024 were prepared based on the accounting records of the Parent Company and remaining entities comprising the Group, in accordance with International Financial Reporting Standards (hereinafter "IFRS") as adopted by the European Union, in accordance with Regulation (EC) No. 1606/2002 of the European Parliament and of the Council.

The Consolidated Annual Accounts have been prepared applying all mandatory accounting principles, standards, and measurement criteria in order to give a true and fair view of the equity and financial position of the Group at December 31, 2024, as well as of the results of its operations, changes in equity, cash flows, and changes in recognised income and expenses, which have arisen in the Group for the year then ended.

The Consolidated Annual Accounts of the Enagás Group for 2024 were authorised for issue by the directors at their Board meeting held on February 17, 2025. The Consolidated Annual Accounts for 2023 were approved at the General Shareholders' Meeting of Enagás, S.A. held on March 21, 2024 and were subsequently filed at the Madrid Companies Registry. The Group's Consolidated Annual Accounts and those of each entity belonging to the Group, corresponding to financial year 2024, are pending approval at their respective Ordinary General Shareholders' Meeting. It is expected that they will be approved without modification.

These Consolidated Annual Accounts are presented in thousands of euros (unless otherwise stated).

### Going concern principle

During 2024, the going concern principle has continued to be fully applied in the preparation of these consolidated annual accounts.

#### a) Materiality criteria

The accompanying Consolidated Annual Accounts do not include the information or disclosures which the Group did not consider of material significance or important relative to the concept of materiality as defined in the conceptual framework of IFRS, taking into account the Consolidated Annual Accounts as a whole.

#### b) Comparison of information

The information included in these consolidated notes relating to 2023 is presented solely and exclusively for purposes of comparison with the information relating to 2024.



## 1.3 Consolidation principles

The Interim Condensed Consolidated Financial Statements include the interim financial statements of the Parent Company, Enagás, S.A. and its subsidiaries, associates, joint ventures, and joint operations at December 31, 2024.

Subsidiaries are considered to be those entities with respect to which the Enagás Group fulfils the following criteria:

- The capacity to use its interest to influence the amount of revenue to be obtained from said subsidiary.
- The Group has power over the affiliate, in so far as a company has rights which permit it to direct relevant activities, understood as those which significantly affect the revenue generated by the subsidiary.
- It maintains exposure or the right to variable revenue arising from its involvement in the subsidiary.

Subsidiaries are consolidated using the full consolidation method.

The share of minority shareholders in the equity and profit of consolidated subsidiaries of the Enagás Group is recognised in "Minority interests (External partners)" under "Equity" in the Consolidated Balance Sheet and "Profit/(loss) attributable to minority interests" in the Consolidated Income Statement, respectively. Subsidiaries are consolidated starting on the acquisition date, i.e., the date on which the Group obtains control, and they continue to be consolidated until such control is lost.

When the minority shareholders' interest in the subsidiary includes a put option whereby it does not substantially assume the risks and rewards of such interest, it is not recorded as "Minority interests (External Partners)" but as a financial liability.

The financial statements of subsidiaries are prepared for the same reporting period as those of the Parent. With respect to the joint agreements, that is, those by virtue of which the Enagás Group maintains joint control with one or more other partners, a distinction is made between joint operations and joint ventures. Joint control is understood as control shared by virtue of a contractual agreement which requires unanimous consent from all involved parties for decision-making regarding relevant activities.

Thus, joint operations are considered to be those in which, based on a contractual arrangement, a company enjoys the rights to assets and assumes obligations with respect to liabilities. The interest held in joint operations is consolidated using the proportionate consolidation method.

In addition, joint ventures are considered to be those in which, based on a contractual arrangement, a company exercises rights with respect to the net assets of the joint venture. Shareholdings in joint ventures are consolidated using the equity method. In those cases in which the Enagás Group acquires control over companies previously considered as joint ventures or associates, a new estimate is made for the fair value of the interest held previously in equity at the acquisition date, recognising income or losses in the Consolidated Income Statement for the reporting period.

Furthermore, associates are considered to be those entities over which the Enagás Group holds significant influence, that is, the power to intervene in decision-making regarding financial policies and operational matters, without attaining full control or joint control. The interest held in associates is consolidated using the equity method.

If appropriate, adjustments are made to the financial statements of subsidiaries, affiliates, joint ventures, and joint operations in order to unify their accounting policies with those of the Enagás Group.

### a) Consolidation methods

Consolidation method/Company	Functional currency
<b>Full consolidation</b>	
Enagás Transporte, S.A.U.	Euro
Enagás GTS, S.A.U.	Euro
Enagás Internacional, S.L.U.	US dollar
Enagás Financiaciones, S.A.U.	Euro
Enagás U.S.A., L.L.C.	US dollar
Enagás Perú, S.A.C.	US dollar
Enagás México, S.A. de C.V.	US dollar
Enagás Emprende, S.L.U.	Euro
Enagás Chile, SpA.	US dollar
Enagás Transporte del Norte, S.L. <sup>(1)</sup>	Euro
Infraestructuras del Gas, S.A. <sup>(1)</sup>	Euro
Enagás Holding USA, S.L.U.	US dollar
Enagás Infraestructuras de Hidrógeno, S.A.U.	Euro
Musel Energy Hub, S.L. <sup>(3)</sup>	Euro
Efficiency for LNG Applications, S.L.	Euro
Enagás Services Solutions, S.L.	Euro
Sercomgas Solutions, S.L. <sup>(1)</sup>	Euro
Scale Gas Solutions, S.L.	Euro
SPV Scale Mar, S.L.U.	US dollar

#### Equity method

Estación de Compresión Soto La Marina, S.A.Pl. de C.V. <sup>(2)</sup>	US dollar
Bahía de Bizkaia Gas, S.L.	Euro
Trans Adriatic Pipeline AG	Euro
Terminal de LNG de Altamira, S. de R.L. de C.V.	US dollar
Transportadora de Gas del Perú, S.A.	US dollar
Planta de Regasificación de Sagunto, S.A. ("SAGGAS").	Euro
Iniciativas del Gas, S.L.	Euro
Mibgas, S.A.	Euro
Tecgas, Inc.	US dollar
Mibgas Derivatives, S.A.	Euro
Senfluga Energy Infrastructure	Euro
Hellenic Gas Transmission System Operator, S.A ("Desfa").	Euro
Seab Power Ltd.	Sterling pound
Vira Gas Imaging, S.L.	Euro
Knutsen Scale Gas, S.L.	Euro
Green Ports Project, S.L.	Euro
Enagás Renovable, S.L. (Subgrupo)	Euro
Solatom CSP, S.L.	Euro
Scale Gas Med Shipping, S.L.U.	US dollar
Trovant Technology, S.L.	Euro
Basquevolt, S.A.	Euro
H2Greem Global Solutions, S.L.	Euro
Axent Infraestructuras de Telecomunicaciones, S.A.	Euro
Hanseatic Energy Hub GmbH	Euro
Hanseatic Energy Hub Operations GmbH	Euro

(1) For these companies the Enagás Group recognises interest corresponding to minority interests under "Minority interests (External partners)" in Equity in the Consolidated Balance Sheet at December 31, 2024.

(2) Reclassified to Non-Current Assets Held for Sale at year-end 2024.



(3) For this company, the Enagás Group recognises the share corresponding to external partners under "Other financial liabilities" (Note 1.5).

## b) Consolidation process

Consolidation of the Enagás Group was carried out in accordance with the following process:

- i. **Transactions between companies included in the consolidation scope.** All balances, transactions, and results between companies consolidated under the full consolidation method were eliminated upon consolidation. For joint operations, the balances, transactions and results of operations with other Group companies were eliminated in the proportion at which they were consolidated. With respect to gains and losses generated through operations among Group companies and companies consolidated under the equity method, the percentage of interest held by the Group in the latter was eliminated.
- ii. **Harmonisation of criteria.** For affiliates which apply different accounting and measurement criteria to those of the Group, the consolidation process included the corresponding adjustments, provided the effect was significant, with a view to presenting the Consolidated Financial Statements based on harmonised measurement standards.
- iii. **Translation of Financial Statements denominated in foreign currency.** The translation to euros of the Financial Statements of the aforementioned companies in the Enagás Group consolidation process was carried out in accordance with the following procedures:
  - Assets and liabilities of each corresponding balance sheet denominated in foreign currency are translated at the spot rate prevailing at the balance sheet date.
  - Income and expense items making up each income statement heading are translated at the average exchange rate for the year in which the related transactions are carried out.
  - The historical exchange rate for Equity is maintained.
  - Exchange gains (losses) arising as a result of net assets are recognised as a separate component of equity under "Adjustments for changes in value" and in the income statement under "Translation differences."

When disposing of a company whose functional currency is not the euro; or when disposals are carried out as a result of losing control; or result from business combinations with respect to previously held interest, translation differences recognised as a component of equity relating to said investment are recognised in the Consolidated Income Statement as soon as the effect arising from said disposal is recognised.

The exchange rates with respect to the euro of the main currencies used by the Group during 2024 and 2023 were as follows:

Currency	Average exchange rate applicable to the headings of the income statement	Exchange rate applicable to the balance sheet headings <sup>(1)</sup>
<b>2024</b>		
US dollar	1.08224	1.03542
Peruvian Nuevo Sol	4.06207	3.97118
Sterling pound	0.84682	0.82768
<b>2023</b>		
US dollar	1.08170	1.10655
Peruvian Nuevo Sol	4.04442	4.09895
Sterling pound	0.86982	0.86935

(1) Does not include equity.

The effect on the main headings of the Group's Consolidated Financial Statements of applying the translation process to the net assets of companies consolidated using the full consolidation method and whose functional currency is the US dollar is as follows:

2024	Consolidated total	Contribution of companies using the euro as functional currency	Contribution of companies using the US dollar as functional currency	Amount in US dollars
Fixed assets and investment properties	3,904,326	3,903,965	361	374
Other non-current financial assets	351,423	165,402	186,021	192,610
Trade and other receivables	463,495	462,226	1,269	1,314
Other current financial assets	124,680	19,550	105,130	108,854
Cash and cash equivalents	1,295,668	750,449	545,219	564,531
Financial debt and non-current derivatives	3,358,309	3,339,145	19,164	19,843
Financial debt and current derivatives	765,231	753,415	11,816	12,235
Trade and other payables	598,872	595,693	3,179	3,292

- iv. **Elimination of dividends.** Internal dividends are considered to be those a Group company recognises as income for the year and that have been distributed by another Group company.

During the consolidation process, dividends received by subsidiaries and joint operations are eliminated by considering them to be reserves of the recipient company, which consequently recognises them under "Reserves". In the case of minority interests in companies consolidated using the full consolidation method, the amount of the dividend corresponding to said minority interests is eliminated from the consolidated equity heading "Minority interests (External partners)".

- v. **Equity method.** The investment is initially recognised at cost and subsequently adjusted by the share corresponding to the investor of the changes in net assets of the affiliate. In addition, dividends received are accounted for as a lower amount under "Investments accounted for using the equity method".



Also, when the associate or joint venture is acquired, any difference between the cost of the investment and the share of the net fair value of the identifiable assets and liabilities of the associate or joint venture is accounted for as follows:

- The capital gain related to these companies or joint ventures is included in the carrying amount of the investment. This capital gain cannot be amortised.
- Any excess of the share of the net fair value of the identifiable assets and liabilities over the cost of the investment is included as income to determine the share of profit or loss of the associate or joint venture in the period in which the investment is acquired.

The consolidated profit for the year includes participation in the results of the affiliates under "Results of investments accounted for using the equity method" in the accompanying Consolidated Income Statement. If the participation in losses of an associate or joint venture equals or exceeds participation in said entities, the loss will no longer be recognised under additional losses. Once interest in an entity is reduced to zero, the additional losses will be maintained and a liability will only be recognised to the extent the corresponding entity incurred legal or implicit obligations or made a payment on behalf of an associate or joint venture. If the associate or joint venture subsequently reports profits, the entity will once again recognise its interest only after its participation in said profits equals its participation in unrecognised losses.



## 1.4 Estimates and accounting judgements made

In the Group's Consolidated Annual Accounts for 2024, estimates and judgements were occasionally made by the Senior Management of the Group and of the consolidated companies, subsequently ratified by the Directors, in order to quantify certain assets, liabilities, income, expenses, and commitments reported herein. Mainly:

### Estimates

- The useful life of PP&E assets ([Note 2.4](#)).
- Provisions for dismantling/abandonment costs, other provisions and assets and contingent liabilities ([Note 2.9](#)).
- The measurement of investments accounted for using the equity method, and non-financial assets to determine the possible existence of impairment losses ([Notes 1.6](#) and [2.7](#)).
- The fair value of financial instruments ([Notes 3.3](#) and [3.6](#)).
- Impairment losses on financial assets measured at amortised cost ([Notes 2.2](#) and [3.3](#)).
- The calculation of income tax and deferred tax assets ([Note 4.2](#)).
- The fair value of equity instruments granted under the Long-Term Incentive Plan (ILP) ([Note 3.1.c](#)).
- Assumptions on the calculation of the term of lease contracts in application of IFRS 16 ([Note 2.4.b](#)).
- Determination of the expected loss associated with receivables ([Note 2.2](#)).

### Judgements

- The recognition of investments accounted for using the equity method ([Note 1.6](#)).
- Compliance with conditions for classifying assets and liabilities as non-current assets and liabilities held for sale ([Note 2.6](#)).

Although these estimates were made on the basis of the best information available at December 31, 2024, future events may require these estimates to be modified prospectively in the coming years (upwards or downwards). In accordance with IAS 8, this would be done prospectively, recognising the effects of any change of estimate in the Consolidated Income Statement.



## 1.5 Changes in the consolidation scope

The following are the changes in the consolidation scope of the Enagás Group:

Entity	Stake percentage		Description/Type of control
	At 12.31.2024	At 12.31.2023	
Exits from the perimeter			
E.C. Soto de la Marina, S.A.P.I.	50.0%	50.0%	Reclassification of the Enagás Group's stake in this company to Non-Current Assets Held for Sale.
Tallgrass Energy, L.P.	—%	30.2%	On July 29, the transaction for the transfer of the Enagás Group's entire stake in Tallgrass Energy, L.P. was completed.

### E.C. Soto de la Marina, S.A.P.I.

On June 26, 2024, the Enagás Group agreed to sell its 50% stake in Estación de Compresión Soto de la Marina, S.A.P.I. to the company owning the remaining 50%, for approximately 15 million dollars.

Therefore, on that date, the Enagás Group reclassified this interest as a Non-Current Asset Held for Sale, until the effective closing of the transaction, subject to the ordinary conditions precedent in this type of transaction, as explained in [Note 2.6](#).

### Tallgrass Energy, L.P.

On July 10, 2024, an agreement was reached with Blackstone Infrastructure Partners for the sale of the Enagás Group's stake in Tallgrass Energy, L.P. for 1.1 billion dollars. This transaction was closed on July 29, 2024 and had an impact on net income of -363.7 million euros, broken down as follows:

- In Net Financial Gain/(Loss), -356.2 million euros (-398 million euros due to the difference between the purchase price and the carrying amount of the equity-accounted investment at the time of closing the transaction, and +42 million euros due to the recycling to the income statement of the cumulative translation differences on this investment); and an expense of 7.5 million euros on income tax.



## 1.6 Investments accounted for using the equity method

### Accounting policies

- The Group assesses the existence of joint agreements as well as significant influence with respect to associates, taking into account the shareholder agreements which require a scheme of increased majorities for taking relevant decisions.
- In order to classify the joint agreements among joint ventures and joint operations, the Group assesses the rights and obligations of the involved parties as well as the remaining circumstances stipulated in said agreements.
- The Group presents the profit for the period of the companies accounted for using the equity method as part of the Group's operating profit, since these companies carry out the same activity as the corporate purpose of the Enagás Group described in [Note 1.1](#).

### Significant estimates and judgements

- At year-end, or when there are indications of impairment, the Group analyses the recoverable amounts of investments accounted for under the equity method to determine the possibility of impairment.

Opening balance	New acquisitions/increases <sup>(1)</sup>	Dividends	Profit/(loss) for the year	Translation differences	Hedging transactions	Changes into the scope/Decreases <sup>(2)</sup>	Valuation adjustments	Other adjustments	Balance at year-end
<b>2024</b>									
<b>2,589,974</b>	16,613	(179,640)	146,474	82,930	(11,029)	(1,418,379)	—	(577)	<b>1,226,366</b>
<b>2023</b>									
<b>2,552,584</b>	167,996	(181,668)	147,304	(71,855)	(22,269)	(512)	—	(1,606)	<b>2,589,974</b>

(1) In 2024, "New acquisitions/Increases" primarily refers to an increase in investment in Axent Inf. Tel., S.A., amounting to 5,022 thousands of euros, and in Enagás Renewable, totalling 9,600 thousands of euros ([Note 1.5](#)).

(2) "Exclusions from scope/Decreases" in 2024 includes the reclassification to Non-current Assets Held for Sale and the sale of the Enagás Group's investment in Tallgrass Energy, L.P. and the reclassification of the Enagás Group's stake in E.C. Soto de la Marina, S.A.P.I. as Non-Current Assets Held for Sale. ([Note 1.5](#) and [Note 2.6](#)).

### Dividends

The dividends approved during the 2024 and 2023 financial years were as follows:

	2024	2023
TgP	73,762	72,590
Saggas	9,882	15,950
TAP Trans Adriatic Pipeline	63,130	76,400
BBG	11,500	—
Grupo Altamira	15,839	14,062
Senfluga	5,400	2,610
Other entities	127	56
<b>Total</b>	<b>179,640</b>	<b>181,668</b>

[Appendix II](#) to these consolidated annual accounts provides disclosure on data relating to joint ventures, joint operations, and associates of the Enagás Group at December 31, 2024 and December 31, 2023.

The recoverable amount of investments in associates or business combinations is evaluated for each associate or business combination, unless the associate or business combination does

not generate cash flows for continuous use which are largely independent of the cash flows arising from other Group assets. [Note 2.7](#) details how the recoverable amount is estimated.

With respect to the impairment analysis for affiliates, the discount rate applied (cost of equity) in 2024 was as follows: between 6.9% and 8.6% for Europe; between 9.5% and 10.2% for Peru; and between 9.9% and 10.6% for Mexico. Considering that all the affiliates have been operating normally during 2024, the sensitivity analysis of the discount rate has been performed using a range of +0.5% and -0.5%. This analysis would finish with no impairment of any affiliate arising as a result.



## 1.7 Diluted earnings per share

	2024	2023	Change
Net result of the financial year attributed to the parent company (thousands of euros)	(299,309)	342,528	(187.4) %
Weighted average number of shares outstanding (thousands of shares)	261,029	261,239	(0.1) %
Basic earnings per share (in euros)	(1.1467)	1.3112	(187.5) %
Diluted earnings per share (in euros)	(1.1467)	1.3112	(187.5) %

As there are no potential ordinary shares at December 31, 2024 and December 31, 2023, the basic earnings and the diluted earnings per share are the same.

For calculating the weighted average number of shares outstanding, the movements in 2024 account for the acquisitions and disposals related to the "Temporary Share Buy-back Programme", conducted during this year (see [Note 3.1.c](#)). This calculation considers the days the shares were actually outstanding during 2024.



## 1.8 Dividends distributed and proposed

### a) Proposed distribution of profit attributable to the parent

The appropriation of 2024 profit corresponding to the parent Enagás, S.A. proposed by the Board of Directors and which will be submitted for approval by the General Shareholders' Meeting is as follows (in thousands of euros):

	2024
Dividends	104,669
<b>TOTAL</b>	<b>104,669</b>

At a meeting held on November 18, 2024, the Board of Directors of Enagás, S.A. agreed to distribute an interim dividend charged against 2024 profit, based on the necessary liquidity statement, expressed in thousands of euros, amounting to 104,443 thousands of euros (0.400 euros gross per share), in accordance with Article 277 of the Spanish Corporate Enterprises Act.

The provisional accounting records prepared by the parent of the Group, in accordance with legal requirements and which presented balances sufficient for the distribution of the interim dividend in 2024, were as follows:

Interim accounting statement formulated on October 31, 2024	
Net accounting result	(68,623)
10% legal reserve	
Interim dividend received from Group companies	334,338
Profit "available" for distribution	265,715
Forecast interim dividend	(104,443)
Forecast cash balance for the period from November 30 to December 31:	
Cash balance	269,516
Projected collection for the period considered	390,067
Credit lines and loans available from financial institutions	1,550,000
Payments projected for the period under consideration (including the interim dividend)	(423,817)
Estimated available financing after dividend distribution	1,785,766

The aforementioned interim dividend was paid on December 12, 2024.

The proposed gross final dividend from the 2024 profit is 0.0009 euros per share.

In addition to the proposed distribution of profit for 2024, it is proposed that a dividend of 156,968 thousands of euros (0.5991 euros per share) be paid out of voluntary reserves, bringing the total gross dividend proposed to 0.6000 euros per share.

These dividends are subject to approval by the ordinary General Shareholders' Meeting and are not included as a liability in these Consolidated Annual Accounts. This gross complementary dividend will amount to a maximum of 157,194 thousands of euros.

### b) Total dividends paid

In addition to the aforementioned interim dividend for 2024, during 2024 Enagás, S.A. distributed the gross complementary dividend for 2023.

This dividend amounted to 272.5 million euros (1.044 euros per share) and was paid on July 4, 2024.

## 1.9 Commitments and guarantees

### Accounting policies

- A financial guarantee contract is a contract which requires that the issuer makes specific payments to repay the holder for losses incurred when a specific debtor does not fulfil payment obligations at maturity, in accordance with the original or modified conditions of a debt instrument. The rights and obligations associated with a financial guarantee will be considered as financial assets and financial liabilities. For subsequent valuation, a contract will be recognised as the greater amount of a) the amount resulting from standards relating to provisions (IAS 37) or b) accumulated amortisation of the initial measurement and possible accrued income.
- An investment commitment corresponds to that obligation contracted with a related party which can give rise to outflows of funds or other resources in the future. The following is included among these: commitments not recognised in connection with contributing funds or resources as a consequence of incorporation agreements, capital intensive projects carried out by a joint venture, commitments not recognised in connection with providing loans or other financial support to the joint venture, or commitments not recognised in connection with acquiring a stake, regardless of whether a specific future event occurs or not.



Commitments and guarantees	Group and related companies	Third parties	Total
<b>2024</b>			
Debt guarantees	604,569	—	<b>604,569</b>
Guarantees and sureties granted - Other	9,596	170,981	<b>180,577</b>
Investment commitments	—	137,207	<b>137,207</b>
<b>2023</b>			
Debt guarantees	655,750	—	<b>655,750</b>
Guarantees and sureties granted - Other	5,702	279,236	<b>284,938</b>
Investment commitments	—	185,101	<b>185,101</b>

## a) Debt guarantees

### TAP

The “Guarantees for related parties debts” heading includes the mechanism to support the repayment of the TAP loan provided by Enagás S.A. for financial institutions acquired in the Financing Agreement of November 30, 2018 in the company TAP, through which the following items are basically guaranteed:

- Principal and interest of the Financing Agreement provided by TAP at any time;
- Market value of the hedging instrument over the interest rate of the Financing Contract.

TAP reached the “Financial Completion Date” on March 31, 2021, a milestone that allowed the partners to replace the guarantees provided on the company's debt during the construction phase of the infrastructure with a mechanism for shareholder support for the repayment of the TAP loan (Debt Payment Undertaking), which will be in effect until its maturity, and which would be activated in the event of certain extraordinary events.

This support mechanism has been granted jointly by each of TAP's shareholders, so that Enagás would only be liable, in a hypothetical case, for the amount corresponding to it in accordance with its stake in TAP's share capital.

This support mechanism during the operating period is contractually limited by a cap in force throughout the life of the financing arrangement, so that the amounts claimed from Enagás may never exceed a total amount of 1,091,022 thousands of euros, regardless of the market value of the derivative or any other contingency.

At December 31, 2024 the amount guaranteed by Enagás, S.A. in favour of TAP creditors amounts to 593,081 thousands of euros (645,000 thousands of euros at December 31, 2023).

### Scale Gas

During 2023, the Enagás Group, through its company Scale Gas Solutions, S.L.U., subscribed a guarantee to cover its 50% share in the financial debt formalised in the affiliate Scale Gas Med Shipping, S.L., in the amount of 11,895 thousands of dollars both at 2024 and 2023 year-end (11,488 thousands of euros and 10,750 thousands of euros, respectively). This guarantee will remain in force until the expiry of the financing contract, which is

initially estimated for July 2030. Therefore, at the end of 2024 it remains in force.

## b) Guarantees and sureties granted - Other

The following items are mainly included:

### Group Personnel, Companies or Entities

- Guarantees for the development of projects, mainly related to access to the electricity transmission grid, granted by Enagás Renovable, S.L.U. amounting to 9,337 thousands of euros (5,450 thousands of euros as of December 31, 2023).

### Third parties

The following items, mainly, are included:

- Technical guarantees granted by financial entities to third parties in the amount of 83,085 thousands of euros (194,044 thousands of euros in 2023) to cover certain responsibilities which may arise during the execution of the contracts constituting the activity of the Enagás Group.
- Guarantees and sureties granted by Enagás, S.A. totalling 23,900 thousands of euros to cover technical and operational risks related to the projects of the Group company Efficiency for LNG Applications, S.L. (23,900 thousands of euros as of December 31, 2023).
- A guarantee granted by a financial institution to third parties in the amount of 730 thousands of euros (730 thousands of euros as of December 31, 2023) to support the application for an advance payment due to a subsidy granted by the Institute for Energy Diversification and Saving (IDAE).
- As indicated in [Note 3.3.a](#) related to the investment in Peru by GSP, a bank guarantee letter in the amount of 63,230 thousands of euros (65,500 thousands of dollars) has been provided in connection with the measures of Law No. 30737 indicated in that note.
- The bid bond insurance policy for the Buenaventura project port concession in Colombia was cancelled in July 2024. As of June 30, 2024, the amount was 1,405 thousands of euros (1,360 thousands of euros at December 31, 2023).

No guarantees had been granted with respect to tender processes at December 31, 2024 and at December 31, 2023.

## c) Investment commitments

The following items are included:

- The Enagás Group has firm investment commitments in Economic Interest Groupings (EIG) amounting to 10,283 thousands of euros, to be disbursed during 2025 and later years (22,268 thousands of euros at December 31, 2023).
- The Enagás Group has investment commitments for its shareholdings in two investment funds amounting to approximately 40,740 thousands of euros (51,096 thousands of euros in 2023): (i) KLIMA Energy Transition Fund, which seeks investment opportunities through the acquisition of minority stakes in companies with high growth potential in energy



transition sectors such as green hydrogen, biogas, energy efficiency, batteries, sustainable transport or digitalisation of electricity grids; and (ii) Clean H2 Infra Fund, which aims to develop the green hydrogen infrastructure sector and have a positive impact on the use and development of hydrogen transmission networks.

- In the last quarter of 2023, the Enagás Group, through its affiliate Scale Gas Solutions, S.L.U., signed two contracts for the construction and long-term chartering of a ship for bunkering liquefied natural gas and alternative fuels, the geographical scope of which covers both Spain and Europe. During the 2024 financial year, the first two milestones outlined in the construction contract were achieved, leading to a disbursement of 19,974 thousands of euros (20,495 thousands of dollars). As a result, the investment commitments related to this project total 46,184 thousands of euros (47,280 thousands of dollars) at the end of the 2024 financial year.
- In connection with the Stade project, the Enagás Group, after accounting for all disbursements made during the first half of 2024 and the long-term debt directly contracted by the company developing the project, has investment commitments of approximately 32,000 thousands of euros until its planned commissioning. The project partners also plan to commit additional funds to cover potential risks during the construction period as well as any deviations in amounts from the project's funding sources. For the Enagás Group, this additional commitment is approximately 8,000 thousands of euros until commissioning.

The Directors consider that no additional significant liabilities will arise in connection with the transactions disclosed in this note other than those already recognised in the accompanying Consolidated Balance Sheet.



## 1.10 New accounting standards

### a) Standards and interpretations adopted by the European Union in force for the current financial year

The accounting policies used in the preparation of these Consolidated Annual Accounts, other than those applied in the Consolidated Annual Accounts for the year ended December 31, 2023, as they came into force on January 1, 2024 are the following: Amendments to IAS 1 regarding the Classification of Liabilities as Current or Non-Current and the Classification of Non-Current Liabilities with Covenants; Amendments to IFRS 16 concerning the Measurement of Lease Liabilities in Sale and Leaseback Transactions; and Amendments to IFRS 7 and IAS 7 concerning Disclosures related to Supplier Financing Arrangements. None of the standards, interpretations or amendments that are applicable for the first time this year have had a material impact on the Group's accounting policies. For the amendment to IFRS 7 and IAS 7, [Note 2.3](#) provides the required details on the Group's reverse factoring agreements.

### b) Standards and interpretations issued by the IASB but not effective for the current year

The Group intends to adopt the standards, interpretations, and amendments thereof issued by the IASB that are not mandatory in the European Union when they become effective, where applicable. While the Group is currently assessing the impacts, preliminary analyses suggest that the initial application will not significantly affect its consolidated annual accounts, except for IFRS 18, which is expected to influence the presentation of the Group's consolidated income statement.

Standards	Content	Mandatory application for periods
Amendments to IAS 21*	Lack of convertibility in currency exchange rate application.	01/01/2025
IFRS 18	Presentation and disclosure of financial statements.	01/01/2027
Amendment to IFRS 7 and IFRS 9	Classification and measurement of financial instruments.	01/01/2026
Amendment to IFRS 7 and IFRS 9	Renewable energy contracts.	01/01/2026
Annual improvements volume 11	Amendments to IFRS 7, IFRS 9, IFRS 10 and IAS 7	01/01/2026

(1) Adopted by the EU on November 12, 2024.

## IFRS 18 – Presentation and Disclosure in Financial Statements

IFRS 18, set to replace IAS 1 Presentation of Financial Statements, primarily introduces, among other changes, three new requirements to enhance how companies disclose their financial performance, providing investors with a better basis for analysis and comparison:

- Enhances comparability by adding three new categories to the Consolidated Income Statement: operating, investing, and financing, along with new subtotals: operating profit and profit before financing and income tax.
- Increases transparency of management-defined performance measures by introducing new guidelines and disclosures.
- Offers guidance for more effective grouping of information in financial statements.

The adoption of IFRS 18 will not affect consolidated net income, but the Group anticipates it will need to adapt how elements of operating income are grouped and reported, particularly due to the presentation of the investments results accounted for using the equity method and other investments.



## 2. OPERATIONAL PERFORMANCE OF THE GROUP



## Relevant aspects

### Operating profit

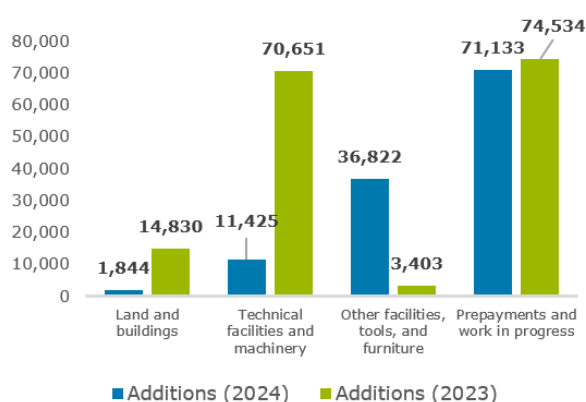
- Operating profit amounted to 429 million euros.

### Trade receivables

- “Other receivables - Current” includes the balance pending settlement corresponding to the remuneration of regulated regasification, transmission and underground storage activities for 412 million euros corresponding to the 2024 financial year (174 million euros at December 31, 2023) (Note 2.2).

### Property, plant, and equipment

- This heading involves, at December 31, 2024, 51% of total assets (47% of total assets at December 31, 2023) (Note 2.4). The change is mainly due to:
  - Additions amounting to 121 million euros primarily relate to activities at the Gaviota and Yela Underground Storage facilities, the Canary Islands LNG Ship project, replacements and adaptations at the Barcelona, Huelva, and Cartagena Regasification Plants, investment in the recovery of ecological cooling in LNG, enhancements in the integration of the Reganosa Gas Pipeline network, and improvements in communication security within the Basic Gas Pipeline Network.
  - The provision for amortisation for the period, in the amount of 268 million euros (255 million euros in 2023).



### Current status of the Castor storage collection rights

- Regarding the Castor storage facility, on November 8, 2019, the Council of Ministers Agreement was published, ending the hibernation of the Castor underground storage facility and agreeing on its dismantling in phases, assigning the work to Enagás Transporte. This Agreement confirmed the Group's obligation to continue to carry out all operations necessary for maintenance and operation of the facilities referred to in article 3.2 of Royal Decree-Law 13/2014 until the final phase of dismantling has been completed, obligations that have been fulfilled up to the date of preparation of these Annual Accounts. As a result of the 2018 Supreme Court rulings that annulled various regulations establishing the terms of remuneration for the obligations related to the management of infrastructures, and in view of the need to establish an alternative mechanism to obtain the corresponding remuneration for the aforementioned tasks with which the Group is legally entrusted and which it still currently performs, on December 18, 2018, the Group, through Enagás Transporte, filed a claim for property liability with the Ministry for the Ecological Transition, which, after being rejected due to the administrative silence, was pursued before the National High Court through the filing of the corresponding contentious administrative claim on October 3, 2019. In 2022, the Contentious Administrative Chamber of the National High Court filed a question of jurisdiction in the Supreme Court, which was resolved in November 2023, determining the jurisdiction of the Supreme Court to resolve the aforementioned appeal, which was in the ruling phase at the date of preparation of these consolidated annual accounts.
- Thus, the damages lawsuit consists of continuing in the jurisdiction of the claim that has already been filed by the Company to recover the amounts deducted or that have been refunded and those not received, in accordance with the legal conclusions of external and internal advisors. Based on the above, the account receivable for the right of Enagás Transporte, S.A.U., to be paid for the Castor underground storage administration and dismantling, is maintained in the balance sheet, the conclusion being that there is no negative impact on the Group's financial statements for the financial year (Note 2.2).



## 2.1 Operating profit

### Accounting policies

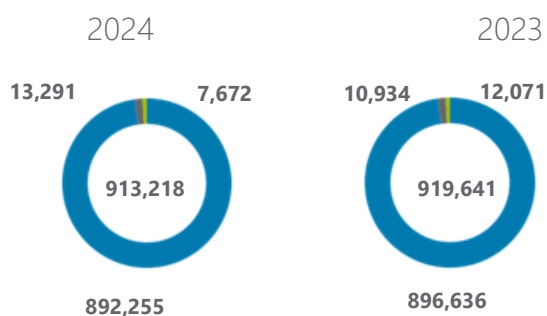
#### Recognition of income

- The Enagás Group measures revenue at the fair value of the consideration received or receivable and represents balances receivable for goods delivered and services provided in the normal course of business, net of discounts and amounts received from third parties such as VAT reimbursements.
- Ordinary revenue from the rendering of services is recognised by reference to the stage of completion of the transaction at the balance sheet date, provided the result of the transaction can be estimated reliably.
- Specifically, income relating to Technical Management of the System (GTS) is regulated by a public body (Appendix III). They are calculated annually on the basis of Enagás GTS, S.A.U.'s remuneration methodology, currently in force for the 2021-2023 and 2024-2026 regulatory periods. Only the revenues from the regulatory account and guarantees of origin are calculated on the basis of the substantiated cost. The monthly attribution of this income to the Income Statement is almost entirely carried out on a straight-line basis.
- Income arising from regasification, storage, and transmission activities in Spain is calculated based on a regulated remuneration system (Appendix III). Remuneration is made up of several terms that aim to remunerate investment, operation and maintenance costs and other items related to improved productivity and efficiency. The return on investment is the sum of amortisation and financial remuneration, calculated by applying the annual net value of the investment and the financial remuneration rate set for each regulatory period.
- The remuneration for productivity and efficiency gains includes the term of the continuity of supply remuneration set in the 2014 regulatory reform. As of 2021, this term will be calculated on the basis of the value established for 2020, adjusted by coefficients that no longer depend on fluctuations in demand.
- Once the regulatory useful life of the facilities has elapsed, and in those cases in which the asset remains operational, the operating and maintenance costs are established as fixed remuneration, increased by a coefficient based on the number of years by which the facility exceeds the regulatory useful life, not accruing any amounts as investment remuneration.
- On January 1, 2021, the new regulatory and remuneration framework came into force with the publication of Circulars 9/2019 of December 12, 2019 and 8/2020 of December 23, 2020 and Royal Decree 1184/2020 of December 29, 2020. The main items of this regulatory reform are set out in Appendix III.
- The Group's deferred income mainly corresponds to the accrual of amounts received for connecting the basic network infrastructure of Enagás Transporte, S.A.U. and Enagás Transporte del Norte, S.L. with networks of distribution companies, secondary transmission companies, gas shippers, and qualified customers. Said income is recognised based on the useful life of the assigned facilities.
- Based on the types of contractual agreements supporting this type of income, it has been determined that there is an implicit financing component which, under the new regulatory requirements, must be recognised as a liability in the Consolidated Balance Sheet.



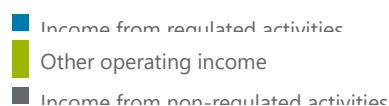
## a) Income

The breakdown of Revenue is as follows:



Revenue	2024	2023
Regulated activities:	892,255	896,636
Enagás Transporte, S.A.U.	801,666	800,655
Enagás Transporte del Norte, S.L.	17,882	16,641
Enagás GTS, S.A.U.	27,846	29,055
Musel Energy Hub, S.L. <sup>(1)</sup>	44,861	50,285
Non-regulated activities:	13,291	10,934
Enagás Transporte, S.A.U.	2,335	3,345
Enagás Internacional, S.L.U.	24	61
Enagás Transporte del Norte, S.L.	447	447
Enagás Services Solutions	10,167	3,823
Remaining companies	318	3,258
<b>Total</b>	<b>905,546</b>	<b>907,570</b>

(1) Includes revenues from the Musel Energy Hub terminal for logistics services.



The details of revenues with the breakdown of revenues from customer contracts at December 31, 2024 and December 31, 2023 is as follows:

Revenue	2024	2023
Regulated activities:	892,255	896,636
Others	892,255	896,636
Non-regulated activities:	13,291	10,934
From customer contracts	5,234	4,671
Others	8,057	6,263
<b>Total revenue</b>	<b>905,546</b>	<b>907,570</b>

Other operating income	2024	2023
From customer contracts	7,135	6,777
Others	537	5,294
<b>Total Other operating income</b>	<b>7,672</b>	<b>12,071</b>

The distribution of the Revenue based on the Group Companies from which it comes for 2024 and 2023 is as follows:



The Management of the Enagás Group considers that there is no collection uncertainty relating to the income indicated above and therefore has not ceased to recognise any type of income for this reason.

## b) Personnel expenses

Personnel expenses	2024	2023
Wages and salaries	104,782	101,255
Termination benefits	2,554	4,070
Social Security	24,966	23,589
Other personnel expenses	10,741	9,392
Contributions to external pension funds (defined contribution plan)	3,238	2,994
Works for fixed assets (Note 2.4)	(3,601)	(4,237)
<b>Total</b>	<b>142,680</b>	<b>137,063</b>

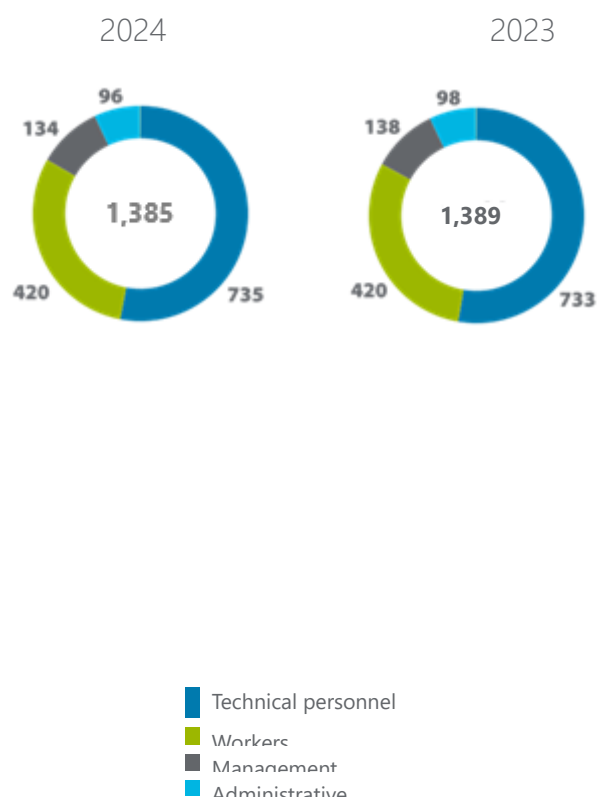
In 2024, "Wages and salaries" include the fair value of services received as consideration for equity instruments granted, in the amount of 1,846 thousands of euros at December 31, 2024 corresponding to the portion of the Long-Term Incentive Plan payable in Enagás, S.A. shares and approved on March 31, 2022 for the Executive Director and senior management, thus representing a share-based transaction. At December 31, 2023, it included 1,439 thousands of euros corresponding to the portion of the Long-Term Incentive Plan payable in Enagás, S.A. shares (2022-2024) approved on March 31, 2022. Services rendered corresponding to the portion of the incentive plan payable in cash were also recognised with a credit to "Provisions" under non-current liabilities, in the amount of 648 thousands of euros at December 31, 2024, corresponding to the Long-Term Incentive Plan (2022-2024). The amount recorded as at December 31, 2023 was 635 thousands of euros and related to the same item. Pending disbursements for this item are presented in both current liabilities and non-current liabilities of the consolidated balance sheet. In addition, the employee benefits expense arising from the bonus payable every three years for contribution to results for the 2022-2024 period and corresponding to the remaining personnel of the Group was also included in the amount of 2,396 thousands of euros. In 2023, an expense of 1,954 thousands of euros was included, derived from the same programme.

The Enagás Group contributes, in accordance with the Pension Plan signed and adapted to the Law on Pension Plans and Funds, to an "Enagás Pension Fund" defined contribution plan, managed by Gestión de Previsión y Pensiones, S.A. with Banco Bilbao Vizcaya Argentaria, S.A. as custodian, which covers the Group's commitments to the workforce in question. The aforesaid plan recognises certain vested rights for past service and undertakes to make monthly contributions averaging 4.18% of eligible salary (4.23% in 2023). It is a mixed plan covering retirement benefits, disability and death. The total number of people adhered to the plan at December 31, 2024 totalled 1,358 participants (1,341 participants at December 31, 2023). The contributions made by the Group in this heading each year are recorded under "Personnel expenses" of the Consolidated Income Statement. At 2024 year-end there were no amounts pending payment with respect to this item.

In addition, the Group has outsourced its pension commitments with respect to its senior managers through a mixed group

insurance policy for pension commitments, including benefits in the event of survival, death, and employment disability.

The average number of Group employees broken down by professional category is as follows:



At December 31, 2024, the Group had 1,395 employees (1,390 in 2023). The breakdown by category and gender is as follows:

Categories	2024		2023	
	Women	Men	Women	Men
Management	46	89	47	91
Technical personnel	239	502	235	499
Administrative personnel	83	11	85	11
Workers	53	372	48	374
<b>Total</b>	<b>421</b>	<b>974</b>	<b>415</b>	<b>975</b>

"Management" includes senior executive management of the Group, comprising ten persons (six men and four women) in 2024; nine persons in 2023 (six men and three women).



The average number of staff with disabilities greater than or equal to 33% employed by Group companies during 2024 and 2023 and broken down by categories is as follows:

Categories	2024	2023
Technical personnel	1	1
Administrative personnel	3	2
Workers	6	4
<b>Total</b>	<b>10</b>	<b>7</b>

In 2024, a flexible remuneration plan was approved by the Parent, which involves delivering shares to employees and senior managers of Enagás, S.A. and its Group companies ([Note 3.1.c](#)).

## c) Other operating expenses

Other operating expenses	2024	2023
External services:		
R+D expenses	1,277	885
Leases and royalties (1)	4,104	3,519
Repairs and conservation	59,363	55,935
Freelance professional services	23,829	19,532
Transport	212	195
Insurance premiums	8,801	9,190
Banking and similar services	27	37
Advertising, publicity and public relations	4,033	3,794
Supplies	25,344	30,689
Other services	39,666	37,983
<b>External services</b>	<b>166,656</b>	<b>161,759</b>
Taxes	11,858	15,098
<b>Other current management expenses</b>	<b>6,100</b>	<b>13,647</b>
<b>Other external expenses</b>	<b>10,574</b>	<b>11,105</b>
<b>Change in traffic provisions</b>	<b>516</b>	<b>169</b>
<b>Total</b>	<b>195,704</b>	<b>201,778</b>

(1) This account includes expenses for leases, which are excluded from IFRS 16 as they relate to assets of low value or with a term of less than one year, amounting to 2,737 thousands of euros at December 31, 2024 (2,894 thousands of euros at December 31, 2023).



## 2.2 Trade and other non-current and current receivables

### Accounting policies

- Financial assets are recognised in the Consolidated Balance Sheet at the transaction date when the Group becomes party to the contractual terms of the instrument.

#### Financial assets measured at amortised cost

- This heading comprises financial assets arising from the sale of goods or the rendering of services in the course of the Company's business, or financial assets which, not having commercial substance, are not equity instruments or derivatives with fixed or determinable payments and are not traded in an active market (see **Note 3.3**).

### Significant estimates and judgements

- An impairment loss on financial assets measured at amortised cost arises when there is objective evidence that the Group will not be able to recover all the corresponding amounts in accordance with the original terms established. The impairment loss is recognised as an expense in the Consolidated Income Statement and is determined as the difference between the carrying amount and the present value of future cash flows discounted at the effective interest rate.
- If, in subsequent periods, the value of the financial asset measured at amortised cost recovers, then the impairment loss is reversed. The reversal shall not result in a carrying amount of the financial asset that exceeds the carrying amount had the impairment not been recognised. The reversal is recognised in the Consolidated Income Statement.
- From January 1, 2018, with the application of IFRS 9, the Group recognises an impairment loss for expected credit losses on financial assets.
  - c) reasonable and well-founded information available on the date of information, without cost or disproportionate effort, on past events, current conditions and forecasts of future economic conditions.
- Under the new standard, an entity will measure the value correction for losses of a financial instrument in an amount equal to the expected credit losses during the life of the asset, if the risk of that financial instrument has increased significantly since its initial recognition.
- Conversely, that is, if the credit risk of a financial instrument has not increased significantly since the initial recognition, an entity will measure the value correction for losses at an amount equal to the expected credit losses in the next 12 months.
- The gain or loss resulting from impairment of value, the amount of the expected credit losses (or reversals) by which it is required that the value adjustment for losses be adjusted on the posting date to reflect the amount to be recognised under this standard will be recorded in the profit for the period.
- In the case of the Enagás Group, practically all financial assets present a low credit risk at the date of posting, and their exposure to events that generate credit losses during the next 12 months is therefore calculated.



	12.31.2024	12.31.2023
Customer receivables for sales and services rendered	20,101	13,145
Accounts receivable from customer contracts	1,956	1,989
Accounts receivable from contracts with customers and associates	2,364	2,842
Associate Companies	699	3,881
Other receivables	419,863	180,868
<b>Subtotal</b>	<b>444,983</b>	<b>202,725</b>
Value added tax	18,512	21,928
<b>Trade and other current receivables</b>	<b>463,495</b>	<b>224,653</b>
Trade and other non-current receivables (Note 3.3.a)	91,944	128,178

### a) Trade and other non-current receivables

This section primarily includes the best estimate of the long-term deficit for the gas years 2023 and 2024 for local transmission, as well as the amount related to facilities pending long-term recognition, which directors anticipate will be recognised over a time horizon exceeding one year.

### b) Trade and other current receivables

In the "Other receivables" heading, under current assets, the Enagás Group mainly records the outstanding balance corresponding to the remuneration of regulated regasification, transmission and underground storage activities at the end of financial years 2024 and 2023, in the amount of 266,902 thousands of euros and 174,378 thousands of euros, respectively.

It should be noted that, as various gas activities have resulted in surpluses (Trunk Transmission, Underground Storage and Regasification activities in gas years 2022, 2023 and 2024), the corresponding amount has been reclassified to long-term and short-term liabilities based on the best estimate, in the amounts of 216,954 thousands of euros and 164,012 thousands of euros, respectively.

The following are also included under Other Receivables:

- Receivable in the amount of 20,142 thousands of euros (19,536 thousands of euros at December 31, 2023) related to the claim of Asset Liability presented to the Council of Ministers to recover the costs incurred in the project of the LNG Regasification Terminal of the Port of Granadilla (GASCAN) ([see details below](#)).
- Receivable in the amount of 124,923 thousands of euros (105,720 thousands of euros at December 31, 2023) related to the administration and operations tasks necessary for the maintenance and operation of the Castor Storage Facility. This receivable has been reclassified to short-term during 2024, as it is estimated that a judgement will be passed and enforced in less than 12 months ([see details below](#)).

"Accounts receivable from contracts with customers" include the following items, broken down in accordance with IFRS 15:

	12.31.2024	12.31.2023
Accounts receivable from customer contracts	1,552	1,722
Accounts receivable from contracts with customers and associates	509	2,267
Accounts receivable invoices to be issued from contracts with customers	404	267
Outstanding accounts receivable invoices to be issued from customer contracts, group companies and associates	1,855	575

The Group has not registered assets under contracts at December 31, 2024 or December 31, 2023.

At December 31, 2024, the Company did not have significant impairment losses on balances receivable from contracts with customers, either registered as accounts receivable or as unissued invoices.

### Financial investment in the Gascan project

In relation to the situation of the regasification assets of the Gascan project in the Canary Islands, on February 21, 2022, the Spanish High Court of Justice was notified of the ruling rejecting the contentious-administrative appeal against the rejection by silence of the application for new administrative authorisation of the LNG regasification terminal project in the Canary Islands (GASCAN).

Once the aforementioned ruling became final, on July 6, 2022, a claim for asset liability was submitted to the Council of Ministers, with the aim of implementing an alternative mechanism to recover the costs incurred in said project, considering, based on the legal conclusions, that the recovery of the assets associated with the project is highly probable.

Since the submission of this claim, the assets and liabilities associated with the project were reclassified as long-term receivables and an initial amount of 18,655 thousands of euros were recognised, as well as the default interest.

During the financial year 2024, this receivable has been classified as short-term, with an estimated recovery period of less than twelve months. The amount of this receivable is 20,142 thousands of euros as of December 31, 2024 (19,536 thousands of euros as of December 31, 2023, which were recorded under "Trade and other non-current receivables").



## Situation of Castor Storage Facility

As explained in Note 9.1 to the 2014 Annual Accounts of Enagás Transporte S.A.U. on October 4, 2014 the Official State Gazette published Royal Decree-Law 13/2014 of October 3, by virtue of which urgent measures were adopted in connection with the gas system and title to the nuclear power plants, with a view to guaranteeing the security of people, goods, and the environment with respect to the Castor natural gas underground storage facility, which establishes, among other matters, the following:

- The termination of the operating concession for the Castor underground storage facility, granted by Royal Decree-Law 855/2008, of May 16.
- The hibernation of the facilities associated with said concession.
- The appointment of Enagás Transporte, S.A.U. for administration of said facilities, for the sole purpose of carrying out the necessary measures for maintenance and operability during the hibernation period, prioritising the goal of guaranteeing the security of the facilities for persons, goods, and the environment, while ensuring compliance with applicable regulations. Likewise, the decision included the stipulation that the maintenance and operational costs be paid to Enagás Transporte, S.A.U. with a charge to income from tolls and royalties of the gas system.
- The recognition of the investment made for the storage facility by the titleholder of the concession which was extinguished with 1,350,729 thousands of euros, and the establishment of a payment obligation for said amount by Enagás Transporte, S.A.U. to the titleholder of the extinguished concession. As a result of assuming the payment obligation, Enagás Transporte, S.A.U. enjoys the right to collect access tolls and royalties from the gas system's monthly invoicing for 30 years, for the amount paid to the titleholder of the extinguished concession plus the financial remuneration which the Royal Decree-Law expressly recognises. Likewise, this Royal Decree-Law contains the necessary measures to guarantee full effectiveness of this collection right, that said right could be freely available to Enagás Transporte, S.A.U. or its third party titleholders, and could consequently be totally or partially ceded, transferred, discounted, pledged, or taxed in favour of any third parties, including securitisation funds or other special purpose vehicles or companies, either domestic or international. The cession of the collection right will be effective with respect to the gas system, which will pay the new titleholder the corresponding amounts.

In light of the above, on October 4, 2014, Enagás Transporte, S.A.U. signed an agreement with various financial entities by virtue of which it ceded the collection right charged to the gas system awarded by the aforementioned Royal Decree-Law, with said entities assuming the payment obligation imposed on Enagás Transporte, S.A.U. In this manner, on November 11, 2014, said financial entities made a payment of 1,350,729 thousands of euros to the titleholder of the extinguished concession.

Furthermore, Enagás Transporte, S.A.U. transferred the aforementioned contractual obligations and rights inherent to ownership of the financial asset to said financial entities, thus derecognising it from the balance sheet as the Sole Director of

the Company considers that all associated risks and benefits have been transferred.

On December 21, 2017 the Constitutional Court handed down sentence No. 152/2017 declaring various provisions of Royal Decree-Law 13/2014 as unconstitutional and null and void due to formal errors. Specifically, (i) acknowledgement of the investment made by the renouncing concessionaire and costs accrued up to the date of said norm becoming effective, and thus the consideration in the amount of 1,350,729 thousands of euros, as well as (ii) recognition of the correlated collection right of Enagás Transporte, S.A.U. with respect to the gas system for the amount of consideration cited, considering that in both cases the reasons given for the urgency were not justified and therefore said measures should be excluded from the ordinary legislative procedure.

Notwithstanding the foregoing, the Constitutional Court did declare the following as constitutional and valid: (i) adoption of the decision to hibernate the underground storage facility; (ii) the declaration of the extinction of the concession; and (iii) the appointment of Enagás Transporte, S.A.U. for administration of the facilities to the extent the hibernation is prolonged; as well as (iv) recognition of the right to obtain remuneration for the maintenance and operability costs for Enagás Transporte, S.A.U., including any costs incurred for the administration and other related work which said Royal Decree-Law established as a requirement.

In accordance with the analysis carried out by the Company's external legal advisors, the purchase-sale contract for the collection rights signed by Enagás Transporte, S.A.U. with the financial entities represents the transfer of rights and obligations to the financial entities and in no case does it enable the buyers (or their possible transferees) the possibility of claiming reimbursement for the price received or payment of any other amounts from the seller. Thus, in no case can adverse effects arise in connection with the financing of the operation for the Company due to the sentence of the Constitutional Court, as Enagás Transporte, S.A.U. is not titleholder to the collection right which was annulled nor is it obliged to pay the titleholder of the extinguished concession.

In addition, in relation to the above, the Supreme Court issued a ruling on October 27, 2020 partially upholding the contentious-administrative appeal filed by the financial institutions against the alleged rejection by the Council of Ministers of the claim for liability of the Legislature for the partial unconstitutionality of Royal Decree-Law 13/2014, recognising the right of these appellant banks to compensation, by way of liability of the Legislature, of the total debt recognised in their favour, in the amount of 1,350,729 thousands of euros plus the corresponding legal interest accrued.

Likewise, in accordance with the analysis carried out and the conclusions drawn by the Company's legal advisors and external legal advisors, the aforementioned sentence of the Constitutional Court does not give rise to any negative effect on the right of Enagás Transporte, S.A.U. to obtain remuneration for the administration and operations necessary for maintenance and operability of the infrastructure, as the Royal Decree-Law was not affected in such a manner by the declaration of unconstitutionality. Similarly, on the basis of these same



conclusions, it is not believed that there has been any negative effect from the process that targets the liability of the Legislator State to financial institutions, since all the risks and benefits of the financial asset have been contractually transferred to the latter and the Supreme Court has also issued a final ruling in their favour.

During 2024, no judicial or regulatory pronouncements have taken place in relation to the various rulings of previous years referring to the declaration of unconstitutionality of certain articles of Royal Decree-Law 13/2014, beyond those associated with the ordinary procedural actions of the proceedings that remain in progress.

Notwithstanding the above, it should be noted that since 2014 Enagás Transporte, S.A.U. has assumed and been performing management functions at the Castor storage facility, which it was legally obliged to do in accordance with the provisions of sections 1 and 2 of Article 3 of Royal Decree-Law 13/2014, which imposed on it the assumption of the administration of the facilities and of the ownership of all the rights and obligations associated with them during the entire period up to the end of the hibernation period through an agreement of the Council of Ministers referred to in Article 1.2 of the aforementioned Royal Decree-Law 13/2014.

It is worth noting at this time that on November 8, 2019, the Council of Ministers published the Agreement terminating the hibernation of the Castor underground storage facilities and agreeing to dismantle them in phases, assigning the work to Enagás Transporte and including all the operations required for the maintenance and operation of the facilities referred to in Article 3.2 of Royal Decree-Law 13/2014 until the last phase of dismantling is completed.

With all of the above, in practice, the adoption of the aforementioned Agreement has not meant that Enagás Transporte has ceased to attend to the tasks it had been carrying out to guarantee the safety of people, property and the environment but, on the contrary, it has confirmed its obligation to continue to carry out all of the operations required for the maintenance and operation of the facilities referred to in Article 3.2 of Royal Decree-Law 13/2014 until the last phase of dismantling is completed.

And given that, due to carrying out these tasks, formerly as a storage administrator, and now as a dismantling manager, Enagás Transporte, S.A.U., has so far been assuming the costs derived from the operations maintenance and operations imposed, as well as those for the full assumption of the administration and dismantling of the storage; and given that, in addition, the right of this company to obtain remuneration for the functions entrusted by Royal Decree-Law 13/2014 and developed in relation to Castor storage remains in force, since it does not derive from Article 6, annulled by the Constitutional Court, but is expressly recognised in Article 3.2 of the former, which subsists, it is considered that the right of Enagás Transporte, S.A.U. to receive the remuneration for the costs incurred is beyond any doubt, with only the specific terms in which this right is specified remaining in doubt, since Article 6 has been annulled.

In view of the foregoing and as it is necessary to implement an alternative mechanism to receive the remuneration for said tasks, legally entrusted to Enagás Transporte and which the company is

still currently carrying out, on December 21, 2018, Enagás Transporte, S.A.U. filed a claim for damages with the Ministry for Ecological Transition, requesting (i) the right of Enagás Transporte, S.A.U. to obtain compensation, for the damages sustained as a result of the administration tasks of the facilities, plus the pertinent interests, (ii) payment of the amounts corresponding to the remuneration for the costs assumed by Enagás Transporte, S.A.U., up to the moment when the resolution is issued, plus the pertinent interests, and (iii) the right of Enagás Transporte, S.A.U. to obtain compensation for the damages that may be caused to it as a consequence of the tasks of administering the facilities until such time as the Council of Ministers adopted an agreement that would put an end to the storage hibernation situation.

The aforementioned claim for asset liability filed on December 21, 2018, was rejected by a presumptive resolution of the Ministry for the Ecological Transition. On October 3, 2019 action was pursued before the National High Court through the filing of the corresponding contentious-administrative appeal against the aforementioned presumptive resolution in order to recover all amounts corresponding to the tasks entrusted, which Enagás has continued to provide to date.

With regard to this contentious-administrative appeal, in 2022 the Contentious-Administrative Chamber of the National High Court filed a question of jurisdiction in the Contentious-Administrative Chamber of the Supreme Court. It was resolved in November 2023, confirming the jurisdiction of the Supreme Court to resolve the aforementioned appeal. At the date of authorisation for issue of these accounts, the judgement of this court has yet to be scheduled for voting and ruling.

According to the legal conclusions of the external and internal advisors, it is considered that this damages lawsuit is the mechanism initiated by the Company for recovering both the amounts deducted from the remuneration corresponding to financial year 2017, the amounts not paid referring to financial years 2018 and the following, and the amounts that have been refunded as a result of the review actions by the CNMC in relation to the settlements corresponding to 2014, 2015 and 2016, included in the final approved settlements of the 2015 and 2016 years, as well as their possible interests. Based on the above, the account receivable for the right of Enagás Transporte, S.A.U. to be paid for the performance of the works and for the administration and dismantling of the Castor underground storage is maintained in the balance sheet, the conclusion being upheld that there is no negative impact on the Company's financial statements as a result of the judgements of the Constitutional Court or the Supreme Court mentioned above. These are recorded as short-term as it is estimated that the resolution will take place within a period of less than twelve months.



## 2.3 Trade and other payables

### Accounting policies

The heading "Trade and other payables" includes balances payable to suppliers under reverse factoring arrangements where the financial terms are not materially different from those of other suppliers or creditors. In this regard, it should be noted that payments corresponding to reverse factoring payments to suppliers are presented as part of operating activities in the Consolidated Cash Flow Statement.

The breakdown of the heading "Trade and Other Payables" for 2024 and 2023 is as follows:

Trade and other payables	12.31.2024	12.31.2023
Debts with related companies	182	1,020
Rest of suppliers	554,524	550,499
Other creditors	20,110	13,656
Subtotal (Note 3.3.b)	574,816	565,175
Value added tax (Note 4.2.)	1,154	919
Public Treasury, payable for withholdings and other (Note 4.2.)	22,902	38,203
<b>Total</b>	<b>598,872</b>	<b>604,297</b>

The heading "Other suppliers" includes the balance payable to the CNMC for the Technical Management of the System revenue, imbalances and surplus from Regasification, Transmission and Storage activities amounting to 409,777 thousands of euros (387,842 thousands of euros at December 31, 2023).

Under the amendment to IAS 7 (Note 1.10), reverse factoring agreements typically allow either the extension of the payment period to suppliers or enable suppliers to benefit from early payment terms ahead of the invoice due date. The Enagás Group does not use reverse factoring contracts to extend the payment period for its suppliers. The Group has only reverse factoring agreements that ensure the payment terms agreed with each supplier, ensuring a maximum due date of 60 days from the invoice date, consistent with the contractual terms with the Enagás Group. This is the same for suppliers not using reverse factoring. The Group only offers the option for payments to be advanced by a bank, so all reverse factoring contracts are classified under "trade payables". Additionally, the balance of suppliers involved in reverse factoring agreements as of December 31, 2024 amounts to 20,677 thousands of euros, with 1,120 thousands of euros having been paid in advance by the bank. Regarding comparative information, Enagás Group has used the waiver available in the first year of adopting the amendments to IAS 7 and IFRS 7 concerning Supplier Financing Arrangements.

### Information on the average payment period

Below follows the information required by the Additional provision three of Law 15/2010 of July 5 (amended by Final provision two of Law 31/2014 of December 3) prepared in accordance with the Resolution of the ICAC of January 29, 2016, as well as by Law 18/2022, of September 28, on the creation and growth of companies, together with ICAC Consultation 1-132 of October 2022, regarding information to be included in the notes to the Annual Accounts in relation to the average payment period to suppliers in commercial operations.

The maximum payment term applicable to Group companies in 2024 under Law 3/2004, of December 29, establishing measures to combat late payments in commercial transactions, is 60 days. In order to obtain the foregoing information, payment obligations that have been the object of withholdings as a result of embargoes, enforcement orders, administrative compensation proceedings, or other similar acts handed down by legal or administrative bodies were excluded.

Days	2024	2023
Average payment period to suppliers	20	17

Amount	2024	2023
Total payments made in a period shorter than the maximum period <sup>(1)</sup>	806,688	753,527
Number of invoices paid in a period shorter than maximum period	67,729	62,997

Percentage	2024	2023
% Volume of payments in a period shorter than the maximum period	92 %	92 %
% Invoices paid in a period shorter than the maximum period	89 %	83 %

(1) This amount includes payments for transactions carried out by the Enagás Group as Technical Manager of the System.



## 2.4 Property, plant, and equipment

### Accounting policies

- The cost model is applied, that is, the corresponding assets are measured at acquisition or production cost less the corresponding accumulated amortisation and any impairment losses.
- Acquisition or production cost includes:
  - Finance expenses relating to the financing of infrastructure projects accrued only during the construction period, when the building work lasts for more than one year. In 2024 and 2023, no financial expenses were capitalised for this item.
  - Personnel expenses directly related to work in progress, lowering personnel expenses in the amount of 3,601 thousands of euros at December 31, 2024 (4,237 thousands of euros at December 31, 2023). (Note 2.1.b).
- The book value of these assets includes an estimate of the current value of the costs to the Group for the dismantling tasks, credited to the "Long-term provisions" heading (Note 2.9.a) of the accompanying Consolidated Balance Sheet. This provision is subject to periodic review, in order to monitor possible changes in any of the hypotheses used to estimate decommissioning costs, in this case assuming the corresponding change in book value, which would be made prospectively, as has been previously indicated in Note 2.9.a to the Consolidated Annual Accounts.
- Non-extractable gas required for exploitation of underground natural gas storage (cushion gas) is recognised under PP&E, depreciated over the specific prevailing useful life (20 years) or over the leasing period if less.
- Natural gas required for minimum levels in gas pipelines and minimum operating levels for regasification plants, (also called "heel gas") is recognised as PP&E that cannot be amortised given that it is not available for sale as indicated under current regulations. It is measured at the purchase price as indicated in Order ITC/3993/2006 an Order IET/2736/2015.
- The restatement of assets recognised under PP&E in accordance with Royal Decree-Law 7/1996 of June 7, on balance sheet restatements, has an effect of 3,110 thousands of euros on amortisation charges for fixed assets in 2024 (3,135 thousands of euros in 2023).
- On January 1, 2021, the new regulatory and remuneration framework came into force with the publication of Circulars 9/2019 of December 12, 2019 and 8/2020 of December 23, 2020 and Royal Decree 1184/2020 of December 29, 2020. (Appendix III).

### Grants

- The official grants relating to the assets recognised under PP&E lower the acquisition cost of said assets and are taken to the income statement over the foreseen useful lives of the corresponding assets, decreasing the related amortisation.

### Significant estimates and judgements

- PP&E items are amortised using the straight-line method, applying annual amortisation rates that reflect the estimated useful lives of the corresponding assets.
- The Directors consider that the carrying amounts of the assets do not exceed the recoverable amounts which result from calculating discounted future cash flows generated by said assets based on foreseen remuneration under current regulations.
- For lease assets arising from the application of IFRS 16, the average term considered in each of the leases has been determined on the basis of both the economic substance and the contractually agreed duration as well as the assumptions on the extension/early termination of the contracts.

- Depreciation is carried out on a straight-line basis in accordance with the following useful lives:

	Annual rate	Useful life
Buildings	2%-5%	50 – 20
Technical facilities (transmission network)	2.5%-5%	40–20
Tanks	5%	20
Underground Storage Facilities	5%-10%	20–10
Cushion gas	5%	20
Other technical facilities and machinery	2.5%-12%	40 – 8.33
Equipment and tools	30%	3
Furniture and fixtures	10%	10
Information technology equipment	25%	4
Transport equipment	16%	6



2024	Opening balance	Inputs or provisions	Increases or decreases due to transfers	Decreases, disposals or reductions	Balance at year-end
Land and buildings	514,707	1,844	1,618	(3,777)	514,392
Technical facilities and machinery	9,803,828	11,425	44,970	(1,258)	9,858,965
Other facilities, tools, and furniture	200,615	36,822	497	(1,091)	236,843
Prepayments and work in progress	205,874	71,133	(47,085)	(10,788)	219,134
Capital grants	(603,373)	(859)	—	65	(604,167)
<b>Total cost</b>	<b>10,121,651</b>	<b>120,365</b>	<b>—</b>	<b>(16,849)</b>	<b>10,225,167</b>
Land and buildings	(268,955)	(15,686)	—	1,273	(283,368)
Technical facilities and machinery	(6,130,952)	(249,239)	—	1,014	(6,379,177)
Other facilities, tools, and furniture	(104,029)	(11,711)	—	495	(115,245)
Capital grants	469,138	8,941	—	—	478,079
<b>Total amortisation</b>	<b>(6,034,798)</b>	<b>(267,695)</b>	<b>—</b>	<b>2,782</b>	<b>(6,299,711)</b>
Technical facilities and machinery	(15,329)	—	—	—	(15,329)
Prepayments and work in progress	(87,662)	(6,219)	—	7,600	(86,281)
<b>Total impairment</b>	<b>(102,991)</b>	<b>(6,219)</b>	<b>—</b>	<b>7,600</b>	<b>(101,610)</b>
Land and buildings	245,752	(13,842)	1,618	(2,504)	231,024
Technical facilities and machinery	3,657,547	(237,814)	44,970	(244)	3,464,459
Other facilities, tools, and furniture	96,586	25,111	497	(596)	121,598
Prepayments and work in progress	118,212	64,914	(47,085)	(3,188)	132,853
Capital grants	(134,235)	8,082	—	65	(126,088)
<b>Net carrying amount of property, plant, and equipment</b>	<b>3,983,862</b>	<b>(153,549)</b>	<b>—</b>	<b>(6,467)</b>	<b>3,823,846</b>

2023	Opening balance	Inputs or provisions	Increases or decreases due to transfers	Decreases, disposals or reductions	Balance at year-end
Land and buildings	504,114	14,830	1,246	(5,483)	514,707
Technical facilities and machinery	9,374,995	70,651	439,531	(81,349)	9,803,828
Other facilities, tools, and furniture	197,333	3,403	2,249	(2,370)	200,615
Prepayments and work in progress	579,926	74,534	(443,026)	(5,560)	205,874
Capital grants	(601,792)	(1,593)	—	12	(603,373)
<b>Total cost</b>	<b>10,054,576</b>	<b>161,825</b>	<b>—</b>	<b>(94,750)</b>	<b>10,121,651</b>
Land and buildings	(253,503)	(16,111)	—	659	(268,955)
Technical facilities and machinery	(5,895,106)	(237,178)	—	1,332	(6,130,952)
Other facilities, tools, and furniture	(94,198)	(11,276)	—	1,445	(104,029)
Capital grants	460,114	9,024	—	—	469,138
<b>Total amortisation</b>	<b>(5,782,693)</b>	<b>(255,541)</b>	<b>—</b>	<b>3,436</b>	<b>(6,034,798)</b>
Technical facilities and machinery	(15,329)	—	—	—	(15,329)
Prepayments and work in progress	(91,642)	(365)	—	4,345	(87,662)
<b>Total impairment</b>	<b>(106,971)</b>	<b>(365)</b>	<b>—</b>	<b>4,345</b>	<b>(102,991)</b>
Land and buildings	250,611	(1,281)	1,246	(4,824)	245,752
Technical facilities and machinery	3,464,560	(166,527)	439,531	(80,017)	3,657,547
Other facilities, tools, and furniture	103,135	(7,873)	2,249	(925)	96,586
Prepayments and work in progress	488,284	74,169	(443,026)	(1,215)	118,212
Capital grants	(141,678)	7,431	—	12	(134,235)
<b>Net carrying amount of property, plant, and equipment</b>	<b>4,164,912</b>	<b>(94,081)</b>	<b>—</b>	<b>(86,969)</b>	<b>3,983,862</b>

The yearly increase under “Technical facilities and machinery” is primarily attributed to equipment actions and replacements at the Gaviota and Yela underground storage facilities, amounting to 4,064 thousands of euros. Other contributions include modifications to the K-01 Spain-Morocco connection point and transmission activity measures totalling 2,187 thousands of euros, adaptations and improvements to the loading, vaporisation, and tank facilities at the Barcelona, Huelva, and Musel plants for 1,522 thousands of euros, and the purchase of a motor compressor unit

and equipment at the Coreses, Almendralejo, and Bañeras compressor stations, amounting to 876 thousands of euros.

The increase in “Other facilities, tools and furniture” is primarily due to the extension of the term for various lease contracts under IFRS 16. This resulted in a rise in right-of-use assets totalling 34,731 thousands of euros ([Note 2.4.b](#)). This increase also reflects the acquisition of computer equipment for the enhancement of IT Infrastructure, amounting to 1,540 thousands of euros.



Most of the increases in “Prepayments and work in progress” are linked to several projects and updates. These include the Canary Islands LNG Ship project by Scale Gas Solutions, S.L., costing 19,988 thousands of euros, and updates at the Regasification Plants in Barcelona, Huelva, and Cartagena – such as replacing unloading arms and electricity generation equipment – totalling 9,265 thousands of euros. Investment in ecological cooling recovery is highlighted by the BCN-Veolia project to utilise LNG energy from Efficiency for LNG applications S.L., valued at 7,996 thousands of euros. Transmission-related activities, including creating or modifying positions of ERMs and enhancing the integration of the Reganosa Gas Pipeline network, amount to 7,341 thousands of euros. Additionally, there is the purchase of compression units and equipment updates at the Gaviota and Yela Underground Storage facilities for 5,548 thousands of euros, along with the Avatar fibre laying project for securing communications within the Basic Gas Pipeline Network, costing 4,479 thousands of euros. The overhaul of unloading arms at the Barcelona, Huelva, and Cartagena Regasification Plants is valued at 3,295 thousands of euros. Lastly, there is the H2Med Barcelona - Marseille Green Energy Corridor project, including studies and preliminary work on the Hydrogen Trunk Infrastructure and the H2Med Celorico-Zamora Green Energy Corridor, totalling 2,318 thousands of euros.

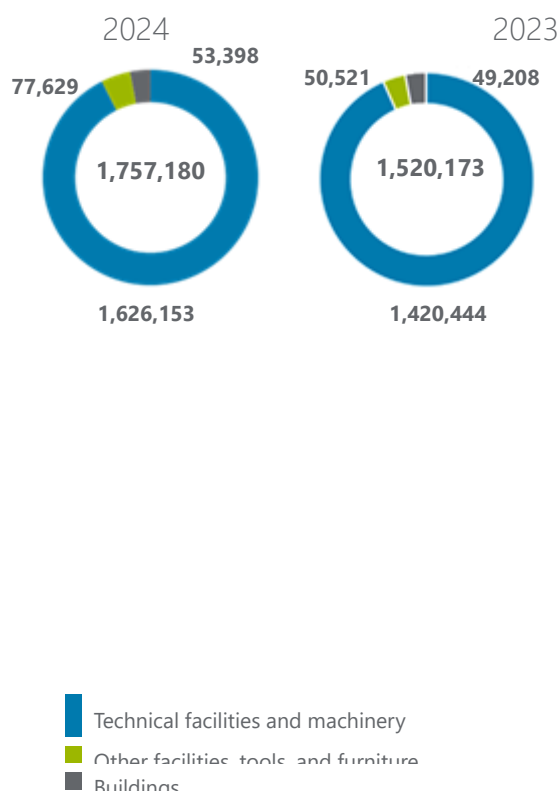
The key transfers recorded under “Technical facilities and machinery” include the overhaul and replacement of offloading arms, electrical generation equipment, and renovations and adaptations at the Barcelona, Huelva, and Cartagena Regasification Terminals, amounting to 28,017 thousands of euros, the volume converters, chromatograph renovations, adjustments to private security regulations, and works in the RMS (regulating and metering stations) and Compressor Stations, totalling 5,980 thousands of euros, electricity generation equipment, renovation, and capacity at the Gaviota, Yela, and Serrablo underground storage facilities, which amounts to 5,003 thousands of euros, the modification of the Pos.K-01 Spain-Morocco Reverse Flow Tariff, the Rio Caudal variant of the León-Oviedo Gas Pipeline, and the integration of Reganosa Gas Pipelines, totalling 3,086 thousands of euros.

The most significant disposals relate to the disposal of investment material and pipes amounting to 8,395 thousands of euros.

There are no mortgages or encumbrances of any type on assets recorded as property, plant, and equipment.

The Group’s policy is to provide sufficient insurance coverage for its assets so as to avoid any significant losses. In addition, the Group has contracted the corresponding insurance policies to cover third party civil liabilities.

Fully amortised PP&E assets recognised by the Enagás Group and still in use at 2024 and 2023 year-end are broken down as follows:



## a) Subsidies

Accumulated capital grants received at year-end which correspond to investments in gas infrastructure are broken down as follows:

	Grants received	Released to income	Balance at year-end
Regasification plants	81,365	(78,625)	2,740
Gas transmission infrastructure	483,971	(361,787)	122,184
Underground storage facilities	37,741	(37,667)	74
Other items of property, plant and equipment	1,090	—	1,090
<b>2024</b>	<b>604,167</b>	<b>(478,079)</b>	<b>126,088</b>
Regasification plants	81,365	(78,470)	2,895
Gas transmission infrastructure	483,843	(353,030)	130,813
Underground storage facilities	37,725	(37,638)	87
Other items of property, plant and equipment	440	—	440
<b>2023</b>	<b>603,373</b>	<b>(469,138)</b>	<b>134,235</b>



The breakdown at year-end of said capital grants by public body which grants them is as follows:

	Grants received	Released to income	Balance at year-end
Structural funds of the European Union	437,448	(333,646)	103,802
Official bodies of the Spanish Autonomous Communities	51,905	(38,520)	13,385
Spanish Government	114,814	(105,913)	8,901
2024	604,167	(478,079)	126,088
Structural funds of the European Union	437,337	(326,713)	110,624
Official bodies of the Spanish Autonomous Communities	51,905	(37,456)	14,449
Spanish Government	114,131	(104,969)	9,162
2023	603,373	(469,138)	134,235

The breakdown by timing criteria of the balance pending application at December 31, 2024 is as follows:

	years		
	<1	2 to 5	>5
Government grants	6,740	33,680	63,382
Autonomous Regions grants	946	4,718	7,721
FEDER grants	919	4,443	3,539
Total grants	8,605	42,841	74,642



## b) Supplementary information on IFRS 16

The activity during the 2024 and 2023 financial years in rights of use by category included under "Property, plant and equipment" was as follows:

	Balance at 12.31.2023	Additions (1)	Disposals (1)	Amortisation	Write-offs	Balance at 12.31.2024
Land and natural assets	142,953	1,262	(2,770)	(8,315)	19	133,149
Buildings	22,069	464	(939)	(3,892)	1,254	18,956
Technical facilities	177,694	953	(33)	(9,918)	—	168,696
Machinery	254	403	(249)	(181)	46	273
Furniture	194	12	(72)	(74)	72	132
Transport equipment	9,953	34,719	(1,019)	(7,921)	572	36,304
<b>Total</b>	<b>353,117</b>	<b>37,813</b>	<b>(5,082)</b>	<b>(30,301)</b>	<b>1,963</b>	<b>357,510</b>

(1) The additions and disposals recorded in the year 2024 are mainly due to updates of the maturities of various lease agreements, as well as respective CPI updates.

	Balance at 12.31.2022	Additions (1)	Disposals (1)	Amortisation	Write-offs	Balance at 12.31.2023
Land and natural assets	155,327	1,037	(4,676)	(8,747)	12	142,953
Buildings	12,823	13,120	—	(3,874)	—	22,069
Technical facilities	189,283	9,165	(12,319)	(8,435)	—	177,694
Machinery	488	24	(29)	(258)	29	254
Furniture	276	—	(23)	(66)	7	194
Transport equipment	15,338	1,606	(2,350)	(6,671)	2,030	9,953
<b>Total</b>	<b>373,535</b>	<b>24,952</b>	<b>(19,397)</b>	<b>(28,051)</b>	<b>2,078</b>	<b>353,117</b>

Likewise, the maturity of financial liabilities for IFRS 16 leases is as follows:

Maturity	12.31.2024	12.31.2023
Up to 3 months	9,573	9,334
Between 3 and 12 months	29,460	28,342
Between 12 months and 5 years	146,394	122,285
More than 5 years	296,941	322,483
<b>Total without deduction</b>	<b>482,368</b>	<b>482,444</b>
Updating effect	(97,239)	(103,429)
<b>Total Debt IFRS 16 Leases (Note 3.4b)</b>	<b>385,129</b>	<b>379,015</b>



## 2.5 Intangible assets

### Accounting policies

#### Goodwill and business combinations

- The acquisition of control of a subsidiary by the parent constitutes a business combination, which is recognised using the acquisition method.
- Goodwill or negative goodwill arising on the combination is calculated as the difference between the fair value of the assets acquired and liabilities assumed which meet the relevant recognition criteria and the cost of the business combination, all measured at the acquisition date.
- Goodwill that arises upon acquisition of companies whose functional currency is not the euro is recognised in the functional currency of the acquired company, translating to euros at the exchange rate prevailing at the balance sheet date.
- Goodwill is not amortised and is subsequently measured at cost less any impairment losses. Goodwill impairment losses are not reversed in subsequent periods.

#### Other intangible assets

- Development costs are capitalised by amortising on a straight-line basis over the corresponding useful life, provided they are specifically itemised by project, their amounts can be clearly established, and technical success and economic and commercial feasibility of the project are reasonably assured.

- The Group recognises all research expenses in the Consolidated Income Statement, including those development costs for which technical and commercial viability cannot be established. The amount recognised in the accompanying consolidated income statement in connection with research expenses totals 1,277 thousands of euros for 2024 (885 thousands of euros in 2023) ([Note 2.1.c](#)).
- Concessions can only be included under assets when acquired for consideration separately by the Company and corresponding to concessions that can be transferred, or in the amount of expenses incurred to acquire them directly from the corresponding State or Public Authority. Should circumstances involving non-compliance with stipulated conditions arise which lead to the loss of rights related to a concession, the corresponding carrying amount for the concession will be written down in order to cancel the net value. These concessions are amortised on the basis of their useful lives.
- Acquisition and development costs incurred with respect to basic IT systems used for management are recognised with a charge to "Intangible assets" in the Consolidated Balance Sheet. Maintenance costs of IT systems are recognised in the Consolidated Income Statement for the year in which they are incurred. They are measured at the amount disbursed for ownership or right-of-use of the IT programs, as well as their production cost if they are developed by the Group.

### Significant estimates and judgements

- Amortisation of intangible assets is carried out on a straight-line basis in accordance with the following useful lives:

	Annual rate	Useful life (years)
IT applications	10%-25%	10 - 4
Development costs	5%-50%	20 - 2
Port concessions	1.28%-7.6%	78 - 13



2024	Opening balance	Additions or allocations <sup>(2)</sup>	Increases or decreases due to transfers	Decreases, disposals or reductions	Balance at year-end
Goodwill <sup>(1)</sup>	17,521	—	—	—	17,521
Other intangible assets					
Development	9,552	346	—	(193)	9,705
Concessions	5,871	—	—	—	5,871
IT applications	315,733	16,001	—	(127)	331,607
Other intangible assets	8,802	—	—	—	8,802
<b>Total cost</b>	<b>357,479</b>	<b>16,347</b>	<b>—</b>	<b>(320)</b>	<b>373,506</b>
Other intangible assets					
Development	(7,336)	(471)	—	—	(7,807)
Concessions	(4,256)	(49)	—	—	(4,305)
IT applications	(254,185)	(18,893)	—	—	(273,078)
Other intangible assets	(7,836)	—	—	—	(7,836)
<b>Total amortisation</b>	<b>(273,613)</b>	<b>(19,413)</b>	<b>—</b>	<b>—</b>	<b>(293,026)</b>
Goodwill (1)	—	—	—	—	—
Other intangible assets	—	—	—	—	—
<b>Total impairment</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>
<b>Total Goodwill</b>	<b>17,521</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>17,521</b>
<b>Total Other intangible assets</b>	<b>66,345</b>	<b>(3,066)</b>	<b>—</b>	<b>(320)</b>	<b>62,959</b>
<b>Net carrying amount of intangible assets</b>	<b>83,866</b>	<b>(3,066)</b>	<b>—</b>	<b>(320)</b>	<b>80,480</b>

(1) Corresponds to the goodwill arising on the acquisition of ETN.

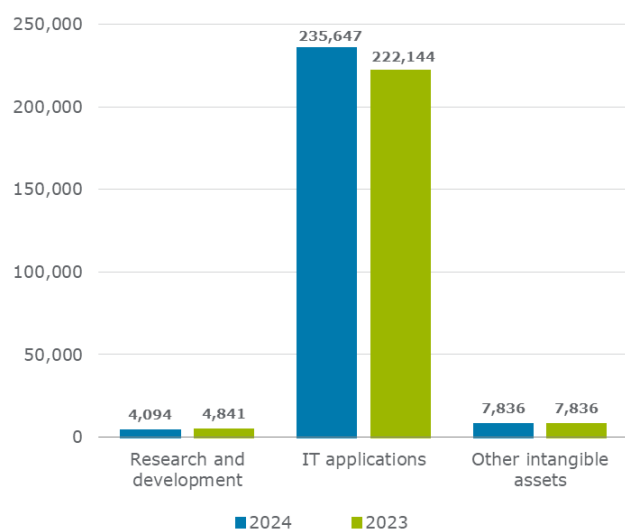
(2) The key additions for the year include software investments in upgrading the gas metering process, IT infrastructure updates, cybersecurity, and automation of processes in regasification and gas transmission, totalling 7,697 thousands of euros. These also cover adjustments to comply with gas system billing regulations and slot auction management, amounting to 3,891 thousands of euros, as well as budget, forecast, and financial projection initiatives costing 1,050 thousands of euros. The implementation of the SCADA Monarch system and enhancements to technological security SL-ATR account for a further 1,027 thousands of euros.

2023	Opening balance	Additions or allocations <sup>(2)</sup>	Increases or decreases due to transfers	Decreases, disposals or reductions	Balance at year-end
Goodwill (1)	17,521	—	—	—	17,521
Other intangible assets					
Development	9,157	395	—	—	9,552
Concessions	5,871	—	—	—	5,871
IT applications	298,178	17,471	84	—	315,733
Other intangible assets	8,253	633	(84)	—	8,802
<b>Total cost</b>	<b>338,980</b>	<b>18,499</b>	<b>—</b>	<b>—</b>	<b>357,479</b>
Other intangible assets					
Development	(6,906)	(430)	—	—	(7,336)
Concessions	(4,207)	(49)	—	—	(4,256)
IT applications	(236,862)	(17,323)	—	—	(254,185)
Other intangible assets	(7,836)	—	—	—	(7,836)
<b>Total amortisation</b>	<b>(255,811)</b>	<b>(17,802)</b>	<b>—</b>	<b>—</b>	<b>(273,613)</b>
Goodwill (1)	—	—	—	—	—
Other intangible assets	—	—	—	—	—
<b>Total impairment</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>
<b>Total Goodwill</b>	<b>17,521</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>17,521</b>
<b>Total Other intangible assets</b>	<b>65,648</b>	<b>697</b>	<b>—</b>	<b>—</b>	<b>66,345</b>
<b>Net carrying amount of intangible assets</b>	<b>83,169</b>	<b>697</b>	<b>—</b>	<b>—</b>	<b>83,866</b>



## Fully amortised elements

Fully amortised intangible assets recognised by the Enagás Group and still in use at 2024 and 2023 year-end are detailed as follows:





## 2.6 Non-current assets held for sale

### Accounting policies

- An entity classifies a non-current asset (or disposal group) as held for sale if its carrying amount will be recovered through a sale transaction rather than through continuing use.
- For the classification, the asset (or disposal group) must be available for immediate sale in its present condition, which is expected to be completed within one year from the date of classification, with the period being extended if the delay is caused by events and circumstances beyond the company's control and there is sufficient evidence of commitment to the sale plan and a reasonable price is negotiated than Management can consider acceptable.

Consequently, as of June 30, 2024, the shareholding held by the Enagás Group, valued at 12.5 million euros, was reclassified as Non-Current Assets Held for Sale, pending the completion of the transaction which is subject to the usual conditions precedent for such deals. No valuation adjustment was required in the consolidated income statement for this transaction.

### Significant estimates and judgements

- Classification in this category involves the application of judgement to determine whether the asset (or disposal group) meets the above requirements by performing a detailed analysis of the particular facts and circumstances of each transaction.

#### Land by the A-6

As of December 31, following the conditions of a sales plan, the land located at km 18 of the A-6 has been reclassified from "Investment properties" to the current section, with a net value of 17,400 thousands of euros.

In the financial year 2024, the valuation report performed by the independent expert, Jones Lang Lasalle España S.A., has amounted to 17,400 thousands of euros. It is worth noting that the report of this independent expert did not include any scope limitations with respect to the conclusions reached.

Also, there are no mortgages or encumbrances of any type on assets recorded as property, plant, and equipment. In addition, it is Group policy to insure its assets so that no significant losses on equity may occur, based on the best market practices and taking into account the nature and characteristics of the investment properties. Therefore, the Group has contracted the corresponding insurance policies to cover third party civil liabilities.

#### E.C. Soto de la Marina, S.A.PI.

On June 26, 2024, the Enagás Group agreed to sell its entire 50% investment in the Estación de Compresión Soto de la Marina, S.A.PI to the company owning the remaining 50%, for approximately 15 million dollars.



## 2.7 Impairment of non-financial assets

### Accounting policies

- With respect to goodwill, at the closing of each year, or more frequently if certain circumstances or changes arise which indicate that the net value of said goodwill may not be entirely recoverable, and when there are indications of impairment losses on the remaining non-current assets, the Company analyses the corresponding recoverable amounts to determine the possibility of impairment.
- The potential impairment loss is determined by assessing the recoverable amount of the cash-generating unit (or group of cash-generating units) to which the goodwill relates at the time it arises.
- The period used by the Enagás Group to determine the projected cash flows of the cash-generating units corresponds to the period in which the asset accrues revenue associated with the investment (Appendix III). At the closing of this period, the Enagás Group considers residual values based on the cash flows of the last period with a growth rate equal to zero.

### Significant estimates and judgements

- Determination of impairment losses on non-current assets other than financial assets is based on fulfilment of a series of hypotheses which are described below in this note and are revised annually. The Group identifies its operating segments based on internal reports relating to the companies comprising the Group which are regularly reviewed, discussed, and evaluated in the decision-making process, as indicated in [Note 4.7](#).
- The Group considers the lowest level of grouped assets that can generate independent cash flows as a cash generating unit (CGU).
- The CGUs identified by the Enagás Group in 2024 are shown below:
- The infrastructure activities in Spain encompass transmission, regasification and storage.
- The operations of the Technical System Manager.
- In addition, as explained in Note 1.6, for investments accounted for by the equity method, each associate or joint venture is considered as a CGU.
- The goodwill presented in the balance sheet is allocated to the Infrastructure Activity CGU in Spain.
- To estimate value in use, the Enagás Group prepares forecasts regarding future cash flows after taxes based on the most recent budget approved by the Directors. The best estimates available for income, costs, investment and dividends (in the case of investments accounted for using the equity method) relating to CGUs are used for said forecasts, making use of past experience, sector forecasts, and future expectations, in accordance with the prevailing regulatory framework and corresponding contracts.
- With regard to infrastructure activities, in continuation of the impairment methodology applied in previous years, the best estimate of revenue items is used, calculated on the basis of the changes in the parameters taken into account in the current remuneration framework. This criterion is in line with that used in the economic and financial projections included in the strategic update of the Enagás Group.
- Therefore, in order to determine the residual value, in application of standard market methodological practices, it is assumed that the flows of the last year analysed will be normalised (taking as a reference base the projection of the main variables of the current remuneration framework at both the revenue level - financial/ amortisation/REVU/OpEx - and the expense level - OpEx and amortisation) without applying any adjustment and assuming a growth rate equal to zero.
- The last period considered for projections is the one corresponding to the year in which the regulatory useful life ends, based on the age of the facilities at the time.



- With respect to the activities corresponding to Technical Management of the System, residual values were calculated based on the cash flows of the last financial year, using a zero growth rate and no normalisation adjustments. This is due to the fact that, as indicated in Appendix III, revenue corresponding to this activity is meant to settle the obligations of Enagás GTS, S.A.U. as Technical Manager of the System. This is calculated according to the applicable remuneration methodology for the 2021-2023 and 2024-2026 regulatory periods (Note 2.1). For the last period, the same criteria were applied as those used for infrastructure activity, under the understanding that while the gas infrastructure is operational and there is demand for gas, technical management of the gas system will continue.
- As mentioned in Note 2.1 and developed in Appendix III, on January 1, 2021, the new regulatory and remuneration framework came into force with the publication of Circulars 9/2019 of December 12, 2019 and 8/2020 of December 23, 2020 and Royal Decree 1184/2020 of December 29, 2020.
- The modifications in the remuneration model incorporated in these have been taken into account in the calculation of the projected flows from January 1, 2021.
- The Directors consider that their projections are reliable and that past experience, taken together with the nature of the business, make it possible to predict cash flows for the periods under consideration.
- The most representative hypotheses used in the projections, based on business forecasts and past experience, are the following:
  - Operating and maintenance costs were estimated considering the prevailing operation and maintenance contracts, as well as remaining estimated costs based on sector knowledge and past experience. The projections made were consistent with the growth expected as a result of the investment plan.
  - Other revenue and costs were projected based on sector knowledge, past experience, consistent with the growth expected as a result of the investment plan.
  - Future dividends have been projected based on the company's knowledge, past experience and activity in free cash flows.
  - In addition, lease liabilities have not been taken into account in the value in use of the CGU or in its carrying amount.
- In order to calculate present value, projected future cash flows are discounted at an after-tax rate which reflects the weighted average cost of capital (WACC) corresponding to the business and the geographical area in which the business is carried out. For its calculation, the time value of money is taken into consideration together with the risk-free rate and risk premiums generally used by analysts of the business and geographic area in question. The risk-free rate corresponds to the sovereign bonds issued by each country in the corresponding market, with sufficient depth and solvency. However, associated country risk is also taken into consideration for each geographical area. The risk premium of the asset corresponds to the risks specific to the asset, calculated taking into consideration the estimated betas in accordance with the selection of comparable businesses dedicating themselves to a similar main activity.
- Regulated remuneration was estimated in accordance with the remuneration approved by CNMC Circulars and RD 1184/2020 for the years in which it is available, while for subsequent years the same updating mechanisms established by law have been used and a better estimate has been made for the costs paid based on audited costs.
- Investment: the best available information on investment plans for assets and maintenance of infrastructures and systems has been used, based on the one hand on the history of investment in maintenance and systems and, on the other, in new projects that are highly likely to be executed in accordance with the work in progress being developed with the Ministry and the CNMC.
- In addition, lease liabilities have not been taken into account in the value in use of the CGU or in its carrying amount. The after-tax discount rate for regulated activities in Spain will be between 5.0% and 7.0% in 2024 (between 5.0% and 7.0% in 2023), while the pre-tax rate will be between 6.2% and 8.0% in 2024 (between 6.7% and 9.3% in 2023).
- Considering that all the CGUs have been operating normally during 2024, the sensitivity analysis of the discount rate has been performed using a range of +0.5% and -0.5%. No significant associated risks have arisen from this analysis. Thus, the Group management considers that, within the specified ranges, there would be no changes in the impairment calculation.



## 2.8 Other non-current liabilities

The heading "Other current liabilities" includes mainly liabilities from customer contracts, in accordance with IFRS 15, the breakdown and changes of which are shown below:

Other non-current liabilities	Connections to the gas basic network	Others	Total
<b>Balance at December 31, 2022</b>	<b>35,485</b>	<b>213</b>	<b>35,698</b>
Additions	697	—	697
Reclassifications	210	(6)	204
Recognised in profit and loss	(485)	—	(485)
<b>Balance at December 31, 2023</b>	<b>35,907</b>	<b>207</b>	<b>36,114</b>
Additions	1,787	—	1,787
Reclassifications	(5)	50	45
Recognised in profit and loss	(383)	—	(383)
<b>Balance at 12/31/24</b>	<b>37,306</b>	<b>257</b>	<b>37,563</b>
Of which:			
Liabilities from long-term customer contracts	37,306	—	37,306
Other non-current liabilities	—	257	257

At December 31, 2024, the heading "Liabilities from customer contracts" includes performance obligations pending execution with an estimated term of more than one year, amounting to 5,083 thousands of euros (2,017 thousands of euros at December 31, 2023).

At December 31, 2024, the Enagás Group had no refund or reimbursement rights associated with contracts with customers.



## 2.9 Provisions and contingent liabilities

### Significant estimates and judgements

- The Consolidated Annual Accounts include all significant provisions when the Group considers that it will more likely than not have to settle the related obligations. Contingent liabilities are not recognised in the Consolidated Annual Accounts, but rather are disclosed, unless the possibility of an outflow of resources embodying economic benefits is considered remote.
- Provisions, which are quantified taking into consideration the best available evidence on implications of obligating events and that are re-estimated at each balance sheet date, are used to cover the specific obligations for which they were originally recognised and are partially or fully reversed when said obligations decrease or cease to exist.
- The compensation to be received from a third party when an obligation is settled is recognised as an asset, provided it is certain that reimbursement will be received, unless there is a legal relationship whereby a portion of risk has been externalised as a result of which the Group is not liable, in which case, reimbursement will be taken into consideration in estimating the amount of any provisions.
- The policy followed with respect to the recognition of provisions for risks and expenses is to recognise the estimated amount required to settle probable or certain liabilities arising from litigation underway, pending indemnities or liabilities, sureties and similar guarantees. They are recognised upon emergence of the liability or obligation determining the indemnity or payment.
- At year-end 2024 and 2023, several legal proceedings were underway against business groups in connection with matters relating to the normal course of their activities. The Group's legal advisors and Directors consider that the final outcome of these proceedings and claims will not have a significant effect on its future Consolidated Annual Accounts.
- Dismantling provisions are subject to periodic review, in order to monitor possible changes in any of the assumptions used, assuming in that case the corresponding change in book value, applied prospectively.

### a) Provisions

The movements during the period under the heading "Non-current provisions" and "Current provisions" were as follows:

Current and non-current provisions	Opening balance	Additions and provisions	Updates	Exchange rate differences	Reclassifications	Disposals and Applications	Balance at year-end
Personnel remuneration	4,869	3,080	—	3	(6,818)	(253)	881
Other long-term provisions	6,268	1,064	—	—	—	—	7,332
Dismantling	230,579	—	7,046	—	—	—	237,625
<b>Total non-current provisions</b>	<b>241,716</b>	<b>4,144</b>	<b>7,046</b>	<b>3</b>	<b>(6,818)</b>	<b>(253)</b>	<b>245,838</b>
Other short-term provisions	4,755	2,261	—	301	—	(25)	7,292
<b>Total current provisions</b>	<b>4,755</b>	<b>2,261</b>	<b>—</b>	<b>301</b>	<b>—</b>	<b>(25)</b>	<b>7,292</b>
<b>Total current and non-current provisions</b>	<b>246,471</b>	<b>6,405</b>	<b>7,046</b>	<b>304</b>	<b>(6,818)</b>	<b>(278)</b>	<b>253,130</b>

The dismantling provisions correspond to the underground storage facilities of Gaviota, Yela, and Serrablo, as well as the regasification plants of Barcelona, Cartagena, Huelva, and El Musel (Gijón) in accordance with the prevailing regulatory framework ([Note 2.4](#)).

These provisions have been updated in the periods following its incorporation, applying a discount rate before taxes that reflects the current assessments that the market is making of the temporal value of money, and those specific risks related to the actual obligation subject provision.

In addition, dismantling provisions are subject to periodic review, in order to monitor possible changes in any of the assumptions used, assuming in that case the corresponding change in book value, applied prospectively.

The only significant movement in 2024 was an increase in the dismantling provision due to the effect of the financial restatement, which has resulted in an amount of 7,046 thousands of euros, which has been recorded as a financial expense (2,107 thousands of euros at December 31, 2023).

Lastly, the Group has proceeded to perform the corresponding sensitivity analyses, showing that a change in the discount rate of 5 basis points and a variation in estimated dismantling provisions of 2.5%, would result in a change in the amount recognised for the provision of (3.31%)-3.12%.

"Personnel remuneration" includes the accrued cash portion of the Long-Term Incentive Plan ("ILP") for the Executive Director and senior management ([Note 4.4](#)) as well as the bonus payable every three years for contribution to results aimed at the



remaining personnel of the Group, payable on 2025. This amount has been reclassified to short-term payables.

"Other long-term liabilities" include, among others, a provision that has its origin in the disputed tax assessments due to the non-acceptance of part of the deduction for technological innovation (TI) applied in the 2012-2015 financial years in the amount of 5.9 million euros (this amount includes the fee and interest on arrears) ([Note 4.2](#)).

The Directors of the Company consider that the provisions recognised in the accompanying Consolidated Balance Sheet for litigation and arbitration risk as well as other risks described in this note are adequate and, in this respect, they do not expect any additional liabilities to arise other than those already recorded. Given the nature of the risks covered by these provisions, it is not possible to determine a reasonably reliable schedule of payment dates, if any.

## b) Assets and contingent liabilities

At December 31, 2024, the Enagás Group has a contingent liability amounting to 2 million euros further to those indicated in [Note 3.3.a](#) in relation to the GSP project in Peru, as well as in [Note 4.2](#).

There are no additional contingent assets beyond those detailed in [Note 3.3.a](#) concerning the award related to the investment in GSP.



# 3. CAPITAL STRUCTURE, FINANCING AND FINANCIAL RESULT

Relevant aspects



## Relevant aspects

### Financial leverage

- Financial leverage at December 31, 2024 amounted to 51.0% (53.0% in 2023) ([Note 3.7](#)).
- On July 19, 2024, the credit rating agency Fitch Ratings upgraded Enagás to BBB+, with a stable outlook. On July 31, 2024, the credit rating agency Standard & Poor's placed Enagás' credit rating at BBB+, with a stable outlook ([Note 3.7](#)).

### Equity

- At December 31, 2024, equity has increased by 20% compared to the previous year, to a total of 2,392 million euros.
- The share price of the parent company, Enagás, S.A. recognised at December 31, 2024 amounted to 11.78 euros.

### Net financial debt

- Net financial debt is the main indicator used by Management to measure the Group's debt level. At December 31, 2024 net financial debt amounted to 2,404 million euros (3,347 million euros at December 31, 2023) ([Note 3.4.a](#)).
- The average annual interest rate during 2024 for the Group's gross financial debt amounted to 2.6% (2.6% in 2023). ([Note 3.4.a](#)).
- The percentage of fixed rate net financial debt at December 31, 2024 and December 31, 2023 amounted to more than 80%, with the average maturity period of the debt at December 31, 2024 being 4.8 (3.9 years at December 31, 2023) ([Note 3.4.a](#)).

### Available funds

- The Group has available funds in the amount of 3,252 million euros at December 31, 2024 (3,309 million euros in 2023) ([Note 3.8.b](#)).

### Net Financial Gain/(Loss)

- Total financial expenses went from 128 million euros in 2023 to 120 million euros in 2024 ([Note 3.5](#)). Financial income and similar increased from 46 million euros in 2023 to 63 million euros in 2024 ([Note 3.5](#)). As of December 31, 2024, this section reflects the impact of the TGE transaction detailed in [Note 1.6](#) and the resolution of the GSP arbitration, as described in [Note 3.3](#).

### Derivative financial instruments

- At December 31, 2024, the fair value of the Group's derivatives was 22 million euros of liabilities (9 million euros of liabilities at December 31, 2023) ([Note 3.6](#)). This amounts corresponds in its entirety to a net investment hedge.

### Gasoducto Sur Peruano, S.A. ("GSP")

- On December 20, 2024, an arbitration award was communicated to Enagás in relation to the situation of the investment in GSP. The dispute between the Peruvian State and Enagás arose as a result of the termination of the Concession Contract on January 24, 2017 in connection with the application of the investment recovery mechanism established in the aforementioned contract. In this regard, an international arbitration was initiated in 2018 under the Agreement for the Promotion and Reciprocal Protection of Investments (hereinafter, APPRI) Spain-Peru, detailed in ([Note 3.3.a](#)), and submitted to the International Centre for Settlement of Investment Disputes (hereinafter ICSID).
- This award considers that the Republic of Peru has violated its obligations under Articles 4.1 and 5 of the Peru-Spain APPRI. Consequently, Peru is ordered to pay Enagás 176 million dollars, plus annual interest of 1.44%, calculated on a simple basis from January 24, 2018 up to the date of the award, and capitalised semi-annually from then until the compensation is actually paid. This results in a total of 194 million euros, in addition to covering 75% of the legal costs.
- Regarding the restriction on repatriating TGP's dividends, the award states "that the inclusion of Enagás Internacional in Category 2 under Law No. 30737, along with any asset restriction measures (e.g., establishment of the Guarantee Trust) and constraints on the rights to transfer resources abroad due to this classification under Law No. 30737 and its Regulations, also amounts to a breach of Article 4.1 of the APPRI".
- Nonetheless, the arbitration filed with ICSID seeking the lifting of restrictions on transferring dividends abroad from the investment in TGP is proceeding as normal. Following the start of direct negotiations with the Peruvian State on February 24, 2021, a request to commence arbitration proceedings with ICSID under the Spain-Peru APPRI was filed on December 23, 2021 ([Note 3.3.a](#)). Enagás and the Peruvian State submitted several Statements, and after the hearings held on October 28, 2024 and the corresponding presentation of written pleadings on December 18, 2024, it is expected that the Court will issue its decision in 2025.
- As of December 31, 2024, taking into account the fair value of the investment in GSP as recognised by ICSID, the value of the financial investment stands at 159,670 thousands of euros (456,779 thousands of euros at December 31, 2023). This resulted in a total gross negative impact of 326,034 thousands of euros recorded in the consolidated income statement for 2024.



## 3.1 Equity

### a) Share capital

At both 2024 and 2023 year-end the share capital of Enagás S.A. amounted to 392,985 thousands of euros, represented by 261,990,074 shares with a face value of 1.5 euros each, fully subscribed, and paid in.

All shares of the parent company Enagás, S.A. are listed on the four official Spanish Stock Exchanges and are traded on the continuous market. At the closing of December 31, 2024 the quoted share price was 11.78 euros, having reached a maximum of 15.88 euros per share on January 12, 2024.

It is worth noting that, subsequent to publication of Additional Provision 31 of Hydrocarbon Sector Law 34/1998, in force since enactment of Law 12/2011, of May 27, "no natural or legal person can participate directly or indirectly in the shareholder structure of Enagás, S.A. with a stake exceeding 5% of share capital, nor exercise political rights in said parent company exceeding 3%. These shares cannot be syndicated under any circumstances." Furthermore, "any party operating within the gas sector, including natural persons or legal entities that directly or indirectly own equity holdings in the former of more than 5%, may not exercise voting rights over 1%". These restrictions shall not apply to direct or indirect interests held by public-sector enterprises.

At December 31, 2024 and 2023 the most significant shareholdings in the share capital of Enagás, S.A. were as follows (from the information published by the National Securities Market Commission (CNMV in Spanish) <sup>(1)</sup> at December 31, 2024):

Company	Investment in share capital (%)	
	12.31.2024	12.31.2023
Sociedad Estatal de Participaciones Industriales	5.000	5.000
Partler 2006 S.L.	5.000	5.000
Bank of America Corporation	3.614	3.614
BlackRock Inc.	4.800	5.422
Mubadala Investment Company PJSC	0.000	3.103
Millennium Group Management LLC	2.148	0.000

(1) Information extracted by the CNMV, obtained at the last notification that each subject obliged to notify sent to the organisation in relation to the provisions of Royal Decree 1362/2007 of October 19 and Circular 2/2007 of December 19.

### b) Issue premium

At December 31, 2024 and 2023 the Parent Company's issue premium amounted to 465,116 thousands of euros.

The Consolidated Text of the Corporate Enterprises Act expressly permits the use of the issue premium account balance to increase capital and does not establish any specific restrictions as to its use.

### c) Treasury shares

At December 31, 2024, once the process for delivering and acquiring treasury shares has been completed, Enagás, S.A.'s treasury shares amounted to 866,271, representing 0.3% of the total shares issued by Enagás, S.A. at December 31, 2024. This acquisition took place within the framework of the "Temporary Treasury Share Buy-Back Scheme", whose exclusive aim was to meet the obligations of delivering shares to the Executive Director and members of the Enagás Group management team under the current remuneration scheme according to the terms and conditions of the 2022-2024 Long-Term Incentive Plan (ILP) and the Remuneration Policy approved at the General Shareholders' Meeting held on March 31, 2022. In addition, in 2024, the "Temporary Share Buy-back Programme" was extended to meet obligations from the Parent Company's flexible remuneration plan, which involves delivering shares to employees and senior managers at Enagás, S.A. and its Group companies.

The shares were purchased in compliance with the conditions set out in Article 5 of Regulation EC/2273/2003 and subject to the terms authorised at the General Shareholders' Meeting held on March 31, 2022. Management of the Temporary Treasury Share Buy-Back Scheme was entrusted to Banco Bilbao Vizcaya Argentaria (BBVA), which carried out the transaction on behalf of Enagás, S.A. independently and without exercising influence on the process (Note 4.4).

During the period from January 1, 2024 to December 31, 2024, the following movements in treasury shares have taken place:

No. of shares as at January 1, 2024	No. of shares acquired new target	No. of shares implemented for the target	No. of shares as at December 31, 2024
723,579	416,522	(273,830)	866,271

### d) Reserves

The Corporate Enterprises Act stipulates that 10% of profit for the year must be transferred to the legal reserve until it represents at least 20% of share capital. At 2024 and 2023 year-end, the legal reserve was fully allocated and totalled 78,597 thousands of euros.

The legal reserve can be used to increase capital by the amount exceeding 10% of the new capital after the increase. Except for this purpose, until the legal reserve exceeds the limit of 20% of capital, it can only be used to compensate losses provided there are no other reserves available.



## e) Income and expenses recognised directly in equity

	Opening balance	Change in value	Recognised in profit and loss	Balance at year-end
<b>2024</b>				
Cash flow hedges	(5,255)	7,742	(2,706)	(219)
Tax recognised in equity	1,321	(1,936)	677	62
Translation differences	(147,155)	24,491	10,450	(112,214)
Fully-consolidated companies	(151,089)	30,297	8,421	(112,371)
Cash flow hedges	47,975	1,742	(14,195)	35,522
Tax recognised in equity	(7,374)	(261)	1,685	(5,950)
Translation differences	131,795	82,930	—	214,725
Companies accounted for using the equity method	172,396	84,411	(12,510)	244,297
Cash flow hedges	2,609	—	—	2,609
Tax recognised in equity	(783)	—	—	(783)
Translation differences	(9,981)	—	(52,462)	(62,443)
Non-current Assets Held for Sale	(8,155)	—	(52,462)	(60,617)
Assets at fair value with changes in Other Comprehensive Income	2,379	(3,286)	—	(907)
<b>Total</b>	<b>15,531</b>	<b>111,422</b>	<b>(56,551)</b>	<b>70,402</b>
<b>2023</b>				
Cash flow hedges	(8,318)	2,480	583	(5,255)
Tax recognised in equity	2,087	(620)	(146)	1,321
Translation differences	(130,243)	(16,912)	—	(147,155)
Fully-consolidated companies	(136,474)	(15,052)	437	(151,089)
Cash flow hedges	73,220	(13,016)	(12,229)	47,975
Tax recognised in equity	(10,350)	1,522	1,454	(7,374)
Translation differences	203,646	(71,851)	—	131,795
Companies accounted for using the equity method	266,516	(83,345)	(10,775)	172,396
Cash flow hedges	—	—	2,609	2,609
Tax recognised in equity	—	—	(783)	(783)
Translation differences	(7,024)	(901)	(2,056)	(9,981)
Non-current Assets Held for Sale	(7,024)	(901)	(230)	(8,155)
Assets at fair value with changes in Other Comprehensive Income	2,786	(407)	—	2,379
<b>Total</b>	<b>125,804</b>	<b>(99,705)</b>	<b>(10,568)</b>	<b>15,531</b>

## 3.2 Result and variation in minority interests

### Accounting policies

- Minority interests are those that can be attributed to shareholders who have no control over the subsidiary.
- Such control is transferred when ownership of the shares gives the holder the risks and rewards associated with ownership and access to the returns associated with its interest.
- They are recognised under equity as a line item separate from the equity attributable to the parent.
- In business combinations, minority interests are measured at fair value or the proportional part of net assets acquired.
- Changes in the percentage of ownership interest held by the parent in the subsidiary which do not represent a loss of control are recognised as equity transactions.
- The amount corresponding to minority interests is calculated for the whole Enagás Group based on the carrying amounts of the companies in which minority interests is held.



	Minority interests holding	Opening balance	Dividends distributed	Other adjustments <sup>(1)</sup>	Distribution of results	Balance at year-end
<b>2024</b>						
ETN, S.L.	10.0%	15,625	(170)	—	442	15,897
Remaining companies		450	(1,034)	939	130	485
<b>Total 2024</b>		<b>16,075</b>	<b>(1,204)</b>	<b>939</b>	<b>572</b>	<b>16,382</b>
<b>2023</b>						
ETN, S.L.	10.0%	15,708	(455)	48	324	15,625
Remaining companies		313	(1,635)	1,616	156	450
<b>Total 2023</b>		<b>16,021</b>	<b>(2,090)</b>	<b>1,664</b>	<b>480</b>	<b>16,075</b>

(1) In 2024 and 2023, "Other adjustments" includes mainly the amounts recorded in Gas Infrastructure Reserves for dividends received from Group companies.

The summarised financial information of affiliate ETN, S.L. is shown below. This information is based on the amounts recognised before eliminations among Group companies:

Condensed income statement	2024	2023
	ETN, S.L.	ETN, S.L.
Ordinary revenue	18,391	17,254
Cost of sales	(7,388)	(7,663)
Administrative expenses	(4,047)	(4,228)
Financial expenses	(1,186)	(1,630)
Profit/(loss) before tax	5,770	3,733
Income tax expense	(1,350)	(493)
Profit/(loss) for the year from continuing operations	4,420	3,240
Total results	4,420	3,240
Attributable to minority interests	442	324
Dividends paid to minority interests	170	455

Condensed balance sheet	12.31.2024	12.31.2023
	ETN, S.L.	ETN, S.L.
Inventories, treasury, and current accounts (current)	13,422	10,622
PP&E and other assets (non-current)	207,369	216,672
Suppliers and payables (current)	13,678	10,880
Loans, credits, and deferred tax liabilities (non-current)	48,143	60,161
<b>Total equity</b>	<b>158,970</b>	<b>156,253</b>
Attributable to:		
Shareholders of the parent company	143,073	140,628
Minority interests	15,897	15,625

Cash flow statement	2024	2023
	ETN, S.L.	ETN, S.L.
Operating income	16,993	4,848
Investment	(1,303)	(2,263)
Financing	(12,700)	(8,546)
<b>Total net cash flows</b>	<b>2,990</b>	<b>(5,961)</b>



## 3.3 Financial assets and liabilities

### Accounting policies

#### Financial assets

- Financial assets are classified under “Financial assets measured at amortised cost” except for investments accounted for using the equity method (Note 1.6), derivative financial instruments (Note 3.6), “Financial assets at fair value through profit or loss”, and “Financial assets measured at fair value through other comprehensive income”.

#### Financial assets measured at amortised cost

- Receivables which do not bear explicit interest are recognised at their face value whenever the effect of not discounting the related cash flows is not significant. Subsequent measurement in this instance is still carried out at face value.
- The said financial assets are initially recognised at fair value of the consideration paid, plus transaction costs directly attributable to the acquisition. They are subsequently measured at amortised cost and related interest accrued at the corresponding effective interest rate is recognised in the Consolidated Income Statement.
- The Group derecognises financial assets when the contractual rights to the cash flows from the financial asset expire or are transferred, which implies transferring substantially all the risks and rewards inherent in ownership of the financial asset; this is the case in firm asset sales, sales of financial assets with an agreement to repurchase them at their fair value, and securitisations in which the Group neither retains subordinated financing, grants any form of guarantee nor assumes any other type of risk.
- In contrast, the Group does not derecognise financial assets, but rather recognises a financial liability at an amount equal to the consideration received, in the transfer of financial assets in which it retains substantially all the risks and rewards incidental to ownership, such as discounted bills, recourse factoring, disposals of financial assets under repurchase agreements at fixed prices or at the sales price plus interest, and securitisations of financial assets in which the Group retains subordinate liability or grants other types of guarantees which would substantially absorb all possible losses.

#### Financial assets measured at fair value with changes in other comprehensive income

- Equity instruments are measured by default at fair value through profit or loss, but there is an option at initial recognition to present changes in fair value in profit/loss. This decision is irrevocable and is made for each asset individually.

#### Financial assets measured at fair value with changes in the income statement

- Financial assets whose contractual cash flows are not solely principal and interest are classified in this category. The financial asset of GSP is included in this category following the recognition of the award.

#### Fair value measurement

- In accordance with IFRS 13, for purposes of financial disclosure, the measurement of fair value is classified as Level 1, 2, or 3, based on the degree that the inputs applied are observable and their importance in measuring fair value in its totality, as described below:
  - Level 1 – Inputs are based on quoted prices (unadjusted) for instruments of an identical nature traded in active markets.
  - Level 2 – Inputs are based on valuation models for which all significant inputs are observable in the market or can be corroborated by observable market data.
  - Level 3 – Inputs are not generally observable and generally reflect estimates regarding market movements for determining the price of the asset or liability.

#### Trade and other payables

- Trade and other payables that do not accrue explicit interest are measured at their face value when the effect of financial discounting is not significant.



## Significant estimates and judgements

- In accordance with the requirements established under IFRS 9, the Group regularly calculates the effect of the expected loss on financial assets. This has had a reversal effect on the Consolidated Income Statement for the current year of 716 thousands of euros (148 thousands of euros at December 31, 2023), with the cumulative effect on the Consolidated Balance Sheet of 1,125 thousands of euros at December 31, 2024 (409 thousands of euros at December 31, 2023).
- The Group assess the expected credit losses of a financial instrument in a way that reflects:
  - a) an amount weighted based on probability and not biased, determined by evaluating a series of possible outcomes;
  - b) the temporal value of money; and
  - c) the reasonable and well-founded information date available on the date of information, without cost or disproportionate effort, on past events, current conditions and forecasts of future economic conditions.
- Under the new standard, an entity will measure the value correction for losses of a financial instrument in an amount equal to the expected credit losses during the life of the asset, if the risk of this financial instrument has increased significantly since its initial recognition.
- Conversely, that is, if the credit risk of a financial instrument has not increased significantly since the initial recognition, an entity will measure the value correction for losses at an amount equal to the expected credit losses in the next 12 months.
- The gain or loss resulting from impairment of value, the amount of the expected credit losses (or reversals) by which it is required that the value adjustment for losses be adjusted on the posting date to reflect the amount to be recognised under this standard will be recorded in the profit for the period.
- In the case of the Enagás Group, practically all financial assets present a low credit risk at the date of posting, and their exposure to events that generate credit losses during the next 12 months is therefore calculated.
- The Group has determined that the inputs used to estimate the fair value of the GSP asset fall under Level 3 of the hierarchy. This fair value has been calculated based on management's best estimate, considering options for monetising and recovering the amount recognised by the award. Significant estimations related to this asset's valuation have been presented to the Group's Board of Directors.
- The fair value calculation has been performed by combining present value techniques with various market-based fair value references. In addition, the Group conducted a sensitivity analysis regarding changes in the present value discount rate, which indicated that the asset's value would fluctuate by 6 million euros (7 million dollars) if one additional year were considered in this calculation.

## a) Financial assets

Class	Categories							
	Amortised cost		Fair Value with changes in the income statement (*)		Fair value through profit/loss		Total	
	12.31.2024	12.31.2023	12.31.2024	12.31.2023	12.31.2024	12.31.2023	12.31.2024	12.31.2023
Equity instruments	—	—	—	—	36,308	28,482	36,308	28,482
Loans	45,002	33,187	—	—	—	—	45,002	33,187
Trade and other receivables (Note 2.2)	91,944	128,178	—	—	—	—	91,944	128,178
Derivatives (Note 3.6)	—	—	—	3,977	—	—	—	3,977
Others	18,499	476,028	159,670	—	—	—	178,169	476,028
<b>Total non-current financial assets</b>	<b>155,445</b>	<b>637,393</b>	<b>159,670</b>	<b>3,977</b>	<b>36,308</b>	<b>28,482</b>	<b>351,423</b>	<b>669,852</b>
Loans	1,709	1,208	—	—	—	—	1,709	1,208
Derivatives (Note 3.6)	—	—	—	2,273	—	—	—	2,273
Others	122,971	19,069	—	—	—	—	122,971	19,069
<b>Total current financial assets</b>	<b>124,680</b>	<b>20,277</b>	<b>—</b>	<b>2,273</b>	<b>—</b>	<b>—</b>	<b>124,680</b>	<b>22,550</b>
<b>Total financial assets</b>	<b>439,795</b>	<b>657,670</b>	<b>159,670</b>	<b>6,250</b>	<b>36,308</b>	<b>28,482</b>	<b>476,103</b>	<b>692,402</b>

(\*) In the specific case of those derivatives to which cash flow hedges or net investment are attributed, the accumulated amounts in equity are transferred to the Consolidated Income Statement in the periods when the covered items affect the Consolidated Income Statement.



The Directors estimate that the fair value of the financial assets at December 31, 2024 does not differ significantly with respect to their carrying amount.

## Equity instruments

This heading includes the Enagás Group's investments in companies over which it does not have control, joint control or significant influence on the basis of the way in which the relevant decision-making is established.

At December 31, 2024, this mainly includes the Enagás Group's investments in 19% of the company Depositi Italiani GNL and the investments in the company Satlantis Microsats, S.L. (7.59%) and the fund Klima Energy Transition Fund, F.C.R., Clean H2 Infra Fund, and Hydrogen Onsite, S.L., the latter being registered in 2024 after the signing of the investment agreement in December 2024. The changes from 2023 are primarily due to the previously mentioned acquisition, changes in the fair value of these investments, and additional investments made by the Enagás Group during 2024.

## Loans

This mainly includes loans granted to group companies consolidated using the equity method and therefore not eliminated in the consolidation process.

The detail of current and non-current loans to Group companies is detailed in [Note 4.3](#).

## Others

As of December 31, 2024, the category "Other non-current financial assets measured at fair value with changes in the income statement" primarily includes the financial asset resulting from the Enagás Group's investment in the GSP project. With the notification of the award determining the recognised amount and estimating its fair value, this asset is valued at 165,100 thousands of dollars (159,670 thousands of euros) as of December 31, 2024.

Furthermore, relating to the TGE transaction ([Note 1.6](#)), as of December 31, 2024, the amount deposited by the Enagás Group in an escrow account, totalling 97 thousands of dollars, is reported under "Other current financial assets at amortised cost". This deposit is contingent upon receiving a certificate from the US tax authority, which is not expected to present any issues.

## Gasoducto Sur Peruano ("GSP")

In relation to the investment in Gasoducto Sur Peruano, S.A. (hereinafter "GSP") as indicated in Note 3.3 to the Consolidated Annual Accounts of the Enagás Group for 2016, on January 24, 2017 the Directorate General of Hydrocarbons of the Peruvian Government's Ministry of Energy and Mines (hereinafter the "State of Peru") sent an official letter to GSP stating "the termination of the concession agreement owing to causes attributable to the concession holder", in accordance with the terms of Clause 6.7 of the "Improvements to the Energy Security of the Country and the Development of the Gasoducto Sur Peruano" (hereinafter "the Project") concession agreement, because the financial close had not been evidenced within the period established in the agreement (January 23, 2017), and proceeded to the immediate enforcement of the totality of the guarantee for full compliance given by GSP (262.5 million

dollars), which in the case of Enagás generated a payment of 65.6 million dollars. Also in January 2017, they paid GSP bank financing sureties to Enagás amounting to 162 million dollars, including both principal and interest pending payment. In December 2017, the process for delivering the Concession Assets held by GSP was substantially completed with the Peruvian State assuming control over them.

As a result of the termination of the concession contract, in accordance with the opinion of external and internal legal advisors, the Peruvian State had the obligation to apply Clause 20 of the Concession Contract, calculating the Net Carrying Amount (hereinafter NCA) of the Concession Assets, calling up to a maximum of three auctions to award the Concession, with the auction result being to pay GSP the NCA. With the amount that GSP would have received for the NCA of the Concession Assets, it would have proceeded to settle its obligations to third parties and, if appropriate, reimburse the capital contributions made by its shareholders.

As a result of inaction by the State of Peru in relation to the aforementioned procedure, on December 19, 2017, Enagás notified the Peruvian State about the existence of a dispute relating to the investment in GSP with a view to reaching an amicable agreement on the terms of Article 9.1 of the Agreement for the Reciprocal Promotion and Protection of APPRI in Spanish signed by the Republic of Peru and the Kingdom of Spain. This notification represented the beginning of the six-month period for direct contact prior to initiating international arbitration in which the APPRI acts as the mechanism for recovering the investment in GSP. Once the required six months of direct contact between Enagás and the Peruvian State had elapsed without it being possible to reach an amicable settlement of this dispute, on July 2, 2018, Enagás filed an application for the initiation of arbitration against the Peruvian State regarding its investment in GSP with the ICSID.

On December 20, 2024, the award regarding this dispute was communicated, establishing that the Republic of Peru breached its obligations under Articles 4.1 and 5 of the Peru-Spain APPRI. Consequently, Peru is ordered to pay Enagás 176 million dollars, plus annual interest of 1.44%, calculated on a simple basis from January 24, 2018 up to the present date and capitalised semi-annually until the compensation payment, totalling 194 million dollars, along with 75% of the legal costs. Said amount does not include bank guarantees and performance bonds which will be reclaimed through the insolvency proceedings of GSP, also subject to arbitration in ICSID.

In relation to the restriction on repatriating TGP's dividends, the ruling states that including Enagás Internacional in category 2 of Law No. 30737, along with any measures of asset restriction (such as the establishment of a Guarantee Trust) and limitations on the rights to transfer resources abroad resulting from this categorisation under Law No. 30737 and its regulations, constitutes a violation of Article 4.1 of the APPRI. The Arbitral Tribunal considered that Peru has not proven the existence of corruption related to the awarding of the GSP project.

As a consequence of this ruling, since the full amount of the investment made by Enagás was not recognised, there has been a loss of 295 million euros in the income statement for the unrecognised amount.



Regarding this award, on January 17, 2025, Enagás requested a correction from the Tribunal under Article 49(2) of the ICSID Convention, arguing that a material error was made in calculating the damages awarded to Enagás due to the incorrect percentage of Enagás' stake in the GSP project being used. This results in a contingent asset valued at 94 million dollars as of December 31, 2024.

Regarding the financial asset related to this investment, once the ruling's amount and execution actions were determined, it has been classified as a financial asset at fair value. The fair value of the receivable is 165,100 thousands of dollars (159,670 thousands of euros), which has led to an additional financial expense in the income statement of 32,400 thousands of dollars (31,334 thousands of euros).

Considering the above, the fair value of the investment in GSP as of December 31, 2024 is 159,670 thousands of euros (compared to 456,779 thousands of euros as of December 31, 2023), with a total negative impact of 326,034 thousands of euros recorded in the 2024 consolidated income statement.

### Other related matters

On March 12, 2018, Law No. 30737 was published "guaranteeing immediate payment to the Peruvian State to repair civil damage caused by corruption and related crimes". On May 9, 2018, Supreme Decree 096-2018-EF was published, enacting the regulations of the aforementioned Law.

In accordance with Article 9 of Law No. 30737, legal persons and legal entities in the form of partnerships, consortiums and joint ventures who may have benefited from the awarding of contracts, or subsequent to it, jointly with persons who have been convicted or who may have acknowledged having committed crimes against the public administration, asset laundering or related crimes, or their equivalents against the State of Peru, in Peru or abroad are classified as Category 2, and therefore fall within its scope of application.

In June 2019, the Peruvian Judiciary approved the Effective Collaboration Agreement reached between the Odebrecht Group and the Peruvian Public Prosecutor's Office, and the GSP project was not included as one of the projects affected by corruption-related events. Subsequent developments reveal that over seven years after the investigations began, the Peruvian Public Prosecutor's Office has been unable to present any definitive evidence of corruption related to the awarding of the GSP project. In July 2024, the status of Odebrecht manager Jorge Barata as an effective collaborator was revoked, and consequently, the Prosecutor's Office has started investigating him, denying any acts of corruption by him or the company in connection with the GSP project's award.

During the arbitration proceedings before ICSID, specifically in the award mentioned earlier, no new evidence has been provided that irrefutably links GSP to corruption. The ICSID Tribunal that issued the award states, upon reviewing the matter, that the evidence in the arbitration file does not indicate any irregularities. On the contrary, it confirms that the awarding of the GSP project complied with legal requirements.

Notwithstanding the above comments on the extension of the initial Effective Collaboration Agreement signed by Odebrecht

and the Public Prosecutor of Peru, there have been no significant developments regarding the actions of the Public Prosecutor of Peru on the investigation of Odebrecht's activities in Peru and other investigations carried out by the Special Team of the Peruvian Prosecutor's Office for alleged crimes that could somehow be related to the awarding of the project. In this regard, two investigations are known to be in progress:

- The first case, documented in Folder 321-2014, concerns aggravated collusion involving a former Odebrecht employee and a public official. This case concluded with a 2024 verdict acquitting both parties of any crime. The verdict has been appealed and is currently under review.
- In relation to the second investigation opened, sealed with Folder 12-2017, being that those under investigation include two employees of Enagás and Enagás Internacional, S.L.U. This investigation has been closed and is awaiting indictment by the Public Prosecutor's Office. Based on the opinion of our external legal advisors in Peruvian criminal law, it is maintained that to date there is no indication that the investigations may conclude negatively for Enagás.

In relation to this second file, on December 30, 2020, the Peruvian Public Prosecutor's Office requested its incorporation as a civil plaintiff in the criminal proceedings in order to request the payment of a possible reparation in the aforementioned proceedings once a final judgement has been handed down, as well as in order to request possible precautionary measures that seek to ensure the eventual reparation, amounting to 1,107 million dollars for the GSP project. After the two previous initial applications were rejected on formal grounds, the last application submitted was accepted in March 2023. The hearing took place on July 12, 2023. Subsequently, Enagás Internacional has been named as a third party civilly liable concerning the two employees involved in the investigation.

The amount will be determined by the presiding criminal judge, who will make a detailed assessment once a final verdict is issued, should there be any convictions of the employees under investigation. According to both external and internal lawyers, the amount requested has not been duly supported nor does it comply with the possible civil liability that could be claimed on the basis of the offences referred to in the indictment. An objective reference for the calculation is the one established by Law No. 30737, which assures payment of civil compensation to the Peruvian State. Considering the preliminary stage of the criminal process, taking into account the elements of knowledge available to date and based on the conclusions of the specialist local lawyers, it is considered that the probability of the imposition of this compensation in any case does not exceed 50% (possible), and therefore it is not appropriate to register any provision, as it is considered a contingent liability. Likewise, in the event that it could eventually be declared well-founded, and the amount of the compensation could not be reliably estimated, the reference amount to be considered would be between 0 and 242 million dollars.

Moreover, with regard to civil compensation, even without evidence of a criminal conviction or a confession of the commission of crimes, as required under Article 9 of Law No. 30737, on June 28, 2018, the State of Peru classified Enagás Internacional on the "List of Contracts and Subjects of Category 2



indicating the legal person or legal entity included under Section II of Law No. 30737" in relation to the concession contract awarded to GSP. The application of the mentioned standard involves different measures to contribute to the payment of potential civil compensation, such as setting up an escrow account, reporting information, limiting transfers to other countries or preparing a compliance programme.

The total amount of the escrow account that would correspond to Enagás, estimated as 50% of the entire average equity that corresponds to its participation in GSP confirmed with the Ministry of Justice, amounts to 65.5 million dollars, Enagás having delivered a bank guarantee letter for this amount in August 2023 which has been renewed until July 2024.

In addition, the Peruvian State has also affirmed that the measure prohibiting companies included in Category 2 from making transfers outside of Peru, pursuant to Law No. 30737, is applicable. Based on the conclusions of Enagás' external and internal legal advisors, it is maintained that this measure would be applicable to the investment in GSP and should not restrict the dividends received from TGP (amounting to 542.2 million dollars), also considering that this investment is protected by the Legal Stability Agreements in force in Peru, a regulation whose prevalence and application has been formally requested to the Peruvian state.

In order to put into practice the application of these Legal Stability Agreements, direct negotiations with the Peruvian State were initiated on February 24, 2021, followed by the submission by Enagás of a request for international arbitration under the Spanish-Peruvian APPRI on December 23, 2021. In addition, Enagás Internacional has pledged its TGP shares in favour of

Enagás Financiaciones, S.A.U. and Enagás, S.A. to guarantee the payment of its present or future obligations and debts.

Regarding the second arbitration proceeding before ICSID, the Arbitral Tribunal was established on December 5, 2022. On June 1, 2023, Enagás filed its Statement of Claim with ICSID, followed by the Statement of Defence from the Peruvian State on October 6, 2023. Enagás submitted its Reply Brief to ICSID on April 17, 2024, and the Peruvian State responded with its Rejoinder Brief on September 16, 2024. Hearings were held on October 28, 2024, followed by the corresponding presentation of written pleadings on December 18, 2024. The tribunal's decision is pending, and is expected in 2025.

As mentioned in the previous section, the GSP arbitration award has also addressed this issue. It determined that placing Enagás Internacional in Category 2, along with the associated asset restrictions – which include a ban on transferring dividends abroad – violates the fair and equitable treatment to which Enagás Internacional is entitled as an international investor.

## Impairment losses on assets

At December 31, 2024, the impact resulting from analysis of the expected loss in accordance with IFRS 9 for the financial assets of the Enagás Group described in this section amounts to 176 thousands of euros (308 thousands of euros at December 31, 2023).

## b) Financial liabilities

Details of current and non-current "Financial Liabilities" of the Enagás Group at December 31, 2024 and December 31, 2023 are as follows:

Class	Categories							
	Fair Value with changes in Profit and Loss		Amortised cost		Derivatives designated as hedging instruments		Total	
	2024	2023	2024	2023	2024	2023	2024	2023
Debts with credit institutions (Note 3.4)	—	—	292,602	1,049,880	—	—	292,602	1,049,880
Debt settlement costs and accrued interest payable (Note 3.4)	—	—	(3,335)	(4,107)	—	—	(3,335)	(4,107)
Debentures and other marketable securities (Note 3.4)	—	—	2,350,000	2,350,000	—	—	2,350,000	2,350,000
Debt settlement costs and accrued interest payable (Note 3.4)	—	—	(11,515)	(19,158)	—	—	(11,515)	(19,158)
Derivatives (Note 3.6)	—	—	—	—	17,004	5,565	17,004	5,565
Trade payables	—	—	—	17	—	—	—	17
Other financial liabilities (Note 3.4)	97,710	116,292	615,843	480,805	—	—	713,553	597,097
<b>Total non-current financial liabilities</b>	<b>97,710</b>	<b>116,292</b>	<b>3,243,595</b>	<b>3,857,437</b>	<b>17,004</b>	<b>5,565</b>	<b>3,358,309</b>	<b>3,979,294</b>
Debts with credit institutions (Note 3.4)	—	—	51,815	413,299	—	—	51,815	413,299
Debt settlement costs and accrued interest payable (Note 3.4)	—	—	748	1,702	—	—	748	1,702
Debentures and other marketable securities (Note 3.4)	—	—	600,000	—	—	—	600,000	—
Debt settlement costs and accrued interest payable (Note 3.4)	—	—	33,413	14,545	—	—	33,413	14,545
Derivatives (Note 3.6)	—	—	—	—	5,044	9,687	5,044	9,687
Trade payables (*) (Note 2.3)	—	—	574,816	565,174	—	—	574,816	565,174
Other financial liabilities (Note 3.4)	—	—	74,211	65,007	—	—	74,211	65,007



Total current financial liabilities	—	—	1,335,003	1,059,727	5,044	9,687	1,340,047	1,069,414
Total financial liabilities	97,710	116,292	4,578,598	4,917,164	22,048	15,252	4,698,356	5,048,708

(\*) The amount of "Trade payables" does not include the balance with the Public Administrations as it is not a financial liability.



The detail by maturity of non-current financial debt for 2024 and 2023, respectively, is as follows:

Maturities at the end of 2024	2026	2027	2028	2029 and later years	Total
Debentures and other marketable securities	500,000	—	750,000	1,100,000	2,350,000
Debts with credit institutions	51,807	67,418	45,856	127,521	292,602
<b>Total</b>	<b>551,807</b>	<b>67,418</b>	<b>795,856</b>	<b>1,227,521</b>	<b>2,642,602</b>

Maturities at the end of 2023	2025	2026	2027	2028 and later years	Total
Debentures and other marketable securities	600,000	500,000	—	1,250,000	2,350,000
Debts with credit institutions	772,882	51,858	51,765	173,375	1,049,880
<b>Total</b>	<b>1,372,882</b>	<b>551,858</b>	<b>51,765</b>	<b>1,423,375</b>	<b>3,399,880</b>

The estimated future interest payments on the contracted financial debt at the closing date until maturity at December 31, 2024 and December 31, 2023 are shown below:

Estimated payment of interest at 2024 year-end	2025	2026	2027	2028	2029 and later years	Total
Payment of interest (*)	59,681	51,550	46,593	44,737	144,277	346,838

Estimated payment of interest at 2023 year-end	2024	2025	2026	2027	2028 and later years	Total
Payment of interest (*)	90,387	42,199	30,117	24,806	38,425	225,934

(\*) Includes a projection of interest on variable debt taking into account current interest rates.

The amounts and characteristics of the main instruments included under the headings “Debentures and other marketable securities” and “Debts with credit institutions” at December 31, 2024 are detailed below:

	Instrument	Nominal Interest	Currency of issue	Maturity	Nominal outstanding (thousands of euros)
Institutional debt (EIB and ICO)	Loan	EURIBOR + Margin	EUR	2031	163,333
	Loan	Fixed rate	EUR	2031	87,607
	Loan	EURIBOR + Margin	EUR	2027	17,727
	Loan	Fixed rate	EUR	2030	60,000
	Loan	Fixed rate	EUR	2026	96
Banking debt	Loan	TSOFR + Margin	USD	2027	15,654
Nominal outstanding					344,417
Debt settlement expenses					(3,344)
Accrued interest payable					757
<b>Total financial debts with credit institutions</b>					<b>341,830</b>

	Instrument	Coupon	Currency of issue	Maturity	Nominal outstanding (thousands of euros)
Bond issue and Private Placements	EMTN bonus	1.25 %	EUR	2025	600,000
	EMTN bonus	1.38 %	EUR	2028	750,000
	EMTN bonus	0.75 %	EUR	2026	500,000
	EMTN bonus	0.38 %	EUR	2032	500,000
	EMTN bonus	3.63 %	EUR	2034	600,000
Nominal outstanding					2,950,000
IFRS 9 and others					(11,515)
Accrued interest payable					33,413
<b>Total debentures and other marketable securities</b>					<b>2,971,898</b>



The amounts and characteristics of the main instruments included under the headings “Debentures and other marketable securities” and “Debts with credit institutions” at December 31, 2023 are detailed below:

	Instrument	Nominal Interest	Currency of issue	Maturity	Nominal outstanding (thousands of euros)
Institutional debt (EIB and ICO)	Loan	EURIBOR + Margin	EUR	2031	186,667
	Loan	Fixed rate	EUR	2031	100,134
	Loan	EURIBOR + Margin	EUR	2027	23,636
	Loan	Fixed rate	EUR	2030	70,000
	Loan	Fixed rate	EUR	2026	146
Banking debt	Loan	EURIBOR + Margin	EUR	2025	450,000
	Loan	TSOFR + Margin	USD	2024	361,483
	Loan	TSOFR + Margin	USD	2025	271,113
Nominal outstanding					1,463,179
Debt settlement expenses					(4,107)
Accrued interest payable					1,702
Total financial debts with credit institutions					1,460,774

	Instrument	Coupon	Currency of issue	Maturity	Nominal outstanding (thousands of euros)
Bond issue and Private Placements	EMTN bonus	1.25 %	EUR	2025	600,000
	EMTN bonus	1.38 %	EUR	2028	750,000
	EMTN bonus	0.75 %	EUR	2026	500,000
	EMTN bonus	0.38 %	EUR	2032	500,000
Nominal outstanding					2,350,000
IFRS 9 and others					(19,158)
Accrued interest payable					14,545
Total debentures and other marketable securities					2,345,387

## 3.4 Financial debts

### Accounting policies

- Financial liabilities are initially measured at the fair value of the consideration received less directly attributable transaction costs.
- Subsequently, financial liabilities are recognised at amortised cost, except for derivative financial instruments, which are recognised at fair value.
- Financial liabilities are derecognised when the related contractual obligations are cancelled or expired. The Group also derecognises financial liabilities when there is a material change in cash flows or debt terms and conditions.
- Options on minority interests, when the agreement does not transfer the risks and rewards to the holder of the shares, result in the recognition of a financial liability. The changes in fair value of the financial liability are accounted for in the Consolidated Income Statement.

	2024	2023
Debentures and other marketable securities	2,971,898	2,345,387
Debts with credit institutions	341,830	1,460,774
Other receivables	787,764	662,104
Total financial debts	4,101,492	4,468,265
Non-current financial debts (Note 3.3)	3,341,305	3,973,712
Current financial debts (Note 3.3)	760,187	494,553

The fair value of debts owed to credit entities as well as debentures and other marketable securities at December 31, 2024 and 2023 is as follows:

	2024	2023
Debts with credit institutions	341,819	1,451,681
Debentures and other marketable securities	2,833,919	2,181,944
Fair value total	3,175,738	3,633,625
Carrying amount total	3,313,728	3,806,161



## a) Net financial debt

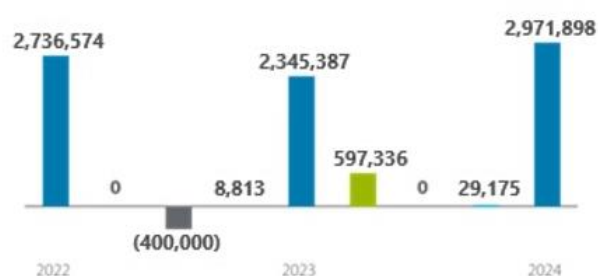
Net financial debt or net debt is the main indicator used by Management to measure the Group's debt level. It is comprised of gross debt less cash in hand:

	2024	2023
Debts with credit institutions (Note 3.3)	341,830	1,460,774
Debentures and other marketable securities (Note 3.3)	2,971,898	2,345,387
Loans from the General Secretariat of Industry, the General Secretariat of Energy, Oman Oil, ERDF E4E and others	863	815
Leases (IFRS 16)	385,129	379,015
Others	6	(135)
<b>Gross financial debt</b>	<b>3,699,726</b>	<b>4,185,856</b>
Cash and other cash equivalents (Note 3.8)	(1,295,668)	(838,483)
<b>Net financial debt</b>	<b>2,404,058</b>	<b>3,347,373</b>

The gross financial cost during 2024 for the Group's financial debt amounted to 2.6% (2.6% in 2023). The percentage of financial debt at fixed interest rate at December 31, 2024 amounted to more than 80%, while the average maturity period at that date amounted to 4.8 years (3.9 years at December 31, 2023). The gross financial costs are determined by dividing gross financial expenses by the average gross debt multiplied by the number of effective days in the year (360 days) divided by the natural days of the period (366 days), where gross financial expenses correspond to Interest on debt (Note 3.5). Further, average gross debt is calculated as the daily average of nominal amounts of gross debt.

## b) Debentures and other marketable securities

The most significant events of the 2024 financial year include:



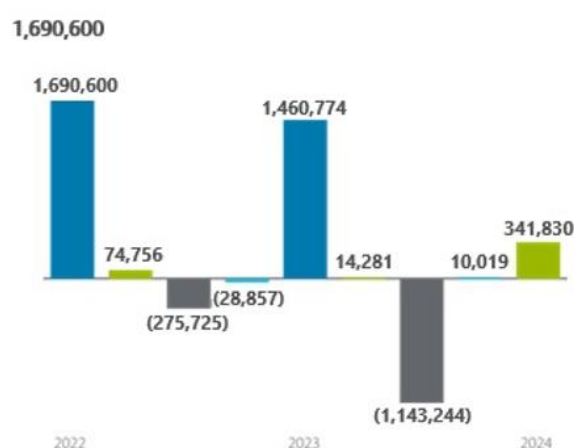
■ Balances at 12/31 ■ Repayment and redemption  
■ Additions ■ Other changes (\*)

(\*) Includes interest paid, accrued interest, valuations, and other.

- On January 15, 2024, the Enagás Group has successfully completed the issue of 600 million euros in bonds maturing in 2034 and an annual coupon of 3.625%.
- On July 27, 2024, Enagás Financiaciones, S.A.U. renewed the Euro Medium Term Note (EMTN) programme for a maximum amount of 4,000 million euros, registered in the Luxembourg Stock Exchange in 2012, with Enagás, S.A. as guarantor.
- In addition, on July 27, 2024, Enagás Financiaciones, S.A.U. renewed the Euro Commercial Paper (ECP) programme for a maximum amount of 1,000 million euros, registered in the Irish Stock Exchange on May 4, 2017, with Enagás, S.A. as guarantor.



## c) Debts with credit institutions



 Balances at 12/31
 Additions
 Repayment and redemption
 Other changes (\*)

(\*) Includes interest paid, accrued interest, valuations, and other.

The most significant events of the 2024 financial year include:

- On January 10, 2024, Scale Gas secured a credit line of 75 million dollars, maturing in January 2027, with 15,654 thousands of euros drawn by December 31, 2024.
- On January 15, 2024, the credit lines of 400 million dollars and 10 million dollars held by Enagás Internacional and Enagás S.A. respectively were cancelled. The policies were not drawn at the time of cancellation.
- On January 29, 2024, the 450 million euros loan with original maturity in January 2025 held by Enagás Financiaciones was repaid early.
- On August 2, 2024, the 400 million dollars loan, with original maturity in December 2024, held by Enagás Internacional was repaid early. The interest rate derivatives related to this debt were also cancelled in July.
- On August 2, 2024, Enagás Holding USA repaid two loans totalling 300 million dollars ahead of their original maturity date in March 2025. The interest rate derivatives related to this debt were also cancelled in July.
- On December 20, 2024, Enagás S.A. extended the maturity of the Club Deal multi-currency credit facility from January 2029 to January 2030.

- On December 23, 2024, Enagás Financiaciones secured a credit facility of 350 million euros, maturing in January 2029, from which no funds had been drawn by December 31, 2024.

At December 31, 2024, the Group had access to credit lines in the amount of 1,972,434 thousands of euros (2,470,521 thousands of euros in 2023), of which 1,956,781 thousands of euros had not been drawn down (2,470,521 thousands of euros in 2023) (Note 3.8). Along these lines, a sustainable syndicated credit line amounting to 1,550,000 thousands of euros is included, the price of which is linked to the reduction of CO<sub>2</sub> emissions. This credit line is held by 12 national and international financial institutions.

In the opinion of the Directors of the Company, this situation allows for sufficient funding to meet possible liquidity requirements in the short-term considering its current obligations.

## d) Other financial liabilities

	2024	2023
Loans from the General Secretariat of Industry, the General Secretariat of Energy, Oman Oil, ERDF E4E and others	863	815
Fair value of sales option on interest held by EVE	—	15,600
Leases (IFRS 16) (Note 2.4)	385,129	379,015
Fair value of sales option on interest held by Reganosa	97,710	100,692
Accounts payable to the CNMC	265,306	135,566
Others	38,756	30,416
<b>Total other financial liabilities</b>	<b>787,764</b>	<b>662,104</b>

At December 31, 2024 and December 31, 2023, "Other receivables" mainly includes the financial liability associated with IFRS 16 on leases. Payments for this item amounted to 39,879 thousands of euros in 2024 (38,072 thousands of euros in 2023).

Given the situation of over-collection of the gas system, mainly due to the increase in regasification activity in 2023 and 2024, the long-term portion corresponding to the Enagás Group has been recorded as "other financial liabilities" in the amount of 216,954 thousands of euros (135,566 thousands of euros as of December 31, 2023) for the over-collection corresponding to the Enagás Group. The amount corresponding to the short term has been recorded under Creditors, amounting to 164,012 thousands of euros (200,377 thousands of euros as of December 31, 2023) (Note 2.2.b).

The put option granted to Reganosa, under which Reganosa has the right to sell and Enagás Transporte the obligation to buy 25% of MEH, has also been registered by an amount of 97,710 thousands of euros at December 31, 2024.

Lastly, under "Other", there are accounts payable to suppliers for fixed assets amounting to 25,387 thousands of euros (20,165 as of December 31, 2023), as well as grant advances received totalling 4.5 million euros.



## 3.5 Net Financial Gain/(Loss)

	2024	2023
Income from associates	2,036	1,474
Finance revenue from third parties	8,650	10,812
Income/expenses in cash and other cash equivalents	52,250	33,676
Financial income	62,936	45,962
Financial expenses and similar	(5,439)	(8,522)
Interest on debt	(106,225)	(116,399)
Capitalised interest	—	(3)
Others	(8,175)	(3,268)
Financial expenses	(119,839)	(128,192)
Gains (losses) on hedging instruments	1,650	214
Change in fair value of financial instruments (*) (Note 3.3)	(31,292)	—
Exchange differences	(1,565)	782
Impairment and result from disposal of financial instruments (Notes 1.5, 1.6 and 3.3) (**)	(653,298)	45,450
<b>Net Financial Gain/(Loss)</b>	<b>(741,408)</b>	<b>(35,784)</b>

(\*) Impact of the GSP transaction as detailed in [Note 3.3](#).

(\*\*) Includes mainly the impact of the TGE transaction (-356 million euros), explained in [Note 1.5](#), and the impact of GSP (-295 million euros), explained in [Note 3.3](#). Both amounts are adjusted in the Cash Flow Statement under the heading "Other adjustments to profit".



## 3.6 Derivative financial instruments

### Accounting policies

- The Enagás Group contracts derivative financial instruments to cover its exposure to financial risk arising from fluctuations of interest rates and/or exchange rates, and does not use derivative financial instruments for speculative purposes. All derivative financial instruments are measured, both initially and subsequently, at fair value. The differences in fair value are recognised in the Consolidated Income Statement except in the case of specific treatment under hedge accounting.
- The measurement and recognition criteria for derivative financial instruments in keeping with the different types of hedge accounting are as follows:
  - Cash flow hedges
- Hedges for exposure to changes in cash flows that: (i) are attributed to a specific risk associated with an asset or liability recognised for accounting purposes, with a highly likely expected transaction or with a firm commitment if the hedged risk is an exchange rate and (ii) may affect profit for the period. The effective portion of the changes in fair value of the hedging instrument are recognised under Equity, and the gains and losses relating to the ineffective portion are recognised in the Consolidated Income Statement. The accumulated amounts under Equity are transferred to the Consolidated Income Statement in the periods in which the hedged items affect the Consolidated Income Statement.
  - Net investment hedging in a foreign operation
- These instruments hedge the foreign currency risk arising from net investments in foreign operations.
- The hedges for net investments in transactions carried out abroad are accounted for in a similar manner to cash flow hedges, though the valuation changes in these transactions are accounted for as translation differences under "Adjustments for changes in value" in the accompanying Consolidated Balance Sheet.
- These translation differences are taken to the Consolidated Income Statement when the gain or loss on disposal of the hedged item occurs.
- In order for these derivative financial instruments to be classified as hedges they are initially designated as such, and the relationship between the hedging instrument and the hedged items is documented, together with the risk management objective and the hedge strategy for the various hedged transactions. In addition, the Group verifies initially and then periodically throughout the life of the hedge (and at least at the end of each reporting period) that the hedging relationship is effective, i.e., that it is prospectively foreseeable that the changes in fair value or in the cash flows from the hedged item (attributable to hedged risk) are almost entirely offset by those of hedging instrument.
- Any remaining loss or gain from the hedging instrument will represent an ineffectiveness of the hedge to be recognised in income of the period.
- Hedge accounting is discontinued when the hedging instrument expires, or when it is sold, or exercised, or when it no longer qualifies for hedge accounting (after taking into account any rebalancing of the hedging relationship, if applicable). At that time, any cumulative gain or loss on the hedging instrument that has been recognised in Equity will be transferred to the income statement to the extent that the expected future cash flows covered will affect profit or loss for the year.
- In accordance with IFRS 13, for purposes of presenting financial information, the measurements of fair value are classified as Level 1, 2, or 3, as indicated in [Note 3.3](#).

### Significant estimates

- The Group has determined that most of the inputs employed to determine the fair value of the derivative financial instruments are in Level 2 of the hierarchy, but that the adjustments for credit risk use Level 3 inputs such as credit estimates based on a credit rating or comparable companies to evaluate the likelihood of the bankruptcy of the company or of the company's counterparties.
- The Group evaluated the relevancy of the inputs and recognised the corresponding adjustments to credit risk in the total valuation of derivative financial instruments, which were not significant.
- Thus, the entire portfolio of derivative financial instruments is classified under Level 2 of the hierarchy.



Category	Type	Maturity	Notional contracted	Fair value 12.31.2024	Fair value 12.31.2023
<b>Cash flow hedges</b>					
Interest rate swap (*)	Floating to fixed	July-24	281,334	—	837
Interest rate swap (*)	Floating to fixed	Dec-24	135,556	—	1,436
Interest rate swap (*)	Floating to fixed	Mar-25	271,113	—	(1,192)
<b>Net investment hedging</b>					
Cross Currency Swap	Fixed to fixed	May-28	237,499	(22,048)	(10,082)
<b>Total</b>			<b>925,502</b>	<b>(22,048)</b>	<b>(9,001)</b>

(\*) Derivative financial instruments matured or cancelled in 2024.

## b) Net investment hedging in foreign operations

The main characteristics of the derivative financial instrument contracted as a hedge of the net investment are as follows:

Category	Contracted amount in Euros	Contracted amount in USD	Type	Maturity
Cross Currency Swap	237,499	270,000	Fixed to fixed	May 2028
<b>Total</b>	<b>237,499</b>	<b>270,000</b>		

The investment considered as a hedged item in the aforementioned hedging relationship is as follows:

Project	Investments hedged in USD
TgP	270,000
<b>Total</b>	<b>270,000</b>

2024	2025	2026	2027	2028	2029	Total
Derivatives	(5,044)	(4,660)	(4,397)	(7,947)	—	(22,048)

2023	2024	2025	2026	2027	2028	Total
Derivatives	(4,518)	(4,164)	(3,969)	(3,787)	6,356	(10,082)

As explained in [Note 3.7](#) below, the Enagás Group directly finances part of the foreign investments with foreign currency, which is then designated as a net foreign investment.

By this means, the Enagás Group tries to designate exchange rate hedges to cover fluctuations in the exchange rates of its investments in foreign currency. As required by IFRS 9, an eligible hedged item and hedging instrument have to be designated. By this means, the exchange fluctuations of the investment in foreign currency are associated with the fluctuations due to the debt obtained to finance the acquisition, which is also in that currency ([Note 3.7](#)), in such a way that there is no impact on the income statement.

With respect to net investment hedging in foreign operations, the breakdown by period in which the related cash flows will arise is as follows:

## 3.7 Financial and capital risk management

The Enagás Group is exposed to various risks intrinsic to the sector, the market in which it operates and the activities it performs, which, should they materialise, could prevent it from achieving its objectives and executing its strategies successfully.

The Company has established a risk control and management model based on the principle of due control, aimed at ensuring the achievement of its objectives in line with the Company's risk tolerance level and the risk appetite approved by the governing bodies, and with a risk profile periodically assessed for all its risks. The particularities of the model are set out in section IV. Risk management of the Company's Management Report.

The main risks of a financial and tax nature to which the Group is exposed are as follows:

### Credit risk

Credit risk relates to the possible losses arising from the non-payment of monetary or quantifiable obligations of a

counterparty to which the Enagás Group has granted net credit which is pending settlement or collection.

Credit risk in connection with trade receivables arising from its commercial activity is historically very limited as the Group operates in a regulated environment ([Note 1.1](#)). However, regulations have been developed establishing standards for managing guarantees in the Spanish gas system and which oblige shippers to provide guarantees for: (i) contracting capacity in infrastructure with regulated third-party access and international connections, (ii) settlement of imbalances; and (iii) participation in the organised gas market.

The Enagás Group is also exposed to the risk of its counterparties not complying with obligations in connection with financial derivatives and placement of surplus cash balances. In order to mitigate this risk, these transactions are carried out in a diversified manner with highly solvent entities.

### Interest rate risk

Interest rate fluctuations affect the fair value of those assets and liabilities that accrue interest at fixed rates, and the future cash flows from assets and liabilities that accrue interest at floating rates.



The objective of interest rate risk management is to create a balanced debt structure that minimises financial costs over a multi-year period while also reducing volatility in the Consolidated Income Statement.

Based on the Enagás Group's estimates and debt structure targets, hedges are put in place using derivatives that reduce these risks (Note 3.6).

### Exchange rate risk

Exchange rate fluctuations may affect positions held with regard to debt denominated in foreign currency, certain payments for services and the purchase of capital goods in foreign currency, income and expenses relating to companies whose functional currency is not the euro and the effect of converting the financial statements of those companies whose currency is not the euro during the consolidation process. With a view to mitigating said risk, the Group can avail itself of financing obtained in US dollars, as well as contracting derivative financial instruments which are subsequently designated as hedging instruments (Note 3.6). In addition, the Enagás Group tries to balance the cash flows of assets and liabilities denominated in foreign currency in each of its companies.

### Liquidity risk

Liquidity risk arises as a consequence of differences in the amounts or payment and collection dates relating to the different assets and liabilities held by the Group.

The liquidity policy followed by the Enagás Group is oriented towards ensuring that all short-term payment commitments acquired are fully met without having to secure funds under burdensome terms. For this purpose, different management measures are taken such as maintenance of credit facilities ensuring flexibility, sufficient amounts and sufficient maturities, diversified sourcing for financing needs via access to different markets and geographical areas, as well as the diversification of maturities in debt issued.

The financial debt of the Group at December 31, 2024 has an average maturity of 4.8 years (3.9 years at December 31, 2023) (Note 3.4).

### Tax risk

The Enagás Group is exposed to possible modifications in tax regulatory frameworks and uncertainty relating to different possible interpretations of prevailing tax legislation, potentially leading to negative effects on results.

The Enagás Group has a Board-approved tax strategy, which includes the policies governing compliance with its tax obligations, attempting to avoid risks and tax inefficiencies

### Other risks

The Enagás Group is exposed to cross-cutting risks that do not correspond to a single risk category but may be correlated with several of them, namely risks related to the three pillars of sustainability: environmental, social and governance (ESG).

In the context of ESG risks, Enagás is exposed to certain risks arising from climate change. These risks are managed and assessed in an integrated manner within the risk management

model described in the Management Report. Risks are identified and quantified which arise from factors such as political and regulatory measures to promote the use of renewable energy, natural disasters or adverse weather conditions, the volume of CO<sub>2</sub> emissions, the use and technological development of renewable gases, and reputational risks (for more details on climate change risks, see chapter 'Climate Action and Energy Efficiency' of the Management Report).

The impact of climate-related risks and how the Group's management assesses these risks to incorporate them into the judgements, estimates and uncertainties that affect the financial statements of the Group are described in Note 4.6.a.

Finally, it is important to highlight, as detailed in the Risks Section of the Consolidated Management Report, that the Group faces operational risks related to Integrated Security in information and communication systems. This includes the ability to identify, protect, detect, respond to, and recover from physical and cyber security threats that negatively impact the company's industrial and corporate systems. Such threats include unauthorised attempts to steal, expose, alter, disable, or destroy information, and they can manifest in various forms, such as economic motives, espionage, activism, or terrorism.

Given the dynamic nature of the business and its risks, and despite having a reputational risks control and management system, it is not possible to guarantee that some risk may exist that is not identified in the risk inventory of the Enagás Group.

In addition, the internationalisation process carried out by the Enagás Group in recent years means that a part of its operations are carried out by companies over which it does not exercise control and which perform their activities within different regulatory frameworks and with different business dynamics, so that potential risks may arise relating to financial investment.

Also, there are uncertainties related to the deployment of renewable gases and the company's future role in the energy sector.

## a) Quantitative information

### Interest rate risk

The percentage of debt at fixed interest rates at December 31, 2024 and December 31, 2023, amounted to more than 80%. Taking into account these percentages of financial debt at fixed rates, and after performing a sensitivity analysis to changes in market interest rates, the Group considers that, according to its estimates, the impact on results of such variations on financial costs relating to variable rate debt could be as follows:

	Interest rate change			
	2024		2023	
	25 bps	(10) pbs	25 bps	(10) pbs
Change in financial costs	502	(201)	206	(82)

In addition, the aforementioned changes would not produce any significant changes in the Company's equity position in connection with contracted derivatives.



## Exchange rate risk

The currency that generates the greatest exposure to exchange rate changes within the Enagás Group is the US dollar.

The exposure of the Group to changes in the US dollar/euro exchange rate is mainly determined by the effect of translating the financial statements of the companies whose functional currency is the US dollar. In addition, there are Group companies whose functional currency is the Peruvian nuevo sol and pound sterling, although their effect is not significant.

The sensitivity of profit/(loss) for the year and equity to exchange rate risk, via appreciation or depreciation of exchange rates and based on said equity held by the Enagás Group at December 31, 2024, is shown below:

	Thousands of euros			
	Appreciation/(Depreciation) of the euro against the dollar			
	2024		2023	
	5.00%	-5.00%	5.00%	-5.00%
Effect on net profit	(18,751)	18,751	4,073	(4,073)
Effect on equity	(13,243)	13,243	5,552	(5,552)

## b) Capital management

The Enagás Group carries out capital management at corporate level and its objectives are to ensure financial stability and obtain sufficient financing for investments, optimising the cost of capital in order to maximise the value created for the shareholder while maintaining its commitment to solvency.

The Enagás Group uses its leverage ratio as an indicator for monitoring its financial situation and capital management. The ratio is defined as the result of dividing consolidated net financial debt by net consolidated assets (understood as the sum of net financial debt and consolidated own funds).

The financial leverage, calculated as the ratio of net financial debt and total financial net debt plus own funds at December 31, 2024 and 2023, is as follows:

	2024	2023
Net financial debt <a href="#">(Note 3.4)</a>	2,404,058	3,347,373
Shareholders' equity	2,305,360	2,968,155
<b>Financial leverage</b>	<b>51.0 %</b>	<b>53.0 %</b>

On July 19, 2024, the credit rating agency Fitch Ratings upgraded Enagás to BBB+, with a stable outlook. On July 31, 2024, the credit rating agency Standard & Poor's placed Enagás' credit rating at BBB+, with a stable outlook.



## 3.8 Cash flows

### Accounting policies

- Under the Cash and other cash equivalents heading of the Consolidated Balance Sheet the Group recognises cash in hand, sight deposits, and other highly liquid short-term investments that can be readily converted into cash and are subject to an insignificant risk of changes in value.

### a) Cash and cash equivalents

	12.31.2024	12.31.2023
Treasury	527,456	366,757
Other cash and cash equivalents	768,212	471,726
<b>Total</b>	<b>1,295,668</b>	<b>838,483</b>

Deposits that are readily convertible into cash are recorded under the heading "Other liquid assets".

Generally, the banked cash accrues interest at rates similar to daily market rates. The deposits maturing in the short-term are easily convertible into cash, and accrue interest at the going market rates. There are no significant restrictions on cash drawdown other than those indicated in [Note 3.3.a](#) in relation to the GSP project in Peru.

### b) Available funds

In order to guarantee liquidity, the Enagás Group has arranged credit lines which it has not drawn down. Thus, liquidity available to the Enagás Group is broken down as follows:

Available funds	12.31.2024	12.31.2023
Cash and cash equivalents	1,295,668	838,483
Other available funds ( <a href="#">Note 3.4</a> )	1,956,781	2,470,521
<b>Total available funds</b>	<b>3,252,449</b>	<b>3,309,004</b>

In the opinion of the Directors of the Parent Company, this situation allows for sufficient funding to meet possible liquidity requirements in the short-term considering its current obligations.

### c) Reconciliation of movements in liabilities arising from financing activities and cash flows

		Debts with credit institutions	Debentures and marketable securities	Total
12.31.2023		1,460,774	2,345,387	3,806,161
Cash flows	Issuance and collection	14,281	597,336	611,617
	Repayment and redemption	(1,143,244)	—	(1,143,244)
	Payment of interest	(39,431)	(23,438)	(62,869)
Without an impact on cash flows	Interest expense	39,040	54,043	93,083
	Changes due to exchange rates and others	10,410	(1,430)	8,980
12.31.2024		341,830	2,971,898	3,313,728

The information for the 2023 financial year is detailed below:

		Debts with credit institutions	Debentures and marketable securities	Total
12.31.2022		1,690,600	2,736,574	4,427,174
Cash flows	Issuance and collection	74,756	—	74,756
	Repayment and redemption	(275,725)	(400,000)	(675,725)
	Payment of interest	(74,312)	(27,437)	(101,749)
Without an impact on cash flows	Interest expense	70,448	36,251	106,699
	Changes due to exchange rates and others	(24,993)	(1)	(24,994)
12.31.2023		1,460,774	2,345,387	3,806,161



## 4. OTHER INFORMATION

### Relevant aspects

#### Remuneration for Board of Directors and Senior Management

- Remuneration to the Board of Directors, without taking into account insurance premiums and termination benefits, amounted to 4,955 thousands of euros (5,022 thousands of euros in 2023) ([Note 4.4](#)).

- Remuneration to the Senior Managers, without taking account of pension plans, insurance premiums and termination benefits, amounted to 5,084 thousands of euros (4,586 thousands of euros in 2023) ([Note 4.4](#)).

## 4.1 Investment properties

### Accounting policies

#### Investment properties

- The cost model is applied for measuring investment property, that is, the corresponding assets are measured at acquisition cost less the corresponding accumulated amortisation and any impairment losses. However, as one plot of land is not currently in use, it was measured at its recoverable amount, calculated as the fair value less the necessary costs for its sale.

- The market appraisal was performed by the independent expert in accordance with the Governing Rules of the Royal Institution of Chartered Surveyors (RICS), set out in the so-called "Red Book" - RICS Valuation - Professional Standards, January 2014. Said market valuations defined by RICS are internationally recognised by advisors and accountants providing services for investors and corporations that own investment properties, as well as by The European Group of Valuers (TEGoVA) and The International Valuation Standards Committee (IVSC).

	Balances at December 31, 2022	Impairment allowances 2023	Balances at December 31, 2023	Impairment allowances 2024	Reclassifications to Non-current assets held for sale	Balances at December 31, 2024
Cost <sup>(1)</sup>	47,211	—	47,211	—	(47,211)	—
Impairment	(29,801)	(30)	(29,831)	20	29,811	—
Net carrying	17,410	(30)	17,380	20	(17,400)	—

(1) Corresponds entirely to a plot of land located at km 18 of the A-6 in Las Rozas (Madrid), reclassified as a non-current asset held for sale ([Note 2.6](#)).



## 4.2 Tax situation

### Accounting policies

- Income tax expense for the year is calculated as the sum of current tax, resulting from applying the corresponding tax rate to taxable income for the year (after applying any possible deductions) and any changes in deferred tax assets and liabilities.
- Deferred tax expense or income relates to the recognition and derecognition of deferred tax assets and liabilities. These include the temporary differences, identified as those amounts expected to be payable or recoverable, arising from the difference between the book value of assets and liabilities and their tax bases, as well as any unused tax credits. These amounts are measured by applying the tax rate to the corresponding temporary differences or tax credits at which they are expected to be recovered or settled.
- Deferred tax assets are only recognised when the Group expects sufficient future taxable profits to recover the deductible temporary differences. Deferred tax liabilities are recognised for all taxable temporary differences except for those arising from the initial recognition of goodwill.
- Recognised deferred tax assets are reassessed at the end of each reporting period and the appropriate adjustments are made when there are doubts as to their future recoverability.
- The Group offsets deferred tax assets and deferred tax liabilities corresponding to one and the same tax authority, as established in IAS 12.74.

### Significant estimates and judgements

- In accordance with prevailing legislation in Spain, tax returns cannot be considered final until they have been inspected by the tax authorities or until the four-year inspection period has elapsed. However, the four-year period can vary in the case of Group companies subject to other fiscal regulations. The Directors consider that the income tax returns for the aforementioned taxes have been filed correctly and, therefore, even in the event of discrepancies in the interpretation of prevailing tax legislation with respect to the treatment applied, the resulting potential tax liabilities, if any, would not have a material impact on these Consolidated Annual Accounts.
- The deferred tax assets were recognised in the balance sheet as the Directors believe, based on the best estimate of future profits and reversals of deductible temporary differences, that it is probable that these assets will be recovered.



## a) Balances with Tax Authorities

	2024	2023
<b>Debit balances</b>		
Deferred tax assets (Note 4.2.f)	179,256	79,019
Income tax and other taxes (1)	44,031	10,623
Value added tax	18,512	21,928
<b>Total current assets</b>	<b>62,543</b>	<b>32,551</b>
<b>Credit balances</b>		
Deferred tax liabilities (Note 4.2.f)	256,226	208,809
Income tax	12,719	5,652
Value added tax	1,154	919
Tax Authorities creditor for withholdings and other	22,902	38,203
<b>Total current liabilities</b>	<b>36,775</b>	<b>44,774</b>

(1) This relates mainly to the Corporate Tax for the 2024 Tax Group (10,623 thousands of euros as of December 31, 2023).

## b) Tax returns

Enagás S.A. has been the parent company of the Tax Consolidation Group 493/12 for Corporate Income tax from January 1, 2013, comprising the following subsidiaries at December 31, 2024:

- Enagás Transporte, S.A.U.
- Enagás GTS, S.A.U.
- Enagás Internacional, S.L.U.
- Enagás Financiaciones, S.A.U.
- Enagás Financiaciones, S.A.U.
- Enagás Emprende S.L.U.
- Infraestructuras del Gas, S.A.
- Scale Gas Solutions, S.L.
- Efficiency for LNG Applications, S.L.
- Enagás Services Solutions, S.L.
- Sercomgas Gas Solutions, S.L.
- Enagás Holding USA, S.L.U.
- Enagás Infraestructuras de Hidrógeno, S.L.
- Musel Energy Hub, S.L.
- SPV Scale Mar 1, S.L.U.

The Group's remaining companies file individual income tax returns in accordance with the applicable tax laws.

## c) Corporate Income Tax

	2024	2023
Before-tax consolidated accounting results	(312,679)	421,094
Permanent differences and consolidation adjustments (1)	221,647	(119,310)
<b>Consolidated tax base</b>	<b>(91,032)</b>	<b>301,784</b>
Tax rate	25 %	25 %
Adjusted result by tax rate (2)	22,758	(75,446)
Effect of applying different rates to tax base	(315)	(2,961)
<b>Tax base</b>	<b>22,443</b>	<b>(78,407)</b>
Effect of deductions	2,494	5,281
Other adjustments to Corporate Income Tax (3)	(10,994)	(4,960)
<b>Corporate Income Tax for the period</b>	<b>13,943</b>	<b>(78,086)</b>
Current income tax (4)	43,595	(53,338)
Deferred income tax	(17,885)	4,247
<b>Adjustments to income tax rate</b>	<b>(11,767)</b>	<b>(28,995)</b>

(1) The permanent differences mainly correspond to the elimination of the results of companies consolidated under the equity method, as well as other consolidation adjustments relating to, among others, the reconciliation of local regulations and IFRS, as well as the impairment losses recognised.

(2) In order to determine income tax, a 25% rate was applied to all Spanish companies, except for those that file tax returns under the special regime of Vizcaya (Enagás Transporte del Norte, S.L.) where a 24% rate is applied. For both 2023 and 2024, the tax rates applicable to the foreign companies Enagás Perú, S.A.C.; Enagás Chile S.P.A.; Enagás México, S.A. de C.V. and Enagás USA, L.L.C. were 29.5%, 27%, 30% and 24%, respectively.

(3) "Other Corporate Income Tax Adjustments" includes, among others, the limitation of the dividend exemption (as from January 1, 2021, in accordance with prevailing Spanish legislation, the exemption on dividends and capital gains associated with holdings in both resident and non-resident entities is 95% of the amount thereof).

(4) In 2024, 53,912 thousands of euros were paid (76,606 thousands of euros in 2023) in connection with the amount to be disbursed for settling 2024 Corporate Income Tax. This amounts corresponds in its entirety to the Tax Consolidation Group (76,210 thousands of euros in 2023). In addition, 14,634 thousands of euros have been received as a refund for the 2023 Corporate Tax from the Tax Consolidation Group. This includes the record associated with the 50% limitation on tax losses not offset by the companies in the Tax Group in 2024, as mentioned in Note 4.2.e).



## d) Tax recognised in equity

	2024			2023		
	Increases	Decreases	Total	Increases	Decreases	Total
<b>Income and expenses recognised directly in equity</b>						
Tax effect on cash flow hedges	-	(2,197)	(2,197)	1,522	(620)	902
<b>Amounts transferred to the income statement</b>						
Tax effect on cash flow hedges	2,362	-	2,362	1,454	(929)	525
Total income tax recognised in equity	2,362	(2,197)	165	2,976	(1,549)	1,427

## e) Years open for inspection and tax audits

In accordance with prevailing legislation in Spain, tax returns cannot be considered final until they have been inspected by the tax authorities or until the four-year inspection period has elapsed. However, the four-year period can vary in the case of Group companies subject to other fiscal regulations.

During financial year 2021, Enagás S.A. and Enagás Transporte S.A.U. were notified that the Central Economic Administrative Court (hereinafter TEAC) had rejected the claims filed in relation to the assessments signed challenging the Corporate Income Tax for the years 2012 to 2015. During 2022, an appeal against the decisions of the Central Economic Administrative Tribunal (TEAC) was filed with the National Court of Appeal, which has not yet been decided at the time of preparing these consolidated annual accounts.

In the event that this appeal were ultimately contrary to the interests of the Group, it would result in a disbursement of approximately 11.7 million euros (not including any late payment interest that may be applicable), giving rise to the recognition of a deferred tax asset of 7.5 million euros and a negative effect on net profit /(loss) of approximately 4.2 million euros. In accordance with what is mentioned in [Note 2.9](#), during the 2023 financial year part of the provision for this concept amounting to 5.7 million euros has been made, which includes both fees and interest on late payment.

The appeal is expected to be resolved in more than one year.

Likewise, at 2024 year-end, the years 2019 to 2024 are pending audit for the taxes applicable to the company, with the exemption of Corporate Income Tax, which is pending audit for the years 2020 to 2024.

The Directors consider that all taxes mentioned have been duly paid so that even in the event of discrepancies in the interpretation of prevailing tax legislation with respect to the treatment applied to transactions, the resulting potential tax liabilities, if any, would not have a material impact on the accompanying Consolidated Annual Accounts.



## f) Deferred tax assets and liabilities

	Initial measurement	Recognised on profit and loss	Recognised in equity	Creation	Translation differences	Final value
<b>Deductible temporary differences</b>						
Capital grants and others	658	(550)				108
Amortisation deduction limit R.D.L. 16/2012 (1)	4,185	(4,185)				—
Provisions for personnel remuneration	4,195	1,774				5,969
Fixed assets provision	31,475	1,461	—	—	—	32,936
Provisions for litigation and other	19,312	27,915	—	—	—	47,227
Derivatives	431	—	(460)	—	—	(29)
Carry-forward tax losses (4)	17,918	3,355	—	71,772	—	93,045
Deductions pending and others (2)	845	(845)	—	—	—	—
<b>Total deferred tax assets</b>	<b>79,019</b>	<b>28,925</b>	<b>(460)</b>	<b>71,772</b>	<b>—</b>	<b>179,256</b>
Accelerated amortisation (3)	(196,025)	(52,982)	—	—	—	(249,007)
Derivatives	(491)	—	(650)	—	—	(1,141)
Deferred expenses	(1,229)	945	—	—	—	(284)
Others	(11,064)	5,221	—	—	(104)	(5,947)
<b>Total deferred tax liabilities</b>	<b>(208,809)</b>	<b>(46,816)</b>	<b>(650)</b>	<b>—</b>	<b>(104)</b>	<b>(256,226)</b>
<b>Net carrying amount</b>	<b>(129,790)</b>	<b>(17,738)</b>	<b>(1,110)</b>	<b>71,772</b>	<b>(104)</b>	<b>(76,970)</b>

(1) Arises from the limitation to tax deductible amortisation with respect to the Corporate Income Tax for the years 2013 and 2014. Said amortisation is recoverable from a tax point of view from 2015 on a straight line basis over 10 years.

(2) In addition, it includes the deduction to be applied from 2015 in accordance with the thirty-seventh transitory provision of Law 27/2014, by virtue of which those contributors for whom limited amortisation was applicable in 2013 and 2014 will have the right to a 5% deduction of the tax base with respect to the amounts included in the taxable income for the corresponding period.

(3) Arising from application of accelerated amortisation of certain assets for tax purposes during the period 2009-2014, and the record of this accelerated amortisation related to El Musel.

(4) This heading includes the deferred tax asset corresponding to the limitation of 50% of the carry-forward tax losses not offset by the Tax Group companies in 2023 and 2024, in accordance with Additional Provision nineteen of Law 27/2014 on Corporate Income Tax. The portion of the asset related to 2023 began reversing in 2024, while the portion related to 2024 will start reversing in 2025, on a straight-line basis over ten years.

The Enagás Group offset deferred tax assets in the amount of 178,215 thousands of euros from the Tax Consolidation Group in Spain (77,368 thousands of euros in 2023) against deferred tax

liabilities in its consolidated statement of financial position in accordance with IAS 12.

	Final value of assets and deferred tax liabilities by nature	Offset of deferred tax assets and liabilities - Tax Group	Final value
Deferred tax assets	79,019	(77,368)	1,651
Deferred tax liabilities	(208,809)	77,368	(131,441)
<b>Net carrying amount 2023</b>	<b>(129,790)</b>	<b>—</b>	<b>(129,790)</b>
Deferred tax assets	179,256	(178,215)	1,041
Deferred tax liabilities	(256,226)	178,215	(78,011)
<b>Net carrying amount 2024</b>	<b>(76,970)</b>	<b>—</b>	<b>(76,970)</b>

The Enagás Group has unregistered deferred tax assets and liabilities amounting to 48,804 thousands of euros and 35,958 thousands of euros, respectively, at the end of 2024 (29,705 thousands of euros and 34,892 thousands of euros, respectively, at the end of 2023). These correspond mainly to taxable temporary differences associated with investments in companies that are accounted for using the equity method and that meet the requirements established in IFRS to apply the registration exception.



## 4.3 Related party transactions and balances

### Accounting policies

- In addition to subsidiaries, associates, multigroup companies and significant shareholders, the Group's "related parties" are considered to be its "key management personnel" (members of the Board of Directors and Senior Managers, along with their close relatives), and the entities over which key management personnel may exercise significant influence or control, considering the definitions indicated in the commercial and reference regulations for listed companies.
- The terms of transactions with related parties are equivalent to those made on an arm's length basis and the corresponding remuneration in kind has been recorded.

Income and expenses	Directors and Senior Managers	Group Personnel, Companies or Entities	Other related parties	Total <sup>(1)</sup>
<b>2024</b>				
Expenses:				
Services received <sup>(2)</sup>	—	23,640	—	<b>23,640</b>
Other expenses	11,017	—	22	<b>11,039</b>
<b>Total Expenses</b>	<b>11,017</b>	<b>23,640</b>	<b>22</b>	<b>34,679</b>
Income:				
Financial income	—	2,030	—	<b>2,030</b>
Rendering of services	—	4,859	—	4,859
<b>Total income</b>	<b>—</b>	<b>6,889</b>	<b>—</b>	<b>6,889</b>
<b>2023</b>				
Expenses:				
Services received <sup>(2)</sup>	—	28,265	—	28,265
Other expenses	10,800	—	—	10,800
<b>Total Expenses</b>	<b>10,800</b>	<b>28,265</b>	<b>—</b>	<b>39,065</b>
Income:				
Financial income	—	1,143	—	1,143
Rendering of services	—	4,151	—	4,151
<b>Total income</b>	<b>—</b>	<b>5,294</b>	<b>—</b>	<b>5,294</b>

(1) No transactions were carried out during 2024 and 2023 with significant shareholders.

(2) Includes the operations that Enagás GTS has carried out with Mibgas.

Other transactions	Significant shareholders	Group Personnel, Companies or Entities	Total
<b>2024</b>			
Debt guarantees (Note 1.9)	—	604,569	604,569
Guarantees and sureties granted - Other (Note 1.9)	—	9,596	9,596
Dividends and other earnings distributed	67,491	—	67,491
<b>2023</b>			
Guarantees for related parties debt (Note 1.9)	—	655,750	655,750
Guarantees and sureties granted - Other (Note 1.9)	—	5,702	5,702
Dividends and other earnings distributed	100,613	—	100,613



The detail of current and non-current loans to related parties is as follows:

	Interest rate	Maturity	12.31.2024	12.31.2023
<b>Non-current credits to related parties (*)</b>			<b>45,178</b>	<b>33,456</b>
Planta de Regasificación de Sagunto, S.A.	Eur6m + Spread	Jun-2031	5,477	5,977
Knutsen Scale Gas, SL	7.00%	Aug-2027	2,000	2,000
Scale Gas Med Shipping	4.9% (revisable in 2024)	Sep-2028	11,881	11,117
Hanseatic Energy Hub GMBH	5.00%	Jun-2041	25,820	14,362
<b>Current loans to related parties</b>			<b>1,686</b>	<b>1,208</b>
Planta de Regasificación de Sagunto, S.A.	Eur6m + Spread	Jun-2031	10	315
Scale Gas Med Shipping	4.9% (revisable in 2024)	July-28	650	730
Knutsen Scale Gas, SL	7.00%	Aug-2027	76	49
Hanseatic Energy Hub GMBH	5.00%	Jun-2041	4	114
H2Greem	5.65%	Jan-2025	418	—
Basquevolt, S.A.	10.00 %	Jun-2025	528	—
<b>Total</b>			<b>46,864</b>	<b>34,664</b>

(\*) Unaffected by the expected loss.



## 4.4 Remuneration to the members of the Board of Directors and Senior Management

### Accounting policies

#### Share-based payments

- The Group classifies its share-based settlement plan for the Executive Director and senior management according to the manner of settling the transaction:
  - With Parent Company shares: Personnel expense is determined based on the fair value of the shares to be delivered at the grant date, taking into account the degree to which the objectives relating to said plan have been fulfilled. This expense is recognised over the stipulated period during which employee services are rendered with a credit to "Other equity instruments" in the accompanying balance sheet.
  - In cash: personnel expenses are determined based on the fair value of the liability at the date recognition requirements are met. Personnel expenses are recognised over the stipulated period during which services are rendered in the stipulated period (Note 2.9) and are entered in "Long-term provisions" in the accompanying Balance Sheet, until it is estimated that they will be settled within less than one year, at which time the associated provision is reclassified to the Personnel line under "Trade and other payables" on the liability side of the accompanying Balance Sheet. The liability is subsequently measured at fair value at each balance sheet date, up to and including the settlement date, with changes in fair value recognised in the Income Statement.
  - The Enagás Group used the Monte Carlo model to evaluate this programme. The fair value of the equity instruments at the granting date is adjusted to include the market conditions relating to this plan. Likewise, the Company takes into account the fact that the dividends accrued during the plan period are not paid to the beneficiaries as they do not become shareholders of the Parent Company until the plan has effectively been settled.

### Significant estimates and judgements

- The Enagás Group estimates fair value of the equity instruments granted on an accrual basis over the corresponding plan period, plus the deferral and loyalty periods of approximately four months for full disbursement. In the 2022 financial year, both the 2019-2021 ILP Plan and the 2022-2024 ILP Plan are considered.
- As for that part of the plans payable in shares, the Enagás Group estimates the fair value of the amount payable in cash on an accrual basis over the plan period (January 1, 2019 to December 31, 2021 for the 2019-2021 ILP and January 1, 2022 to December 31, 2024 for the 2022-2024 ILP), plus the deferral and loyalty periods of approximately four months for full disbursement.
- On September 29, 2022, the National Commission on Markets and Competition (CNMC) approved its supervisory report on the application of the measures to separate the activities of Enagás GTS, S.A.U., with the following requirements:
  - The multi-year variable remuneration that may be assigned to Enagás GTS managers must be independent of parameters associated with transmission and other incompatible activities.
  - The Executive Director of Enagás GTS and other persons responsible for the management of this company who are beneficiaries of long-term variable remuneration shall not receive shares in the share capital of Enagás as payment for such remuneration.
- In view of the above, it has been necessary to align the 2022-2024 Long-Term Incentive Plan with the requirements of the CNMC, developing two Plans and their respective Regulations, one for the Enagás Group (with the exception of Enagás GTS, S.A.U. senior managers), and another specific Regulation for Enagás GTS so that senior managers belonging to Enagás GTS will receive their variable remuneration in cash instead of receiving it in Enagás S.A. shares.



Remunerations	Salaries	Per diems	Other items	Pension plans	Insurance premiums	Termination benefits
<b>2024</b>						
Board of Directors	2,491	2,400	64	—	10	—
Senior Management	4,738	—	346	78	31	—
<b>Total</b>	<b>7,229</b>	<b>2,400</b>	<b>410</b>	<b>78</b>	<b>41</b>	<b>—</b>
<b>2023</b>						
Board of Directors	2,533	2,400	89	—	73	—
Senior Management	4,330	—	256	63	74	—
<b>Total</b>	<b>6,863</b>	<b>2,400</b>	<b>345</b>	<b>63</b>	<b>147</b>	<b>—</b>

The remuneration of the members of the Board of Directors for their Board membership and those corresponding to the Chairman and the Chief Executive Officer for the exercise of their executive and non-executive functions, respectively, during 2024 were approved by the General Shareholders' Meeting held on May 27, 2021 as part of the "Directors' Remuneration Policy for 2022, 2023 and 2024", having been modified by the General Shareholders' Meeting held on March 31, 2022, as Item 8 of the Agenda.

The Chief Executive Officer is a beneficiary of the 2022-2024 Long-Term Incentive Plan approved at the General Shareholders' Meeting held on March 31, 2022. Item 9 of its Agenda assigned him a total of 96,970 rights relating to shares. These rights do not entail the acquisition of shares for the time being, since the termination of the programme and the right to accrue the final incentive, which depends on the degree of achievement of the programme's objectives, will be generated within thirty days following the approval of the 2024 annual accounts by the General Shareholders' Meeting to be held in 2025.

Members of Senior Management (members of the Executive Committee) are beneficiaries of the 2022-2024 Long-Term Incentive Plan. As approved at the General Shareholders' Meeting, the Board has assigned them a total of 145,764 rights relating to shares as well as an incentive in cash amounting to approximately 1,000 thousands of euros. These rights do not

entail the acquisition of shares for the time being, since the termination of the programme and the right to accrue the final incentive, which depends on the degree of achievement of the programme's objectives, will be generated within thirty days following the approval of the 2024 annual accounts by the General Shareholders' Meeting to be held in 2025.

The Group has outsourced its pension commitments with respect to its Senior Managers through a mixed group insurance policy for pension commitments, including benefits in the event of survival, death, and employment disability. The Chief Executive Officer does not have a pension commitment instrument, as he does not have an employment relationship with the company, but rather a commercial relationship. The Chief Executive Officer maintains an assimilated individual savings insurance amounting to 214 thousands of euros.

The members of the Senior Management also form part of the group insured under the mixed group insurance policy for pension commitments. The total premium paid for the same during the financial year amounts to 645 thousands of euros.

The aforementioned remuneration, broken down for each member of the Board of Directors, without taking into account insurance premiums, is as follows:



	2024	2023
Mr Antonio Llardén Carratalá (Executive Chairman) (1)	730	730
Mr Arturo Gonzalo Aizpiri (Chief Executive Officer) (2)	2,085	2,152
Sociedad Estatal de Participaciones Industriales (Proprietary Director) (3)	160	160
Mr José Blanco López (Independent Director) (3)	160	160
Ms Ana Palacio Vallelersundi (Independent Leading Director) (3)	190	190
Mr José Montilla Aguilera (Independent Director) (3)	175	175
Mr Cristóbal José Gallego Castillo (Independent Director) (3)	160	160
Ms Eva Patricia Úrbez Sanz (Independent Director) (3)	160	160
Mr Santiago Ferrer Costa (Proprietary Director) (3)	160	160
Ms Natalia Fabra Portela (Independent Director) (3)	160	160
Ms María Teresa Arcos Sánchez (Independent Director) (3)	175	175
Mr David Sandalow (Independent Director) (3)	160	160
Ms Clara García Fernández-Muro (Independent Director) (3)	160	160
Ms María Teresa Costa Campi (Independent Director) (3)	160	160
Mr Manuel Gabriel González Ramos (Independent Director) (3)	160	160
<b>Total</b>	<b>4,955</b>	<b>5,022</b>

(1) The remuneration of the Executive Chairman for the exercise of his executive duties during 2023 was that approved in detail by the General Shareholders' Meeting held on May 27, 2021 as part of the "Directors' Remuneration Policy for 2022, 2023 and 2024" as approved as Item 10 of the Agenda as amended by the General Shareholders' Meeting held on March 31, 2022 under Item 8 of the Agenda to cover his remuneration as non-executive Chairman as from that date. In 2024, the Chairman received a fixed remuneration of 600 thousands of euros. He also received remuneration for membership of the Board amounting to 130 thousands of euros, making a total of 730 thousands of euros.

(2) The remuneration of the Chief Executive Officer for the 2024 financial year has been approved in detail by the General Shareholders' Meeting held on May 27, 2021 as part of the "Directors' Remuneration Policy for 2022, 2023 and 2024", approved as Item 10 of the Agenda and modified by the General Shareholders' Meeting held on March 31, 2022, as Item 8 of the Agenda. During financial year 2024, he received fixed remuneration of 1,000 thousands of euros and accrued variable remuneration of 505 thousands of euros. In addition, he received remuneration in the amount of 130 thousands of euros for Board membership, as well as other remuneration in kind amounting to 64 thousands of euros (the changes in remuneration in kind with respect to previous years are exclusively a result of measurement differences without there having been any additional items included in the remuneration). The Group has also implemented a 2022-2024 ILP of which the current Chief Executive Officer is a beneficiary and whose settlement will take place as of 2025, under the terms explained in this report. Throughout 2024, the CEO earned 386 thousands of euros for this role, bringing the total to 2,085 thousands of euros. In addition, he was also the beneficiary of a life insurance policy with a premium of 10 thousands of euros for the year. The Chief Executive Officer is a beneficiary of the 2022-2024 Long-Term Incentive Plan approved at the General Shareholders' Meeting held on March 31, 2022. Item 9 of its Agenda states that the meeting assigned him a total of 96,970 performance shares or rights relating to shares. These rights do not entail the acquisition of shares for the time being, since the right to accrue the final incentive, which depends on the degree of achievement of the programme's targets will be generated within thirty (30) days following the approval of the 2024 annual accounts by the General Shareholders' Meeting to be held in 2025. In addition, the CEO maintains an individual savings insurance amounting to 214 thousands of euros.

(3) The remuneration for these Directors relating to Board and committee membership was approved in detail by the General Shareholders' Meeting on March 31, 2022 as part of the proposal to modify the "Directors' Remuneration Policy for 2022, 2023, and 2024".

## Share-based payments

On March 31, 2022, the Enagás, S.A. General Shareholders' Meeting approved the 2022-2024 Long-Term Incentive Plan (ILP) aimed at the Executive Director, the members of the Executive Committee and the senior management of the Parent Company and its Group. The objective of the Plan is to (i) encourage the sustainable achievement of the objectives of the Company's Strategic Plan, (ii) give the opportunity to share the creation of value with participants, (iii) foster a sense of belonging to the Company and shared destiny, (iv) be competitive, and (v) align with the requirements of institutional investors, proxy advisors, and best Good Corporate Governance practices and, especially, those resulting from the recommendations of the CNMV's new Good Governance Code.

The plan consists of an extraordinary mixed multi-year incentive which will permit the beneficiaries to receive, after a certain period of time, a bonus payable in (i) Enagás, S.A. shares and (ii) cash; provided that certain strategic objectives of the Enagás Group are met.

On September 29, 2022, the National Commission on Markets and Competition (CNMC) approved its supervisory report on the application of the measures to separate the activities of Enagás GTS, S.A.U., with the following requirements:

- The multi-year variable remuneration that may be assigned to Enagás GTS managers must be independent of parameters associated with transmission and other incompatible activities.

- The Executive Director of Enagás GTS and other persons responsible for the management of this company who are beneficiaries of long-term variable remuneration shall not receive shares in the share capital of Enagás as payment for such remuneration.

In view of the above, it has been necessary to align the 2022-2024 Long-Term Incentive Plan with the requirements of the CNMC, developing two Incentive Plans and their respective Regulations, one for the Enagás Group (with the exception of Enagás GTS, S.A.U. senior managers), and another specific Regulation for Enagás GTS so that senior managers belonging to Enagás GTS will receive their variable remuneration in cash instead of receiving it in Enagás S.A. shares.

With respect to the portion payable in shares, a maximum of 679,907 shares are deliverable, all of which will come from the Company's treasury shares. Furthermore, the beneficiaries of the plan are not guaranteed any minimum value for the assigned shares. The cash part of the Plan is limited to an estimated payment of approximately 3.3 million euros should all the objectives be fully met.

This plan is aimed at persons who, due to their level of responsibility on their position in the Enagás Group, contribute decisively to achieving the Company's objectives. The Plan initially designated 53 beneficiaries, notwithstanding the possibility that new recruitments due to mobility or professional level changes may include new beneficiaries during the measurement period.



The objectives determined to evaluate the achievement of the Enagás S.A. Long-Term Incentive Plan are as follows:

- Accumulated results corresponding to the Funds for Operations ("FFO") of the Enagás Group. This metric shows the financial soundness and net profit growth, which are the cornerstones of the Strategic Plan. This takes into account both the EBITDA of the regulated business and the dividends received from the subsidiaries that are not controlled by Enagás. It is a benchmark indicator for investors. Fulfilling this objective will satisfy the Company forecasts for the distribution of Group, investment and debt amortisation dividends. It accounts for 20% of the total targets.
- Accumulated cash flows received from international affiliates and other businesses ("Dividend"). This shows the focus on international growth and a realistic and profitable investment plan as the cornerstones of the Strategic Plan. It measures the profitability of the international business compared with the annual remuneration objective which measures the year's international investment volume. It accounts for 20% of the total targets.
- Total shareholder return ("TSR"). To ensure appropriate, competitive shareholder remuneration. It takes into account share performance and the dividend policy. This objective comprises two components, each with a relative importance of 12.5% of the total objectives:
  - a) Absolute TSR: this is measured as the acquisition of a target share price in 2024. The target price has been established by investing estimated share dividends and is based on profitability and market parameters.
  - b) Relative TSR: this is measured with respect to the Peer Group of fifteen companies.
- The Company's commitment to long-term sustainable value creation ("Sustainability"). The target will have five indicators:
  - *Decarbonisation:*
    - Reduction of CO<sub>2</sub> emissions in line with the decarbonisation pathway (emissions 2024 vs. emissions 2021). It accounts for 6% of the total targets.
    - Investment in renewable gases: 2022-2024 investment associated with the adaptation of infrastructure for the transmission of renewable gases and the development of infrastructure dedicated to the transmission and storage of renewable gases. It accounts for 6% of the total targets.
  - *Diversity and inclusion:*
    - Percentage of female members on the Board of Directors. It accounts for 2% of the total targets.
    - Percentage of women in managerial and pre-managerial positions. It accounts for 3% of the total targets.
    - Percentage of promotions that are women in managerial and pre-managerial positions. It accounts for 3% of the total targets.

- **Digitalisation of the company.** The target will consist of 2 indicators:

- Implementation of the Digital Transformation Strategy and improvement of the associated indicators.
- Strengthening the positioning of Enagás' digital assets in the company's strategic areas.

It accounts for 15% of the total targets (7.5% for each indicator respectively).

Regarding the measurement period, although it will occur during the period from January 1, 2022 to December 31, 2024, its settlement will take place on the following dates:

- a. The beneficiary will receive 50% of the incentive within thirty (30) days following approval of the 2024 Annual Accounts by the General Shareholders' Meeting. This 50% will apply to the assets part of the incentive as well as the cash part of the incentive;
- b. The beneficiary will receive the remaining 50% of the incentive once a period of one year has elapsed from the first payment date.

In this regard, and since the Enagás S.A. ILP Regulation establishes the obligation for the beneficiaries to continue to provide their services to the Enagás Group until the first payment date in order to receive 50% of the incentive, and until the second payment date in order to receive the remaining 50%, the Enagás Group accrues the estimated fair value of the equity instruments granted taking account both of the target measurement period (January 1, 2022 to December 31, 2024) and the service conditions established for the period required to consolidate the remuneration.

The portion of said plan to be settled in Enagás, S.A. shares is considered a share-based transaction payable in equity instruments in accordance with IFRS 2 and, in keeping with said standard, the fair value of services received, as consideration for the equity instruments granted, is included in the Consolidated Income Statement at December 31, 2024, under "Personnel expenses" in the amount of 1,846 thousands of euros and a credit to "Other equity instruments" in the consolidated balance sheet at December 31, 2024 (1,439 thousands of euros at December 31, 2023).

The breakdown and fair value of the shares at the granting date of the ILP of the Enagás Group are as follows:

	ILP 2022-2024
Total shares at the concession date (1)	679,907
Fair value of the equity instruments at the granting date (EUR)	20.15
Dividend yield	7.94 %
Expected volatility	26.15 %
Discount rate	0.48 %

(1) This number of shares reflects the maximum number of shares to be delivered under the plan, and includes both the possibility of achieving the maximum degree of fulfilment of objectives established in the plan (125%), as well as the possibility that new hiring, staff mobility, or changes in professional levels, lead to the inclusion of new beneficiaries during the measurement period.



With respect to that part of the bonus payable in cash, the Enagás Group recognised the rendering of services corresponding to this plan as personnel expenses amounting to 648 thousands of euros with a credit to "Provisions" under non-current liabilities in the consolidated balance sheet at December 31, 2024 (635 thousands of euros at December 31, 2023). Disbursements for this item are presented in both current liabilities and non-current liabilities of the consolidated balance sheet. As in the case of the share-based payment plan component, the Enagás Group accrues the estimated fair value of the cash-settled amount over the term of the plan (from January 1, 2022 to December 31, 2024) and the service conditions established for the period of time required for the consolidation of the remuneration.

The objectives set to assess the achievement of the Enagás GTS, S.A.U. Long-Term Incentive Plan are as follows:

- The Company's commitment to long-term sustainable value creation. It accounts for 25% of the total targets.
- Digitisation of the Company. It accounts for 30% of the total targets.
- Improvement of the GTS income statement. It accounts for 25% of the total targets.
- Security of supply. It accounts for 20% of the total targets.

As for the measurement period, although it will take place during the period from January 1, 2022 to December 31, 2024, it will be settled on the basis of the payment dates set out in the Regulation.



# 4.5 Other information concerning the Board of Directors

The information included below as required by Article 229 and subsequent of the Spanish Corporate Enterprises Act was prepared considering that they are companies with similar or complementary activities to those carried out by Enagás, that is, natural gas transmission, regasification, distribution, and commercialisation activities regulated by Law 31/1198 of the Hydrocarbons Sector.

At December 31, 2024 and December 31, 2023, there were no holdings in the share capital of companies with the same, similar or complementary type of activity reported to the Company by the Directors.

Positions held or duties performed by Group directors at companies whose corporate purpose is the same, similar or complementary disclosed to Enagás, S.A. at December 31, 2024 and 2023, are as follows:

DIRECTOR	COMPANY	POSITIONS
2024		
Arturo Gonzalo Aizpiri	Enagás Transporte del Norte, S.L.	Chairman

DIRECTOR	COMPANY	POSITIONS
2023		
Arturo Gonzalo Aizpiri	Enagás Transporte del Norte, S.L.	Chairman
Arturo Gonzalo Aizpiri	Tallgrass Energy G.P.	Director

There are no activities of the same, similar or complementary nature to those carried out by Enagás which are performed by its Board members, on their own behalf or on behalf of third parties, not included in the above section.

At 2024 year-end, neither the members of the Board of Directors of the Company nor any parties related to them had notified the remaining Board members of any conflicts of interest, direct or indirect, with those of the Company.



## 4.6 Other information

### Accounting policies

#### Free-of-charge emission rights

- The Enagás Group does not initially recognise any free-of-charge CO<sub>2</sub> emission rights in the financial statements when applying the accounting method corresponding to the net value of the asset and the grants allocated to it in accordance with IAS 20. Likewise, neither expenditure (with the provision of allowance consumption) nor revenue is recorded, if the actual emission of rights is in line with the allocated rights.

#### Obtaining CO<sub>2</sub> emission allowances for consideration

- The Enagás Group only recognises the expense in the Consolidated Income Statement when it becomes known that the company has caused more emissions than were allocated to it. In this situation, the Enagás Group goes to the market and acquires CO<sub>2</sub> emission rights for a fee.
- Following the approval of Royal Decree 602/2016 of December 2, the Enagás Group records the carrying amount of CO<sub>2</sub> emission allowances under inventories (Note 4.8).
- If the Enagás Group intends to consume part of these rights in a period exceeding one year, the inventories heading recorded under assets in the balance sheet will be broken down for separate collection of those estimated to be consumed before and after that period.

- CO<sub>2</sub> emission rights acquired for consumption in the production process are recognised in inventories at their acquisition price, making the appropriate valuation adjustments if the recoverable amount of these rights is lower than their carrying amount and they will not be used in its activity, in which case an expense is recognised in the Consolidated Income Statement.
- The Enagás Group recognises an expense for the year in the Consolidated Income Statement, and the corresponding provision, which will be maintained until such time as the Group has to cancel the obligation through the delivery of the corresponding rights to the corresponding body, based on the following criteria:
  - According to the weighted average cost related to the CO<sub>2</sub> emission rights acquired;
  - In case of having a shortfall of emission rights, according to the best possible estimate to cover said shortfall.
  - The above expenses are recognised in the "Other current management expenses" item, under "Other operating expenses" in the Consolidated Income Statement.
  - These rights are verified during the first quarter of the following year by an accredited entity (SGS) and, after verifying them, the Enagás Group delivers the rights consumed, recording their accounting derecognition in the balance sheet.



## a) Information on the impact and management of climate change

In managing climate change, the Enagás Group considers energy efficiency, emissions reduction, and offsetting as essential elements for climate change mitigation.

The Enagás Group remains firmly committed to energy transition and has set a target to be carbon neutral by 2040 for Scopes 1 and 2, and by 2050 for Scope 3. Consequently, the Enagás Group has developed a Climate Transition Plan, which is incorporated into the updated 2022-2030 Strategic Plan. A key focus of this Plan is the decarbonisation of the energy sector. Specifically, it identifies the integration of renewable gases and the development of new midstream businesses related to other molecules, such as CO<sub>2</sub> and ammonia, as main drivers. The Plan also strengthens the commitment to improving energy efficiency, ensuring security of supply, and reducing emissions within its own operations and across the value chain.

Moreover, as outlined in the 2022-2030 Strategic Plan, there is a commitment to leading the development of renewable hydrogen and other molecules, fostering new activities linked to logistical services or CO<sub>2</sub> transmission and storage. The Plan highlights investments in developing new hydrogen connections, such as the southwest hydrogen corridor (H2Med) and the infrastructure of the Spanish Hydrogen Backbone, which includes underground storage and the hydrogen network. For the preparation of these Consolidated Annual Accounts and the disclosures of the Consolidated Management Report, Management has considered both the impact of these initiatives and the main risks arising from climate change. These risks include regulatory measures to discourage the use of fossil fuels that reduce future gas demand and the risk of increased operating costs due to natural disasters. Further information on climate-related risks and opportunities can be found in the sections "IRO-1 Description of the processes for determining and assessing material climate-related impacts, risks, and opportunities" and "E1-9 Expected financial effects of significant physical and transition risks" within the Non-Financial Information Statement and Sustainability Statement.

The Enagás Group remains firmly committed to energy transition and has set a target to be carbon neutral by 2040. In order to achieve this, the decarbonisation of the sector and the promotion of the use of hydrogen as a key vector in the transition was established as a priority within its Strategic Plan. Enagás is working to boost domestic production of renewable hydrogen in Spain as well as in the development of new hydrogen connections with France and Portugal.

For the preparation of these Consolidated Annual Accounts and the disclosures of the Management Report, Management has considered both the impact of these initiatives and the main risks arising from climate change. These risks include regulatory measures to discourage the use of fossil fuels that reduce future gas demand and the risk of increased operating costs due to natural disasters. More detail on Climate Risks and Opportunities is provided in the section "Management of risks and opportunities arising from climate change" contained in the Non-Financial Information Statement.

The main aspects that the Group has considered in incorporating the measures and risks mentioned above are described below:

- **Impairment of non-financial assets:** In the short and medium term (horizon up to 2030) a limited impact is estimated. Revenues for regasification, storage and transportation assets in Spain are calculated on the basis of a regulated remuneration system, which is made up of different terms aimed at remunerating the investment for the indicated useful lives, operating and maintenance costs, and other items associated with improving productivity and efficiency. As of today, the flows considered for the impairment test are calculated on the basis of this stable regulatory framework and are not affected by demand risk.

Flows arising from future projects, as the eventual adaptation of existing infrastructures, will be taken into account from the definition and approval of the regulatory framework for investment and remuneration, including, if applicable, the utilisation factor to be applied to existing infrastructures. The Group is closely monitoring ongoing regulatory developments and the progress in the project to develop the future hydrogen backbone network.

- **Property, plant and equipment:** It is important to note that any potential investments stemming from the new connections are still in the early stages. The Group is currently evaluating route options for the BarMar project and has submitted a planning proposal for the future hydrogen backbone network to the government. In addition, the non-binding Call for Interest process for H2Med has been initiated. At present, it has not been considered necessary to re-estimate the useful life of gas infrastructures as long as the same current regulatory and remuneration framework continues to apply, in which revenues from regasification, storage and transmission activities guarantee the remuneration of the investment. In addition, the progressive plan to replace natural gas turbochargers with electrically powered motor compressors (the acquisition cost ranges from 10 to 20 million euros per turbochargers depending on the power) is being continued.

- **Provisions and contingencies:** Physical risks caused by natural disasters or adverse weather conditions (floods, landslides, etc.) may cause damage to our infrastructures in Spain and in other countries in which Enagás participates. The need for additional provisions for these items or regulatory changes associated with the remuneration of decommissioning costs is reviewed at regular intervals in order to monitor possible changes in the assumptions used.

- **Impairment of investments accounted for using the equity method.** No significant impacts have been identified in the calculation of the recoverable value associated with the risk of a possible fall in demand for natural gas. As far as non-financial assets are concerned, revenue projections for each of the investments have been taken into account for their infrastructure, most of which correspond to long-term stable contracts with off-takers, concessions, regulated revenues, etc.

In addition, other measures related to the energy transition that continue this year are: definition of decarbonisation targets linked to the variable remuneration of all the Group's professionals, the weight of which has increased in recent years; the inclusion of



environmental criteria in the suppliers and contractors risk's assessment, as well as in decision-making when awarding contracts for the provision of services and products. As indicated in Note 3.4, the Group has entered into a sustainable credit line with an interest rate linked to the reduction of CO<sub>2</sub> emissions. During 2024, environmental actions were carried out in the amount of 3,604 thousands of euros, recognised as investments under assets in the Balance Sheet (6,752 thousands of euros in 2023). The Company also assumed environmental expenses amounting to 7,048 thousands of euros in 2024, recognised under "Other operating expenses" (26,686 thousands of euros in 2023).

The Group has arranged sufficient civil liability insurance to meet any possible contingencies, compensation and other risks of an environmental nature which it might incur.

The Group did not benefit from any tax incentives during 2024 as a consequence of activities relating to the environment.

## b) Greenhouse gas emission rights

Some of the Enagás Group's facilities are included within the scope of Law 1/2005 of March 9, which regulates the commercial regime for greenhouse gas emission rights.

Directive 2018/410 of the European Parliament and of the Council of March 14, 2018, reformed the scheme with a view to the 2021-2030 period, dividing it into two periods of free allocation of emission allowances for fixed facilities: 2021-2025 period and 2026-2030 period. The calculation of the allocations subject to public consultation has been carried out by applying the allocation methodology set out in Delegated Regulation (EU) 2019/331.

On July 13, 2021, the Council of Ministers approved the final assignation of free greenhouse gas emission rights to institutions subject to the greenhouse gas emission allowance trading regime

## c) Audit fees

"Other operating expenses" includes the fees for audit and non-audit services provided by the auditor of the Group, Ernst & Young, S.L., or by a company belonging to the same group or related to the auditor, broken down as follows:

Categories	2024		2023	
	Services rendered by the accounts auditor and related companies	Services provided by other auditors of the Group	Services rendered by the accounts auditor and related companies	Services provided by other auditors of the Group
Audit services (1)	1,075	111	1,081	197
Other assurance services (2)	399	—	427	—
<b>Total audit and related services</b>	<b>1,474</b>	<b>111</b>	<b>1,508</b>	<b>197</b>
<b>Total professional services (3)</b>	<b>1,474</b>	<b>111</b>	<b>1,508</b>	<b>197</b>

(1) Audit services: This heading includes services rendered for the performance of statutory audits of the Group's annual accounts and the limited review work performed with respect to the Interim and Quarterly Consolidated Financial Statements as well as the Certification of the Internal Control over Financial Reporting (ICFR) System.

(2) Other audit-related assurance services: This section also covers the review of the Sustainability Statement in the Management Report and its Internal Control System over Sustainability Information, the review of the Annual Corporate Governance Report, the commissioning of a Comfort letter for the EMTN programme update, the report on agreed subsidy procedures, the review of the Directors' Remuneration Report and the issuing of an Agreed Procedures Report on the eligibility and alignment of the Hydrogen Backbone Network for the application of CEF funds.

(3) Law 22/2015 on the Audit of Accounts establishes that non-audit services provided by the auditor must be less than 70% of the average fees paid for audit services for three consecutive years. The amount of non-audit services rendered by the accounts auditors (Ernst & Young, S.L.) amounts to 37% of the audit service fees invoiced (34% for the Group).

for the period 2021-2025, among which certain facilities of the Enagás Group are included. The free allocation can be adjusted annually based on the facilities' activity level to reflect significant production increases and decreases, as specified in Implementing Regulation (EU) 2019/1842.

The rights assigned in 2024 were 55,637 emission rights (50,509 emission rights in 2023) measured at 73.17 euros/right and 83.18 euros/right, respectively, the spot price on the first working day of 2024 and 2023 of SENDECO<sub>2</sub> (European CO<sub>2</sub> Negotiation System), a company engaged in the purchase and sale of emission rights on its own account and in providing technical and administrative advice on industrial facilities subject to the Trade Directive (EU ETS).

During the 2024 financial year, 40,000 emission allowances were purchased for a total of 2,523 thousands of euros, all of which are estimated to have been used within the same year. In 2023, 274,000 allowances were acquired for a total of 22,393 thousands of euros.

The Enagás Group consumed 150,161 greenhouse gas emission rights during 2024 (215,438 rights during 2023).

During the second quarter of 2024, the Enagás Group presented the verified emissions reports of 2023 by the accredited entity (SGS) to the corresponding Autonomous Communities, which validated the emissions. In the second quarter of 2024, the Enagás Group delivered greenhouse gas emission allowances equivalent to the verified emissions in 2023 for all the facilities referred to.

During 2023 and 2024, the Enagás Group did not engage in any negotiations for future contracts relating to greenhouse gas emission rights, nor were there any contingencies relating to penalties or provisional cautionary measures in the terms established by Law 1/2005.



## 4.7 Information by segments

### Accounting policies

#### Basis of segmentation

- Segment reporting is structured based on the Group's various business lines as described in Note 1.1.
  - The Group identifies its operating segments based on internal reports relating to the companies comprising the Group which are regularly reviewed, discussed and evaluated in the decision-making process.
- As of December 31, 2024, the scope of the Enagás Group's operating segments has changed, aligning with shifts in the priorities of the 2022-2030 strategic plan and the new structure being implemented.

### a) Main business segments

#### Regulated gas activities

These encompass both infrastructure activities and the role of the Technical System Manager.

**Gas transmission:** Core activity which consists of the movement of gas through the Group's transmission network, composed of gas pipelines for the primary (with maximum design pressure equal to or higher than 60 bars) and secondary (with maximum design pressure of between 60 and 16 bars) transmission of gas to distribution points, as owner of most of the Spanish gas transmission network.

**Regasification:** The gas is transported from the producing countries in methane tankers at 160°C below zero in its liquid state (LNG) and is unloaded at the regasification plants where it is stored in cryogenic tanks.

At these facilities, via a physical process which normally makes use of seawater vaporisers, the temperature of the liquefied gas is increased until it is transformed into its gaseous state.

The natural gas is injected into the gas pipelines for transmission to the whole peninsula.

**Storage of gas:** The Enagás Group operates the following underground storage facilities:

Serrablo (located between Jaca and Sabiñánigo - Huesca), Gaviota (offshore storage, located close to Bermeo - Vizcaya), and Yela (Guadalajara).

Likewise, the Company carries out all the operations necessary for the maintenance and operation of the facilities until the last phase of the decommissioning of the Castor storage facility is completed.

The Enagás Group continued carrying out its functions as Technical Manager of the System in 2024 in compliance with Royal Decree 6/2000 of June 23 and Royal Decree 949/2001 of August 3, with a view to guaranteeing supply continuity and safety, as well as the correct coordination among the access points, storage, transmission, and distribution points.

In accordance with said legislation, the activities related to transmission and technical management of the system which are of a regulated nature must be carried out by two subsidiaries entirely owned by Enagás, S.A. (Enagás Transporte, S.A.U. and Enagás GTS, S.A.U., respectively).

#### Regulated Activities – Hydrogen Infrastructure

Notably, hydrogen infrastructure activities, mainly undertaken by Enagás Infraestructuras de Hidrógeno, will be crucial for the development of Spain's future hydrogen backbone network.

#### New businesses

This area also includes all non-regulated activities related to new energies such as biomethane, ammonia, and CO<sub>2</sub>, along with other services and entrepreneurial ventures.

The above activities can be carried out by Enagás, S.A. itself or through companies with an identical or analogous corporate purpose in which it holds interest, provided they remain within the scope and limitations established by legislation applicable to the hydrocarbons sector and new regulations associated with the future Hydrogen System.

#### International

Includes all activities, both regulated and non-regulated, as well as transactions related to investments in associates and joint ventures, except those corresponding to BBG, Saggas, MIBGAS and Iniciativas del Gas, S.L., which are included in the Regulated segment.



## Other areas

This section encompasses the assets and/or liabilities, as well as the income and/or expenses, of companies that are not allocated to any specific business area. This includes, notably, Enagás S.A., the parent company of the Group.

The information structure of the segments is designed as if each business line were an independent business, with its own resources, distributed on the basis of the assets assigned to each line

in accordance with an internal system of cost allocation by percentages.

Income Statement 2024	Regulated Gas	International	New businesses	Hydrogen	Other Areas	Adjustments <sup>(1)</sup>	Total Group
Operating income	904,974	208	11,491	—	459	(3,914)	913,218
· Third parties	901,230	208	6,859	—	69	—	908,366
· Group	3,744	—	4,632	—	390	(3,914)	4,852
Provisions for amortisation of fixed assets	(275,122)	(91)	(631)	—	(11,264)	—	(287,108)
Inc. from investments accounted for using the equity method	12,635	139,572	(5,733)	—	—	—	146,474
Operating profit	341,589	126,609	(8,619)	(5,172)	(25,684)	6	428,729
Financial income	14,671	36,740	804	110	344,632	(334,021)	62,936
Financial expenses	(23,922)	(36,628)	(16)	—	(70,172)	10,899	(119,839)
Income tax	(81,396)	21,050	436	1,244	72,608	—	13,942
Net profit	250,833	(303,023)	(7,633)	(3,818)	100,271	(335,939)	(299,309)

Income Statement 2023	Regulated Gas	International	New businesses	Hydrogen	Other Areas	Adjustments <sup>(1)</sup>	Total Group
Operating income	905,390	3,690	9,760	—	2,391	(1,590)	919,641
· Third parties	904,463	3,627	7,079	—	761	—	915,930
· Group	927	63	2,681	—	1,630	(1,590)	3,711
Provisions for amortisation of fixed assets	(261,873)	(290)	(397)	—	(10,783)	—	(273,343)
Inc. from investments accounted for using the equity method	14,387	139,252	(6,335)	—	—	—	147,304
Operating profit	365,238	125,497	(8,962)	(3,216)	(21,652)	(27)	456,878
Financial income	9,163	27,315	899	785	530,678	(522,878)	45,962
Financial expenses	(17,406)	(36,502)	(31)	(41)	(67,868)	(6,344)	(128,192)
Income tax	(88,088)	(2,753)	1,705	677	10,373	—	(78,086)
Net profit	268,292	152,360	(4,956)	(1,795)	451,505	(522,878)	342,528

(1) "Adjustments" includes the eliminations of inter-company transactions (rendering of services and credits granted).



2024 BALANCE SHEET	Regulated Gas	International	New businesses	Hydrogen	Other Areas	Adjustments <sup>(1)</sup>	Total Group
Total assets	4,996,770	1,875,264	190,048	11,143	5,807,715	(5,385,005)	7,495,935
Acquisition of fixed assets	98,351	4	27,567	3,322	7,468	—	136,712
Investments accounted for using the equity method	146,700	1,009,661	70,005	—	—	—	1,226,366
Non-current liabilities <sup>(2)</sup>	456,113	(37,742)	(2,649)	(1,641)	(52,669)	—	361,412
- Deferred tax liabilities	179,739	(37,760)	(3,215)	(1,644)	(59,109)	—	78,011
- Provisions	239,040	18	366	3	6,411	—	245,838
- Other non-current liabilities	37,334	—	200	—	29	—	37,563
Current liabilities <sup>(2)</sup>	541,547	6,580	4,860	3,643	51,070	(8,828)	598,872
#VALUE!	541,547	6,580	4,860	3,643	51,070	(8,828)	598,872

2023 BALANCE SHEET	Regulated Gas	International	New businesses	Hydrogen	Other Areas	Adjustments <sup>(1)</sup>	Total Group
Total assets	4,856,332	3,317,802	173,317	7,776	6,432,500	(6,280,457)	8,507,270
Acquisition of fixed assets	153,002	129	8,870	1,174	17,812	—	180,987
Investments accounted for using the equity method	157,099	2,371,390	61,485	—	—	—	2,589,974
Non-current liabilities <sup>(2)</sup>	423,939	1,817	(2,589)	(1,905)	(11,991)	—	409,271
- Deferred tax liabilities	154,150	1,714	(2,878)	(1,905)	(19,640)	—	131,441
- Provisions	233,882	103	89	—	7,642	—	241,716
- Other non-current liabilities	35,907	—	200	—	7	—	36,114
Current liabilities <sup>(2)</sup>	540,380	4,925	4,213	3,377	63,907	(12,505)	604,297
#VALUE!	540,380	4,925	4,213	3,377	63,907	(12,505)	604,297

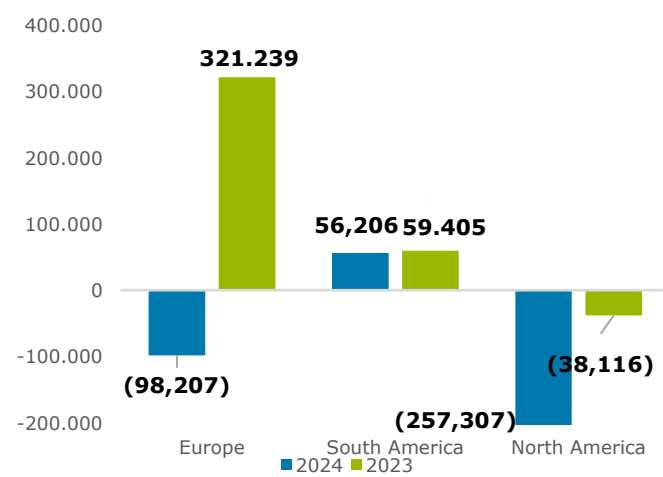
(1) "Adjustments" includes the eliminations of inter-company transactions (rendering of services and credit granted) as well as the elimination of Investments-Shareholders equity.

(2) Financial liabilities are not included.

## b) Segments by geographical information

The majority of companies in the Enagás Group operating outside Europe are consolidated under the equity method, with the corresponding expenses and income thus recognised under "Profit/(loss) from investments consolidated under the equity method" in the Consolidated Income Statement. In view of this, the information relating to geographical markets is based on net revenue.

The distribution of consolidated results for 2024 and 2023, broken down by geographical markets, is as follows:





## 4.8 Inventories

As established in Order IET/2736/2015 of December 17: "From October 1, 2016, the quantity of working gas is zero." At December 31, 2015, the Enagás Group, as Technical Manager of the System, maintained control of approximately 755 GWh of working gas necessary for enabling operation of the gas system as established in the fifth additional provision to Order ITC/3863/2007 of December 28. This gas is not reflected in the financial statements as it is gas available for the System and therefore not owned by the Enagás Group.



## 4.9 Subsequent events

From December 31, 2024 until the date of preparation of these Consolidated Annual Accounts, the following events have occurred:

- On February 6, 2025, the Enagás Group, through its subsidiary Enagás Financiaciones, repaid a 600 million euros bond at maturity.
- On January 30, 2025, the European Commission granted the full amount of funds requested by Enagás for studies related to the Projects of Common Interest (PCI) for the H2med corridor. This corridor includes a connection between Celorico da Beira in Portugal and Zamora in Spain (CelZa), as well as a maritime link between Barcelona and Marseille (BarMar). It also covers the initial sections of the Spanish Hydrogen Backbone Network, including the Vía de la Plata Axis with its link to the Puertollano Hydrogen Valley, and the Axis that incorporates the Cornisa Cantábrica, Ebro Valley, and Levante corridors.

These funds, totalling 75.8 million euros, originate from the Connecting Europe Facility (CEF) of the European Climate, Infrastructure and Environment Executive Agency (CINEA). They also cover studies for underground storage associated with the Spanish Hydrogen Backbone Network.

## 4.10 Explanation added for translation to English

These Consolidated Annual Accounts are a translation of financial statements originally issued in Spanish and prepared in accordance with International Financial Reporting Standards as adopted by the EU, in conformity with Regulation (EC) No. 1606/2002. In the event of a discrepancy, the Spanish-language version prevails.

These Consolidated Annual Accounts are presented on the basis of the regulatory financial reporting framework applicable to Enagás Group ([Note 1.2](#)). Certain accounting practices applied by the Group that conform to that regulatory framework may not conform to other generally accepted accounting principles and rules





# APPENDIX I. SUBSIDIARIES AT DECEMBER 31, 2024

Subsidiaries	Country	Activity	% stake and Voting Rights controlled by the Enagás Group	Amount of Share Capital in functional currency
Enagás Transporte, S.A.U.	Spain	Regasification, storage, and transmission of gas	100.00 %	532,089,120 euros
Enagás GTS, S.A.U.	Spain	Technical Management of the Gas System	100.00 %	5,914,451 euros
Enagás Internacional, S.L.U.	Spain	Holding	100.00 %	219,768,258 dollars
Enagás Financiaciones, S.A.U.	Spain	Financial management	100.00 %	890,000 euros
Enagás Transporte del Norte, S.L.	Spain	Gas transmission	90.00 %	38,501,045 euros
Enagás Chile, S.P.A.	Chile	Holding	100.00 %	2,252,644 dollars
Enagás México, S.A.	Mexico	Holding	100.00 %	4,608,133 dollars
Enagás Perú, S.A.C.	Peru	Holding	100.00 %	4,794,417 dollars
Enagás USA, LLC	USA	Holding	100.00 %	244,495,289 dollars
Enagás Intern. USA, S.L.U.	Spain	Holding	100.00 %	121,530,445 euros
Infraestructuras de Gas, S.A.	Spain	Holding	85.00 %	340,000 euros
Enagás Emprende, S.L.U.	Spain	Holding	100.00 %	35,053,953 euros
Efficiency for LNG Applications, S.L.	Spain	Development of industrial projects and activities relating to LNG terminals.	100.00 %	1,286,694 euros
Scale Gas Solutions, S.L.	Spain	Development and implementation of facilities for the supply of natural gas as fuel for vehicles, including its design, construction and maintenance.	100.00 %	8,711,217 euros
Enagás Services Solutions, S.L.	Spain	Holding	100.00 %	9,617,560 euros
Sercomgas Gas Solutions, S.L.	Spain	Provision of commercial services for the purpose of improving the daily operational management of gas shippers.	84.00 %	88,536.00 euros
Enagás Infraestructuras de Hidrógeno, S.L.	Spain	Design, construction, operation and maintenance of hydrogen and other gas production facilities	100.00 %	3,978,300 euros
Musel Energy Hub, S.L.	Spain	Regasification, natural gas storage and capacity logistics services.	100.00 %	5,003,000 euros
SPV Scale Mar 1, S.L.U.	Spain	Management of all types of merchant ships, therefore engaging in maritime transport activities.	100.00 %	3,600 euros



# APPENDIX II. JOINT VENTURES AND ASSOCIATES

Company	Country	Activity	% of voting rights controlled by the Enagás Group	Thousands of euros (1)		Net carrying amount in functional currency		
				Carrying amount	Dividends received	Thousands of euros	Thousands of dollars	
Joint ventures								
Bahía de Bizkaia Gas, S.L.	Spain	Storage and regasification	50.00 %	50.00 %	54,884	11,500	54,884	—
Subgrupo Altamira LNG, C.V. (3)	Netherlands/Mexico	Holding/Regasification	40.00 %	40.00 %	35,127	15,839	—	39,712
Tecgas, Inc.	Canada	Holding	51.00 %	51.00 %	8	—	—	—
Iniciativas de Gas, S.L. (4)	Spain	Holding	60.00 %	60.00 %	46,648	—	46,648	—
Planta de Regasificación de Sagunto, S.A. (4)	Spain	Storage and regasification	72.50 %	72.50 %	750	9,882	750	—
Axent Inf. Tel., S.A.	Spain	Construction, maintenance and operation of a telecommunications network.	49.00 %	49.00 %	19,247	—	19,247	—
Vira Gas Imaging, S,L.	Spain	Development and commercialisation of technological activities	40.00 %	40.00 %	—	—	—	—
Scale Gas Med Shipping, S.L.U.	Spain	Construction, design, commissioning, start-up and O&M of energy structures	50.00 %	50.00 %	56	—	56	—
Green Ports Project, S.L.	Spain	Small scale in ports	50.00 %	50.00 %	30	—	30	—
H2Greem Global Solutions, S.L.	Spain	Development of industrial projects and activities to promote hydrogen production and transmission infrastructures.	34.00 %	34.00 %	216	—	216	—
Knutsen Scale Gas, SL	Spain	Bunkering	50.00 %	50.00 %	502	—	502	—
Hanseatic Energy Hub Operations GMBH	Germany	Operation of a liquefied gas terminal in Hamburg	50.10 %	50.10 %	52	—	52	—
Associates								
Transportadora de gas del Perú, S.A.	Peru	Gas transmission	28.95 %	28.95 %	383,992	73,762	—	515,412
Trans Adriatic Pipeline, A.G. (3)	Switzerland (2) and (3)	Gas transmission	20.00 %	20.00 %	327,537	63,130	367,246	—
Grupo Senfluga Energy Infrastructure, S.A.	Greece	Holding	18.00 %	18.00 %	29,794	5,400	34,157	—
Mibgas Derivatives, S.A.	Spain	Operation of the (organised) gas market	28.34 %	28.34 %	97	—	97	—
Seab Power Ltd.	United Kingdom	Development of systems to transform waste into energy	12.99 %	12.75 %	—	—	—	—
Enagás Renewable, S.L. (Subgrupo)	Spain	Development of projects to promote the role of renewable gases in the energy transition.	60.00 %	60.00 %	17,419	—	17,419	—
Solatom CSP, S.L.	Spain	Use of heat as an energy source	7.15 %	7.15 %	317	—	317	—
Mibgas, S.A.	Spain	Operation of the (organised) gas market	13.34 %	13.34 %	417	—	417	—
Trovant Technology, S.L.	Spain	Upgrading from biogas to biomethane for bioenergy production	12.47 %	12.47 %	487	—	487	—
Hanseatic Energy Hub GMBH	Germany	Development of a liquefied gas terminal in Hamburg	10.00 %	10.00 %	2,122	—	2,122	—

(1) For those companies whose local currency is different to that of the Group, the euro (Note 1.3), the "Net carrying amount" of the financial investment is shown in historic euros and includes the capitalised acquisition costs. The euros corresponding to "dividends received" are translated at the exchange rate corresponding to the transaction date.

(2) This company has three permanent establishments in Greece, Italy, and Albania.

(3) Both companies are owned together with other international industrial partners. Their activity consists in the development and operation of infrastructure projects, such as the regasification plant already operational in Altamira and the TAP project (declared Project of Common Interest by the European Union).

(4) Iniciativas de Gas, S.L. and Infraestructuras de Gas, S.L. each hold a 50% stake in Planta de Regasificación de Sagunto Gas, S.A. Both companies are in turn affiliates of the Enagás Group, which holds a 60% stake and an 85% stake in them, respectively. Thus, the indirect interest held by the Enagás Group in Planta de Regasificación de Sagunto Gas, S.A. amounts to 72.5%. The dividend distribution is carried out by Planta de Regasificación de Sagunto Gas, S.A.



## Balance sheet figures 2024

Company	Thousands of euros								
	Figures for affiliate (1)(2)								
	Assets			Equity		Liabilities			
	Long-term	Cash and cash equivalents	Short-term Remaining short-term assets	Other results	Remaining equity	Long-term Financial liabilities	Short-term Remaining liabilities	Financial liabilities	Remaining liabilities
Axent Inf. Tel., S.A.	52,578	1,143	2,423	—	21,962	1,594	22,815	1,799	7,974
Bahía de Bizkaia Gas, S.L.	139,084	104,434	4,114	(80)	67,154	68,476	27,074	11,261	73,747
Basquevolt, S.A.	37,895	16,600	615	—	4,478	27,099	5,171	13,769	2,773
Enagás Renovable S. L. (Subgroup)	78,023	8,141	1,485	(2)	79,737	1,279	634	4,481	1,520
Green Ports Projects, S.L.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
Senfluga Energy Infrastructure S.A. Group	1,170,045	112,812	155,199	1,877	548,537	608,978	63,192	61,788	153,684
H2Greem Global Solutions S.L.	1,090	322	751	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
Hanseatic Energy Hub GMBH	—	—	100	—	100	—	—	—	—
Hanseatic Energy Hub Operations GMBH	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
Iniciativas de Gas, S.L.	750	789	6,815	—	1,575	—	—	6,700	79
Knutsen Scale Gas, S.L.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
Mibgas Derivatives, S.A.	4	2,025	36,468	—	2,058	—	1	—	36,438
Mibgas, S.A.	624	216,410	107,444	—	5,883	—	506	193,242	124,847
Planta de Regasificación de Sagunto, S.A.	238,200	94,646	60,362	(630)	153,909	78,907	42,410	24,092	94,520
Scale Gas Med Shipping,	54,051	3,848	11,928	—	(1,527)	54,260	9,747	3,161	4,185
SeaB Power Ltd.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
Solatom CSP	676	2,011	621	—	2,715	—	375	3	215
Subgrupo Altamira LNG,	250,008	15,364	47,914	—	199,823	—	65,620	26,865	20,977
Tecgas, Inc.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
Trans Adriatic Pipeline,	4,739,502	94,136	476,278	166,151	1,904,212	2,540,593	170,507	284,081	244,373
Transportadora de gas del Perú, S.A.	2,431,672	247,523	90,628	—	1,535,485	491,778	411,156	176,451	154,953
Trovant Technology, S.L.	1,124	434	44	—	1,187	—	421	—	(6)
Vira Gas Imaging, S.L.	252	46	207	—	519	—	—	—	(14)

(1) Data provided as though companies were 100% invested, in accordance with IFRS.

(2) For those companies whose functional currency is different to the Group's functional currency, the euro (Note 1.3), the balance sheet figures were translated at the exchange rate prevailing at year-end.



## Income Statement figures 2024

Thousands of euros							
Figures for affiliate (1)(2)							
Income statement							
Company	Revenue	Amortisation	Interest income	Interest expense	Income tax	Other expenses and income	Net profit/(loss)
Axent Inf. Tel., S.A.	6,381	(3,251)	18	(588)	—	(4,224)	(1,664)
Bahía de Bizkaia Gas, S.L.	45,276	(9,253)	3,774	(5,248)	2,830	(21,613)	15,766
Basquevolt, S.A.	159	(1,602)	—	(1,028)	—	(2,491)	(4,962)
Enagás Renovable S. L. (Subgroup)	1,032	(385)	89	(19)	111	(8,851)	(8,023)
Senfluga Energy Infrastructure S.A. Group	200,285	(27,509)	2,914	(11,402)	(15,992)	(86,589)	61,707
H2Greem	1,123	(107)	—	(58)	191	(2,683)	(1,534)
Hanseatic Energy Hub GMBH	—	—	—	—	—	(24,235)	(24,235)
Hanseatic Energy Hub Operations GMBH	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
Iniciativas de Gas, S.L.	—	—	—	—	—	(122)	(122)
Knutsen Scale Gas, S.L.	5,086	(1,964)	—	(1,440)	—	(370)	1,312
Mibgas Derivatives	656	—	405	—	210	(640)	631
Mibgas, S.A.	6,045	(4)	190	—	241	(5,576)	896
Planta de Regasificación de Sagunto, S.A.	55,391	(27,811)	4,847	(5,322)	(2,347)	(18,269)	6,489
Scale Gas Med Shipping, S.L.U.	7,715	(2,532)	901	(4,200)	(2)	(1,799)	84
SEAB Power Ltd.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
Solatom CSP, S.L.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
Subgrupo Altamira LNG, C.V.	44,097	(1,514)	167	(2,516)	(11,281)	(6,346)	22,607
Tecgas, Inc.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
Trans Adriatic Pipeline, A.G.	756,131	(196,700)	87,567	(180,787)	(68,034)	(81,177)	317,000
Transportadora de gas del Perú, S.A.	711,692	(163,730)	11,604	(48,795)	(92,709)	(223,750)	194,312
Trovant Technology, S.L.	186	—	—	—	—	(387)	(201)
Vira Gas Imaging, S.L.	—	(37)	—	—	—	49	12

(1) Data provided as though companies were 100% invested, in accordance with IFRS.

(2) For those companies whose functional currency is different to the Group's functional currency, the euro (Note 1.3), the income statement figures were translated at the average exchange rate for the year.



## Balance sheet figures 2023

Company	Thousands of euros								
	Figures for affiliate (1)(2)								
	Assets			Equity		Liabilities			
	Long-term		Short-term	Other results	Remaining equity	Long-term		Short-term	
		Cash and cash equivalents	Remaining short-term assets			Financial liabilities	Remaining liabilities	Financial liabilities	Remaining liabilities
Axent Inf. Tel., S.A.	63,233	387	3,944	—	31,127	1,525	24,450	7,338	3,123
Bahía de Bizkaia Gas, S.L.	144,538	118,939	10,083	1,031	74,387	79,211	26,618	11,659	80,653
Basquevolt, S.A.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
EC Soto La Marina SAPI de CV	58,840	8,188	2,828	—	222,675	42,602	(294)	4,761	522
Enagás Renovable S. L. (Subgroup)	64,853	11,701	921	(10)	71,768	1,815	—	1,476	2,426
Green Ports Projects, S.L.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
Senfluga Energy Infrastructure S.A. Group	1,063,750	185,763	216,997	5,952	660,797	539,043	19,250	226,891	14,577
Tallgrass Energy LP Group	8,763,715	42,995	575,154	—	4,501,287	4,173,643	56,312	917	649,725
H2Greem Global Solutions S.L.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
Hanseatic Energy Hub GMBH	—	—	100	—	100	—	—	—	—
Hanseatic Energy Hub Operations GMBH	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
Iniciativas de Gas, S.L.	733	951	19	—	1,697	—	—	—	6
Knutsen Scale Gas, S.L.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
Mibgas Derivatives, S.A.	—	1,169	13,592	—	1,198	—	1	—	13,562
Mibgas, S.A.	606	262,100	7,125	—	6,185	—	435	262,943	266
Planta de Regasificación de Sagunto, S.A.	276,697	95,417	60,151	(593)	162,319	89,972	42,022	44,449	94,097
Scale Gas Med Shipping, S.L.	51,037	247	13,385	—	(291)	57,931	2,416	3,879	734
SeaB Power Ltd.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
Solatom CSP	722	553	125	—	1,388	—	—	2	10
Subgrupo Altamira LNG, C.V.	252,091	14,588	44,217	—	194,613	2,812	67,408	29,120	16,942
Sunrgyze, S.L. (formerly Sun2Hy, S.L.)	8,374	833	89	—	9,206	—	—	73	17
Tecgas, Inc.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
Trans Adriatic Pipeline, A.G.	4,916,927	302,429	340,142	214,801	1,888,903	2,798,478	166,846	270,211	220,258
Transportadora de gas del Perú, S.A.	2,411,990	289,423	96,883	—	1,485,154	613,486	398,695	165,275	135,686
Trovant Technology, S.L.	769	535	46	—	1,327	—	—	8	15
Vira Gas Imaging, S.L.	288	157	435	—	487	—	—	121	272

(1) Data provided as though companies were 100% invested, in accordance with IFRS.

(2) For those companies whose functional currency is different to the Group's functional currency, the euro (Note 1.3), the balance sheet figures were translated at the exchange rate prevailing at year-end.



## Income Statement figures 2023

Thousands of euros							
Figures for affiliate (1)(2)							
Income statement							
Company	Revenue	Amortisation	Interest income	Interest expense	Income tax	Other expenses and income	Net profit/(loss)
Axent Inf. Tel., S.A.	6,258	(3,178)	14	(613)	—	(4,180)	(1,699)
Bahía de Bizkaia Gas, S.L.	59,386	(14,220)	2,392	(5,798)	(4,965)	(21,345)	15,450
Basquevolt, S.A.	—	(138)	—	—	—	(5,006)	(5,144)
EC Soto La Marina S.A.Pl. de C.V.	11,582	(4,473)	1,329	(3,682)	(671)	(3,782)	303
Enagás Renovable S. L. (Subgroup)	204	(312)	8	(102)	149	(8,402)	(8,455)
Green Ports Projects, S.L.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
Senfluga Energy Infrastructure S.A. Group	331,107	(25,698)	2,050	(14,030)	(26,209)	(168,064)	99,156
Tallgrass Energy LP Group	672,737	(77,471)	2,681	(336,138)	21,168	(283,322)	(345)
H2Greem Global Solutions S.L.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
Hanseatic Energy Hub GMBH	—	—	—	—	—	(5,700)	(5,700)
Hanseatic Energy Hub Operations GMBH	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
Iniciativas de Gas, S.L.	—	—	—	—	—	(245)	(245)
Knutsen Scale Gas, S.L.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
Mibgas Derivatives	476	—	275	—	(151)	(122)	478
Mibgas, S.A.	6,055	(4)	583	—	(492)	(4,563)	1,579
Planta de Regasificación de Sagunto, S.A.	66,090	(20,562)	3,649	(15,313)	(3,467)	(21,483)	8,914
Scale Gas Med Shipping, S.L.U.	1,746	(592)	17	(771)	17	(537)	(120)
SEAB Power Ltd.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
Solatom CSP, S.L.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
Subgrupo Altamira LNG, C.V.	44,543	(1,373)	116	(2,662)	(4,497)	(20,842)	15,285
Sunrgyze, S.L. (formerly Sun2Hy, S.L.)	—	(323)	—	—	14	62	(247)
Tecgas, Inc.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
Trans Adriatic Pipeline, A.G.	756,116	(184,255)	71,295	(174,103)	(55,721)	(145,487)	267,845
Transportadora de gas del Perú, S.A.	725,294	(161,304)	10,965	(55,584)	(97,470)	(213,177)	208,724
Trovant Technology, S.L.	—	—	—	—	—	(431)	(431)
Vira Gas Imaging, S.L.	383	(38)	—	—	—	(291)	54

(1) Data provided as though companies were 100% invested, in accordance with IFRS.

(2) For those companies whose functional currency is different to the Group's functional currency, the euro (Note 1.3), the income statement figures were translated at the average exchange rate for the year.



# APPENDIX III. REGULATORY FRAMEWORK

## a) Regulatory framework

### a.1) Second regulatory period (2021-2026)

The current regulatory framework was established when the authority over remuneration for transmission and regasification was transferred to the National Commission on Markets and Competition (CNMC) through Royal Decree-Law 1/2019. This legislation amended the foundational laws of the electricity and gas sectors to distribute responsibilities between the Government and the CNMC, aligning them with the requirements of EU law.

In this distribution of powers, the CNMC received the transfer of all powers related to:

- Toll and remuneration methodologies in transmission, distribution and LNG terminals, as well as the establishment of their values.
- Remuneration parameters and asset bases.
- Methodology and remuneration of the Technical Manager of the System, i.e., Enagás GTS, S.A.U.
- Methodology on the conditions of access and connection to gas infrastructures.
- Approving the Technical Management of the Gas System Regulations (NGTS) in relation to the balance system, programming, international connections and shrinkage.

On the other hand, the Ministry for Ecological Transition and the Demographic Challenge (MITECO) was in charge of the following:

- Establishing energy policy guidelines (Order TEC/406/2019).
- Methodology for calculating royalties and remuneration of basic services for access to Underground Storage Facilities and approval of their values.
- Determining the last resort tariffs (TUR).
- Structure and methodology of the charges for costs of facilities not associated with the use of these facilities (CNMC rate, deficit annuities, regulated remuneration of Mibgas, S.A., etc.).
- Approving the Technical Management of the Gas System Regulations related to security of supply, emergency, gas quality and inflow/outflow control.

This new allocation of responsibilities ensures the CNMC's independence as the regulator of the domestic gas and electricity markets and establishes cooperation mechanisms with the Government to ensure the system functions effectively overall. One such mechanism is the set of energy policy guidelines, adopted by MITECO after receiving a report from the Government's Delegate Committee for Economic Affairs, which the CNMC must consider in its regulatory role. These guidelines can cover various aspects, including security of supply, public

safety, the economic and financial sustainability of the electricity and gas systems, supply independence, air quality, combating climate change and environmental protection, optimal management and development of national resources, demand management, future technological choices, and the rational use of energy. To ensure smooth collaboration between the two institutions, a Cooperation Commission was established between the Ministry and the CNMC to develop the foundations for the upcoming gas regulatory period.

In the energy policy guidelines released by the Government for the 2021-2026 period, which preceded the CNMC circulars:

- Is committed to regasification plants, promoting their competitiveness with respect to other international plants, favouring international connections and committing to a deep and liquid LNG market.
- Encourages the extension of the operation of those facilities that have exceeded their useful life in terms of remuneration.
- Discourages investment in new infrastructure except for assets that are necessary to ensure the supply of the whole system or that are strategic for meeting energy policy objectives.
- It was stated that remuneration rates should ensure sufficient profitability, aligning with principles of economic and financial sustainability, and reflecting the actual costs incurred by an efficient and well-managed company.
- It was also suggested that access charges for gas facilities should promote the use of existing infrastructure to maintain the economic and financial health of the gas system. These charges should consider the competitiveness of the industrial sector and encourage the injection of biomethane and other renewable gases, aiding in the reduction of greenhouse gas emissions and combating climate change.

As regards remuneration, the CNMC published the following circulars to update, for the second regulatory period, the current remuneration model, as well as the system of access tolls for each of the services provided by the facility, taking into account the infrastructures involved in the provision of each service:

- Circular 2/2019, of November 12, establishing the methodology for calculating the financial remuneration rate for power transmission and distribution, and natural gas regasification, transmission and distribution.
- Circular 9/2019, of December 12, establishing the methodology for the remuneration of regulated natural gas transmission and regasification activities.
- Circular 6/2020 of July 22, establishing the methodology for the calculation of tolls for the regasification, transmission and distribution of natural gas.



- Circular 8/2020, of December 2, establishing the unitary benchmark values for investment and operation and maintenance for the 2021-2026 regulatory period and the minimum requirements for audits of investments and costs in natural gas transmission facilities and liquefied natural gas plants.
- Circular 1/2020 of January 9 of the National Commission on Markets and Competition establishing the methodology for the remuneration of the technical manager of the gas system, subsequently updated by Circular 2/2023.
- Circular 6/2021 of June 30, 2021, of the National Markets and Competition Commission, which establishes the incentives of the technical manager of the gas system and the effect on its remuneration.

In the operational field, it published the following circulars with the aim of encouraging and facilitating competition, promoting greater use of gas infrastructure, harmonising, simplifying and establishing a transparent and competitive mechanism for the allocation and use of capacity, making the operations of agents more flexible and resolving situations of congestion at regasification plants, as well as contemplating measures to regularise the physical imbalance of LNG at regasification plants and in underground storage facilities:

- Circular 8/2019, dated December 12, established the mechanisms for access and capacity allocation within the natural gas system. It was later updated by Circular 9/2021, and a new amendment is currently under review.
- Circular 2/2020, of January 9, setting out the natural gas balance rules.
- Circular 7/2021 of July 28, of the National Commission on Markets and Competition, establishing the methodology for the calculation, supervision, valuation and settlement of shrinkage in the gas system.

## a.2) Remuneration of LNG transmission, regasification and storage activities in the second regulatory period 2021-2026

The CNMC set out the remuneration methodology for transmission and regasification activities through Circulars 9/2019 and 8/2020. This methodology opted to maintain the basic principles established in the previous regulatory framework, defined in Law 18/2014, adapting them to current gas market conditions, while establishing an orderly and progressive transition between the two remuneration frameworks.

The fundamental principles that remain are:

- Appropriate remuneration to a low-risk activity.
- Ensure the recovery of the investments made by the titleholders during their useful life.
- Allow a reasonable return on financial resources invested.
- Determine the operating costs remuneration system in a way that encourages effective management and improvement of productivity that should be partly passed on to users and consumers.

- Contribute to the economic and financial sustainability of the natural gas system.
- Take into account the costs necessary for an efficient and well-managed company to perform the activity.

From a methodological perspective, the following aspects remain:

- The regulatory periods run consecutively for a period of six years.
- The remuneration parameters for the regulated activities are set for the entire 6-year regulatory period, taking into account the cyclical nature of the economy, gas demand, the development of costs, efficiency improvements, the economic and financial balance of the system, and the reasonable profitability of these activities.
- Remuneration is still calculated individually for each facility, using unit reference values or audited costs for unique facilities.
- The net value of the asset is maintained as the basis for calculating the return on investment.
- Any procedure for automatic adjustment of values and remuneration parameters according to price indices is removed.
- Depreciation continues to be calculated on a straight-line basis and the useful lives of the assets are maintained.

One of the most significant novelties, although it has practically no material impact, is that in order to allow the temporary coordination of remuneration with the methodology of tolls and royalties, in accordance with the European Commission Regulation the remuneration is now calculated per gas year. The gas year for which the remuneration of the facilities is determined runs from October 1 of year "n-1" to September 30 of year "n", both inclusive, with the exception of 2021 which started on January 1, 2021.

The remuneration accrued in one gas year by each company that owns natural gas transmission facilities and liquefied natural gas plants is the result of adding up the following remuneration components for each of its facilities:

- Return on investment (RINV) which aims to recover the investments made and to obtain a reasonable return.
- Remuneration for operation and maintenance of the facility (RO&M).
- Productivity and efficiency remuneration adjustments (ARPE).
- Remuneration for facilities in special administrative situations (RSAE).
- Return on investment in facilities with cross-border impacts resulting from the application of Article 12 of Regulation (EU) No. 347/2013, (RIIT).

The breakdown of each of these components is shown below:

### a.2.1) Return on investment (RINV).

It is determined for each of the assets in production entitled to individual remuneration and is intended to provide return on investment costs incurred. Investment remuneration covers both



amortisation and the financial remuneration of assets and the minimum filling gas.

Remuneration for investment costs is comprised of the following parameters:

- Value of assets recognised. For facilities commissioned before 2002, the corresponding amounts are calculated based on the carrying amounts of the assets once the accounting restatement of 1996 is taken into account (Royal Decree-Law 7/1996), less grants received for the purpose of financing said assets, applying a restatement coefficient comprised of the adjusted average Consumer Price Index (CPI) and Industrial Price Index (IPRI) to this difference.

For the new facilities commissioned from 2002, the standard value of each investment as established by the regulator is used, while for those which require expansion, the real cost is used.

Transmission facilities commissioned from 2008 are measured by taking the average of the standard value and real cost.

Regasification facilities commissioned from 2006 are measured at real cost plus 50% of the difference between the standard value and said real cost, up to a maximum of the standard value.

Circular 9/2019 sets out that for all and regasification facilities commissioned after 2020, the formula previously applied to transmission facilities will be used: the recognised gross investment value is calculated as the average of the accepted audited investment value and the investment value at unit rates. For the latter calculation, the unit rates applicable at the time of obtaining the initial administrative construction authorisation must be used.

The resulting value is reduced by the amounts transferred and financed by third parties, 90% of the amounts obtained from the sale of dismantled equipment and the subsidies received (90% if they come from the European Union).

- Remuneration for amortisation of system assets (A). The value of the resulting amount recognised for the investment is amortised applying a rate corresponding to its useful life, obtaining the related income in this manner.
- Financial remuneration of the amount invested (FR). It is calculated by applying a financial remuneration rate to the net values of the assets without restatement and accrues until the net value is zero.

The remuneration rate on the transmission and regasification assets is calculated on the basis of the average WACC capital cost of the transmission and regasification activity. For the second period (2021-2026), the rate was established in Circular 2/2019 and was set at 5.44%.

The financial remuneration is calculated for facilities with individualised remuneration with the right to remuneration by amortisation and begins to accrue from the same date as the latter.

- Financial remuneration for heel gas and minimum fill (RFNMLL). The remuneration is calculated by applying the financial remuneration rate to the purchase value of the gas and has no amortisation. It starts to accrue from the later of the date of purchase of the gas and the date of commissioning of the

facility until the closure of the facility or the delivery of the gas to the GTS for use as operating gas.

- Remuneration based on the gas transmitted or processed (RGV). This remuneration is applied to the primary transmission facilities in the local area of influence awarded by competition and to new regasification plants and primary gas pipelines in the area of influence directly authorised after December 31, 2020. The annual remuneration is that which results from multiplying a unit remuneration coefficient by the gas transmitted or processed annually and is accrued from the date of commissioning. In no case may the RGV remuneration, in each gas year, be greater than the amounts invoiced for tolls and royalties.

For facilities awarded by competition, the unit remuneration (ROC) is that offered by the company awarded the contract, while for facilities awarded directly (RUM), the unit remuneration is the average remuneration calculated as the sum of the amortisation and financial remuneration during the useful life of the project divided by the sum of the annual gas volumes forecasted by the owner of the facility when the economic justification of the project was presented for award. For these facilities, given that the remuneration risk is greater than for the trunk facilities, the financial remuneration rate is increased by a differential provisionally set at 0.39%, resulting in a rate of 5.83%.

The RGV remuneration is accrued until the present value of the sum of the recognised annual remuneration, discounted at the previous remuneration rate, is equal to the present value of the recognised investment.

### a.2.2) Remuneration for operation and maintenance of the facilities (RO&M).

For transmission and regasification assets to which the standard unit costs apply, the remuneration for operation and maintenance is calculated by applying the reference unit costs of operation and maintenance in force, regardless of the date of commissioning of the fixed asset ( $COM_{VU}$ ).

For the second regulatory period 2021-2026, the standard unit costs are those published in Circular 8/2020.

For one-off assets, costs are calculated on the basis of actual audited costs ( $COM_{sing}$ ).

Apart from the above costs, other costs not included in the unit reference values (OCOM) are also recognised and will be recognised on the basis of their audited cost.

These costs include:

- Direct and indirect capitalised operating expenses. When the capitalised expenses exceed 250,000 euros, they will be recognised with amortisation and financial remuneration based on their audited investment value, considering a useful life of 2 years. In these cases, the accrual will occur from January 1 of the year following their commissioning. Capitalised expenses below this limit will be recognised as an expense for the year up to the limit established by the CNMC.
- The acquisition cost of the operating gas for transmission and of the odorant.



- The cost of electricity supply for LNG terminals and for electric motors in compressor stations. In the case of the regasification plants this audited cost replaces the variable remuneration existing in the current framework.
- The cost increases from January 1, 2021 for municipal fees for public domain occupancy and for port fees for port domain occupancy.

### a.2.3) Remuneration for adjustments to productivity and efficiency (ARPE).

Under this item, facilities that are at the end of their useful life (REVU) are remunerated, as are the transitional remuneration for continuity of supply (RCS), the remuneration for efficiency in operating and maintenance costs (RMP) and the remuneration for incentives to shrinkage reduction (IM) and promote gas in maritime and land transport. The items included are the following:

- Remuneration for extension of useful life for fully depreciated assets (REVU). Once the regulatory useful life of each fixed asset finalises, if the asset is still in use, the remuneration accrued for said facility corresponding to remuneration for investment, amortisation, and financial remuneration will be nil.

In contrast, remuneration for operation and maintenance of the asset "i" each year "n" will be increased. In this manner, the value recognised will be the amount corresponding to it multiplied by a coefficient for increasing its useful life,  $\mu_{in}$ , which is gradually increasing.

- Remuneration for continuity of supply (RCS). A transitional remuneration is established for the RCS during the 2021-2026 regulatory period. The RCS is no longer indexed to the variation in demand or regasification, and it is calculated on the basis of the 2020 RCS, adjusted by the following coefficients for the different gas years of the second regulatory period.  $\frac{3}{4}$  of 95% for 2021, 80% for 2022, 65% for 2023, 50% for 2024, 35% for 2025 and 20% for 2026.
- Remuneration for productivity improvements in operating and maintenance costs in regulatory periods (RMP). This item intends to allow the carrier to retain part of the operating and maintenance cost efficiencies achieved over the previous regulatory period and is calculated per company, which is currently set at 50%. Under this item, the company is attributed 50% of the reduction in costs in the current regulatory period with respect to the unit costs of the previous regulatory period.
- Shrinkage reduction incentive (IM). According to the methodology set out in Circular 7/2021, of July 28.
- Incentive remuneration for the development of natural gas in maritime and land transport (IDS). This incentive aims to promote the use of natural gas as a fuel in maritime and land transport and is calculated by multiplying the gas invoiced for service stations connected to the transmission network and the LNG invoiced in regasification plants for use as maritime fuel by unit coefficients, which in both cases is 0.50 euros/MWh.

### a.2.4) Remuneration for facilities in special administrative situations (RSAE).

The document outlines the remuneration treatment for facilities that might be in a special administrative situation. This includes

those impacted by the suspension of processing as detailed in the third transitional provision of Royal Decree-Law 13/2012 (RST), which applies solely to the liquefied natural gas terminal in El Musel. It also covers facilities with a unique and temporary economic regime for providing liquefied natural gas logistics services as per Article 60.7 of Law 18/2014 (RISL).

During the hibernation period, which lasted until the terminal was commissioned in July 2023, the remuneration framework comprised a financial remuneration (RST) based on the standard investment value, along with the actual audited operation and maintenance costs incurred while processing was suspended

After the administrative processing of the El Musel terminal was reinstated, as stipulated in the first additional provision of Royal Decree 335/2018, a resolution by the General Directorate of Energy Policy and Mines on June 28, 2022 granted Enagás Transporte S.A.U administrative authorisation and approved the project for executing its facilities. On July 28, 2023, a commissioning certificate was issued for the provision of logistics services at the El Musel terminal, in line with the regime set out by Order TED/578/2023, dated June 7.

The unique and temporary economic regime for the provision of liquefied natural gas (LNG) logistics services was established by a CNMC resolution dated February 2, 2023.

In addition, due to the transfer of remuneration rights from Enagás Transporte to Musel Energy Hub on September 29, 2023, the publication of the Resolution of December 15, 2023 determines the distribution and adjustments to the remuneration in 2023 and 2024 among the owners involved in the transfer of ownership of the El Musel terminal. This Resolution transfers to Musel Energy Hub the remuneration previously recognised by Enagás Transporte from the effective date of the transfer.

### a.2.5) Remuneration for investments with cross-border impacts (RIIT).

This item is aimed at remunerating any costs that a carrier may incur as a result of the cross-border distribution of investment costs for a project of common European interest, as established in Article 12 of Regulation (EU) 347/2013 of the European Parliament and of the Council, of April 17, 2013.

Pipelines which affect reverse flow capacities or change the capacity to transport gas across the borders of the Member States concerned by at least 10% compared to the situation prior to the project is put into service may, in the case of natural gas, be considered as a project of common interest as set out in Appendix II to this Regulation. In the case of storage of natural gas, liquefied natural gas (LNG) or compressed natural gas (CNG), they will be considered as a project of common interest when the project is intended for the direct or indirect supply of at least two Member States or for compliance with the infrastructure standard (n-1) at regional level, in accordance with European Regulation 2017/1938 on Security of Supply.

### a.2.6) Introduction of the principle of financial prudence

For the purpose of incorporating a principle of financial prudence required of the holders of transmission assets and liquefied natural gas plants, a penalty is established for companies whose ratios are outside the recommended value ranges set forth in the CNMC Communication 1/2019.



Accordingly, a company's annual remuneration in calendar year  $n$  could be reduced by up to 1% if the overall ratio defined in that communication, calculated on the basis of the financial statements for year  $n-2$ , is less than 0.9. For the first time in 2024, this penalty was applied based on the 2022 financial statements. However, companies conducting regulated activities for Enagás were not affected, as they fell within the CNMC's recommended value ranges.

### a.3) Remuneration for underground storage activity

The remuneration methodology applicable to underground storage activity during the period 2021-2026 was established by Royal Decree 1184/2020, of December 29, which establishes the methodologies for calculating charges in the gas system, the regulated remuneration of basic underground storage facilities and the fees applied for their use.

In general, the remuneration methodology for underground storage is consistent with that established by the CNMC for transmission activities and LNG terminals, although there are some differences due to the specific nature of underground storage facilities.

Other differences include the absence of unit reference values for investment and operation and maintenance, as well as the fact that the starting coefficient established for calculating the remuneration for the extension of useful life remains at 15%, compared to 30% for other activities. This difference is justified precisely because the operation and maintenance costs of each underground storage facility are established on the basis of their real audited costs and not on the basis of a reference unit value.

The annual remuneration of each company will be obtained as the sum of the individual remunerations of all the storage facilities it owns. The titleholders of basic underground storage facilities shall be entitled to the following remuneration:

- Remuneration for investment in facilities with individualised remuneration and in the purchase of gas for use as cushion gas.
- Provisional remuneration for operation and maintenance costs.
- Remuneration for life extension.
- Remuneration for productivity improvements.
- Transitional remuneration for continuity of supply, in accordance with the second transitional provision.
- Review, if applicable, of the provisional operation and maintenance remuneration.

The useful lives set are as follows: 10 years for research and vehicles, 20 years for facilities and cushion gas, 40 years for pipelines, and 50 years for land-based civil engineering works.

The remuneration of each holder is reduced according to the related income obtained, and by application of the penalty for insufficient financial prudence, calculated in accordance with Article 27 of Circular 9/2019, of December 12, of the National Commission on Markets and Competition, which establishes the methodology for determining the remuneration of natural gas transmission facilities and liquefied natural gas plants.

### a.4) Income corresponding to Technical Management of the System (GTS)

#### Remuneration recognised in the 2021-2023 and 2024-2026 regulatory periods

Circular 1/2020, amended by Circular 2/2023, establishes a methodology that allows the remuneration of the GTS to be set on the basis of known criteria and parameters, thus giving the remuneration framework the transparency, security and visibility in the medium-term that it lacked.

The Circular establishes regulatory periods of 3 years for the GTS, as opposed to 6 years for transmission and regasification activities.

The new remuneration methodology is based on the following principles:

- Obtaining a reasonable return for a low-risk activity.
- Consideration of the costs incurred by an efficient and well-managed company.

The methodology takes into account that the activity of the GTS requires few assets, basically in software and applications, that its costs correspond mainly to personnel and external services costs, and that its activity is strongly conditioned by European regulations and projects, in a changing and evolving environment, to which it must continuously adapt.

The remuneration is the sum of a basic remuneration (Bret), an incentive remuneration (RxInc), a remuneration for new obligations (CR and Guarantees of Origin) and a remuneration (D) for the difference, positive or negative, between the amounts received by the technical manager of the system for the application of the quota for the financing of the remuneration and the annual remuneration to be established for year  $n$  and for the difference between the estimate of the incentive remuneration term and the amount resulting from the level of compliance with it.

The basic remuneration is made up of:

- Remuneration for OpEx, (BOpex): based on financial and regulatory accounting.
- Margin on recognised OpEx, (BMarg\_Opex), set at 5%.
- Remuneration for depreciation, (BAmort), based on the depreciation of financial and regulatory accounting.
- Financial remuneration, (BRF) by applying a remuneration rate to the net asset value. The rate is the same as for transmission and regasification activity, 5.44% for the period 2021-2026.

As a complement to the Circular 1/2020, the National Commission on Markets and Competition published Circular 6/2021 of June 30, 2021, which establishes the incentives of the technical manager of the gas system. Remuneration for incentives that can be up to  $\pm 5\%$  of the basic remuneration, depending on the incentive mechanism established by the CNMC for each regulatory period. However, for the regulatory period 2021-2023 the limits are set at  $\pm 2\%$ . Seven indicators are defined to assess the efficiency of the GTS in carrying out its functions during the gas year. Each indicator can range from 0 to 1, with 1 representing 100% performance and 0 indicating 0% performance.



The remuneration for new obligations is established on the basis of a regulatory account, the balance of which is established for each regulatory period, divided by 3, for each of the years of the regulatory period. For the regulatory period 2021-2023, the regulatory account is 5 million euros.

Thus, for the regulatory period 2021-2023, the basic remuneration is set at 25,007 thousands of euros and the remuneration of the regulatory account at 1,667 thousands of euros.

For the 2024-2026 regulatory period, the remuneration base remains constant, the same as for the 2021-2023 regulatory period, as do the parameters for its calculation. The value amounts to 25,007 thousands of euros.

The Resolution dated March 16, 2023 sets the remuneration for the technical manager of the gas system for 2023 and the 2024 gas year. For 2024, the GTS remuneration is 27,174 thousands of euros. This was calculated using the parameters established for the 2024-2026 period. The base remuneration is 25,007 thousands of euros with an additional 1,667 thousands of euros accrued annually from the regulatory account for new obligations and 500 thousands of euros for incentives.

The CNMC's Resolution of September 28, 2023 determines the fee for funding the technical system manager's remuneration for the 2024 gas year. The remuneration for the 2024 gas year, initially set at 27,174 thousands of euros by the March 16, 2023 Resolution, was later adjusted downward by 4,024 thousands of euros, bringing it to 23,148 thousands of euros. It is broken down into the following items:

Remuneration basis: 25.007 M€

Regulatory account: 1.667 M€

Incentive remuneration: 0.500 M€

Differences: -4.026 M€

The GTS share for 2024 is 1.173%, calculated by dividing the GTS remuneration for 2024 (23,148 thousands of euros) by the forecast toll and fee income for the gas year 2024 (1,973,340 thousands of euros).

The remuneration of the GTS is recovered through the application of a fee, calculated as a percentage of the turnover from tolls and royalties.

The Resolution of September 6, 2024 by the CNMC (National Commission on Markets and Competition) sets the incentive remuneration for the GTS from January to September 2023 at 184 thousands of euros. This amount is calculated by multiplying the annual remuneration base for the technical system manager (25,007 thousands of euros) by the incentive remuneration rate, set at 0.98% for the 2023 gas year. A total of 246 thousands of euros is set for the full gas year, with 184 thousands of euros allocated for the period from January to September 2023.

## a.5) Tolls and royalties relating to third party access to the gas system

The revenues collected from the application of tolls for third party access to gas facilities are exclusively used to support the remuneration of regulated activities for gas supply. As gas system

revenues are used to finance all gas system costs, they must be sufficient to meet the full costs of the gas system.

The tolls and royalties are established so that their setting responds as a whole to the following principles:

- Ensure the recovery of the investments made by the titleholders during their useful life.
- Allow a reasonable return on financial resources invested.
- Determine the operating costs remuneration system in a way that encourages effective management and improvement of productivity that should be partly passed on to users and consumers.

In addition, tolls and royalties will take into account the costs incurred by the use of the network in a way that optimises the use of infrastructures and can be differentiated by pressure levels, consumption characteristics and duration of contracts.

The values applicable from October 1, 2023 to September 30, 2024 have been published in the Resolution of May 30, 2023, of the National Commission on Markets and Competition, which establishes the access tolls to the transmission networks, local networks and regasification for the 2024 gas year.

Similarly, the Ministry of Ecological Transition and Demographic Challenge is responsible for setting the remuneration and fees for access to underground storage facilities. From October 1, 2023 to September 30, 2024, the values of the access charges published in the Order TED/1072/2023 of September 26, which establishes the gas network charges and the remuneration and royalties for underground storage for the gas year 2024, shall apply.

The values of the access tolls for the transmission, local, and regasification networks for the gas year 2025, applicable from October 1, 2024 to September 30, 2025, were set by the Resolution dated May 23, 2024. Order TED/1013/2024, of September 20, also established the gas system charges and the remuneration and royalties for underground storage facilities for gas year 2025.

## a.6) System of settlement of costs and regulated revenues

From October 1, 2021, the settlement procedures established in Ministerial Order TED/1022/2021, of September 27, regulating the settlement procedures of the regulated activities remunerations, charges and fees with specific destinations of the gas sector, are applicable.

The update of the settlement procedure was motivated to adapt it to the European Commission Regulation 2017/460 of March 16, 2017, establishing a network code on harmonised transmission tariff structures for gas. This Regulation determines the need for a regulatory account for the transmission activity that reflects the difference between the recognised remuneration and the revenues actually obtained in the tariff period, a principle that, in order to avoid discrimination, must also be applied to other activities.

Thus, 5 separate settlement procedures were established for the following activities:

a. Trunk transmission.



b. Local networks, which will include distribution, secondary transmission and primary transmission activities of local influence and any other facility determined by the regulations in force.

c. Liquefied natural gas plants.

d. Basic underground storage facilities.

e. Gas system charges. It will include the revenues from application of the unit charges defined in Royal Decree 1184/2020, of December 29, establishing the methodologies for calculating the gas system charges, the regulated remuneration of basic underground storage facilities and the fees applied for their use, and the costs listed in Article 59.4.b) of Law 18/2014, of October 15. Basically, the costs to be recovered through charges are: CNMC fee, differential cost of supply of liquefied or manufactured natural gas in island territories, annuity of the deficit for 2014 and subsequent years (until 2020), demand management measures that are recognised by regulation, the approved remuneration of the natural gas Market Operator and any other cost that is legally established.

It is understood that annual mismatches between revenues and costs of the gas system occur if the difference between revenues and settlement costs in each of the settlement procedures of a gas year results in a negative amount. The annual mismatch of each subject, whether positive or negative, is recognised in the form of a lump sum payment in the first available settlement of the following gas year.

Since the implementation of Ministerial Order TED/1022/2021, the system has consistently experienced an overall surplus. The latest available settlement for 2024, number 14/2024, showed a surplus of 410,201 thousands of euros. Of this, 8,542 thousands of euros were related to the underground storage settlement, 130,677 thousands of euros to trunk transmission, and 408,249 thousands of euros to LNG terminals, while local networks faced a deficit of 137,634 thousands of euros.

Law 18/2014, of October 15, establishes the principle of economic and financial sustainability in the gas system. In accordance with this principle, revenues from the system will be used exclusively to sustain own remuneration of the regulated activities concerning the supply of gas and, furthermore, the revenues must be sufficient to satisfy all of the costs incurred by the gas system. In addition, in order to ensure economic sufficiency and avoid the appearance of new deficits ex ante, all regulatory measures relating to the gas system which involve an increase in costs for the system or a reduction of income must incorporate an equivalent reduction in other cost items or an equivalent increase in income which ensures equilibrium for the system.

The remuneration framework of Law 18/2014 also establishes a specific methodology to guarantee the resolution of temporary imbalances between revenues and costs of the system, with a series of measures aimed at definitively ending the deficit of the gas system, such as:

- As long as there are annual amounts pending payment from previous years, tolls and royalties cannot be revised downwards, but will be increased if there are negative mismatches that exceed a set limit.
- A period of several years is established for the recovery of imbalances, also recognising financial costs to the companies

regulated by the financing of these imbalances, in such a way that the subjects shall recover:

- The accumulated deficit of the gas system at December 31, 2014 during the fifteen years following the date of approval of the final settlement of that financial year, recognising an interest rate in conditions equivalent to those of the market.
- And the temporary imbalances between income and expenses resulting for 2015 during the following five years, also recognising an interest rate in conditions equivalent to those of the market.

If the annual mismatch between revenues and recognised remuneration is positive, the amount will be used to settle the outstanding annual payments relating to mismatches from previous years. This amount will be applied first to the temporary imbalances between revenues and costs of the system and then to those annual payments relating to the accumulated deficit of the gas system at December 31, 2014.

Since 2018, positive annual mismatches between income and remuneration have been generated (surplus), so that the 2015 and 2017 financial years were amortised on an accelerated basis against the surplus of this 2018 financial year. Similarly, in 2019, the annual mismatch between income and remuneration resulted in a surplus of 353,859 thousands of euros, with the collection right pending receipt for the 2016 (33,475 thousands of euros) mismatch being fully amortised, and the 2014 mismatch being partially amortised (320,384 thousands of euros).

From that date, the annual mismatch between revenues and remuneration is used to cover the negative mismatch pending from 2014, partially amortising 186,691 thousands of euros against the surplus for 2020 and 81,127 thousands of euros against the surplus for 2021, whose resolution was approved by the CNMC on July 28, 2022.

Since 2023, only the surplus originated in the settlement of charges is used to amortise the negative mismatch pending from 2014. Therefore, 11,280 thousands of euros are amortised against the surplus from 2022, a resolution approved on July 27, 2023.

As of October 1, 2023 (beginning of gas year 2024) the outstanding capital amounts to 41,122 thousands of euros. In 2024, the outstanding deficit accumulated up until 2014, as per the provisions of article 66 of Law 18/2014, was successfully reduced by an annual amount of 5,045 thousands of euros.

Thus, the 2014 mismatch remaining to be amortised at October 1, 2024 (beginning of 2025 gas year) amounts to 36,077 thousands of euros, which is much lower than the 1,025,053 thousands of euros accumulated at December 31, 2014.

With regard to the Company's share of the deficit generated by the system during 2014, it should be noted that, as reported in the 2017 annual accounts, on December 1, 2017 the receivables from the accumulated deficit rights at December 31, 2014 were assigned. Said rights represented an amount of 354,751 thousands of euros, corresponding to the nominal amount plus accrued interest pending collection at the date of cession. Through the above operation Enagás Transporte, S.A.U. transferred the obligations and contractual rights involved in the ownership of the transferred financial asset to the Santander Group, and proceeded to derecognise that financial asset from



the Balance Sheet, as the Sole Director of Enagás Transporte, S.A.U. deemed that all the risks and benefits associated with it had been substantially transferred, together with control of the aforementioned financial asset.

## b) Upcoming regulatory milestones

### b.1) Development of the H2 regulatory framework

#### b.1.1) Transposition of the Hydrogen and Gas Decarbonisation Package

On July 15, 2024, Directive (EU) 2024/1788 on common rules for the internal markets in renewable gas, natural gas, and hydrogen, along with Regulation (EU) 2024/1789 on these markets (known collectively as the Hydrogen and Gas Decarbonisation Package), were published in the Official Journal of the European Union (OJEU).

This European legislative package sets out the general principles for developing the hydrogen regulatory framework that Member States need to adopt in their national laws.

The aim of Directive (EU) 2024/1788 is to facilitate the integration of renewable gases into the energy system while progressively phasing out fossil gas. This is intended to help achieve the 2030 climate target (Fit for 55) and the European Union's 2050 climate neutrality goal. The directive outlines general market rules for the supply, transmission, and storage of natural gas, decarbonised gases, and hydrogen, defining national regulations concerning the planning and conditions for third-party access to these infrastructures, consumer protection, and other related aspects.

The aim of Regulation (EU) 2024/1789 is to update the rules governing access to natural gas and hydrogen systems. This is intended to ensure the smooth functioning of the internal markets for natural gas and hydrogen, support the creation and operation of efficient and transparent wholesale markets for these gases, and maintain high security of supply. It also seeks to establish harmonised network access rules for cross-border trade in natural gas and hydrogen.

The Hydrogen and Gas Decarbonisation Package suggests that a model for third-party access to hydrogen networks, based on regulated access tariffs, is the most efficient approach. This model would offer predictability, transparency, non-discrimination, and legal certainty for all market participants. Setting up a regulated access framework involves developing a comprehensive economic system, including a remuneration framework and access tariffs, to ensure the financial sustainability of the hydrogen system. The costs associated with the hydrogen backbone network infrastructure – comprising interconnected transmission pipelines and essential storage facilities – would typically be covered by users through applicable access tolls. However, this does not preclude the use of additional support and financing mechanisms.

The Directive allows Member States two years from its entry into force to incorporate it into national law, with a deadline of August 5, 2026.

The Ministry for Ecological Transition and the Demographic Challenge has already begun this process by launching a

preliminary public consultation in September 2024 to gather input from various stakeholders. Following this, the draft law for transposing the Hydrogen and Gas Decarbonisation Package will undergo a public hearing before being approved by the Council of Ministers. It will then proceed to the parliamentary process for approval by the Spanish Parliament.

Meanwhile, on September 24, the Council of Ministers approved the Draft Bill to re-establish the National Energy Committee (CNE), which was sent to the Congress of Deputies to continue its legislative process as a Bill.

The aim of re-establishing the CNE is to enhance the regulator's institutional capacity at a critical time for the energy transition. This move addresses the increasing demand for specialisation and efficiency due to the new energy and regulatory landscape. It also supports decarbonisation and the creation of new markets, such as hydrogen, thereby boosting economic competitiveness.

The bill includes key functions for shaping the regulatory framework of the hydrogen sector. These functions include setting the methodology, parameters, and asset base for compensating hydrogen transmission and distribution facilities, as well as developing the framework for connection and access charges for third-party facility access.

#### b.1.2) Enagás has been appointed as the provisional hydrogen transmission network operator (HTNO).

Royal Decree-Law 8/2023, of December 27, adopting measures to address the economic and social consequences of the conflicts in Ukraine and the Middle East, as well as to alleviate the effects of the drought, making it possible for the natural gas transmission network managers (Enagás Transporte, S.A.U. is the only company currently certified as a Transmission Network Manager in Spain) to exercise development functions of the hydrogen backbone network manager on a provisional basis until the final designation occurs in accordance with the conditions established in European regulations.

Specifically, it is outlined that, temporarily, the natural gas transmission network operators, as per article 63 bis of Law 34/1998, of October 7, concerning the hydrocarbons sector, may:

- Submit to the Directorate General of Energy Policy and Mines, within four months since the entry into force of this royal decree-law, a non-binding proposal for the development of the hydrogen backbone infrastructure with a ten-year horizon.
- Act as representatives in the European Network of Network Operators for Hydrogen.
- Temporarily, by agreement of the Council of Ministers and through legally distinct entities, they can carry out the development of the hydrogen backbone network for projects of common European interest.

Following the mandate of the aforementioned Royal Decree-Law, Enagás Transporte, S.A.U. submitted a proposal for the hydrogen backbone infrastructure development to the Directorate-General for Energy Policy and Mines on April 29, 2024.

The first list of Projects of Common Interest (PCI) and Projects of Mutual Interest (PMI) was published in the Official Journal of the European Union on April 8, 2024, under Delegated Regulation (EU) 2024/1041 of the Commission, dated November 28, 2023.



This list includes the following hydrogen infrastructure projects, promoted by Enagás Transporte, SAU:

- 9.1.2 Portugal-Spain hydrogen interconnector.
- 9.1.3 Internal hydrogen infrastructure in Spain.
- 9.1.4 Spain-France hydrogen interconnector [currently known as "BarMar"].
- Hydrogen storage facilities in Spain include: 9.24.1 "H2 storage North-1" and 9.24.2 "H2 storage North-2".

On August 14, 2024, the Spanish Secretary of State for Energy issued a Resolution that published the Council of Ministers' Agreement from July 30, 2024. This agreement authorises Enagás Infraestructuras de Hidrógeno, SLU, to provisionally carry out the development of Projects of Common European Interest in Hydrogen Networks.

Developing these PCI infrastructure projects includes applying for authorisation, constructing, commissioning, operating, monitoring, and maintaining hydrogen pipelines and underground storage facilities.

The provisional authorisation is contingent upon Enagás Infraestructuras de Hidrógeno, SLU (EIH), operating as a legally separate entity from Enagás Transporte, SAU, in accordance with the separation of activities criteria set out in Directive (EU) 2024/1788.

### b.1.3) Publication of the National Integrated Energy and Climate Plan (PNIEC) 2023-2030 update

On September 24, 2024, Royal Decree 986/2024 was published, approving the updated National Integrated Energy and Climate Plan 2023-2030 (PNIEC). This plan incorporates the EU's heightened climate ambitions, supports the ecological transition outlined in the Recovery, Transformation, and Resilience Plan (PRTR), and includes other national advancements, as well as geopolitical changes stemming from the war in Ukraine (REPowerEU).

The updated PNIEC 2023-2030 document strengthens climate and energy goals:

- The number of planned policies and measures has increased from 78 in the original PNIEC to 110.
- The target for reducing greenhouse gas emissions by 2030, compared to 1990 levels, has been increased from 23% to 32%.
- The share of renewables in final energy consumption is set to rise to 48%.
- By 2030, installations are projected to include 76 GW of photovoltaic capacity, 62 GW of wind capacity, 22.5 GW of storage, and 12 GW of electrolyzers for renewable hydrogen production.
- Economic electrification is expected to reach 35%, up from 32%.
- The industrial value chain and strategic autonomy are to be strengthened, reducing energy dependence from 73% in 2019 to 50% by 2030.

There is also a stronger focus on renewable hydrogen and its network infrastructures to achieve these goals:

- Increase installed electrolyser capacity to 12 GW by 2030.
- Replace 74% of the current grey hydrogen usage in industry and contribute 3.56% of renewable fuels of non-biological origin (RFNBO) in the transport sector.
- Support the development of the Iberian H2Med hydrogen corridor, backed by the governments of Spain, Portugal, France, and Germany, which includes a new measure (Measure 4.12).

H2Med is envisaged as the first major green corridor connecting the Iberian Peninsula with the rest of Europe. Set to be operational by 2030, it is expected to transport 2 million tonnes of green hydrogen per year from Spain, accounting for 10% of the EU's total consumption. By 2050, it is estimated that renewable hydrogen will make up 20% of all energy in Europe. The backbone network aims to link green hydrogen production centres on the Iberian Peninsula with domestic hydrogen demand, prioritising national coverage. Promoted by the governments of Spain, Portugal, and France, H2Med includes two cross-border infrastructures: one connecting Celorico da Beira (Portugal) to Zamora, known as CelZa, and another undersea link between Barcelona and Marseille (France), called BarMar.

These projects have been designated as projects of common interest for the European internal market (PCI) in the first list published under Delegated Regulation (EU) 2024/1041, as they are seen as crucial for enhancing and enabling international infrastructure.

### b.2) Third regulatory period (2027-2033)

The legal framework governing regulated activities in the electricity and natural gas sectors (Law 24/2013 and Law 18/2014, respectively) specifies that remuneration parameters for these activities are set for six years, with the option to revise them before the start of the next regulatory period (2026 for electricity and 2027 for gas), with the CNMC as the responsible authority.

In 2024, the revision process for the electricity framework began with preliminary public consultations to gather stakeholders' initial input on updating remuneration methodologies for electricity transmission and distribution, as well as the rate of financial return (also applicable to natural gas in this context). In 2025, the proposals for electricity remuneration will be processed for approval before the year ends.

The same schedule will be applied with a one-year delay for reviewing the remuneration framework for regulated natural gas activities. Consequently, on December 30, 2024, the CNMC published the regulatory calendar for processing Circulars, which it intends to commence in 2025. This includes the start of the review process for remuneration methodologies in the natural gas sector for the 2027-2032 regulatory period:

- Proposed Circular amending Circular 9/2019 of December 12, establishing the methodology for determining the remuneration of natural gas transmission and liquefied natural gas plants.
- Proposed Circular to establish the financial remuneration rate for regasification, transportation, technical system management, and activities related to natural gas distribution for the 2027-2032 regulatory period, in line with Circular 2/2019.



- Proposed Circular to amend Circular 4/2020, of March 31, which sets out the remuneration methodology for natural gas distribution.
- Proposed Circular establishing the methodology for the calculation of tolls for transmission, local networks and regasification of natural gas.

## c) List with the development of the regulatory framework in 2024

The main regulatory developments applicable to the gas sector, approved in the course of 2024, were the following:

### c.1) Supranational regulation

#### Hydrogen and Decarbonised Gas Package (GHP)

Regulation 2024/1789 of the European Parliament and Council of June 13, 2024, on the internal markets for renewable gas, natural gas, and hydrogen, amending Regulations 1227/2011, 2017/1938, 2019/942, and 2022/869 and Decision 2017/684, and repealing Regulation 715/2009.

Directive 2024/1788 of the European Parliament and of the Council of June 13, 2024, on common rules for the internal markets for renewable gas, natural gas, and hydrogen, amending Directive 2023/1791 and repealing Directive 2009/73/EC.

#### Methane emissions

Regulation 2024/1787 of the European Parliament and of the Council of June 13, 2024 **on the reduction of methane emissions in the energy sector and amending Regulation 2019/942**.

#### Projects of Common Interest (PCI) and Projects of Mutual Interest (PMI)

Commission Delegated Regulation 2024/1041 of November 28, 2023 amending Regulation (EU) 2022/869 of the European Parliament and of the Council as regards the Union list of Projects of Common Interest and Projects of Mutual Interest.

#### Cross-border renewable energy projects

Commission Delegated Regulation 2024/2613 of July 24, 2024 amending Commission Delegated Regulation 2022/2202 supplementing Regulation 2021/1153 of the European Parliament and of the Council by establishing a list of selected cross-border projects in the field of renewable energy (CB RES).

#### Demand reduction measures

Council Recommendation of March 25, 2024, on continuing coordinated demand-reduction measures for gas.

#### Security of supply

Commission Implementing Regulation 2024/2995 and its Annex setting the plan for filling trajectory with intermediary targets for 2025 for each Member State with natural gas storage facilities on its territory.

#### REMIT II

Regulation 2024/1106 of the European Parliament and of the Council of April 11, 2024, amending Regulations 1227/2011 and

2019/942 as regards improving the Union's protection against market manipulation on the wholesale energy market.

#### Sanctions on Russia

Council Regulation 2024/1745 of June 24, 2024 amending Regulation No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine.

#### Renewable energy

Council Regulation 2024/223 of December 22, 2023 introducing amendments to Regulation (EU) 2022/2577 laying down a framework to accelerate the deployment of renewable energy.

Commission Recommendation 2024/1344 of May 13, 2024, on auction design for renewable energy.

#### Net-Zero Industry Act (NZIA)

Regulation 2024/1735 of the European Parliament and of the Council of June 13, 2024, establishing a framework of measures to strengthening Europe's net-zero technology manufacturing ecosystem and amending Regulation 2018/1724.

#### Emissions and carbon management

Commission Delegated Regulation 2024/873 of January 30, 2024 amending Delegated Regulation 2019/331 as regards transitional Union-wide rules for harmonised free allocation of emission allowances.

Commission Communication of February 6, 2024 on *"Securing our future. Europe's 2040 climate target and path to climate neutrality by 2050 building a sustainable, just and prosperous society"*.

Commission Communication of February 6, 2024 on *"Towards an ambitious Industrial Carbon Management for the EU"*.

Directive 2024/1785 of the European Parliament and of the Council of April 24, 2024, amending Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions (integrated pollution prevention and control) and Council Directive 1999/31/EC on the landfill of waste.

Regulation 2024/1244 of the European Parliament and the Council, dated April 24, 2024 on reporting of environmental data from industrial installations, establishing an Industrial Emissions Portal and repealing Regulation 166/2006.

Regulation 2024/1610 of the European Parliament and of the Council of May 14, 2024, amending Regulation 2019/1242 as regards strengthening CO<sub>2</sub> emission performance standards for new heavy-duty vehicles and integrating reporting obligations, amending Regulation 2018/858 and repealing Regulation 2018/956.

Commission Communication of June 3, 2024 – Publication of the total quantity of allowances in circulation in 2023 for the purposes of the market stability reserve established in the EU Emissions Trading System established by Directive 2003/87/EC.

Regulation 2024/3012 of the European Parliament and of the Council of November 27, 2024, establishing a Union certification framework for permanent carbon removals, carbon farming and carbon storage in products.



## Industrial Emissions

Directive 2024/1785 of the European Parliament and of the Council of April 24, 2024, amending Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions (integrated pollution prevention and control) and Council Directive 1999/31/EC on the landfill of waste.

## Strategic Technologies for Europe Platform (STEP)

Commission Communication of May 14, 2024 – Guidance note concerning certain provisions of Regulation 2024/795, establishing the Strategic Technologies Platform for Europe (STEP).

Commission Communication of June 3, 2024 – Commission Communication supplementing the Guidelines on Regional State Aid in relation to the Strategic Technologies Platform for Europe (STEP):

## Electricity market

Regulation 2024/1747 of the European Parliament and of the Council of June 13, 2024, amending Regulations 2019/942 and 2019/943 as regards improving the Union's electricity market design.

Directive 2024/1711 of the European Parliament and of the Council of June 13, 2024, amending Directives 2018/2001 and 2019/944 as regards improving the Union's electricity market design.

## Energy efficiency

Directive 2024/1275 of the European Parliament and of the Council of April 24, 2024, on the energy performance of buildings.

Commission Recommendation 2024/1722 of June 17, 2024 setting out guidelines for the interpretation of Article 4 of Directive 2023/1791 of the European Parliament and of the Council as regards energy efficiency targets and national contributions.

## Key raw materials

Regulation 2024/1252 of the European Parliament and of the Council of April 11, 2024, establishing a framework for ensuring a secure and sustainable supply of critical raw materials and amending Regulations 168/2013, 2018/858, 2018/1724 and 2019/1020.

## TEN-T

Commission Delegated Regulation 2024/751 of December 11, 2023 amending Regulation No 1315/2013 of the European Parliament and of the Council as regards the indicative maps of the trans-European transmission network.

Regulation 2024/1679 of the European Parliament and of the Council of June 13, 2024, on Union guidelines for the development of the trans-European transmission network, amending Regulation 2021/1153 and Regulation 913/2010 and repealing Regulation 1315/2013.

## FuelEU Maritime

Commission Implementing Regulation 2024/2027 of July 26, 2024, on verification activities pursuant to Regulation 2023/1805

of the European Parliament and of the Council on the use of renewable and low-carbon fuels in maritime transport, and amending Directive 2009/16/EC.

Commission Implementing Regulation 2024/2031 of July 26, 2024, on the template for monitoring plans pursuant to Regulation 2023/1805 of the European Parliament and of the Council on the use of renewable and low-carbon fuels for maritime transport, and amending Directive 2009/16/EC.

Commission Delegated Regulation 2024/3214 of October 16, 2024 amending Regulation 2015/757 of the European Parliament and of the Council as regards the rules for the monitoring of greenhouse gas emissions from offshore ships and the zero-rating of sustainable fuels.

## NECPs

Commission Recommendation 2024/600 of December 18, 2023 on the draft updated national energy and climate plan of Spain covering the period 2021-2030 and on the consistency of Spain's measures with the Union's climate neutrality objective and with ensuring progress on adaptation.

## Voluntary certification schemes

Implementing Decision 2024/3130 of December 20, 2024 on the recognition of the "CertifyHy" voluntary scheme to demonstrate compliance with the requirements applicable to renewable fuels of non-biological origin established in Directive 2018/2001 of the European Parliament and of the Council.

Implementing Decision 2024/3176 of December 20, 2024 amending Implementing Decision 2022/602 as regards the recognition of the 'International Sustainability & Carbon Certification – ISCC EU' voluntary scheme for forest biomass, renewable fuels of non-biological origin and recycled carbon fuels.

Implementing Decision 2024/3194 of December 20, 2024 on the recognition of the REDcert-EU voluntary scheme for demonstrating compliance with the requirements for biofuels, bioliquids, biomass fuels, renewable fuels of non-biological origin and recycled carbon fuels set out in Directive 2018/2001 of the European Parliament and of the Council, and repealing Commission Implementing Decision 2022/605.

## Sustainable Finance – Taxonomy, Green Bonds and Disclosure

Directive 2024/1306 of the European Parliament and of the Council of April 29, 2024, amending Directive 2013/34/EU as regards the time limits for the adoption of sustainability reporting standards for certain sectors and for certain third-country undertakings.

Commission Implementing Regulation 2024/1281 of May 7, 2024 amending Implementing Regulation 2020/1208 on structure, format, submission processes and review of information reported by Member States pursuant to Regulation 2018/1999 of the European Parliament and of the Council.

Regulation 2024/3005 of the European Parliament and of the Council of November 27, 2024, on the transparency and integrity of Environmental, Social and Governance (ESG) rating activities, and amending Regulations 2019/2088 and 2023/2859.



## European Commission

European Council Decision 2024/2997 of November 28, 2024, appointing the Commission.

## Energy Charter Treaty

Council Decision 2024/1638 of May 30, 2024, concerning the withdrawal of the Union from the Energy Charter Treaty.

## Others

Directive 2024/1760 of the European Parliament and of the Council of June 13, 2024 on corporate sustainability due diligence and amending Directive 2019/1937 and Regulation 2023/2859.

Council Recommendation of June 25, 2024 on a blueprint to coordinate a response at Union level to disruptions of critical infrastructure with significant cross-border relevance.

Commission Communication of November 13, 2024 on the interpretation of certain regulatory provisions of Directive 2013/34/EU (Accounting Directive), Directive 2006/43/EC (Audit Directive), Regulation 537/2014 (Audit Regulation), Directive 2004/109/EC (Transparency Directive), Delegated Regulation 2023/2772 (first series of European sustainability reporting standards, first delegated act on the ESRS) and Regulation 2019/2088 (Sustainability Disclosure Regulation) as regards sustainability reporting.

## c.2) Spanish regulation

### In relation to the general framework of the gas system and its facilities:

#### Energy transition and hydrogen regulatory framework

Royal Decree-Law 8/2023, of December 27, adopting measures to address the economic and social consequences of the conflicts in Ukraine and the Middle East, as well as to alleviate the effects of the drought, and whereby Enagás Transporte is appointed as provisional hydrogen transmission network operator (HTNO).

Royal Decree 986/2024, of September 24, approving the update of the National Integrated Energy and Climate Plan 2023-2030.

Royal Decree 663/2024, of July 9, regulating the direct granting of subsidies to Spanish projects for their participation in the Important Project of Common European Interest of the hydrogen industry within Component 9 of the Recovery, Transformation and Resilience Plan - Financed by the European Union - Next Generation EU.

TED/268/2024 Order, of March 20, establishing energy saving obligations, compliance through Energy Saving Certificates and the minimum contribution to the National Energy Efficiency Fund for the year 2024.

TED/728/2024 Order, of July 15, developing the mechanism for promoting biofuels and other renewable fuels for transmission purposes.

Order TED/764/2024, of July 22, approving the regulatory bases for the granting of aid of the new incentive programme for unique pilot projects of energy communities (CE Implementa Programme), within the framework of the Recovery,

Transformation and Resilience Plan, financed by the European Union-Next Generation EU.

Order TED/788/2024, of July 24, establishing the regulatory bases for calls for aid for renewable value chain projects, within the framework of the Recovery, Transformation and Resilience Plan, financed by the European Union-Next Generation EU.

Order TED/801/2024, of July 26, establishing the regulatory bases for the calls for the Incentive Programme for renewable hydrogen production and consumption projects (clusters or valleys), within the framework of the Recovery, Transformation and Resilience Plan, financed by the European Union-Next Generation EU.

Order TED/803/2024, of July 26, on the tariffs of the Spanish area of the Register of Emission Rights of the European Union within the framework of Law 1/2005, of March 9, regulating the greenhouse gas emission rights trading regime.

Order ITU/831/2024, of August 2, establishing the regulatory bases for aid for the development of highly efficient and decarbonised manufacturing facilities, as part of the Industrial Decarbonisation (Strategic Projects for Recovery and Economic Transformation, PERTE), within the framework of the Recovery, Transformation and Resilience Plan, and calls for these aids for the year 2024.

Resolution of August 14, 2024, of the Secretary of State for Energy, publishing the Agreement of the Council of Ministers of July 30, 2024, authorising Enagás Infraestructuras de Hidrógeno, SLU, to provisionally exercise the functions of development of the Hydrogen Networks Projects of Common European Interest.

Resolution of September 9, 2024, from the Directorate General for Environmental Quality and Assessment, formulating the strategic environmental declaration of the Update of the National Integrated Energy and Climate Plan 2023-2030.

Decree-Law 5/2024, of June 24, amending Law 6/2022, of December 27, on climate change and energy transition in the Canary Islands.

Resolution of December 23, 2024, of the General Directorate of Energy Planning and Coordination, which determines the procedure for sending information of the obliged entities of the national system of energy efficiency obligations, in relation to their energy sales, in accordance with Law 18/2014, of October 15, on the approval of urgent measures for growth, competitiveness and efficiency.

Prior public consultation on the transposition of Directive (EU) 2024/1788 of the European Parliament and of the Council on common rules for the internal markets in natural gas and renewable gases and hydrogen and updating sectoral regulations on liquid and gaseous hydrocarbons

Prior public consultation on the partial transposition of the amendments introduced by Directive (EU) 2023/2413, on the promotion of energy from renewable sources, in relation to transport and industry targets, as well as on waste, biofuels, bioliquids, biogas, solid biomass, renewable fuels of non-biological origin and recycled carbon.



Public consultation prior to the update of the “Long-Term Strategy for a Modern, Competitive and Climate Neutral Spanish Economy in 2050”.

### Remuneration framework, tolls, charges and settlement system (economic sustainability of the gas system)

Royal Decree-Law 4/2024, of June 26, extending measures to address the economic and social consequences of the conflicts in Ukraine and the Middle East, and adopting urgent fiscal, energy and social measures.

Royal Decree-Law 7/2024, of November 11, adopting urgent measures to promote the Immediate Response, Reconstruction and Relaunch Plan for the damages caused by the Isolated High Level Depression (DANA) in different municipalities between October 28 and November 4, 2024.

Order TED/463/2024, of April 24, establishing energy policy guidelines for the National Commission on Markets and Competition regarding the modification of Circular 8/2019, which establishes the methodology and conditions for access and allocation of capacity in the natural gas system.

Order ITU/831/2024, of August 2, establishing the regulatory bases for aid for the development of highly efficient and decarbonised manufacturing facilities, as part of the Industrial Decarbonisation (Strategic Projects for Recovery and Economic Transformation, PERTE), within the framework of the Recovery, Transformation and Resilience Plan, and calls for these aids for the year 2024.

Order TED/1013/2024, of September 20, establishing the gas system charges and the remuneration and fees for basic underground storage facilities for gas year 2025.

Order TED/1193/2024, of October 30, establishing energy policy guidelines for the National Commission for Markets and Competition in relation to the proposal to amend Circular 2/2019, of November 12, establishing the methodology for calculating the financial remuneration rate for the activities of transmission and distribution of electrical energy, and regasification, transmission and distribution of natural gas.

Resolution of December 15, 2023, of the National Commission on Markets and Competition, which determines the distribution and adjustments to be made to the remuneration for the 2023 and 2024 gas years among the owners involved in the transfer of ownership of the El Musel Terminal.

Resolution of March 14, 2024, of the National Commission on Markets and Competition, on the addendum to the valuation of shrinkage in the natural gas transmission system corresponding to January 2021 to September 2021 and their effect on the remuneration of gas transmission network operators.

Resolution of March 26, 2024, of the Directorate General of Energy Policy and Mines, publishing the last resort natural gas tariff.

Resolution of April 4, 2024, of the National Commission on Markets and Competition, determining the transitional price for the rental of smart natural gas meters with a flow rate of 6 m<sup>3</sup>/h or less for customers connected to networks of less than 4 bar and consumption of 50,000 kWh/year or less..

Resolution of May 23, 2024, of the National Commission on Markets and Competition, establishing the access tolls to the transmission networks, local networks and regasification for the gas year 2025.

Resolution of May 23, 2024, of the National Commission on Markets and Competition, establishing remuneration for the 2025 gas year of the companies that carry out the regulated activities of liquefied natural gas plants, transmission and distribution.

Resolution of June 27, 2024 of the Directorate General of Energy Policy and Mines, publishing the last resort natural gas tariff.

Resolution of July 5, 2024, of the National Commission on Markets and Competition, which calculates the balance of the regulatory account of the Technical Manager of the Spanish Gas System at the end of 2023.

Resolution of July 15, 2024, of the Directorate General of Energy Policy and Mines, approving the reference prices for calculating the value of gas, oil and condensate extraction for the first half of 2024.

Resolution of July 18, 2024, of the National Commission on Markets and Competition, which establishes the remuneration for incentives of the Technical Manager of the Gas System corresponding to 2022.

Resolution of July 31, 2024, of the National Commission on Markets and Competition, which establishes the methodology for calculating the adjustment to be made to the annual remuneration of natural gas transmission, regasification and distribution companies for the provision of related products and services.

Resolution of September 6, 2024, of the National Commission on Markets and Competition, which determines the incentive remuneration of the technical manager of the gas system corresponding to the period from January to September 2023.

Resolution of September 13, 2024, of the National Commission on Markets and Competition, establishing the amount of remuneration of the Technical Manager of the Spanish Gas System and the quota for the financing of the gas year 2025.

Resolution of September 20, 2024, of the National Commission for Markets and Competition, which establishes the destination of natural gas stocks in the gas system shrinkage balance account.

Resolution of September 26, 2024 of the Directorate General of Energy Policy and Mines, publishing the last resort natural gas tariff.

Resolution of November 28, 2024, of the National Commission on Markets and Competition, establishing the value of the 2025 global ratio index and the penalty relating to the financial prudence of companies that carry out electricity transmission and distribution activities and natural gas transmission, regasification, underground storage and distribution activities.

Resolution of December 20, 2024, of the National Commission on Markets and Competition, on the addendum of the calculation, supervision and valuation of shrinkage balances in the gas system corresponding to gas year 2022 and their effect on the remuneration of facility owners.



Resolution of December 20, 2024, of the National Commission on Markets and Competition, on the addendum of the calculation, supervision and valuation of shrinkage balances in the gas system corresponding to gas year 2023 and their effect on the remuneration of facility owners.

Royal Decree-Law 9/2024, of December 23, adopting urgent measures in economic, tax, transport and social security matters, and extending certain measures to address situations of social vulnerability.

Resolution of December 26, 2024 of the Directorate General of Energy Policy and Mines, publishing the last resort natural gas tariff.

### Gas system operation, access and infrastructure.

Order TED/352/2024, of April 11, which revokes Order IET/241/2015, of February 12, which authorizes and designates Regasificadora del Noroeste, S.A., as natural gas transmission network manager.

Resolution on the certification of Enagás Transporte, S.A.U. as a storage system manager referred to in Article 3a of Regulation (EC) No 715/2009 of the European Parliament and of the Council of July 13, 2009.

Resolution of January 16, 2024, of the Directorate General of Energy Policy and Mines, publishing the assigned and available capacity in underground natural gas storage facilities for the period April 1, 2024 to March 31, 2025.

Resolution of July 26, 2024, of the Directorate General of Energy Policy and Mines, adapting the maximum annual regasification capacity of the reception, storage and regasification terminal for liquefied natural gas in the port of El Musel, in the municipality of Gijón (Asturias).



On February 17, 2025, the Board of Directors of Enagás, S.A. prepared the Consolidated Annual Accounts for the year ended December 31, 2024, consisting of the accompanying documents attached hereto, in accordance with the provisions of Article 253 of the Corporate Enterprise Act and Article 37 of the Code of Commerce, and remaining applicable standards.

DECLARATION OF RESPONSIBILITY: For the purposes of Article 99.2 of Law 6/2023, of March 17, on Securities Market and Investment Services, the Directors state that, to the best of their knowledge, the Consolidated Annual Accounts, prepared in accordance with applicable accounting principles, provide a true and fair view of the equity, financial position and results of the Group. They additionally state that, to the best of their knowledge, the directors not signing below did not express dissent with respect to the Consolidated Annual Accounts.

Chairman:

Mr Antonio Llardén Carratalá

Chief Executive Officer:

Mr Arturo Gonzalo Aizpiri

Directors:

Sociedad Estatal de Participaciones Industriales-SEPI  
(Represented by Mr Bartolomé Lora Toro)

Mr José Montilla Aguilera

Ms Ana Palacio Vallelersundi

Ms María Teresa Arcos Sánchez

Ms Eva Patricia Úrbez Sanz

Ms Natalia Fabra Portela

Mr Santiago Ferrer Costa

Ms Clara Belén García Fernández-Muro

Mr David Sandalow

Mr José Blanco Lopez

Ms María Teresa Costa Campi

Mr Manuel Gabriel González Ramos

Mr Cristóbal José Gallego Castillo

DILIGENCE to record that, in accordance with the call of the Board of Directors, having been held at the registered office, allowing the directors to participate telematically, the Consolidated Annual Accounts have been drawn up with the agreement of all members of the Board of Directors, which is certified by the Secretary of the Board with his signature below, and with the signatures of those Directors who have physically participated in the Board of Directors.



Electronic signature of the Secretary to the Board:

---

Mr Diego Trillo Ruiz

# CONSOLIDATED MANAGEMENT REPORT 2024



In the event of any discrepancy between the Spanish version and this translation into English, the Spanish version shall prevail

# TABLE OF CONTENTS CONSOLIDATED MANAGEMENT REPORT

Letter from the Chairman	3
Interview with the Chief Executive Officer	5
Introduction	8
Enagás in 2024	9
Major company milestones	10
Risk management	11
Statement of consolidated non-financial and sustainability information	19
<b>1.General disclosures</b>	<b>20</b>
2 General disclosures	21
<b>2.Environmental information</b>	<b>71</b>
European taxonomy for sustainable activities	72
E1 Climate change	88
E2 Pollution	111
E3 Water and marine resources	116
E4 Biodiversity and ecosystems	120
E5 Resource use and circular economy	129
<b>3.Social Information</b>	<b>135</b>
S1 Own workforce	136
S2 Workers in the value chain	172
S3 Affected communities	179
<b>4.Governance information</b>	<b>190</b>
G1 Business conduct	191
<b>5.Enagás additional information</b>	<b>205</b>
Regulatory compliance	206
Information security	208
Customers	212
Non-financial and diversity reporting requirements (Law 11/2018)	221
<b>6.Appendices</b>	<b>223</b>
Non-financial and diversity reporting requirements (Law 11/2018) and the EU taxonomy for sustainable activities Regulation	224
External verification report	230
Appendices	237
Annual Corporate Governance Report	238
Annual Report on Directors' Remuneration	239
TCFD content index	240
TCFD content index	241
Contact	243

# LETTER FROM THE CHAIRMAN

## ANTONIO LLARDÉN



### 2024 has been an important year for Enagás:

We tackled significant challenges and laid the groundwork for future growth.

We play a crucial role in ensuring the security of energy supply and the decarbonisation efforts in Spain and across Europe. Our strategic importance in providing energy access to industries and the public became particularly evident following the war in Ukraine, and we have continued to strengthen this role throughout 2024.

#### At the forefront of security of supply

Once again, we have set a benchmark in energy security, with Spain being among the first EU countries to fully fill its underground storage facilities by August. The Spanish Gas System operated at full capacity with great flexibility, sourcing supplies from 14 different origins during a year in which the demand for

conventional gas – including industries, households, and services – increased for the second year running.

Our role as the Technical Manager of the Gas System underpins this seamless operation, 24/7, every day of the year. In 2025, we will celebrate 25 years since Enagás took on these responsibilities, marking a quarter-century of impeccable service to society.

#### Strengthening the green and industrial agenda

Now more than ever, decarbonisation is central to the EU's role as a global actor, with energy being the cornerstone of the European project. The new European Commission is acutely aware of these challenges and opportunities and has bolstered its commitment to industrial competitiveness, the green agenda, and the development of a European renewable hydrogen network, with H2med set to be a key hydrogen corridor for Europe.

In 2024, Europe has continued to develop a truly unified energy policy by approving the Hydrogen and Decarbonised Gas Directive. The European Hydrogen Bank, during its first auction, confirmed that the most cost-effective hydrogen will be produced in the Iberian Peninsula.

Decarbonisation – and therefore renewable hydrogen – will be crucial for Europe to enhance its strategic autonomy and industrial competitiveness. The development of a hydrogen market heavily relies on infrastructure. A European market requires a network that connects production centres with demand centres.

A new era of hydrogen infrastructure

Spain's strong gas infrastructure has proven its strategic value, and this will extend to the future renewable hydrogen infrastructure. We are on the brink of a wave of hydrogen investments across Europe aimed at securing decarbonisation and security of supply – an opportunity we are prepared for, as we take decisive steps in 2025.

The H2med corridor, the Spanish Hydrogen Backbone Network, and its two associated storage facilities are European Projects of Common Interest and key components of the future European hydrogen network. This network is crucial for enhancing the competitiveness of European industry and transport. Discussing energy transition also means discussing reindustrialisation.

At Enagás, we take pride in contributing to these significant challenges for both Spain and Europe. By 2040, we aim to become a carbon-neutral company, and this year, we will continue to advance steadily towards this goal. We will also continue to contribute to the well-being and prosperity of Spanish society, that of the countries where we operate, and that of those around us.

We are equipped to meet these challenges thanks to the outstanding work of Enagás' team, to whom I extend my gratitude for their dedication, energy, and hard work. I would also like to acknowledge the dedication and valuable contributions of our Board of Directors. Additionally, I extend my gratitude to our shareholders for their continued trust in us; their support is more crucial than ever in this period of transformation. Please rest assured that as we approach 2025, our primary goal remains to continue creating value for you.

Antonio Llardén

CHAIRMAN

# INTERVIEW WITH THE CHIEF EXECUTIVE OFFICER **ARTURO GONZALO**

## ‘Green hydrogen presents a significant opportunity for both Spain and Enagás’ growth’



### How was 2024 for Enagás?

The year 2024 has been pivotal for Enagás, marking a turning point as we achieved crucial milestones to gear up the company for a new phase of growth centred primarily on hydrogen.

This year, we've started our journey as a Hydrogen Transport Network Operator (HTNO). Furthermore, the European Commission has recognised the Spanish hydrogen network and H2med as Projects of Common Interest (PCI), and we have been tasked by the Spanish Government to develop these initiatives. We have also submitted four new segments of the Spanish Hydrogen Backbone Network to the EU's second PCI call for

proposals, which will connect all the mainland autonomous communities with this network.

**‘2024 has been crucial in setting Enagás up for the future. We have enhanced our business profile and significantly lowered our debt levels’**

I also want to highlight the success of the H2med Call for Interest, the first of its kind for a pan-European corridor, which has

attracted more than 500 projects. This initiative showcases the collaboration between the governments and operators of Portugal, Spain, France, and Germany. It gives us a clear insight into the European market, positioning Spain as a major hub for green hydrogen, with strong demand coming from Germany and other European nations.

To support this investment in hydrogen infrastructure, which will underpin the company's growth, we have made several important decisions this year: we have adjusted our capital structure with a sustainable dividend policy and sold our stake in Tallgrass Energy, actions that have strengthened the company's balance sheet and risk profile.

The ICSID has also ruled in favour of Enagás regarding our investment in Gasoducto Sur Peruano (GSP). This decision, which ends over seven years of uncertainty, strongly affirms Enagás' competent handling of the situation and largely paves the way for repatriating dividends from our affiliate, Transportadora de Gas del Perú (TGP).

It has been an intense year, during which we have also ensured the seamless operation of the System and reinforced Spain's position as a crucial energy hub for Europe's strategic autonomy.

#### What are the company's prospects for 2025?

We have made significant progress as the year begins. Europe has taken decisive steps to continue supporting renewable hydrogen as a key element of its green and industrial agenda. In January, the European Commission unveiled its Competitiveness Plan, which highlights the acceleration of investments in hydrogen infrastructure as a top priority.

Both Europe and the Spanish government are united in their support for green hydrogen as a cornerstone of the energy transition. This was evident at the Third Enagás Hydrogen Day, where key figures such as the President of the Government of Spain, Pedro Sánchez; the Executive Vice-President for a Clean, Just and Competitive Transition at the European Commission, Teresa Ribera; and the President of the National Commission on Markets and Competition (CNMC), Cani Fernández, spoke.

At Enagás, we continue to take all necessary steps to ensure that 2025 becomes the year of hydrogen infrastructure. Together with our partners, we have secured all the Connecting Europe Facility (CEF) funding we requested for the studies and engineering of the Spanish Hydrogen Backbone Network and the H2med corridor. We are set to progress according to the planned timeline to establish a hydrogen infrastructure by 2030.

A notable initiative in this schedule is the public participation plan for the Spanish Hydrogen Backbone Network. This will be the largest process of its kind ever undertaken in Spain, running throughout this year and into part of 2026 nationwide.

#### What are the main features of the 2024 results?

The year 2024 has been crucial for Enagás, marked by two key achievements: an improved business risk profile and a significant reduction in debt levels.

Our net profit, excluding non-recurring impacts, has increased to 310.1 million euros, which is 3.2% higher than in 2023 and exceeds our annual targets. Efficiency in operating expenses,

strong performance from our affiliates, and improved financial results have been crucial in offsetting the annual impact of the regulatory framework.

Including the effects of asset rotation and the accounting loss from the GSP ruling, our net profit stands at -299.3 million euros. This adjustment strengthens our strategic initiatives and solidifies our dividend policy both now and for the future.

Selling our stake in Tallgrass Energy enabled us to cut debt by 943 million euros, which is a 28% reduction compared to 2023. Rating agencies have acknowledged these improvements by upgrading Enagás' credit rating to BBB+ with a stable outlook.

And, as I was saying, the GSP ruling has finally ended years of uncertainty.

In summary, 2024 has been crucial in establishing the groundwork for an Enagás poised for growth driven by hydrogen and new energy carriers, ensuring sustainable returns for our shareholders.



## How well has the Strategic Plan been implemented and what does it update entail?

Our plan's implementation since 2022 has surpassed our expectations, prompting us to introduce the 2025-2030 Strategic Update. Our initial focus has been on ensuring the security of supply in Spain and Europe, with our Gas System operating at full capacity. By efficiently managing our infrastructure, we have saved approximately 10 billion euros on the national energy bill due to the price differential with Europe from 2022 to 2024.

Our strategic focus is on Spain and Europe, and progress in asset rotation is crucial to this aim. In 2024, alongside selling Tallgrass Energy, we increased our involvement as an industrial partner and operator of the Stade LNG terminal in Germany.

As part of the second pillar of our Strategic Plan, we have effectively managed operating and financial costs and reduced the impact of inflation through our Efficiency Plan.

This strong foundation allows us to advance the third pillar of our Strategic Plan: contributing to decarbonisation. We have announced 4.035 billion euros in investments, with 3.125 billion earmarked for renewable hydrogen infrastructure.

In addition, the newly formed company, Scale Green Energy, will enable Enagás to spearhead the development of other decarbonisation-related infrastructures and services. This includes sustainable CO<sub>2</sub> management, renewable ammonia, bunkering, small-scale LNG and BioLNG, and renewable hydrogen for mobility.

The company's investments are expected to achieve a compound annual growth rate of 9.5% in EBITDA between 2026 and 2030. This growth is aligned with our strategy of maintaining an attractive and sustainable dividend policy beyond 2026.

In short, this ambitious strategic update, with clear challenges and goals, aims to create value for our shareholders.

## 'We have introduced a strategic update with clear challenges and objectives that will enhance value for our shareholders'

### What is the key to remaining a sustainability leader?

We are deeply committed to sustainability, tackling it as a personal challenge. Addressing climate change is a major societal challenge and is central to Enagás' mission. We aim to become a net zero company by 2040. To achieve this, we are implementing a stringent decarbonisation strategy across both our direct operations and those within our value chain, reporting our progress transparently.

We foster a culture of sustainability that engages everyone within the company. This ethos is reflected in our actions and is why Enagás has been included, for the seventeenth year in a row, in the Dow Jones Best in Class Index (formerly the Dow Jones

Sustainability Index). We continue to hold a leading position and have improved our rating.

### What would you highlight from your performance in other ESG areas?

We are advancing across all three ESG dimensions. In particular, our commitment to quality employment is a defining characteristic of Enagás in the social sphere. We are a leader in people management and have been recognised as a Top Employer for fifteen years, as well as achieving the highest level of excellence, A+, as a Family-Friendly Company (efr).

Diversity and inclusion are central to our strategy. According to Equileap's Gender Equality Report & Ranking 2024, Enagás ranks among the top 15 companies globally and second in Spain for gender equality.

Last year, we joined ClosinGap to help close gender gaps and were recognised in the Global Summit of Women report as one of the energy companies with the highest number of female managers and executives worldwide.

In the field of Corporate Governance, we have a robust governance model that adheres to best practices and standards. In 2024, we received the highest rating, G++, from the AENOR Corporate Governance Index 2.0, which we have just renewed in 2025.

## 'At Enagás, we are committed to fostering a culture of sustainability on a personal level'

### Is there anything else you would like to highlight about the company's prospects?

We are at a crucial moment in the company's future and we are addressing this by leveraging innovation, technology, and digitalisation – our key strategic allies in transitioning to a hydrogen economy. In 2024, we established the Hydrogen Technology Observatory to drive innovation, facilitate the exchange of technical knowledge, and accelerate the rollout of this energy carrier. This initiative has already attracted 40 partners from across the value chain.

Our Digital Transformation Plan is helping us advance more swiftly with the 2022-2030 Strategic Plan. We are driving a more digitalized energy model across all areas of our activity, with a prominent role for our Cybersecurity Plan in ensuring the resilience and continuity of our business, and for Artificial Intelligence as a disruptive and transformative element. We believe in a digitalisation approach that puts people at its core, enabling us to become more agile and flexible.

I want to express my gratitude to the outstanding team of professionals at Enagás for their excellent work this year and their continual dedication to realising the company's future plans.

I also extend my thanks to our Board of Directors, stakeholders, and every shareholder for their support and trust. Our main priority is to create sustainable value for you.

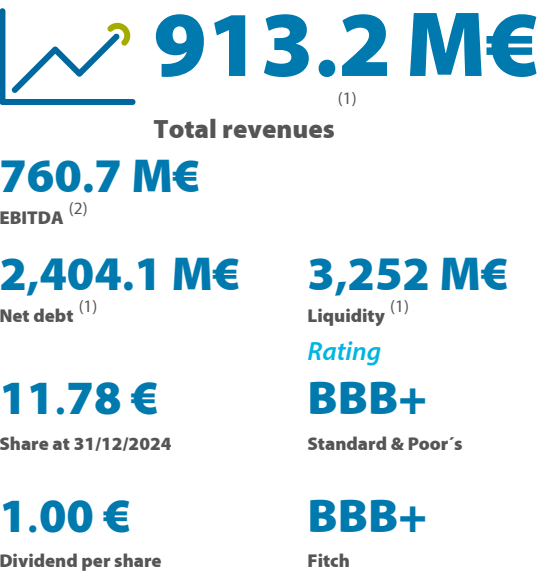
# INTRODUCTION

# 2024

Enagás in 2024	9
Major company milestones	10
Risk management	11

# ENAGÁS IN 2024

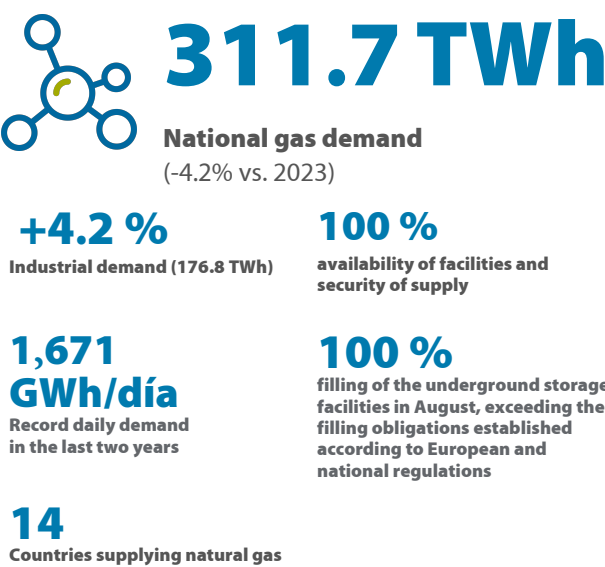
## Sustainable and profitable growth



(1) Figures from the income statement of the Consolidated Annual Accounts of the Enagás Group for financial year 2024.  
(2) Figure reported in the Alternative Performance Measures Report, available at <https://www.enagas.es/en/investor-relations/financial-information/alternative-performance-measures-apm/>.

Important circumstances arising after year-end: [see 'Consolidated Annual Accounts', section '4.9 Subsequent events'.](#)

## Operational excellence

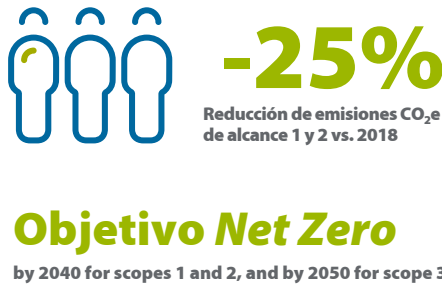


## Transformation



Launch of the  
2024-2026 Digital  
Transformation Plan

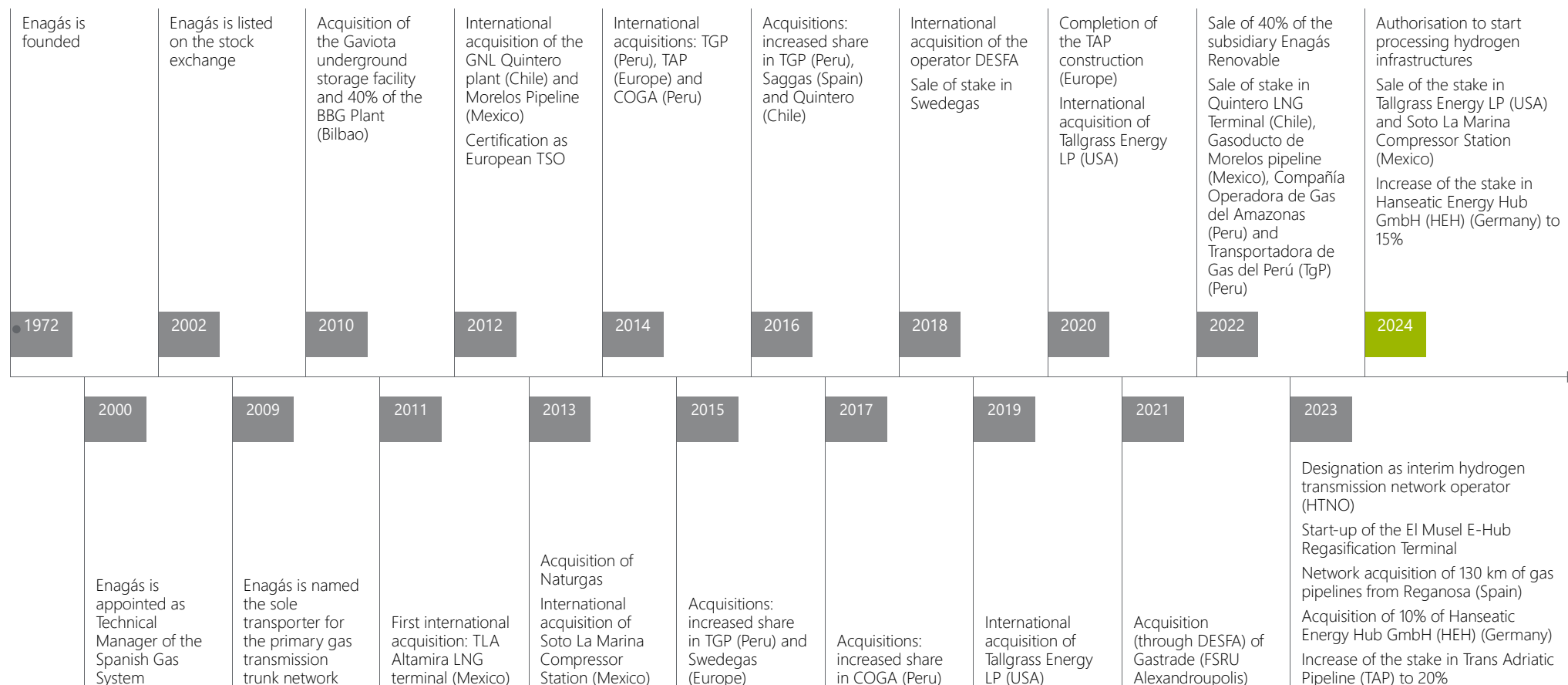
## Sustainability



## Sustainability indices



# MAJOR COMPANY MILESTONES



# RISK MANAGEMENT

## Enagás Risk Model

Enagás has established a risk control and management model aimed at ensuring the achievement of the objectives of the company in a predictable manner and with a medium-moderate profile for all of its risks. This model is perfect for adapting to the complexity of a globalised competitive environment and a complex economic backdrop.

In its [Risk Control and Management Policy](#), Enagás establishes its commitments to ensure a clear governance structure, a proactive and comprehensive approach to risk control and management, as well as effective information management to identify, assess, manage and communicate risks at the appropriate levels.

This model is based on five aspects:

1. The consideration of a risk taxonomy, which sets out standard typologies of risks according to their nature. The taxonomy comprises the following categories: Strategic and Business, Operational and Technological, Financial and Tax and Credit and Counterparty. In addition, there are other types of risk transversal to the previous ones: Reputational, Compliance and Criminal Liability.

The Enagás Group is also exposed to other cross-domain risks that do not correspond to a single risk category, but rather may be correlated with multiple. These risks are related to the three ESG sustainability pillars: environmental, social and governance.

The taxonomy defined is taken as a reference point for the identification of the risk inventory to which society is exposed. It is dynamic inventory, conditioned by changes in the corporate environment.

It should also be noted that the methodologies used for risk measurement differ depending on each type.

2. The segregation and independence of the functions of risk control and management are articulated at the company in three 'lines of defence':

On the one hand, the business units responsible for the risks take them on when conducting their ordinary business activities, and are therefore responsible for identifying and measuring them.

Moreover, there is a risk control and management area responsible for the following:

- Ensuring that the risk control and management systems function correctly.
- Actively participating in the preparation of risk strategies and the impact definition regarding their management.
- Ensuring that the control and management systems adequately mitigate risks.

Lastly the internal audit function is responsible for monitoring the efficiency of controls in relation to identified risks.

## Internal risk control and management framework

	1st line of defence - Business units	2nd line of defence - Risk area	3rd line of defence - Internal audit
<b>Governance</b>		Define the regulatory and governance framework.	
	Identify the risks they assume in their ordinary activity.	Define a taxonomy of risks and advise the business units on identifying risks.	
	Assess and measure risks following the established measurement methodologies, assuming and managing them.	Establish the risk measurement methodologies and the risk consolidation and reporting system.	
<b>Risk profile</b>		Validate the measurements made by the business units.	
	Define risk control and management measures.	Ensure that management controls and measures are aligned with the company's strategy.	Verify and monitor the risk function and established control activities.
	Define actions to correct failure to comply with risk limits.	Provide a global and homogeneous vision of risks, reporting to Senior Management and Governing Bodies.	
<b>Risk appetite</b>		Inform the Governing Bodies of the risk appetite and its associated limit structure.	
		Validate measures and strategies for correcting any non-compliance.	
<b>Coordination with second lines</b>		Ongoing coordination with Insurance, Cybersecurity and Health and Safety areas	

3. The existence of a solid risk culture, as well as a governance structure with clear responsibilities in the company's risk control and management process:

#### Governing Bodies

##### Board of Directors

The Board of Directors is responsible for approving the Risk Control and Management Policy, setting the acceptable level of risk, and ultimately ensuring the Risk Control and Management Model is in place and functioning.

Other responsibilities with respect to risks are delegated in the Audit and Compliance Committee.

##### Audit and Compliance Committee

The Audit and Compliance Committee mainly monitors the efficiency of the risk control and management systems and evaluates the risks to the company (identification, measurement and establishment of measures for their management). It also ensures the independence of the function and that it is provided with the necessary workforce and material resources needed for the optimum performance of its duties.

##### Executive Committee

The Executive Committee establishes the overall strategy for risks and the limits of global risk for the company. It also reviews the level of exposure to risk and the corrective actions, should there be any non-compliance.

4. Establishing a risk appetite framework which defines the risk levels considered acceptable and that is in line with established business objectives and the market environment in which the company's activities are carried out.
- There is also a scorecard of key risk indicators (KRIs) with their associated limits for the company's main processes and risks. These delimit the risk appetite that the Group wishes to assume in its quest for profitability and value.

Among the established KRIs, we highlight the areas of operational risk, health and safety, financial, sustainability, geopolitical context and compliance.

Similarly, some KRIs (financial, environmental, sustainability) are included as metrics in the company's objectives for long-term incentives.

Finally, it is worth highlighting the establishment of KRIs associated with the main Monitoring KPIs for the 2025-2030 Strategic Update.

5. The transparency of information supplied to third parties, to guarantee its reliability and accuracy.

The Model complies with international best practice standards in terms of risk control and management, primarily referring to ISO 31000 Risk Management Standard and 2nd COSO Report<sup>1</sup>: ERM (Enterprise Risks Management). It is also fully aligned with the national regulatory framework in this area (requirements of the Spanish Corporate Enterprises Act and the recommendations of the CNMV's Good Governance Code of Listed Companies and Technical Guide 3/2017 on Audit Committees for Public Interest Entities).

This risk model includes a comprehensive analysis and regular monitoring of all risks to which the company is exposed, enabling them to be adequately controlled and managed.

## Risk monitoring

Corporate risks are continuously monitored through different channels and a wide variety of reports. Substantial changes in risk are promptly communicated to decision-makers.

At least quarterly, a monitoring report is made to the company's Executive Committee, Audit and Compliance Committee and Board of Directors. The risk identification and assessment process includes the following phases:

<sup>1</sup> Committee of Sponsoring Organizations of the Treadway Commission.

## Phase 1

### Risk identification

Identification of those risks to which the company is exposed in the ordinary course of business on a continuous and systematic basis.

Risks are classified according to the risk taxonomy set out by the company.

## Phase 2

### Risk assessment

Qualitative and quantitative assessment of the level of risk for a given time horizon on an annual basis, updated quarterly for the most significant risks.

Use of different methodologies, taking into account the characteristics of each risk and the different scenarios established on the basis of available information.

The impact/exposure of risks is assessed in the different dimensions indicated below, including ESG aspects, so that risk levels are determined from the perspective of relative importance, impact on the company's value and impact on the environment (environmental, security, reputational and social):

- Economic: assessment according to impact on company results.
- Health and safety: assessment according to severity of incidents.
- Reputational: assessment according to the impact on stakeholder expectations.
- Security of supply: assessment according to the degree to which the Gas System is affected and the time for which infrastructure is unavailable.
- Environment: assessment depending on the type of environmental impact (biodiversity or emissions). Done according to the level of environmental damage and impact on protected areas, the energy efficiency indicator, and/or the volume of methane emissions.

The risk measurement exercise consists of estimating possible prospective business scenarios that could eventually have a negative impact on the company's interests.

The level of risk (Acceptable, Assumable, Significant or Critical) is determined on the basis of the impact/exposure, as indicated above, and the likelihood of the risk events materialising.

The existing model is complemented by specific risk analyses that facilitate decision-making based on risk-profitability criteria for strategic initiatives of the Enagás Group, new products (CO<sub>2</sub>, ammonia, etc.), services, businesses, etc. The risk control and

## Phase 3

### Risk Control and Mitigation Measures

The required control and management activities are designed for each risk according to the nature of the risk, the operational plans of the business and the established risk management strategy: take on, mitigate or eliminate.

## Phase 4

### Reporting

Creation of cutbacks at different levels of the organisation: areas, Executive Committee, Audit and Compliance Committee and Board of Directors.



management area performs this analysis independently, transversally (covering all types of risk) and homogeneously (following the same methodologies as for global risk measurement), based on the establishment of specific risk levels for this type of operation, which are aligned with the methodology used for other risks, making it possible to monitor the risks identified throughout the entire life cycle (from the study of the opportunity to management of the activity once it has been integrated into the Company's processes).

In 2024, the Risk Control and Management Model was certified by an independent third party. Its report concluded that the level of maturity and deployment within the organisation and compliance with the aforementioned reference standards are high, highlighting as strong points the risk culture at all levels of the organisation, the robustness and maturity of the model, and the solidity of the quantification models used.

Furthermore, within the framework of ISO 55001 - Asset Management Certification, ISO 14001 - Environmental Management Systems Certification and ISO 37001 - Anti-Bribery Management Systems Certification, regular external audits are carried out on the Risk Control and Management Model, as far as these standards are concerned.

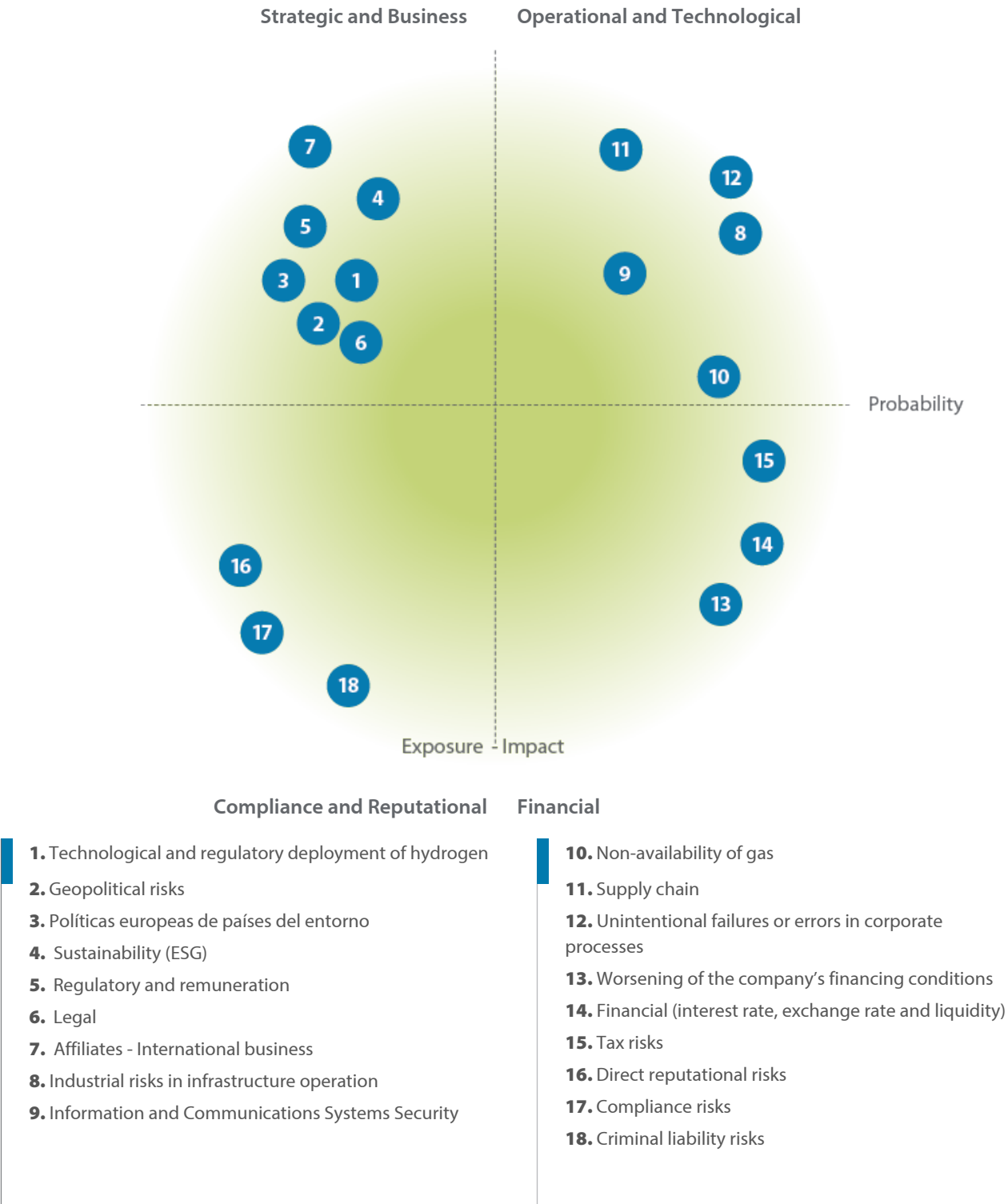
In 2024, Enagás carried out internal communication campaigns and training activities for the Board of Directors and Enagás employees - in relation to the Risk Management Model, methodology and comprehensive security risk in information and communications systems (cybersecurity). This allows us to update knowledge in this area and continue to strengthen the risk culture at all levels of the organisation.

The Enagás risk map is shown below, detailing the risks to which the Enagás Group is exposed, represented in aggregate (in accordance with level 2 of the company's risk taxonomy).

This map includes aggregate Sustainability (ESG) risks, defined as the effects of non-compliance with commitments and targets in the company's material topics. Enagás has identified and assessed these

risks, based on the company's materiality analysis (for more information, see disclosure requirements [SBM-3](#) and [IRO-1](#) in chapter 2 of the Non-Financial and Sustainability Information Statement). The result is risks with ESG factors or impacts for each of the material topics.

Corporate Risk Map



## Breakdown of main risks<sup>2</sup>

Type of risk	Risk description	Level of risk <sup>3</sup>	Control and management measures
<b>STRATEGIC AND BUSINESS RISKS</b>			
<b>1. Technological and regulatory deployment of hydrogen</b>	<ul style="list-style-type: none"> <li>Achieving technological deployment is necessary to ensure the viability of renewables as an energy alternative.</li> <li>There is uncertainty as to the regulatory deployment (remuneration, public funds) that conditions the viability of the projects.</li> </ul>	<b>Significant</b>	<ul style="list-style-type: none"> <li>Update to the Policy on the separation of activities.</li> <li>Agreement of the Council of Ministers of July 30, 2024 authorising Enagás Infraestructuras de Hidrógeno as provisional manager of the hydrogen network.</li> <li>Publication of the results of the 2nd hydrogen bank auction in the expected terms.</li> <li>H2Med has established itself as the most mature pan-European H2 corridor in Europe.</li> <li>Recognition as PCIs of the H2med hydrogen corridor and the initial axes of the Hydrogen backbone.</li> <li>100% of the requested aid from CEF funds for PCI studies has been granted.</li> <li>H2med Call for Interest process. Endorses Spain as a H2 production hub in Europe.</li> <li>The third H2 day on January 29, 2025, was received very positively.</li> <li>Early engagement with Spanish regulators, including the CNMC and the Ministry for Ecological Transition and the Demographic Challenge (MITERD).</li> </ul> <p>For more information, see disclosure requirement SBM-1 in chapter 2 of the Non-Financial and Sustainability Information Statement.</p>
<b>2. Geopolitical risks</b>	<ul style="list-style-type: none"> <li>Certain geopolitical developments could have a negative impact on the natural gas market and the energy transition and, therefore, on the company's strategic objectives and business development.</li> </ul>	<b>Tolerable</b>	<ul style="list-style-type: none"> <li>Internal monitoring of the main geopolitical hotspots with potential negative consequences for the gas market and the energy transition, and indirectly for Enagás and its 2025-2030 Strategic Update.</li> </ul>
<b>3. European policies of neighbouring countries</b>	<ul style="list-style-type: none"> <li>Enagás' strategy, focused on security of supply and decarbonisation, may be affected by dependence on the government policies of neighbouring countries in Europe.</li> </ul>	<b>Tolerable</b>	<ul style="list-style-type: none"> <li>Monitoring of government policies (PNIECs, Energy Policies) and the macroeconomic context in the EU countries of greatest relevance to Enagás (France, Germany, Portugal, etc.).</li> <li>Publication on July 15, 2024, of the hydrogen and decarbonised gas package (Regulation 2014/1789 and Directive 2024/1788).</li> <li>Monitoring of possible delays that could slow down the implementation of BarMar and the hydrogen backbone network.</li> </ul>
<b>4. Sustainability (ESG)</b>	<ul style="list-style-type: none"> <li>Effects of non-compliance with commitments and targets on the company's material topics: decarbonisation, environmental impact, human rights, discrimination/diversity/vulnerability, loss of talent/lack of human capital, health and safety, and non-compliance with governance principles.</li> </ul>	<b>Tolerable</b>	<ul style="list-style-type: none"> <li>Health and safety policy, environmental policy, climate action policy and quality and operational excellence policy, the principles of which are embodied in the Enagás Environmental Management System, certified in accordance with ISO 14001 and EMAS.</li> <li>Sustainable Management Plan with lines of action in the field of natural capital and biodiversity management.</li> <li>Presence in the S&amp;P Global's sustainability rankings, the Dow Jones Best in Class Index and other sustainability indices.</li> <li>Compliance, Sustainability and Good Governance policies that establish the general principles governing the company's management in this area, as well as the specific area in the company that manages diversity and inclusion.</li> </ul> <p>For more information, see chapters E1, E2, E3, E4 and E5 of the Non-Financial and Sustainability Information Statement.</p>
<b>5. Regulatory and remuneration</b>	<ul style="list-style-type: none"> <li>Admissibility of CapEx investment costs, adjustment of CapEx and OpEx standards for inflation.</li> </ul>	<b>Tolerable</b>	<ul style="list-style-type: none"> <li>Promotion of the use of natural gas and dissemination of analyses of the economic and financial sustainability of the system.</li> <li>Ongoing relationship with regulatory bodies and Public Administrations.</li> <li>Participation in the development of proposals for regulatory development and the consultation phase.</li> </ul>

<sup>2</sup> Riesgo de Crédito y Contraparte: En aplicación de la NIIF9, desde enero de 2018 se realiza una provisión por la pérdida esperada de este tipo de riesgo.

<sup>3</sup> En el mapa de riesgos se representa el riesgo residual, es decir, el riesgo considerando la efectividad de las medidas de control y gestión establecidas (transferencia del riesgo a compañías aseguradoras o medidas de mitigación). Nivel de Riesgo: Aceptable / Asumible / Relevante / Crítico.

Type of risk	Risk description	Level of risk <sup>3</sup>	Control and management measures
<b>6. Legal risks</b>	<ul style="list-style-type: none"> <li>The company's results may be affected by the outcomes of administrative or legal actions and proceedings in which it is involved, as well as by the uncertainties that arise from differing interpretations of contracts, laws or regulations that the company may have that differ from those of third parties.</li> <li>Effects on Enagás' income statement arising from the resolution of arbitration, legal proceedings, and/or the evolution of its business plans and growth projects.</li> </ul>	<b>Significant</b>	<ul style="list-style-type: none"> <li>Management and follow-up of existing situations in legal proceedings and/or with the relevant administrative authorities.</li> <li>Hiring specialised legal counsel for the process.</li> </ul>
<b>7. Affiliates – International business</b>	<ul style="list-style-type: none"> <li>Effects on Enagás' income statement derived from the evolution of its business plans and growth projects.</li> </ul>	<b>Acceptable</b>	<ul style="list-style-type: none"> <li>Follow-up and monitoring of the evolution of the business, the portfolio of opportunities and the project execution at the different companies.</li> </ul>
<b>OPERATIONAL AND TECHNOLOGICAL RISKS</b>			
<b>8. Industrial risks in infrastructure operation</b>	<ul style="list-style-type: none"> <li>In the operation of the infrastructure for transmission, regasification terminals and underground storage facilities, accidents, damage or incidents involving loss of value or lost profits may occur.</li> </ul>	<b>Acceptable</b>	<ul style="list-style-type: none"> <li>Emergency, maintenance and continuous improvement plans, the existence of control systems and alarms that guarantee service continuity and quality.</li> <li>Quality, prevention and environmental certifications and redundancy of equipment and systems.</li> <li>Insurance policy contracts.</li> <li>Cybersecurity Measures /Resilience / Physical Security</li> </ul>
<b>9. Security of information and communication systems</b>	<ul style="list-style-type: none"> <li>Damage to corporate and industrial systems as a result of attacks by third parties.</li> </ul>	<b>Tolerable</b>	<ul style="list-style-type: none"> <li>Cybersecurity Strategy (2025-2027)</li> <li>Good position in the sector in terms of cyber-attack mitigation and control measures.</li> <li>Cybersecurity and AI Committee, Business Continuity Committee and quarterly report to the Audit and Compliance Committee on the actions taken to mitigate risk in the areas of logic, resilience, and physical security.</li> <li>Definition and update of BIAs (Business Impact Analysis) and BCPs (Business Continuity Plan) to respond to different cyber-attack scenarios.</li> <li>Supply chain assessment (suppliers).</li> <li>Cybersecurity and AI training (Board, Senior Management and other professionals).</li> <li>Conducting cyber-attack simulation tests (Red Team) to test detection and response capabilities.</li> </ul> <p>For more information, see the section on 'Information Security' in the Additional Information section of the Non-Financial and Sustainability Information Statement.</p>
<b>10. Gas unavailability</b>	<ul style="list-style-type: none"> <li>Interruption of supply in the Spanish Gas System due to unavailability of gas at the source or due to market tensions irrespective of cause (sabotage, geopolitical decisions).</li> </ul>	<b>Tolerable</b>	<ul style="list-style-type: none"> <li>Preventive action plan for the Spanish Gas System (investments in gas infrastructures, flexibility of entry points, organised market, interruptible contracts, among others).</li> <li>Cybersecurity Measures /Resilience / Physical Security</li> <li>Business Continuity Committee, BIAS and BCP.</li> </ul>
<b>11. Supply chain</b>	<ul style="list-style-type: none"> <li>Contractual disputes, poor quality of services or information received, non-compliance with sustainability criteria and delays in administrative decisions.</li> </ul>	<b>Acceptable</b>	<ul style="list-style-type: none"> <li>Processes and regulations and internal procedures for purchasing and supplier approval.</li> <li>Reputational analysis and ESG assessments of suppliers.</li> <li>Close and continued relationship with stakeholders.</li> </ul> <p>For more information, see disclosure requirement G1-2 of the Non-Financial and Sustainability Information Statement.</p>
<b>12. Unintentional failures or errors in corporate processes</b>	<ul style="list-style-type: none"> <li>Non-industrial processes (invoicing, formalisation of contracts, legal and/or administrative formalities, etc.).</li> </ul>	<b>Acceptable</b>	<ul style="list-style-type: none"> <li>Processes with specific validation and monitoring controls.</li> <li>External and internal audits.</li> <li>Internal policies, standards, training and procedures.</li> <li>Automation of processes, updating and review of systems.</li> </ul>

<sup>3</sup> The risk map represents the residual risk, i.e. the risk considering the effectiveness of the established management and control measures (risk transfer to insurance companies or mitigation measures). Level of risk: Acceptable / Tolerable / Significant / Critical.

Type of risk	Risk description	Level of risk <sup>3</sup>	Control and management measures
<b>FINANCIAL AND FISCAL RISKS</b>			
<b>13. Worsening of the company's financing conditions</b>	<ul style="list-style-type: none"> <li>The push for sustainable finance by regulators and investors (EU taxonomy, EIB investment policy, European Green Deal, and other similar measures) could affect the company's financing conditions in the medium and long term.</li> </ul>	<b>Acceptable</b>	<ul style="list-style-type: none"> <li>The development of renewable gas projects aligned with the EU Taxonomy and the ESG requirements of regulators and investors will enable sustainable debt issuance and improved financing conditions.</li> </ul>
<b>14. Financial risks (interest rate, exchange rate and liquidity)</b>	<ul style="list-style-type: none"> <li>Volatility of interest and exchange rates, as well as movements in other financial variables that could negatively affect the company's liquidity.</li> </ul>	<b>Acceptable</b>	<ul style="list-style-type: none"> <li>Hedging through derivative contracts to establish an optimal debt structure.</li> <li>Natural hedging through financing in the business's functional currency.</li> <li>Taking out credit lines with unconditional availability and temporary financial investments.</li> </ul>
<b>15. Tax risks</b>	<ul style="list-style-type: none"> <li>Possible changes to tax legislation that could affect the company's results.</li> <li>Possible differences in interpretation of the tax legislation in force in the countries in which the Group is present that may diverge from the criteria held by Enagás and its tax advisors.</li> <li>Possible defects of form.</li> </ul>	<b>Tolerable</b>	<ul style="list-style-type: none"> <li>Consultancy services provided by tax specialists.</li> <li>Monitoring of Principles of action that govern compliance with tax obligations, avoiding risks and tax inefficiencies.</li> </ul>
<b>REPUTATIONAL RISKS</b>			
<b>16. Direct reputational risks</b>	<ul style="list-style-type: none"> <li>Possible deterioration of the perception or image of the Enagás Group from the different stakeholders.</li> </ul>	<b>Tolerable</b>	<ul style="list-style-type: none"> <li>Fluent, direct communication with stakeholders.</li> <li>Permanent monitoring of information published in the media and social networks.</li> <li>Internal communication regulations.</li> </ul> <p>For more information, see disclosure requirement SBM-2 in chapter 2 of the Non-Financial and Sustainability Information Statement.</p>
<b>COMPLIANCE RISKS AND MODEL</b>			
<b>17. Compliance risks</b>	<ul style="list-style-type: none"> <li>Non-compliance with external regulations (sanctions), fraud, corruption and anti-trust.</li> </ul>	<b>Tolerable</b>	<ul style="list-style-type: none"> <li>Internal policies and procedures relating to the Code of Ethics, Compliance models, control framework, etc.</li> <li>Dissemination and awareness raising measures</li> <li>Continuous monitoring of new rules/regulations.</li> </ul> <p>For more information, see disclosure requirement G1-1 and the 'Regulatory compliance' section in the Additional Information section of the Non-Financial and Sustainability Information Statement.</p>
<b>CRIMINAL LIABILITY RISK</b>			
<b>18. Criminal liability risk</b>	<ul style="list-style-type: none"> <li>Criminal offences included in the Spanish Criminal Code that could result in corporate criminal liability.</li> </ul>	<b>Tolerable</b>	<ul style="list-style-type: none"> <li>Corporate Defence Programme.</li> <li>Internal policies, rules and procedures from different areas of the company.</li> <li>Code of conduct and code of ethics.</li> </ul> <p>For more information, see disclosure requirement G1-1 and the 'Regulatory compliance' section in the Additional Information section of the Non-Financial and Sustainability Information Statement.</p>

<sup>3</sup> The risk map represents the residual risk, i.e. the risk considering the effectiveness of the established management and control measures (risk transfer to insurance companies or mitigation measures). Level of risk: Acceptable / Tolerable / Significant / Critical.

## Emerging risks

Within this process, Enagás also pays special attention to identifying changes in the reference context to capture events or macro-trends originating outside the organisation that could have a significant impact on the business or the sector in the long term, identifying the most significant threats in order to get ahead of them and establish mitigation measures.

Emerging risks have the unique characteristic of not having been addressed in the past. They are risks for which there is a lack of knowledge/preparedness to quantify their potential impact through long-term prospective scenarios. Pro-active management of these risks is essential to avoid potential negative effects and deviations from established objectives, which, if they occur, could be mitigated

through the establishment of prevention and control strategies and measures.

Emerging risks are identified by the business areas (first line of defence) during measurement exercises.

In 2024, there was significant uncertainty driven by rapid changes and the potential for unpredictable events, further intensified by a complex geopolitical landscape and escalating armed conflicts. The Transformation Plan for models and the adoption of new technologies, such as Artificial Intelligence, also brings about new risks.

In addition to those risks that are already included in the company's risk breakdown, as they are already present in the company's day-to-day business (such as risks derived from the macroeconomic and geopolitical context, the transformation plan

and the adoption of new technologies, climate change, exposure to cyber-attacks or artificial intelligence), other risks have been identified that could become relevant in the future:

Risk	Description / Impact	Risk control and management measures
<b>Extreme weather conditions affecting people</b>	<ul style="list-style-type: none"> <li>Intensification of acute weather events urgent in nature (floods, cut-off lows, storms), as well as chronic weather events (drought, increased temperatures) over the long term in areas most exposed to these hazards could have significant impacts for the company.</li> <li>This may affect people's health and also cause difficulties in accessing buildings and communication between locations, and may even prevent access to Enagás' facilities and affect the integrity and operation of infrastructures.</li> </ul>	<ul style="list-style-type: none"> <li>Simulations of operation with partial unavailability of infrastructures.</li> <li>Emergency Action Plans, Crisis Management Standard, NGTS (Exceptional Operating Situation, EOS).</li> <li>Acquisition of new emergency communication systems.</li> <li>Update of physical risk at all facilities during 2024-2025, as well as the need for new implementation measures.</li> </ul>
<b>Disinformation or misinformation of the public</b>	<ul style="list-style-type: none"> <li>Providing intentionally manipulated information to serve certain malicious ends. Disinformation is spread in various ways, most notably through digital platforms and social media, through fake profiles, algorithms or Generative Artificial Intelligence tools.</li> <li>Disinformation can be a threat that increases the risk to the overall security of information systems (e.g. cyber-attacks), worsens the company's reputation and/or causes the loss of investor confidence.</li> </ul>	<ul style="list-style-type: none"> <li>Verifying sources, developing critical thinking, contextualising information.</li> <li>Tracking of information published in media and social networks.</li> <li>Awareness-raising and training workshops: organising workshops and training programmes to try to prevent misinformation risks.</li> </ul>
<b>Shortage of talent with the technical skills required by the market</b>	<ul style="list-style-type: none"> <li>Due to the ageing of the population, the low birth rate and the changing occupational trends of the new generations entering the labour market, there could be a long-term shortage of skilled labour to develop the hydrogen infrastructure investment plan foreseen in the 2025-2030 Strategic Update.</li> <li>This could lead to delays in project development and increased costs in hiring available personnel.</li> </ul>	<ul style="list-style-type: none"> <li>Training and development programmes.</li> <li>Partnerships with educational institutions and research centres.</li> <li>Internal talent retention and development programmes.</li> <li>Global talent attraction: expanding recruitment strategies to attract talent from different regions and countries.</li> <li>Use of technology for talent management.</li> </ul>
<b>Shortage of materials</b>	<ul style="list-style-type: none"> <li>Possible tensions or problems in the supply of critical materials for the construction of infrastructures, given the H<sub>2</sub> infrastructure development plan planned at the European level, and increasing geopolitical tensions.</li> </ul>	<ul style="list-style-type: none"> <li>Better planning and diversification of suppliers.</li> <li>Long-term agreements with strategic suppliers.</li> </ul>
<b>Solar storms</b>	<p>In addition to the increased frequency and intensity of certain weather phenomena, which currently already occur, there are new threats such as solar storms that may gain strength in the coming years.</p> <p>These phenomena can cause significant disruptions to power grids, communication systems and/or satellites. A severe storm could overload and damage electrical transformers, as well as affect navigation or communication systems, which are key to the coordination and control of operations at Enagás infrastructures.</p>	<ul style="list-style-type: none"> <li>At the governmental level, work is under way to develop early warnings.</li> <li>Business continuity plans, simulation exercises to increase resilience.</li> <li>Update of physical risk at our facilities during 2024-2025 for all facilities, where this threat is modelled, and adaptation measures will be defined accordingly.</li> </ul>

# STATEMENT OF CONSOLIDATED NON-FINANCIAL AND SUSTAINABILITY INFORMATION 2024

1 General disclosures	20
2 Environmental Information	71
3 Social Information	135
4 Governance Information	190
5 Enagás additional information	205

# GENERAL INFORMATION



**2** General information

21

## 2. INFORMATION

### Basis for preparation

#### BP-1

#### General basis for preparation of sustainability statements

The Statement of consolidated non-financial and sustainability information forms part of the Consolidated Management Report of Enagás, S.A. (parent company) and its subsidiaries. It includes information relating to the 2024 financial year on a consolidated basis with the same scope of consolidation as the Consolidated Annual Accounts of the Enagás Group (for further information, see Note '[1.3. Consolidation principles](#)' in this fiscal year's Consolidated Annual Accounts). Excluded from the scope are Efficiency for LNG applications S.L., Scale Gas Solutions S.L. and Sercomgas Gas Solutions.

The exclusion of these three companies is due to the difficulties in obtaining the necessary data for sustainability reporting, as well as their minimal contribution and impact. These companies account for less than 1% of the Enagás Group's revenues and engage in activities akin to those of other Group companies, such as energy efficiency and LNG bunkering to replace more polluting ship fuels. Their impact on environmental, social, and governance indicators is not significant, as they do not substantially affect the group's overall data. Enagás is undergoing a transformation so that, by 2025, Efficiency for LNG applications S.L. and Scale Gas Solutions S.L. will become part of a new company named Scale Green Energy S.L. This integration will bring their operations into the Enagás Group's management framework, aligning the new company's processes with corporate standards. This will streamline information gathering and ensure management aligns with global criteria. In 2025, efforts will focus on obtaining the necessary information to report on the sustainability aspects of Sercomgas Gas Solutions.

In addition, the Statement of consolidated non-financial and sustainability information also covers the upstream and downstream stages of the Enagás value chain (for more information on the company's value chain, see disclosure requirement [SBM-1](#)). In other words, the value chain has been considered in the assessment of the relative importance of impacts, risks and opportunities, as well as in the establishment of policies and certain actions.

This Statement of consolidated non-financial and sustainability information was prepared by the Board of Directors on February 17, 2025, in accordance with the requirements of:

- Directive 2014/95/EU on non-financial information and diversity, as well as with the associated Spanish legislation (Law 11/2018).
- Regulation (EU) 2020/852 of the European Parliament and of the Council of June 18, 2020 on the establishment of a framework to facilitate sustainable investments and its delegated acts, which establish the obligation to disclose information on how and to what extent the company's activities are associated with economic activities that are considered environmentally sustainable.

See Appendix '[Non-financial and diversity reporting requirements \(Law 11/2018\) and the EU Taxonomy for sustainable activities Regulation](#)'.

Similarly, it follows, as a voluntary reporting framework, the Regulations of Directive (EU) 2022/2464 of the European Parliament and of the Council of December 14, 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting<sup>4</sup>.

#### BP-2

#### Disclosures in relation to specific circumstances

Specifically and where applicable, Enagás will respond to the BP-2 Disclosure requirement for information relating to specific circumstances throughout this Statement of consolidated non-financial and sustainability information via explanatory footnotes.

In this report, Enagás outlines the following timeframes, consistent with the applicable ESRS:

- Short term: the one-year reference period used for financial statements.
- Medium term: between 1 and 5 years.
- Long term: more than 5 years.

In 2024, the criteria for the calculation of the following indicators have been modified:

- CapEx numerator for the key results indicators from the Regulation (EU) 2020/852 (Taxonomy Regulation) chapter. This change has been made to ensure consistency in the calculation

<sup>4</sup> Enagás has not chosen to omit items of specific information on intellectual property, know-how or results of innovation or information on imminent developments or matters under negotiation.

methodology for the key performance indicators of the Taxonomy Regulation and the CapEx indicator in the financial statements. As a result of this change, the information for the previous year has been recalculated. For more information, see the chapter on [Disclosure of information under Article 8 of Regulation \(EU\) 2020/852 \(Taxonomy Regulation\)](#).

- Water collected and water consumed in disclosure requirement E3-4: in 2023, stored water (10,857 m<sup>3</sup>) was considered as water collected, with 270,508,968 m<sup>3</sup> reported as water collected and 101,136 m<sup>3</sup> as water consumed. In 2024, these figures have been recalculated, treating the collected water as not affecting the balance. For further details, refer to disclosure requirement E3-4.

The quantitative parameters and monetary amounts provided are primarily based on direct measurements. When estimates or approximations are used, the assumptions or methods are noted alongside the parameter:

- Significant CapEx amounts invested during the reporting period related to gas-related economic activities under Disclosure Requirement E1-1: further information on the estimation methodology in the specified disclosure requirement.

- Scope 1, 2, and 3 emissions in disclosure requirement E1-6: for detailed information on the estimates for different scopes, see the specified disclosure requirement.
- Non-greenhouse gas emissions in disclosure requirement E2-4: further information on the quantification methodology can be found in the specified disclosure requirement.
- Water discharged in disclosure requirement E3-4: additional information on this parameter's estimation is available in the mentioned disclosure requirement.
- Biodiversity areas reported in disclosure requirement E4-5: information related to these areas is included in requirement E4-5. Enagás uses Cartographic Information Systems to determine the protected areas occupied by its priority infrastructures, while it estimates the altered, revegetated, and restored areas based on the linear kilometres of affected gas pipelines.

Any disclosure requirements that are incorporated by referencing other requirements are detailed in the table titled "Disclosure requirements established in the ESRS covered by the company's sustainability report under disclosure requirement IRO-2 in this chapter.

It is also worth noting that Enagás has applied the following phased-in provisions in accordance with Appendix C of ESRS 1:

European Sustainability Reporting Standards	Disclosure requirement	Full name of the Disclosure Requirement	Phase-in
2	SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Information prescribed by ESRS 2 SBM-3 paragraph 48(e) (anticipated financial effects)
E1	E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Information prescribed by ESRS E1-9

# Governance

## GOV-1

### The role of administrative, management and supervisory bodies

#### Board of Directors and Committees

Name of the Director	Position on the Board of Directors	Type of Director	Position on the Audit and Compliance Committee	Position on the Sustainability and Appointments Committee	Position on the Remuneration Committee
Antonio Llardén Carratalá	Chairman	Other External			
Arturo Gonzalo Aizpiri	Chief Executive Officer	Executive			
Ana Palacio Vallelersundi	Independent Leading Director	Independent		Chairwoman	
José Montilla Aguilera	Director	Independent	Chairman		
María Teresa Arcos Sánchez	Director	Independent			Chairwoman
Santiago Ferrer Costa	Director	Proprietary		Member	
SEPI - Sociedad Estatal de Participaciones Industriales (represented by Bartolomé Lora Toro)	Director	Proprietary	Member		
José Blanco López	Director	Independent		Member	
Natalia Fabra Portela	Director	Independent	Member		
Cristóbal José Gallego Castillo	Director	Independent		Member	
Clara Belén García Fernández Muro	Director	Independent			Member
Manuel Gabriel González Ramos	Director	Independent			Member
David Sandalow	Director	Independent		Member	
Patricia Úrbez Sanz	Director	Independent	Member		
María Teresa Costa Campí	Director	Independent		Member	
Diego Trillo Ruiz	General Secretary		Secretary	Secretary	Secretary

#### Board structure: Independence and diversity

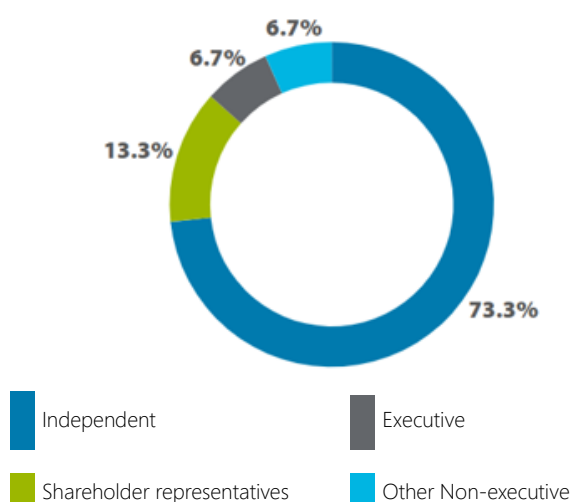
The Rules and Regulations of the Organisation and Functioning of the Board of Directors of Enagás includes conditions which must be met by Board members in order for them to be considered independent. An additional target has been defined to have at least half of the Board consisting of independent directors.

#### Number of Directors by type

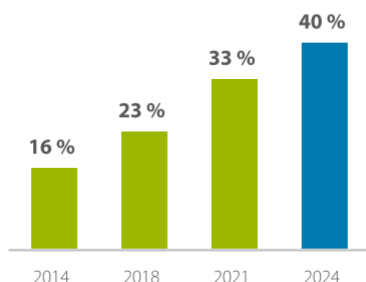
Type of Director	2022	2023	2024
Executive <sup>(1)</sup>	1	1	1
Non-executive	14	14	14
Independent	10	11	11
Shareholder representatives	2	2	2
Other Non-executive	2	1	1
<b>Total Board members</b>	<b>15</b>	<b>15</b>	<b>15</b>

(1) There are no Directors that represent employees at Enagás.

#### Board of Directors



## Percentage of women on the Board of Directors



## Percentage of Board members by age range and gender

	Women	Men	Others	Total
<30 years	0%	0%	0%	0%
30-50 years	16.7%	11.1%	0%	13.3%
>50 years	83.3%	88.9%	0%	86.7%
<b>TOTAL</b>	<b>40.0%</b>	<b>60.0%</b>	<b>0%</b>	<b>100.0%</b>

In 2024, the Enagás Board of Directors has 15 Directors, 73.3% of whom are independent. The average age of the Directors is 60.5 years old and their average tenure is 6.5 years.

The Board Diversity and Director Selection Policy sets out the principles on which the selection processes for members of the Board of Directors are based:

- Principle of diversity in the composition of the Board.
- The principle of non-discrimination and equal treatment, so that the selection procedures for members of the Board of Directors are not subject to implicit bias which could entail any discrimination of any kind, whether due to race, sex, age, disability, etc.
- Compliance with laws in force and with the Enagás corporate governance system; likewise, with the recommendations and principles of good governance adopted by the company.

In 2024, and in line with its commitment to promote gender diversity and the recommendations of the National Securities Market Commission (CNMV), 40% of the Enagás' Board are women, thus meeting the target of having 40% women on the Board by 2024 included in the 2022-2024 Long-Term Incentive Plan.

## Knowledge, skills and professional experience of the Board of Directors

	Audit and Compliance Committee						Sustainability and Appointments Committee						Remuneration Committee		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Senior Management	x	x	x	x		x	x	x		x	x	x	x		x
Industry experience	x	x	x		x	x	x		x	x	x	x	x	x	
International experience	x	x	x	x	x	x	x		x	x	x	x	x	x	
Audit and finance	x	x	x	x	x	x	x	x			x	x	x	x	x
Risk management	x	x	x	x		x	x					x	x		
Strategy	x	x	x	x	x	x	x	x		x	x	x	x		x
Institutional experience and public service	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Legal, regulatory and corporate governance	x	x	x		x	x	x	x		x	x	x	x		x
Technology		x	x	x		x		x	x	x		x	x		
Innovation		x	x	x		x				x	x	x	x		
Cybersecurity and the digital transformation		x	x		x	x		x		x			x		
People, culture, talent and human rights management	x	x	x	x	x	x	x	x		x	x	x	x	x	x
Sustainability, climate change and environment	x	x	x		x	x	x	x	x	x	x	x	x	x	x

### Assessment of the Board of Directors

Every year, an assessment of the Board is performed with the participation of an independent external expert. This assessment is performed objectively and from a best-practice viewpoint by means of questionnaires completed by all members of the Board. The conclusions of this phase are checked in interviews with the same Directors. The aim is to sustain and bolster the performance of the Board of Directors.

For more details on the results of the assessment carried out during 2024, see the '[Annual Corporate Governance Report](#)'<sup>5</sup>, sections C.1.17 and C.1.18.

Following the evaluation process that has been carried out, it can be concluded that Enagás' governance model is in an optimal situation. Among the board members, there is a general feeling that the composition of the Board of Directors is appropriate, with a wide range of profiles and expertise that contribute to

<sup>5</sup> This external link refers to information that has not been verified within the review of the Non-Financial Information and Sustainability Information Statement.

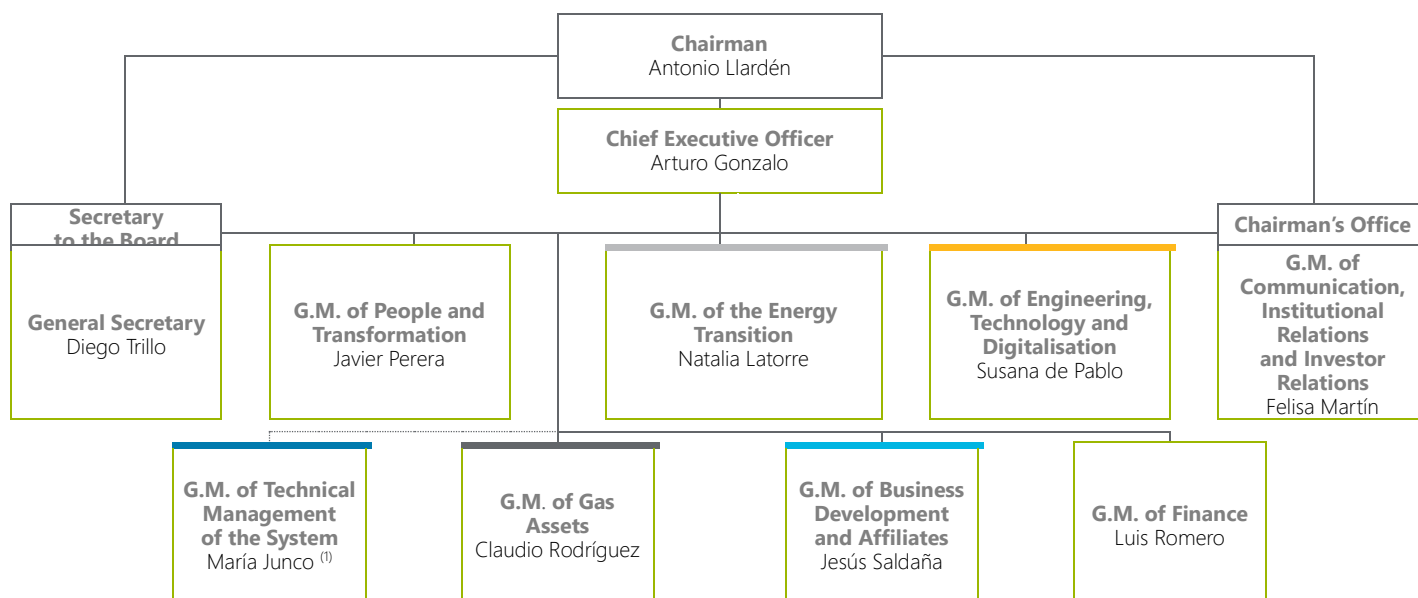
enriching the discussions and to good decision making.  
Concluding that the members of the Board of Directors have the necessary knowledge, skills and professional experience to

oversee sustainability issues identified as having material impacts, risks and opportunities.

Cross-reference of knowledge and skills with impacts, risks and opportunities

	Sustainability issues with material impacts, risks and opportunities for Enagás												
	Climate action and energy efficiency	Pollution	Water and marine resources management	Biodiversity	Circular economy	People	Human rights	Sustainable value chain	Local communities	Customers	Good Corporate Governance	Ethics and integrity	Operational excellence
Senior Management						x	x				x	x	
Industry experience	x									x			x
International experience						x					x	x	
Audit and finance												x	x
Risk management	x	x	x	x	x	x	x	x	x	x	x	x	x
Strategy	x	x	x	x	x	x	x	x	x	x	x	x	x
Institutional experience and public service											x	x	
Legal, regulatory and corporate governance											x	x	
Technology										x			x
Innovation										x			x
Cybersecurity and the digital transformation										x			x
People, culture, talent and human rights management						x	x	x	x				
Sustainability, climate change and environment	x	x	x	x	x	x	x	x	x		x	x	

## Executive Committee



- Enagás GTS, S.A.U.
- Enagás Transporte, S.A.U.
- Enagás Internacional S.L.U., Enagás Emprande S.L., Enagás Service Solutions S.L.
- Enagás S.A., Enagás Infraestructuras de Hidrógeno S.L.U.
- Enagás S.A., Enagás Transporte S.A.U.
- Members of the Executive Committee

(1) The Technical Management of the System General Manager shall have her participation in the Executive Committee limited, depending on the issues to be discussed.

In line with the company's commitment to gender diversity in management and pre-management positions, Enagás' Executive Committee comprises 40% women.

### Percentage of professionals who are members of the Executive Committee by age range and gender

	Women	Men	Others	Total
<30 years	0	0	0	0
30-50 years	4	2	0	6
>50 years	0	4	0	4
<b>TOTAL</b>	<b>4</b>	<b>6</b>	<b>0</b>	<b>10</b>

The members of the company's Executive Committee have extensive experience in the utilities sector and in the geographic locations where Enagás operates. This is largely due to the fact that most of the members have spent a large part of their professional careers within the company, giving them an in-depth knowledge of the sector's characteristics, as well as a cross-cutting and highly specialised vision of the operations and strategies of the business. On the other hand, there are also members of the Executive Committee from other companies in the energy sector, thus bringing a valuable external perspective to decision-making. In addition to their sectoral expertise, the members of the Executive Committee stand out for their specialised knowledge in the field of sustainability. The company has senior managers with extensive experience in environmental, social and governance (ESG) matters. This specialisation ensures that sustainability is central to the company's strategy and management.

### Responsibility for Sustainability

The Board of Directors is responsible for guiding, overseeing, and monitoring strategy, policies, risks, objectives, and performance concerning the different sustainability areas. Likewise, through its Sustainability and Appointments Committee, it is responsible for supervising environmental and social practices, as well as stakeholder relations processes, to ensure their alignment with the company's policies and strategy. For more information, see the [Rules and Regulations of the Organisation and Functioning of the Board of Directors of Enagás<sup>6</sup>](#) and the [Regulations of its Committees<sup>6</sup>](#) on the corporate website.

The Sustainability Committee, composed of members of the Executive Committee, reports to this committee and is responsible for reviewing the materiality analysis conducted by the company and approving sustainability actions in line with the impacts, risks and opportunities identified as material by the analysis. It is also responsible for overseeing the setting of targets and progress towards their achievement (delegated by the Sustainability and Appointments Committee). Both bodies meet at least twice a year.

At executive level, the Chief Executive Officer is responsible for managing the company's business, and is responsible for driving

the company forward and the ongoing coordination of its activities.

Reporting to the Chief Executive Officer, the various General Managements are responsible for the identification, assessment and management of material impacts, risks and opportunities, which are generally distributed as follows:

- General Secretariat: the impacts, risks and opportunities related to ethics and integrity and good governance.
- Energy Transition General Management: impacts, risks and opportunities related to the environment (climate action and energy efficiency, pollution, water and marine resource management, biodiversity and circular economy).
- People and Transformation General Management: the impacts, risks and opportunities related to people and human rights of our workforce.
- Engineering, Technology and Digitalisation General Management: impacts, risks and opportunities in the supply chain (part of the value chain).
- Business Development and Affiliates General Management: the impacts, risks and opportunities for affiliates (part of the value chain).
- Technical Management of the System General Management: customer impacts, risks and opportunities
- Infrastructure General Management: the impacts, risks and opportunities for customers and local communities.

### GOV-2

### Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

#### Board of Directors and Sustainability and Appointments Committee

On a regular basis, the Board of Directors is provided - directly and/or through the Sustainability and Appointments Committee - with information on issues related to sustainability matters material to the company (in 2024, the Committee met on six occasions). This information includes, but is not limited to, information on policies, actions, benchmarks and targets related to the impacts, risks and opportunities identified as material. This information is provided to all governing body members prior to the meeting for their review. Subsequently, the information is presented by the member of the Executive Committee responsible for the team that manages the sustainability issue in question.

In 2024, the following actions of the Board of Directors relating to sustainability issues were particularly notable:

<sup>6</sup> This external link refers to information that has not been verified within the review of the Non-Financial Information and Sustainability Information Statement.

- Unanimous approval of the Annual Corporate Governance Report and Consolidated Management Report (Statement of consolidated non-financial and sustainability information).
- Approval of the sustainability materiality analysis (for more information, see disclosure requirement IRO-1) addressing all material impacts, risks and opportunities.
- Approval of the following policies: Cybersecurity and Data Governance Policy, Environmental Policy, Health and Safety Policy, Quality and Operational Excellence Policy, Human Capital Management Policy, Sustainability and Good Governance Policy, Climate Action Policy, Major Accident Policy, Policy for Comprehensive Security in Strategic Infrastructures, Human Rights Policy, Fiscal Policy, Policy for the separation of Enagás Group Activities and Enagás GTS Code of Conduct.

In addition, the Board of Directors and the Sustainability and Appointments Committee have also overseen specific aspects of material impacts, risks and opportunities (for further information, see the [2024 Sustainability and Appointments Committee Activity Report](#)).

## Sustainability Committee

In addition, at the executive level, the Sustainability Committee meets at least twice per year (two meetings in 2024). It also discusses information on issues related to sustainability matters of material importance to the company. This information is provided to all members prior to the meeting for their review. Subsequently, the information is presented by the Chair of the Committee, the Energy Transition General Manager, who is responsible for the company's Sustainability team.

The information provided to the Board of Directors, the Sustainability and Appointments Committee and the Sustainability Committee ensures that the management of material impacts, risks and opportunities is integrated into the oversight processes of the 2025-2030 Strategic Update, risk management and new business opportunities.

### GOV-3

## Integration of sustainability-related performance in incentive schemes

Strategic priorities are established at company level as annual targets linked to the variable remuneration of all Enagás professionals, including the Chief Executive Officer, thus linking remuneration to environmental, social and economic goals. These targets are approved annually by the Board of Directors.

Moreover, Enagás has a Long-Term Incentive Plan (ILP) in place, requiring the fulfilment of objectives aligned with strategic priorities, thus linking remuneration to the commitment to long-term management. These targets are approved on a triennial basis by the Board of Directors and subsequently by the General Shareholders' Meeting.

The annual targets for 2024 and the long-term targets for the 2022-2024 period have been met with a degree of compliance of 84.2% and 87.5%, respectively.

## Targets linked to variable remuneration

Strategic priorities	2022–2024 Long-Term Incentive Plan targets (% weighting)	Achievement of ILP 2022–2024 targets (%)	Yearly targets 2024 (% weighting)	Achievement of 2024 targets (%)
<b>Shareholder remuneration</b>	Total shareholder return (25%): • Relative TSR to a comparison group. • Absolute TSR.	0%	Financial results (25%): • Net profit at 31.12.2024 aligned with budget. • Net profit at 31.12.2024 considering non-recurring impacts.	50%
<b>Regulated assets</b>	Funds from operations (20%): • Accumulated results corresponding to the Company's Funds From Operations (FFO)	125%	Regulated income from eligible CopEx projects and other income (20%). • Amount of capitalization in eligible CopEx projects associated with their accrued start-up date • Expected CopEx revenues. • Other expected income.	93.4%
<b>International growth</b>	Dividends (20%): • Dividends from international affiliates and other businesses.	125%	International and diversification (20%): • Compliance with the subsidiaries' yearly budget. • Origination and identification of new opportunities, diversification and asset rotation. • Execution of the Innovation and Corporate Entrepreneurship Plan. • Future business development. • Ongoing legal proceedings.	91.6%
<b>Sustainability</b>	Decarbonisation, diversity and inclusion (20%) <sup>(1)</sup> : • Decarbonisation: ◦ Reduction of CO <sub>2</sub> emissions in line with the decarbonisation pathway (emissions 2024 vs. emissions 2021). ◦ Investment in renewable gases: Investment and studies associated with the adaptation of infrastructure to transport renewable gases and the development of infrastructure dedicated to the transport and storage of renewable gases. • Diversity and inclusion: ◦ Percentage of women on the Board of Directors. ◦ Percentage of women in managerial and pre-managerial positions. ◦ Percentage of promotions that are women in managerial and pre-managerial positions.	106.7%	Sustainability and energy transition (20%): • Degree of implementation of planned actions and investments. • Positioning in the leading global sustainability index (DJSI). • Total greenhouse gas emission reductions (Scopes 1 and 2). <sup>(1)</sup> • Reduction of methane emissions. <sup>(1)</sup>	98.9%
<b>Digitalisation and diversity</b>	Implementation of the Digital Transformation Strategy and improvement of indicators and strengthening the positioning of Enagás' digital assets (15%): • Development of priority initiatives from the Roadmap for the 2022-2024 Digital Transformation Framework and improvement to the indicators. • Development and execution of the company's digital asset strategy for the 2022-2024 period and improvement of indicators.	125%	Transformation (15%): • Execution of the 2024 Transformation Plan. • Percentage of promotion of the less-represented gender in management positions. • Number of persons of the less-represented gender hired as a percentage of total workforce. • Completion of the actions set out. • Implementation of the Business Continuity Plan for Enagás assets.	99.3%
<b>Total achievement</b>		<b>87.5 % <sup>(2)</sup></b>		<b>84.2 %</b>

<sup>(1)</sup> Sustainability-related performance parameters that are taken into account as performance benchmarks.

In line with the provisions of the ILP Regulation, failure to meet the absolute TSR target does not allow for the recognition of overachievement of the remaining indicators above 100%. As a result, the incentive is limited from 90.1% to 87.5%.

For further information, see details of the 2024 and 2025 annual targets and the 2022-2024 and 2025-2027 Long-Term Incentive Plan targets in the [Annual Directors' Remuneration Report<sup>7</sup>](#).

<sup>7</sup> This external link refers to information that has not been verified within the review of the Non-Financial Information and Sustainability Information Statement.

## GOV-4

### Statement on due diligence

The Enagás Human Rights Policy shows the company's commitment to develop and maintain a due diligence system aimed at anticipating, preventing, mitigating, and/or remedying negative impacts on people (both its own workforce and those in the value chain), the environment, and society. This is achieved by regularly taking the following actions, which are based on a continuous improvement approach and cooperation with stakeholders:

- Establish mechanisms to identify, assess and prioritise actual and/or potential negative impacts on human rights arising from the company's own activities and those of the value chain in all geographical areas where the company is present.
- Implement actions to avoid, prevent, or mitigate identified negative impacts, within the company's sphere of influence, should they materialise. This will prevent associated human rights violation risks.
- Monitor the actions taken to ensure that they have achieved their purpose, thereby assessing the effectiveness of the due diligence system.
- Accountability to stakeholders on the due diligence system through public reporting.

Enagás applies this commitment to a range of relevant sustainability issues:

Due diligence essential elements	Sections of the Statement of consolidated non-financial and sustainability information
<b>Integration of due diligence into governance, strategy and the business model</b>	Chapter 2: GOV-1, GOV-2, GOV-3, GOV-4, SBM-1 and SBM-3. Chapter E1: GOV-3 and SBM-3. Chapter E4: E4-1 and SBM-3. Chapter S1: SBM-3. Chapter S3: SBM-3. Chapter G1: GOV-1. Additional information: Governance and Strategy.
<b>Engaging with affected stakeholders at all key stages of due diligence</b>	Engagement with stakeholders is systematically undertaken when actual or potential negative impacts are identified: <ul style="list-style-type: none"> <li>• Chapter 2: SBM-2.</li> <li>• Chapter S1: SBM-2, S1-2 and S1-3.</li> <li>• Chapter S3: SBM-2, S3-2 and S3-3.</li> <li>• Chapter G1: G1-1.</li> <li>• Additional information: Strategy and management of impacts, risks and opportunities.</li> </ul>
<b>Identification and assessment of adverse impacts</b>	Enagás incorporates the phases of identification and assessment of negative impacts arising from the due diligence system into its materiality analysis. <ul style="list-style-type: none"> <li>• Chapter 2: IRO-1.</li> <li>• Chapter E1: IRO-1.</li> <li>• Chapter E2: IRO-1.</li> <li>• Chapter E3: IRO-1.</li> <li>• Chapter E4: IRO-1.</li> <li>• Chapter E5: IRO-1.</li> <li>• Chapter S1: SBM-3.</li> <li>• Chapter S3: SBM-3.</li> <li>• Chapter G1: IRO-1.</li> <li>• Additional information: Management of Impacts, Risks and Opportunities.</li> </ul>
<b>Adoption of measures to deal with such adverse impacts</b>	Measures taken and planned to address negative impacts are described in detail in the MDR-A sections: <ul style="list-style-type: none"> <li>• Chapter E1: E1-3.</li> <li>• Chapter E2: E2-2.</li> <li>• Chapter E3: E3-2.</li> <li>• Chapter E4: E4-3.</li> <li>• Chapter E5: E5-2.</li> <li>• Chapter S1: S1-4.</li> <li>• Chapter S3: S3-4.</li> <li>• Chapter G1: G1-1, G1-2, G1-3, G1-5 and G1-6.</li> <li>• Additional information: Management of Impacts, Risks and Opportunities.</li> </ul>
<b>Monitoring the effectiveness of these efforts and communication</b>	The effectiveness of the measures taken is monitored as described in the MDR-A and MDR-T sections: <ul style="list-style-type: none"> <li>• Chapter E1: E1-3 and E1-4.</li> <li>• Chapter E2: E2-2 and E2-3.</li> <li>• Chapter E3: E3-2 and E3-3.</li> <li>• Chapter E4: E4-3 and E4-4.</li> <li>• Chapter E5: E5-2 and E5-3.</li> <li>• Chapter S1: S1-4 and S1-5.</li> <li>• Chapter S3: S3-4 and S3-5.</li> <li>• Chapter G1: G1-1, G1-2, G1-3, G1-5 and G1-6.</li> <li>• Additional information: Management of Impacts, Risks and Opportunities.</li> </ul>

## GOV-5

# Risk management and internal controls over sustainability reporting

Starting in 2019, the Enagás Group has implemented an Internal Control System over Sustainability Reporting (ICSSR) that reinforces the transparency and reliability of processes for generating, communicating, preparing and reporting sustainability information in a manner equivalent to the internal control system over financial reporting (see Appendix '[Audit Opinion on Internal Control over Financial Reporting \('ICFR'\)](#)' of the 'Annual Corporate Governance Report')<sup>8</sup>.

The ICSSR has been designed based on the guide published by COSO<sup>9</sup> in 2018 on 'Enterprise Risk Management' (COSO 2018 ESG), which establishes the guidelines to be applied in enterprise risk management to environmental, social and corporate governance risks, taking into account the following structure:

- Governance and Culture.
- Strategy and Target's Setting.
- Performance.
- Review and Monitoring.
- Information, Communications and Reporting.

Specifically, the following aspects have been taken into account in the risk assessment of the main processes associated with the sustainability disclosure process, as well as the associated sustainability issues and indicators:

- Relative importance based on materiality analysis.
- Assessment of the associated risks, such as integrity risk, existence and occurrence risk, risk of breaching applicable regulations or risk of manipulation of files, programmes and information. It should be noted that the main risks identified are associated with information integrity and information manipulation risks.

Based on this risk assessment, the scope of the ICSSR has been set, ensuring that it covers the company's three areas of sustainability (environmental, social and governance). The outline of the model adopted by the ICSSR is as follows:

- General controls: these are the basis on which the Enagás Group's ICSSR model is based. They represent a cross-cutting control framework established directly by Senior Management, which affects all of the Organisation's processes and employees. This is what COSO calls the 'control environment'.
- Process controls: controls over operational processes that are more specific than general controls. Also referred to as control activities, they are embedded in each of the company's main sub-cycles<sup>10</sup> with a material impact on sustainability reporting, ensuring the reliability and transparency of sustainability reporting by avoiding or mitigating risk. These controls may vary according to their nature (preventive, detective, corrective or directive) and their level of automation (manual, semi-automatic or automatic).

Since its implementation, Enagás carries out a yearly review with a focus on continuous improvement of this internal control system, increasing its scope and improving the traceability of the associated databases. In addition, the ICSSR is externally reviewed annually by EY through an agreed-upon procedures report, which in turn is reviewed by the Audit and Compliance Committee.

In 2024, Enagás considered the result of the materiality analysis when analysing the scope of the ICSSR. This has been formalised in a roadmap of which process controls to include during the year and in the coming years in order to cover the matters that are most material to Enagás.

<sup>8</sup> This external link refers to information that has not been verified within the review of the Non-Financial Information and Sustainability Information Statement.

<sup>9</sup> Committee of Sponsoring Organizations of the Treadway Commission.

<sup>10</sup> Series of activities carried out consecutively with one or more persons in charge and with a common goal.

In 2024, the scope of the internal control system over sustainability reporting included the following indicators:

Sustainability issues	General
<b>Indicators</b>	Receipt and external verification of the information points for the preparation of the Statement of consolidated non-financial and sustainability information
	Review of the Statement of consolidated non-financial and sustainability information
	Dual materiality analysis
<b>Climate change</b>	Scopes 1,2 and 3 greenhouse gas emissions (categories 4, 9 and 11 according to GHG Protocol)
	Financial effects of climate change
<b>Climate change / Pollution</b>	Energy consumption
<b>Water and Marine Resources</b>	Water collection, consumption and discharge
<b>Biodiversity and Ecosystems</b>	Biodiversity (area restored/revegetated)
<b>Resource Use and Circular Economy</b>	Volume of waste generated and managed
<b>Own workforce</b>	Diversity - Gender diversity (workforce, management positions and other professional categories)
	Pay gap
	Diversity - Professionals with disabilities
	Accident rate indicators
<b>Workers in the value chain / Business Conduct</b>	Approved suppliers
	Suppliers assessed
<b>Affected communities</b>	Social action contribution amounts
<b>Customers</b>	Customer satisfaction
<b>Business Conduct</b>	Communications received via the whistleblowing line
<b>Others</b>	The Council's abilities and experience assessment process
	Board remuneration
	Executive Committee remuneration
<b>EU Taxonomy</b>	Taxonomic CapEx of activities significantly contributing to climate change mitigation and adaptation objectives (eligible and aligned activity and eligible and non-aligned activity)
	Taxonomic OpEx of activities contributing significantly to climate change mitigation and adaptation objectives (eligible and aligned activity and eligible and non-aligned activity)

## Strategy

### SBM-1

## Strategy, business model and value chain

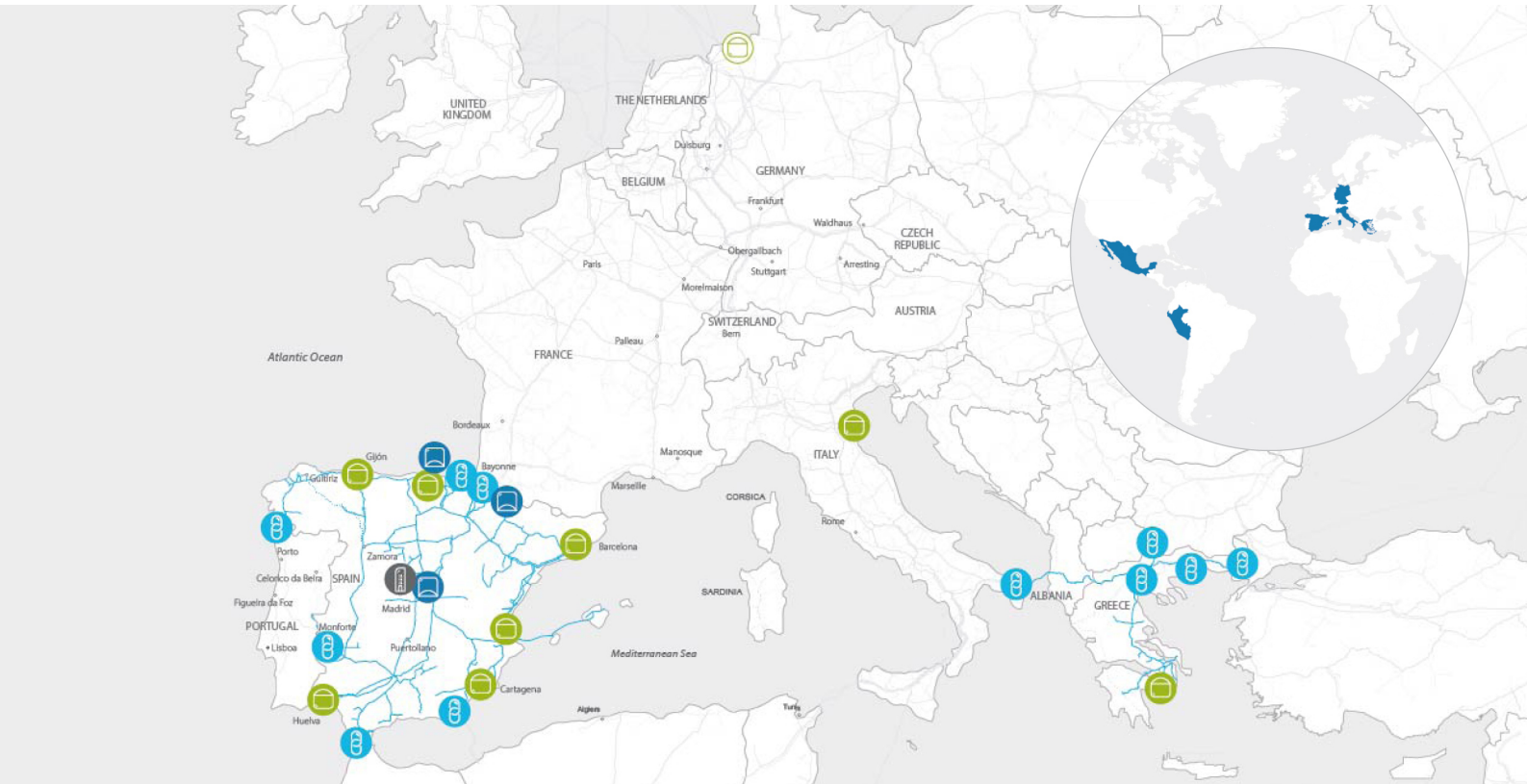
### Enagás Risk Model

The countries in which Enagás is present directly and through affiliates are shown below<sup>11</sup>. The location of infrastructures in Spain and the rest of Europe is also included.

For more details on employees by country at the end of the financial year, refer to disclosure requirement S1-6.

<sup>11</sup> See Appendix II. Joint ventures and associates of the Consolidated Annual Accounts to see all Enagás Group affiliates.

Geographies



Spain

~11,000 km of pipeline

6 LNG terminals

- Barcelona LNG terminal
- Huelva LNG terminal
- Cartagena LNG terminal
- El Musel E-Hub LNG terminal (75%) <sup>(1)</sup>
- Saggas LNG terminal (72.5%) <sup>(2)</sup>
- BBG LNG terminal (50%) <sup>(2)</sup>

3 underground storage facilities

- Gaviota storage facility
- Yela storage facility
- Serrablo storage facility

19 compressor stations

6 international connections

Head office (Madrid)

- Enagás Renovable (60 %) <sup>(2)</sup>

Germany

Hanseatic Energy Hub (15 %) <sup>(2)</sup>

Hanseatic Energy Hub Operations GmbH (50.1 %) <sup>(2)</sup>

Italy

Ravenna *Small Scale* LNG Terminal (19 %) <sup>(2)</sup>

Greece

DESFA (11.88 %) <sup>(2)</sup>

Greece, Albania and Italy

Trans Adriatic Pipeline (TAP) (20 %) <sup>(2)</sup>

Mexico <sup>(3)</sup>

TLA Altamira Pipeline (40 %) <sup>(2)</sup>

Peru

Transportadora de Gas del Perú (TgP) (28.95 %) <sup>(2)</sup>

Gas pipeline

LNG terminal under development

LNG terminal

Underground storage

Estación de compresión

International connection

Headquarters

(1) Affiliate without operational control. The percentage shareholding is specified in brackets.  
(2) Affiliate with operational control. The percentage shareholding is specified in brackets.  
(3) Estación de Compresión de Soto la Marina (50%) pendiente cierre de venta.

32

## Transmission System Operator

Enagás, a midstream company with more than 50 years of experience and independent European TSO (Transmission System Operator), is an international reference in the development and maintenance of gas infrastructure and in the operation and management of gas networks. Enagás has been carrying out the majority of its activities in Spain since its founding in 1969. It has built up a meshed network of more than 11,000 km of high-pressure gas pipelines, facilitating access to gas from almost every point on the Iberian Peninsula. Enagás holds stakes in six of the seven regasification terminals in the Iberian Peninsula (three wholly-owned terminals and three part-owned), and has three underground storage facilities. As the main transmission company, Enagás has developed the main infrastructure facilities of the Spanish Gas System, making it a leader in security and diversification of supply.

### Commercial services

Enagás works to provide its customers with logistics services in accordance with current regulations. The Third-Party Network Access (ATP) services provided at its facilities are fundamentally classified as:

#### Individual services:

- Tanker unloading
- Regasification
- LNG storage
- Truck loading
- LNG terminal-to-tanker bunkering
- LNG ship-to-ship transfer
- Ship cooling
- Virtual liquefaction
- Entry to the Virtual Balancing Point
- Departure from the Virtual Balancing Point
- Departure from the Virtual Balancing Point to a consumer
- Natural gas storage in basic underground storage facilities
- Injection
- Extraction

The sale of these services is carried out through a framework access contract and through standard capacity products, i.e. through the signing of annual, quarterly, monthly, daily or intraday contracts.

#### Bundled services

- Vessel unloading, LNG storage and regasification.
- Vessel unloading, LNG storage, regasification and flow on to the Virtual Balancing Point.
- LNG storage and regasification.
- LNG storage, regasification and flow on to the Virtual Balancing Point.

- Vessel unloading, LNG storage and LNG loading from plant to vessels.
- Underground natural gas storage, injection and extraction.

In turn, Enagás works to provide its customers with services that allow them to connect to the transmission network, which are classified as follows:

- End consumers connection services.
- Transmission network connection services.
- Distribution network connection services.
- Renewable gases connection services.

The decarbonisation targets set by the European Union have accelerated the pace of promotion and development of renewable gases, including biomethane. In this context, Enagás is working to adapt its transmission infrastructure to facilitate the injection of renewable gases into the network and, through the Green Link service, contribute to lay the foundations for the future injection of renewable energies into the system. This service offers the possibility for the different agents of the Gas System to request connection of their biomethane and/or hydrogen production facilities to the transmission network managed by Enagás.

As Enagás' activity is carried out in an environment covered by the regulation, this and its implementation form the basis of our plans moving forward. It should be noted that in recent years, the regulatory pieces necessary to establish the regulatory framework have been published, making it possible to complete the new management and shipping model for the Spanish Gas System.

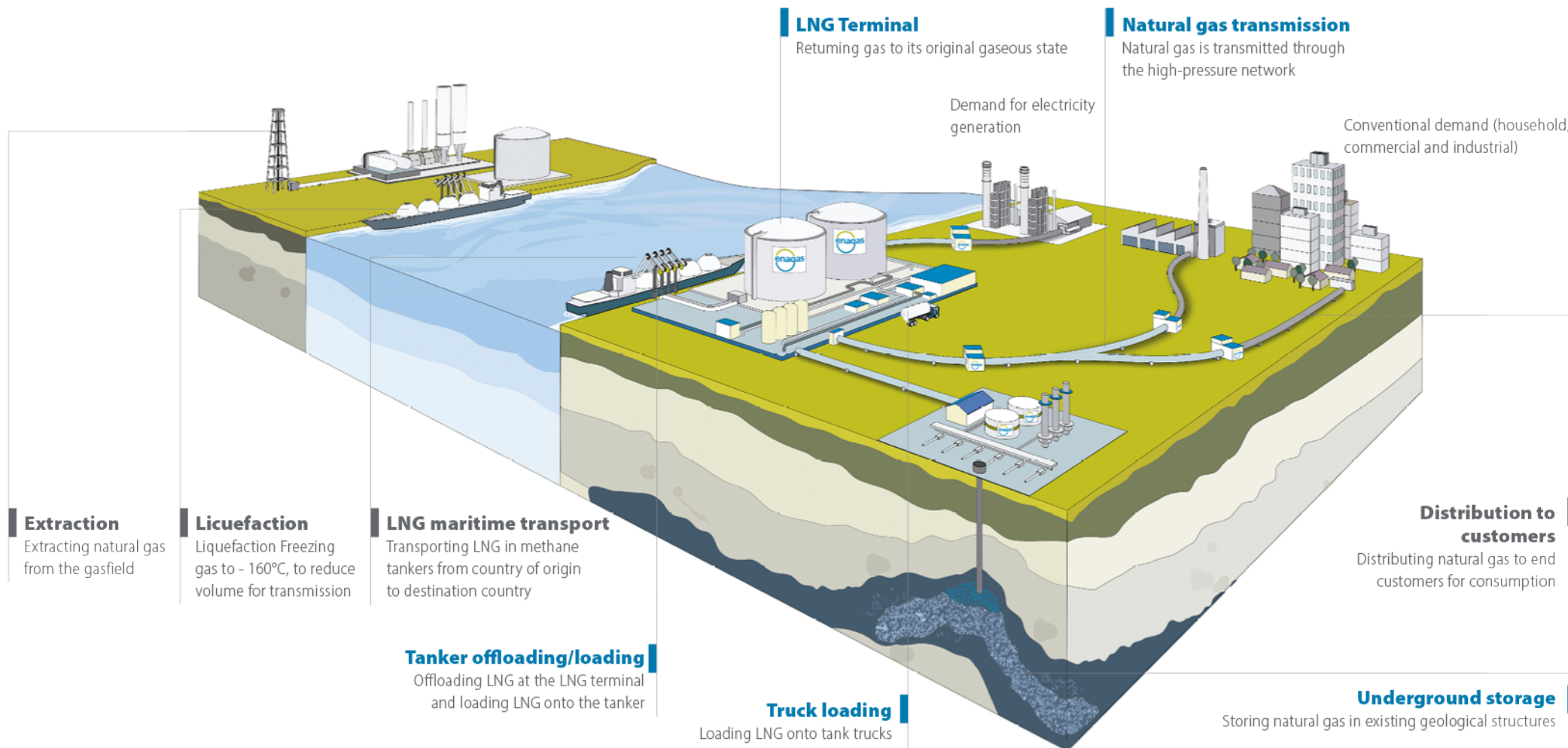
For further information about the company's customers, see the additional section of interest for Enagás titled '[Customers](#)'.

## Enagás activities in the natural gas value chain

- Activities carried out by Enagás on the gas value chain.
- Activities carried out

### Gas network operation

(Technical Manager of the Spanish Gas System, certified as independent European TSO)



## Technical Management of the System

Enagás also works as the Technical Manager of the System from the publication of the Hydrocarbons Law. This means it is responsible for the operation and technical management of the basic network and the secondary transmission network, guaranteeing the continuity and security of the natural gas supply as well as proper coordination between marketers, the operators of access points, storage facilities, and transmission and distribution networks.

The Main Control Centre (MCC), or Dispatching, manages the operation and supervision of Spanish Gas System transmission facilities, in real time, 24 hours a day, 365 days a year. It also issues guidelines for the safe and efficient operation of the system, manages international connections with operators outside Spain, drafts plans to guarantee the security of supply and, if necessary, coordinates and adapts maintenance schedules of the facilities to ensure their operation and availability.

The MCC is also the centre from which Gas System incidents and emergencies are managed. To strengthen security, Enagás also has a Reserve Control Centre and a Last Resort Control Centre, both of which are equipped with equivalent technical resources as the Main Control Centre.

The Technical Manager of the System carries out its duties in coordination with other figures that operate or use the gas system. Its key duties include:

- Guaranteeing the natural gas supply at all times.
- Predicting the use of the System's facilities and the natural gas reserves in accordance with demand forecasts.
- Providing the necessary instructions and orders to ensure that the System and transmission network is functioning correctly.
- Submitting the development of the basic natural gas network and emergency plans that are deemed necessary to the Ministry.
- Carrying out delivery schedules, managing the entry and exit of natural gas into/out of the system.
- Calculating and applying the daily balance that the gas network uses and the network's strategic and operating reserves.
- Coordinating maintenance plans.

These duties are governed by criteria of reliability, safety, transparency, objectivity and independence.

For further information about the company's customers, see the additional section of interest for Enagás titled '[Customers](#)'.

### Management of the system of guarantees of origin of renewable gases

In 2023 Enagás GTS, as the responsible entity designated by the Ministry for the Ecological Transition and the Demographic Challenge, launched the System of Guarantees of Origin of gas from renewable sources. In 2024, a system feature was introduced to facilitate the export and import of guarantees of origin with other European countries. This system allows to certificate that the biogas, biomethane and hydrogen produced in Spain is of renewable origin, providing information on how and where it was produced.

Also, and in compliance with regulatory provisions, in 2023 Enagás GTS set up a Committee of Subjects of the Guarantees of Origin System. The aim of this committee is to know and be informed of the functioning and management of the System of Guarantees of Origin, as well as to elaborate and provide a channel for improvement proposals. In 2024, six meetings of this body were held, and more than 100 agents from the renewable gases sector participated.

In 2024, there are 179 agents registered in the Guarantees of Origin System, including producers, suppliers and intermediaries. 53 production facilities have completed their registration with the system, 34 of them definitively (already in operation with access to issue Guarantees of Origin) and 19 provisionally (not yet operational). The production plants include all shipper logistics.

The Guarantees of Origin System issued a total of 496,602 Guarantees of Origin in 2024, of which approximately 35% were for biomethane for injection into the Gas System and 64% were for biogas for self-consumption. A small amount were also issued for off-grid hydrogen and bio-LNG. In terms of redemption, 21,809 Guarantees of Origin were redeemed in 2024 for points of consumption, of which 8,614 Guarantees of Origin were imported for redemption.

### Provisional HTNO (Hydrogen Transmission Network Operator)

Additionally, Royal Decree-Law 8/2023 of December 27 establishes that Enagás, as the hydrogen transmission network operator (in accordance with the provisions of Article 63 bis of Law 34/1998 of October 7 on the hydrocarbons sector), may operate as the provisional hydrogen transmission network operator.

Energy infrastructures are a core element in the energy transition towards decarbonisation. In addition, in 2024, the Spanish Government approved the agreement authorising Enagás Infraestructuras de Hidrógeno to provisionally exercise the functions of developing European Projects of Common Interest (PCI) for hydrogen networks.

This new role for Enagás is aligned with the 2025-2030 Strategic Update and its commitment to the energy transition and sustainability, representing the Group's main axis of growth and development.

## Revenue breakdown by sector

Breakdown of net turnover by ESRS sector and by fossil fuel sector (thousands of euros)

ESRS Sector <sup>(1)</sup>	Fossil fuels Sector	2023	2024
Oil and gas - Midstream and Downstream <sup>(2)</sup>	Natural gas	830,411	828,596
Energy production and utilities sector	Natural gas	50,285	45,271
Oil and Gas - Upstream and services	Natural gas	310	3,866
Professional and commercial services sector		38,508	35,459
Capital markets sector		127	29
<b>TOTAL</b>		<b>919,641</b>	<b>913,221</b>

(1) Classification based on the NACE code (Statistical Classification of Economic Activities in the European Community) for companies consolidated through global integration.

(2) Includes natural gas storage and transmission activity.

For further information on the Enagás Group's net turnover, see '[section a\) Revenue in note 2.1 Operating profit](#)' in the Consolidated Annual Accounts.

## Enagás value chain

Understanding the company's business model and that Enagás does not sell any products but rather services, the company's value chain is described below:



### • Supply chain

In order to work with Enagás, suppliers must undergo a strict approval process. The company currently works with 1,836 approved suppliers (1,706 in 2023), which are classified in families according to the products or services they offer:

- Suppliers of works and services: IT & communication suppliers, engineering, etc. In 2024, 3,052 persons belonging to 494 service providers carried out work at Enagás facilities (in 2023, 2,518 persons belonging to 512 service providers).
- Suppliers of supplies: electrical equipment suppliers, piping manufacturers, rotary machine manufacturers, manufacturers of instrumentation and control devices, among others.

### Supply chain cost analysis (thousands of euros)<sup>12</sup>

Indicator	Category of the supplier	Geographical distribution		
		Domestic	International	Total
2024				
Number of orders	Works and services	6,328	225	6,553
	Supplies	10,691	99	10,790
	Total	17,019	324	17,343
Number of suppliers contracted	Works and services	1,390	123	1,513
	Supplies	1,642	46	1,688
	Total	3,032	169	3,201
Amount from orders (million euros)	Works and services	219.0	63.1	282.1
	Supplies	46.0	7.5	53.5
	Total	265.0	70.6	335.6

Approximately 79% of the amount of expenditure in our supply chain is local in nature.

<sup>12</sup> Local purchases are considered to be purchases made domestically in Spain.

• Affiliates

Enagás has a presence in various affiliates that are not financially consolidated and are managed autonomously. This presence is mainly oriented towards Europe and countries that are key to the European continent's security of supply.

The Shareholders' Agreements regulate, among other things, decisions that require joint decision-making by shareholders. Enagás' influence and decision-making is exercised through leadership on Boards of Directors and other governing bodies (e.g. Remuneration Committee, etc.), appointing directors with extensive experience in the sector and the country.

However, Enagás has developed a management model for these companies that seeks to guarantee compliance with the business plans and their long-term sustainability, contributing Enagás' experience, knowledge and best practices as an industrial partner, while at the same time allowing affiliates to contribute to Enagás' growth, ensuring the targets communicated to the market.

Enagás has an internal management team in each affiliate, as well as the support of specific working groups for the corporate and business areas in their areas of expertise. In addition, Enagás guarantees the suitability of the managers of the affiliates for their positions by analysing and evaluating their profiles, as well as by appointing specialised profiles from the company to key positions in the affiliates (seconded personnel).

• Customers

Customers are one of the company's key stakeholders as described in additional information of interest to Enagás on ['Customers'](#).

Enagás' management model and its value chain

Enagás has a twofold purpose: to contribute to ensuring the security of energy supply, an essential service for the well-being of society. By driving innovation and accelerating the decarbonisation process, we create value for our stakeholders (for more information, see disclosure requirement G1-1). To achieve this goal, which is grounded in Enagás' business model and value chain, the company must implement a management system that ensures the availability of essential resources to support its operations.

Enagás manages its human capital to ensure it has the committed and qualified personnel needed for its operations and to implement the 2025-2030 Strategic Update (for more information, see chapter S1). It also implements supply chain management measures to guarantee the quality and availability of key materials and resources in the short, medium, and long term (for more information, see disclosure requirement [G1-2](#)).

Enagás' services, by operating and managing key energy supply infrastructures, create significant benefits for stakeholders. These include customers and society, who enjoy a stable and secure supply, and investors, who see predictable returns from the regulated model. Looking ahead, and in line with the 2025-2030 Strategic Update, efforts to decarbonise the energy sector and Enagás' own operations will strengthen these benefits and support the energy transition.

Company strategy

2025-2030 Strategic Update


Strategic priorities

Enagás' strategy has a clear purpose: to contribute to security of supply and decarbonisation, creating value, working towards sustainable and profitable growth in Spain and Europe. It is focused on hydrogen and expanding the business spectrum to the logistics of new molecules related to the energy transition that offer synergies with our work (carbon dioxide and ammonia).


Leading TSO and HTNO in Europe




Decarbonisation



Security of supply



Focus on H<sub>2</sub>



Spain and Europe



Creation of value



Sustainable and profitable

Resilient strategy for long-term sustainable growth in Spain and Europe

Sustainable and profitable growth

- Boosting the development of hydrogen and other molecules related to the energy transition (CO<sub>2</sub> and ammonia).
- Security of supply and decarbonisation.
- Focus on Spain and Europe.
- Innovation, technology and digitalisation to accelerate decarbonisation.
- Relevance of cybersecurity.

Transformation

- Focus on people, processes and new ways of working.
- Digitalisation boost.
- Strategic talent management.
- Diverse and inclusive environment.

Operational excellence

- 100% technical and operational availability of our infrastructures.
- Operational flexibility.
- Efficiency plan to absorb inflation.

ESG

- Fully aligned 2025-2030 Strategic Update and Climate Transition Plan.
- Net Zero commitment.
- Sustainability due diligence /ESG.

The strategic priority is the development of green hydrogen transmission infrastructures in Spain and Europe, both because of the growth this represents for the company in line with its strategic pillars, and because of the economic development and decarbonisation potential it represents on a domestic and European scale. This priority has synergies with Enagás' TSO function for the Spanish Gas System and corresponds to its role as provisional HTNO of the Spanish hydrogen backbone network in a context of positive developments in the European regulatory environment.

In line with Enagás' commitment to decarbonisation, the company has the opportunity to position itself in other midstream businesses associated with other molecules related to the energy transition (CO<sub>2</sub> and NH<sub>3</sub>) by participating in projects that meet the following requirements:

- Complement the strategic focus on hydrogen.
- Have an appropriate risk-return ratio.
- Build on our capabilities and assets, without competing with the same, in line with the strategic vision of adapting our regasification terminals to serve as multi-molecule terminals.

Growth drivers

The drivers of company growth are presented below either under a regulated or contractual business model approach, and discipline in required returns, as well as in the capital allocation policy:

Hydrogen infrastructure

- Renewable hydrogen infrastructures (transmission and storage) that facilitate the decarbonisation of the economy, in line with European and domestic energy policy guidelines.

Natural gas and transition infrastructure

- Gas and transition infrastructures for security of supply, decarbonisation, maintenance/life extension, efficiency and safety.

Scale Green Energy

- Creation of a non-regulated operator of energy infrastructures that contribute to decarbonisation and favour the development of logistics chains for the new molecules associated with the energy transition, promoting activities that extend the useful life of our infrastructures.

Innovation, technology and digitalisation, international assets and Enagás Renewable

- Incorporate the technology necessary for the competitive development of new activities in the field of energy transition.
- Transformation and digitalisation of the company to facilitate new ways of working.
- International gas infrastructures (Europe focus).
- Development of renewable gas production projects (hydrogen and biomethane).

Most of the investments included in this strategy have a business model that is currently regulated or will be regulated in the near future, or will have contracts that guarantee a security of returns comparable to that of regulated activity.

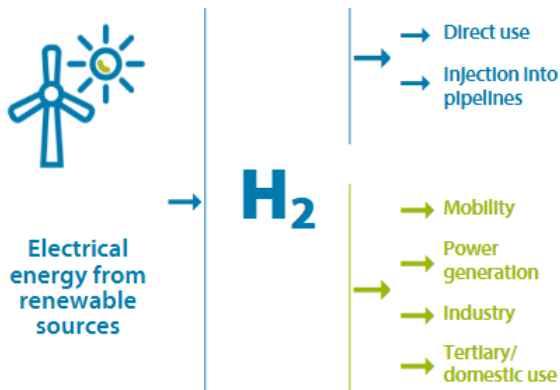
During 2024, the company has accelerated its fulfilment of the 2022-2030 Strategic Plan, reaching milestones that have led to an update in February 2025.

Renewable gases

Security of supply and decarbonisation are the main axes on which the new European energy paradigm is based. These axes reinforce Europe's renewable energy and energy efficiency while allowing new infrastructure developments to be driven forward to integrate EU markets.

Spain occupies a privileged position thanks to its geographical location and its consolidated network of infrastructures and international connections. It is poised to become a leading

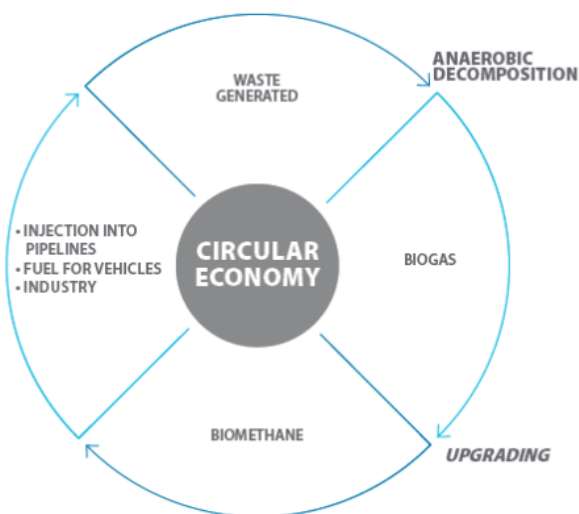
country for the production and export of non-electrical renewable energies (hydrogen and biomethane), indispensable energy carriers that contribute to the development of a circular economy and to the energy transition process, as they enable progress towards a carbon-neutral economy.



Renewable hydrogen, which is obtained using renewable electricity, is a key energy carrier for decarbonisation with multiple applications as it can be used in all energy sectors (industry, mobility, domestic-commercial and power generation).

Biogas obtained from waste is a source of renewable energy with a positive impact on employment and the rural economy. After a process of cleaning and CO<sub>2</sub> separation, the biogas transforms into biomethane: a totally renewable gas, of equivalent quality to natural gas, that can be injected into the transmission network.

At Enagás, we want to actively contribute to the energy transition process, promoting the integration of renewable gases in the Spanish and European Gas System.



## Scale Green Energy: business development associated with other molecules related to the energy transition

Enagás will contribute to decarbonisation by promoting the development of logistics chains for new molecules associated with the energy transition, such as carbon dioxide (CO<sub>2</sub>) and ammonia (NH<sub>3</sub>). It will promote activities that create synergies with our infrastructures and also act as a catalyst for the development of end uses of hydrogen, such as mobility.

In order to develop these activities, a non-regulated operator of energy infrastructures, Scale Green Energy, has been created. Through it, positioning investments are envisaged, which will be increased as business dynamics are consolidated. Scale Green Energy integrates Scale Gas' businesses related to LNG / bio-LNG bunkering to decarbonise the maritime sector (extending them to NH<sub>3</sub>), as well as small-scale LNG plants, gaseous fuel refuelling stations, and energy efficiency businesses through the use of the industrial cold inherent in LNG (Efficiency for LNG Applications, S.L.), extending its lines of business to CO<sub>2</sub>, NH<sub>3</sub> and H<sub>2</sub> for land mobility. In this respect:

- CO<sub>2</sub>: Scale Green Energy will drive the development of a CO<sub>2</sub> logistics chain around emissions concentration areas, especially at industrial facilities close to our LNG terminals and with a focus on the cement industry, for subsequent export to geological storage. This initiative supports the multi-molecule plant vision.
- NH<sub>3</sub>: it will drive the development of a green ammonia logistics chain, especially at industrial facilities close to our LNG terminals, with a focus on use as a marine fuel (bunkering) and as a final product. This initiative builds on the capabilities of Scale Gas and also supports the multi-molecule plant vision.
- H<sub>2</sub> for mobility: Scale Green Energy will drive the penetration of green hydrogen in hard-to-electrify land mobility segments through the development of hydrogen supply stations (HRS<sup>13</sup>).

## Sustainable mobility

Enagás is committed to decarbonising transport by promoting the use of natural gas and renewable gases in mobility.

Natural gas plays a highly relevant role in ensuring security of supply and competitiveness, while meeting the energy requirements of highly demanding sectors, such as intensive industry or segments that are difficult to electrify, where there are currently no solutions that can meet the requirements of the majority of users. In the field of heavy and maritime transport, natural gas is positioning itself as one of the most sustainable and realistic fuels in the short-term, key to reducing emissions and immediately improving air quality.

The use of natural gas as a fuel for transport would allow for NO<sub>x</sub> emissions to be reduced by 80-90%, CO<sub>2</sub> emissions to be reduced by 20-30% and SO<sub>x</sub> emissions and particles by practically 100% compared to traditional fuels. This makes natural gas a sustainable alternative for mobility and heavy, maritime and rail transport.

<sup>13</sup> Hydrogen Refuelling Station.

Its contribution is particularly important in the case of maritime transport, as it allows vessels to adhere to new environmental regulations set forth by the International Maritime Organisation (IMO) and European Directive 2016/802.

Renewable hydrogen and its derivatives are emerging as a viable, clean, and sustainable alternative to traditional fuels in the transport sector.

Within the terrestrial field, Scale Green Energy will participate in projects for the development of new hydrogen refuelling points in Spain. These would be added to the one already inaugurated in 2021 in Madrid.

## SBM-2

## Interests and views of stakeholders

Enagás' commitment to stakeholders is reflected in the company's [Sustainability and Good Governance Policy](#), approved by the Board of Directors. Among other commitments, it includes the implementation of mechanisms that allow the company to establish commitments with stakeholders based on collaboration, the timely exchange of information and participation, as well as regular, transparent, timely and reliable reporting to the different interest groups.

This is also a common element in all Enagás corporate policies, which include - among the elements of the management model for fulfilling the commitments we have taken on - the implementation of stakeholder participation, prior information, dialogue, consultation and collaboration processes to ensure that their needs and expectations are understood by the company and, where appropriate, incorporated into its regulations.

Enagás defines its stakeholder map by identifying the different groups that are influenced by and exert influence on the company's activities, based around the company's strategy. Every

year, internal supervisors at Enagás review these groups and their segmentation, type of interaction, the relationship channels with each of them, as well as the frequency of contact, according to the company's strategy and organisational model. This is how the stakeholder relationship model is defined. For more information regarding the channels established with our own workforce, affected communities and customers, see disclosure requirements S1-2, S1-3, S2-2 and S2-3 and the following blocks: 'Processes for engaging with customers about impacts' and 'Processes to remediate negative impacts and channels for customers to raise concerns' of the additional information relevant to Enagás relating to Customers, respectively.

As a result of these interactions with stakeholders, the company analyses the information received and incorporates, depending on relevance, stakeholders' opinions and interests in its management models. Internal managers are responsible for this understanding and related actions, as well as for reporting to the Board of Directors or Executive Committee on the main results and associated measures.

Stakeholders	Relationship channels	
<b>Regulatory bodies</b> (state, local and international)	<ul style="list-style-type: none"> <li>Regular meetings (face-to-face, telephone, e-mail)</li> <li>Public consultations</li> </ul>	<ul style="list-style-type: none"> <li>Electronic headquarters administration</li> <li>Corporate electronic mailbox</li> <li>Industry associations</li> </ul>
<b>Investors</b> (investment fund managers, rating agencies, analysts)	<ul style="list-style-type: none"> <li>Regular meetings (face-to-face, telephone, e-mail)</li> <li><i>Roadshows</i></li> <li>Shareholder Information Office</li> <li>Electronic mailbox</li> </ul>	<ul style="list-style-type: none"> <li>Free shareholder helpline</li> <li>Direct phone line to the Investor Relations Team</li> <li>Meetings with minor shareholders and analysts</li> </ul>
<b>Professionals</b> (our professionals, social organisations)	<ul style="list-style-type: none"> <li>Regular meetings (face-to-face, e-mail)</li> <li>Corporate Intranet</li> <li><i>Chatbot</i></li> </ul>	<ul style="list-style-type: none"> <li>Internal communication campaigns</li> <li>Whistleblowing Line</li> <li>Opinion surveys and associated improvement plans</li> </ul>
<b>Customers</b> (distributors, shippers, transmission companies, direct consumers in the market)	<ul style="list-style-type: none"> <li>Managers by service</li> <li>Regular meetings (face-to-face, telephone, e-mail)</li> <li>Main Control Centre</li> <li>Spanish Gas System Monitoring Committee</li> <li>Annual Control Centres Conference</li> <li>Technical Management of the System Standards Group</li> </ul>	<ul style="list-style-type: none"> <li>Corporate website: SL-ATR 2.0 portal and SITGAS portal</li> <li>Biomethane connections platform</li> <li>Committee of Subjects of the Guarantees of Origin</li> <li>Commercial Service Portal</li> <li>Customer satisfaction surveys and associated improvement plans</li> <li>Service desk</li> <li>Consultation and Incident Service Portal</li> </ul>
<b>Partners</b> (business partners, strategic business partners and company management)	<ul style="list-style-type: none"> <li>Governing bodies (General Shareholders' Meetings, Boards of Directors, Committees, etc.)</li> <li>Coordinators of affiliates</li> </ul>	<ul style="list-style-type: none"> <li>Working groups with management and partners (financial, HR, technical, etc.)</li> </ul>
<b>Media</b> (general, economic, specialised in the sector, specialised in sustainability)	<ul style="list-style-type: none"> <li>Regular meetings (face-to-face, telephone, online, e-mail)</li> <li>Corporate website and social media</li> </ul>	<ul style="list-style-type: none"> <li>Media hotline</li> <li>Media mailbox</li> </ul>
<b>Suppliers</b>	<ul style="list-style-type: none"> <li>Corporate website: supplier portal</li> <li>Supplier platform</li> <li>Contractor Access System</li> </ul>	<ul style="list-style-type: none"> <li>Supplier mailbox</li> <li>Regular meetings (telephone, e-mail)</li> </ul>
<b>Financial institutions</b>	<ul style="list-style-type: none"> <li>Regular meetings (face-to-face, telephone, e-mail)</li> </ul>	
<b>Representatives of local communities, associations and foundations</b>	<ul style="list-style-type: none"> <li>Corporate electronic mailbox.</li> <li>Informative sessions.</li> <li>Consultation processes.</li> </ul>	<ul style="list-style-type: none"> <li>Regular meetings derived from participation in groups and forums (face-to-face, telephone, e-mail)</li> </ul>

The consultation of key stakeholders as part of the materiality assessment process (for more information, see disclosure requirement [IRO-1](#)) is an example of the integration of their views into the company's strategy, sustainability strategy and management model. Through these surveys, stakeholders provided their assessment of the relevance of the different sustainability issues, enabling Enagás to integrate this information into its assessment of the impacts, risks and opportunities identified. They were also consulted on Enagás' efforts to transform the company towards new energy carriers such as green hydrogen and its impact on the creation of value for shareholders, information that contributed to the company's 2025-2030 Strategic Update. This information was presented to the Board of Directors within the framework of approving the Materiality Analysis.

As a testament to the importance of stakeholder opinions and their influence on the company's strategy and business model, to gauge the interest of key players in the energy sector regarding the development of essential renewable hydrogen transport infrastructure, Enagás

initiated a new, non-binding, open, transparent, and non-discriminatory Call for Interest (CFI) process in 2024 for the initial routes of the Spanish Hydrogen Backbone Network. The results of this consultation will help to optimise the infrastructure's design and establish operational requirements, thereby modifying the company's strategy. Further consultations are planned to ensure that the views of the main actors in the energy sector are taken into account in the establishment of this infrastructure.

### SBM-3

## Material impacts, risks, and opportunities and their interaction with the strategy and business model

As a result of the materiality analysis (for more information, see disclosure requirement [IRO-1](#)), and following the application of impact and financial materiality thresholds, Enagás has identified the following impacts, risks and opportunities<sup>14</sup> (IROs) that are material to the company.

<sup>14</sup> The significant risks and opportunities identified by Enagás have not resulted in material adjustments to the current financial statements, nor are they anticipated to in the short term (next financial year).

Identified material impacts, risks and opportunities

European Sustainability Reporting Standards (ESRS) by theme		Sustainability issues addressed by the ESRS by theme			The cells with a blue background refer to topics, subtopics, or sub-subtopics that are not applicable to Enagás' business model.					
	Topic	Sub-topic	Sub-subtopic	Main topic: Enagás	Subtopic: Enagás	Description of impact, risk, or opportunity	Impact, risk or opportunity	Location of this impact/risk/opportunity	Current and anticipated effects and responses to these effects	Additional information
Environment	E1	Climate change	Climate change adaptation	Climate action and energy efficiency	Climate change adaptation	Operational cost overruns due to natural disasters that damage the company's infrastructures or due to the adaptation of the company's infrastructures to the consequences of climate change, as the case may be.	Risk	Own operations	Currently, the main effects include potential increases in operational costs due to the need for repairs to infrastructure damaged by natural disasters, supply chain disruptions, and higher insurance premiums. Looking ahead, beyond these cost increases, there may be a need for significant investments in adapting to extreme weather conditions, complying with stricter regulations, and relocating assets or suppliers.  For further details on Enagás' response to this risk, refer to disclosure requirement E1-3.	
			Climate change mitigation		Climate change mitigation	High direct (scope 1) and indirect (scope 3) greenhouse gas emissions due to the company's own operations and those of its value chain.	Negative impact	Suppliers Own operations Customers	This negative impact is currently leading to increased operating costs to achieve the company's decarbonisation goals for its own operations and value chain. This trend is expected to continue in the future.  For more details on how Enagás is addressing this risk, refer to disclosure requirements E1-1 and E1-3.	The impact, directly tied to Enagás' business model and its energy consumption, contributes to climate change. This can exacerbate natural disasters, degrade ecosystems, impact human health (particularly in vulnerable communities), and disrupt biodiversity, agriculture, and natural resources. The significance of this issue is increasing in the short, medium, and long term. Therefore, the latest 2025-2030 Strategic Update is regarded as the Climate Change Mitigation Transition Plan, concentrating on decarbonising both the energy sector and Enagás' own operations. For further information, see disclosure requirements SBM-1 and E1-1.
						Reputational deterioration that may negatively impact the valuation of intangibles by stakeholders, due to loss of relevance in sustainability indices for not reaching the expected standard of climate management or due to climate change impacts.	Risk	Suppliers Own operations Customers	The potential effects of this risk, both now and in the future, include damage to our reputation and a loss of trust among investors who prioritise sustainable investment criteria, as well as other key stakeholders.  For more details on how Enagás is addressing this risk, refer to disclosure requirements E1-1 and E1-3.	
						Failure to meet the announced carbon neutrality commitments due to the materialisation of the identified transition risk factors, among others	Risk	Suppliers Own operations Customers	This risk could lead to reputational damage, the loss of investors focused on sustainability, or regulatory penalties, all of which could undermine stakeholder trust and company valuation. In the future, the risk may increase due to more stringent regulations and/or shifting stakeholder interests.  For more details on how Enagás is addressing this risk, refer to disclosure requirements E1-1 and E1-3.	

The cells with a blue background refer to topics, subtopics, or sub-subtopics that are not applicable to Enagás' business model.

European Sustainability Reporting Standards (ESRS) by theme	Sustainability issues addressed by the ESRS by theme			The cells with a blue background refer to topics, subtopics, or sub-subtopics that are not applicable to Enagás' business model.						
	Topic	Sub-topic	Sub-subtopic	Main topic: Enagás	Subtopic: Enagás	Description of impact, risk, or opportunity	Impact, risk or opportunity	Location of this impact/risk/opportunity	Current and anticipated effects and responses to these effects	Additional information
Environment	E1	Climate change	Climate change mitigation	Climate action and energy efficiency	Climate change mitigation	Worsening financing conditions / attraction of capital flows for the development of activities not aligned with the EU taxonomy of sustainable activities or similar	Risk	Own operations Customers	In the short term, investing in activities that do not align with the environmental goals of the EU Taxonomy Regulation may affect the ability to secure financing on more favourable terms and attract investors focused on sustainability. However, in the long term, and in accordance with the 2025-2030 Strategic Update, this risk is expected to diminish as the business model becomes more aligned with activities that support climate change mitigation.  For more details on how Enagás is addressing this risk, refer to disclosure requirements E1-1 and E1-3.	
						The value of the assets is recovered with the current remuneration life; in the long term, there may be possible lower revenues for the company due to lower remuneration associated to the extension of the assets' useful life (Spain business).	Risk	Own operations	The main effect of this risk is the reduced long-term remuneration due to certain natural gas infrastructure assets not having their useful life extended, as they will not support the company in its journey towards carbon neutrality over the long term.  For more details on how Enagás is addressing this risk, refer to disclosure requirements E1-1 and E1-3.	
						Hydrogen infrastructure development	Opportunity	Own operations Customers	Green hydrogen is emerging as one of the most promising options for cutting carbon emissions and speeding up the transition to a more sustainable energy system, offering the company an opportunity to align its business model with the energy transition. This energy carrier brings flexibility and resilience to the system, decarbonises the energy mix and enhances security of supply.  For more details on how Enagás is addressing this risk, refer to disclosure requirements SBM-1 and E1-1.	
						New logistics services that promote natural gas consumption	Opportunity	Own operations Customers	According to the opportunities presented by Enagás in its new 2025-2030 Strategic Update, it is crucial to develop new logistical services and applications for natural gas in the maritime, rail, road transport, industrial, and residential sectors because of their role in mitigating climate change.  For more details on how Enagás is addressing this risk, refer to disclosure requirements SBM-1 and E1-1.	
						Development of infrastructure for CO <sub>2</sub> transport and storage	Opportunity	Own operations Customers	Further, CO <sub>2</sub> transmission infrastructures will help mitigate climate change by reducing its effects, as set out in the new 2025-2030 Strategic Update.  For more details on how Enagás is addressing this risk, refer to disclosure requirements SBM-1 and E1-1.	

The cells with a blue background refer to topics, subtopics, or sub-subtopics that are not applicable to Enagás' business model.

The cells with a blue background refer to topics, subtopics, or sub-subtopics that are not applicable to Enagás' business model.

European Sustainability Reporting Standards (ESRS) by theme	Sustainability issues addressed by the ESRS by theme			Main topic: Enagás	Subtopic: Enagás	Description of impact, risk, or opportunity	Impact, risk or opportunity	Location of this impact/risk/opportunity	Current and anticipated effects and responses to these effects	Additional information
	Topic	Sub-topic	Sub-subtopic							
Environment	E1	Climate change	Energy	Climate action and energy efficiency	Energy	Contribute to the transition of the energy model towards a more sustainable version by integrating renewable gases.	Positive impact	Suppliers Own operations Customers	The company's latest 2025-2030 Strategic Update supports the energy transition, for instance, by developing hydrogen infrastructure. This new business model will positively impact society and the environment by mitigating climate change and enhancing the security of supply. For more details on Enagás' approach to this impact, refer to disclosure requirements SBM-1 and E1-1.	Over the long term, this potential impact, associated with the business model described in the new 2025-2030 Strategic Update, will benefit society and the environment through improved security of supply, decarbonisation of the energy sector, and a just energy transition.
						The deterioration of air quality due to the emission of pollutants associated with energy consumption in the organisation's operations.	Negative impact	Own operations	Associated with the burning of natural gas in its operations, the current impact affects air quality in the regions where facilities use this fossil fuel. For more information on how Enagás is addressing this impact, see disclosure requirements E2-2.	This has adverse effects on human health, such as an increased rate of respiratory diseases, and on the environment by contributing to air pollution and climate change. This impact is linked to the company's business model, but it is expected to decrease in the long term as the company works to decarbonise its operations.
	E2	Pollution and contamination	Pollution of air	Pollution	Pollution					
			Pollution of water							
			Pollution of soil							
			Pollution of living organisms and food resources							
			Substances of concern							
			Substances of very high concern							
			Microplastics							
	E3	Water and marine resources	Water and marine	Water and marine resources management	Water consumption	Reduction in water resources due to the consumption of water from municipal networks, underground sources, or surface sources.	Negative impact	Own operations	The current effect of this issue is primarily a reduction in water resources in regions where Enagás uses water. For more information on how Enagás is addressing this impact, see disclosure requirements E3-2.	This reduction negatively impacts the environment by decreasing water availability for ecosystems and local communities, especially in the long term in areas of high water consumption, regions experiencing significant water stress, and places facing consumption restrictions due to water scarcity. Enagás does not consume water as part of its production process, only for sanitary use, cleaning, maintenance, and green areas.
			Marine resources							
			Water discharges							
			Water discharges in the oceans							
			Extraction and use of marine resources							

European Sustainability Reporting Standards (ESRS) by theme	Sustainability issues addressed by the ESRS by theme			Main topic: Enagás	Subtopic: Enagás	Description of impact, risk, or opportunity	Impact, risk or opportunity	Location of this impact/risk/opportunity	Current and anticipated effects and responses to these effects	Additional information
	Topic	Sub-topic	Sub-subtopic							
E4	Biodiversity and ecosystems	Direct impact drivers of biodiversity loss	Climate change	Biodiversity	Terrestrial and fluvial ecosystems	Impacts affecting the health of terrestrial ecosystems and their natural resources, stemming from maintenance activities on pipeline infrastructure, such as weeding, in both protected areas and other ecologically valuable regions.	Negative impact	Own operations	Enagás' gas pipeline infrastructure currently has a negative impact on biodiversity, disrupting habitats and degrading natural resources, particularly in protected or ecologically sensitive areas. This impact is primarily due to vegetation clearance required for the maintenance and integrity of the infrastructure, which directly ties to the company's business model. In the short term, these activities can lead to a loss of plant cover and the displacement of species; in the long term, there is a risk of cumulative impacts on ecosystems.  For more information on how Enagás is addressing this impact, see disclosure requirements E4-3.	This impact is directly connected to the maintenance work on the gas pipelines and, therefore, to Enagás' business model. It negatively affects the environment through vegetation clearance. In the short term, these activities can result in the loss of plant cover and species displacement, while in the long term, there is a risk of cumulative impacts on ecosystems.
			Land-use change, fresh water-use change and sea-use change							
			Direct exploitation							
			Invasive alien species							
			Pollution							
			Others							
		Impacts on the state of species	Species population size	Marine ecosystems						
			Species global extinction risk							
		Impacts on the extent and condition of ecosystems	Land degradation							
			Desertification							
Impacts and dependencies on ecosystem services	Soil sealing									
E5	Circular economy	Resource inflows, including resource use	Circular economy	Use of auxiliary materials						
		Resource outflows related to products and services								
		Waste								

The cells with a blue background refer to topics, subtopics, or sub-subtopics that are not applicable to Enagás' business model.

European Sustainability Reporting Standards (ESRS) by theme		Sustainability issues addressed by the ESRS by theme			Main topic: Enagás	Subtopic: Enagás	Description of impact, risk, or opportunity	Impact, risk or opportunity	Location of this impact/risk/opportunity	Current and anticipated effects and responses to these effects	Additional information
Social	S1	Own Workforce	Working conditions	People	Stable employment	Maintenance of quality employment through the provision of jobs with short, medium and long-term stability and favourable working conditions for workers.	Positive impact	Own operations	The positive impact of maintaining stable, high-quality employment with favourable working conditions strengthens the company's ability to attract and retain talent, which is crucial for the continuity and sustainability of its business model. In today's context, this impact is vital for maintaining productivity and employee engagement. Over the long term, its significance is expected to grow, as the company will require highly skilled workforce to address the challenges posed by the 2025-2030 Strategic Update.	The cells with a blue background refer to topics, subtopics, or sub-subtopics that are not applicable to Enagás' business model.	This impact directly benefits individuals by ensuring economic stability, improving quality of life, and fostering a safe and supportive working environment, which in turn enhances social welfare in the communities where Enagás operates. It is closely linked to the company's strategy and business model, as providing stable employment with competitive working conditions is key to ensuring the security of supply and the energy transition. This impact is relevant in the short, medium, and long term.
					Satisfaction and motivation of professionals	Use of programmes and policies to ensure the well-being of professionals in the workplace	Positive impact	Own operations	This impact directly influences the company's professionals by enhancing the satisfaction of professionals and the efficiency of the business model. At present, these initiatives have boosted workforce satisfaction, commitment, and productivity, positively affecting the company's performance.	For further details on Enagás' response to this impact, refer to disclosure requirement S1-4.	The positive impact significantly improves professionals' satisfaction and engagement. It positively impacts on their experience and promotes an inclusive and motivating work environment, as shown by regular satisfaction surveys. This impact is directly related to the company's strategy and business model, as the well-being of employees is crucial for operational efficiency and the successful implementation of the new 2025-2030 Strategic Update. The timelines for these issues span the immediate, medium, and long term, considering their ongoing impact on talent retention and development as Enagás faces various challenges.
					Collective bargaining	The right of professionals to join trade unions to promote and defend their economic and social interests without discrimination.	Positive impact	Own operations	This right, aligned with respect for the human and labour rights of the company's professionals, has a direct positive impact on corporate culture. It encourages active worker participation and promotes constructive social dialogue that supports the interests of professionals. Currently, this has led to improvements in labour relations and workers' rights, increasing professionals' commitment to the company. Looking ahead, this impact will remain crucial in sustaining dialogue, commitment, and satisfaction among professionals.	For further details on Enagás' response to this impact, refer to disclosure requirement S1-4.	The positive impact of employees' right to unionise directly benefits professionals by enhancing their ability to promote and defend their economic and social interests. This improvement leads to greater well-being, a stronger sense of belonging, and fosters a more equitable and inclusive work environment. Indirectly, it also benefits society by encouraging the formation of trade unions and respecting trade union rights. This impact is closely tied to the 2025-2030 Strategic Update and the company's business model because ensuring labour rights is essential for sustaining the current business model and supporting the 2025-2030 Strategic Update. This impact materialises in the short, medium, and long term.

European Sustainability Reporting Standards (ESRS) by theme		Sustainability issues addressed by the ESRS by theme			The cells with a blue background refer to topics, subtopics, or sub-subtopics that are not applicable to Enagás' business model.						
	Topic	Sub-topic	Sub-subtopic	Main topic: Enagás	Subtopic: Enagás	Description of impact, risk, or opportunity	Impact, risk or opportunity	Location of this impact/risk/opportunity	Current and anticipated effects and responses to these effects	Additional information	
Social	S1	Own Workforce	Working conditions	People	Collective bargaining	Establishment of a fair and stable employment framework through collective bargaining to strengthen the employment relationship, raise professional satisfaction, commitment and expertise and contribute to a more productive working environment in a collaborative climate	Opportunity	Own operations	Establishing a fair and stable labour framework positively impacts professionals and provides a significant opportunity to strengthen employee relations, improve job satisfaction, and create a more collaborative and productive work environment. Currently, this opportunity has helped reduce labour disputes, increase talent retention, and enhance Enagás's operational efficiency. Looking ahead, it will be crucial for addressing the challenges of the energy transition, as having collaborative, committed professionals with the right technical skills is essential for its successful implementation.  For further details on how Enagás' is capitalising on this opportunity, refer to disclosure requirement S1-4.		
						Work-life balance	Improving the balance between the different aspects of professionals' lives thanks to the implementation of a comprehensive plan of measures favouring work-life balance and co-responsibility.	Positive impact	Own operations	By implementing measures to promote work-life balance and shared responsibility, Enagás currently and in the future positively impacts its professionals' satisfaction and well-being. This leads to increased productivity, improved talent retention, and a more inclusive and collaborative work environment. Strategically, the company has recognised that encouraging a balance between personal and professional life is crucial for having a workforce that supports its operational excellence.  For further details on Enagás' response to this impact, refer to disclosure requirement S1-4.	Enhancing the balance between different aspects of professionals' lives positively impacts individuals by promoting well-being, reducing stress, and increasing job satisfaction. This effect is closely linked to the company's strategy and business model, as having committed and motivated professionals is crucial for task development and managing the changes associated with the 2025-2030 Strategic Update. This impact is expected to span the short, medium, and long term, reflecting Enagás's commitment to long-term benefits. This commitment also influences its business relationships by encouraging similar practices among its affiliates and suppliers, promoting a positive impact across the entire value chain.
						Health and safety	Implementation of occupational health and safety plans, protocols and training for the company's professionals to improve the performance of their duties in a safe and healthy manner.	Positive impact	Own operations	Implementing plans, protocols, training and projects on a culture of occupational health and safety has significantly benefited the company's professionals by enabling them to work safely and healthily. This development has enhanced the integration of health and safety across the value chain, strengthening and positively evolving the company's safety culture. It has helped reduce operational disruptions and ensured compliance with regulatory standards. In the future, this impact will become even more significant as the transition to new energy carriers requires managing new risks associated with new molecules, emerging technologies and innovative processes.  For further details on Enagás' response to this impact, refer to disclosure requirement S1-4.	This current positive impact affects Enagás professionals and its value chain by ensuring a safe and healthy working environment, which, among other benefits, reduces the risk of workplace accidents. It enhances the well-being of professionals and strengthens the mutual trust between them and the company. This impact is closely linked to Enagás's business model, as it is a crucial component of its operations and infrastructure. It is evident in the short, medium, and long term, as health and safety are core company values, demonstrating the establishment of a robust and sustainable safety culture over time.

The cells with a blue background refer to topics, subtopics, or sub-subtopics that are not applicable to Enagás' business model.

European Sustainability Reporting Standards (ESRS) by theme		Sustainability issues addressed by the ESRS by theme									
		Topic	Sub-topic	Sub-subtopic	Main topic: Enagás	Subtopic: Enagás	Description of impact, risk, or opportunity	Impact, risk or opportunity	Location of this impact/risk/opportunity	Current and anticipated effects and responses to these effects	Additional information
Social	S1	Own Workforce	Working conditions	Health and safety		Health and safety	Possibility of harmful work situations for professionals that generate insecurity in the work environment, including situations that negatively affect both mental and physical health.	Negative impact	Own operations	Enagás has identified a potential negative impact related to adverse workplace conditions, accidents and occupational illnesses, which could significantly affect the professionals involved and, indirectly, erode trust in the company.  For more information on how Enagás addresses this issue, see disclosure requirements S1-2, S1-3, and S1-4.	If these negative impacts were to occur, they would primarily affect professionals, creating an unsafe working environment and harming their physical and mental well-being. This impact is indirectly connected to the business model and 2025-2030 Strategic Update, given that human capital is a fundamental pillar of development. Enagás must ensure the effective implementation of measures to keep the likelihood of this impact happening low. The company is directly involved in this impact through its activities, as it creates the working environments and conditions within its own operations.  This impact is relevant in the short, medium, and long term.
			Equal treatment and opportunities for all	Gender equality and equal pay for work of equal value Diversity Employment and inclusion of persons with disabilities Measures against violence and harassment in the workplace	People	Diversity and inclusion	Economic and reputational consequences resulting from serious incidents involving professionals during operations, such as fatal workplace accidents	Risk	Own operations	If this risk were to materialise, it would have a variety of reputational and economic consequences, significantly impacting the company's business model and decision-making. Currently, such incidents can lead to direct costs, including potential compensation payments. They can also incur indirect costs from operational disruptions, alongside the undeniable effect on the affected professionals and harm to the company's reputation.  For further details on Enagás' response to this risk, refer to disclosure requirement S1-4.	
							Ensure non-discrimination and equal opportunities, regardless of gender, race, ethnicity or other personal characteristics, through the implementation of policies, strategies and action plans	Positive impact	Own operations	These initiatives currently and in the future affect the company's professionals by promoting respect for equality and non-discrimination, which, in turn, creates a ripple effect in society. The measures implemented by Enagás have had a positive impact by fostering an inclusive and diverse work environment, which enhances talent attraction and retention, and improves team performance. These are key factors during times of transition, when diverse perspectives are essential for tackling the company's challenges. Across the value chain, these initiatives have also fostered stronger relationships with partners and suppliers, promoting inclusive practices throughout the operations network.  For further details on Enagás' response to this impact, refer to disclosure requirement S1-4.	Ensuring non-discrimination and equal opportunities, which has a direct positive impact on professionals, by promoting an inclusive work environment where individual differences are respected and valued. This impact is closely linked to the company's business model, as promoting diversity is crucial in the industrial sector for attracting and retaining key talent and enhancing the ability to adapt to the challenges of the new 2025-2030 Strategic Update.  The effects of this impact extend over the short, medium, and long term, as inclusive policies offer immediate benefits while also driving a cultural transformation that strengthens the company's resilience and competitiveness over time.

European Sustainability Reporting Standards (ESRS) by theme		Sustainability issues addressed by the ESRS by theme			The cells with a blue background refer to topics, subtopics, or sub-subtopics that are not applicable to Enagás' business model.									
	Topic	Sub-topic	Sub-subtopic	Main topic: Enagás	Subtopic: Enagás	Description of impact, risk, or opportunity	Impact, risk or opportunity	Location of this impact/risk/opportunity	Current and anticipated effects and responses to these effects	Additional information				
Social	S1	Own Workforce	Equal treatment and opportunities for all	People	Awareness and development of in-house talent	Professional development and qualification of workforce through appraisals and development plans, as well as continuous learning and training	Positive impact	Own operations	Various assessments focused on identifying and recognising talent make a positive contribution to implementing development plans and training programmes. These initiatives benefit professionals and present an opportunity for the company, as they help improve technical skills and soft skills, boosting productivity, adaptability, and capability. This, in turn, enhances operational efficiency and aids in achieving strategic goals.	The professional development and training of professionals directly benefits them by enhancing their technical skills, professional capabilities, and growth opportunities. This impact is linked to the company's strategy and business model, as the energy transition requires new specialised knowledge to support the effective implementation of the 2025-2030 Strategic Update.				
									This is crucial in a rapidly changing energy sector, where ongoing training is essential to ensuring the continuation of current activities and the pursuit of activities aligned with the energy transition.	The timeframe for this impact is ongoing and long-term, with benefits starting to emerge in the short term while fostering a sustainable cultural and operational transformation.				
									For further details on Enagás' response to this impact, refer to disclosure requirement S1-4.					
						Optimisation of operational efficiency by promoting professional development and training for internal workforce	Opportunity	Own operations	In an industrial company with an ambitious 2025-2030 Strategic Update aligned with the energy transition, enhancing operational efficiency by fostering the professional development and training of internal workforce is fundamental to the business model and strategy. This training and development initiatives establish a foundation of professionals who work with a focus on continuous improvement and operational efficiency, which, in turn, boosts the company's competitiveness.					
									Looking ahead, this opportunity is expected to be crucial in providing the company with increased resilience and flexibility to tackle upcoming challenges, ensuring it stays at the forefront of the energy sector.					
									For further details on how Enagás is managing this opportunity, refer to disclosure requirement S1-4.					
			Child labour Forced labour Adequate housing Privacy	Human rights	Human rights of own workforce	Reputational improvement and improvement of the due diligence management model for the protection of human rights, derived from the company's alignment with international initiatives and principles in defence of human rights (UN, ILO, etc.).	Opportunity	Own operations	A robust human rights due diligence model, which ensures effective management in this area and aligns the company with international initiatives and principles, can enhance its reputation among various stakeholders. This improved reputation helps attract talent, reduces the risks related to non-compliance with human rights regulations, and strengthens the company's sustainability position.					
									For further details on how Enagás is managing this opportunity, refer to disclosure requirement S1-4.					

The cells with a blue background refer to topics, subtopics, or sub-subtopics that are not applicable to Enagás' business model.

European Sustainability Reporting Standards (ESRS) by theme		Sustainability issues addressed by the ESRS by theme			Main topic: Enagás	Subtopic: Enagás	Description of impact, risk, or opportunity	Impact, risk or opportunity	Location of this impact/risk/opportunity	Current and anticipated effects and responses to these effects	Additional information
Social	S2	Workers in the value chain	Working conditions	Secure employment	Human rights	Human rights of employees in the value chain (supply chain and affiliates)	Reputational and financial consequences from human rights violations in the value chain	Risk	Suppliers Own operations Affiliates Customers	If this risk, linked to the proper implementation of the due diligence system within Enagás's value chain, were to occur, it could undermine the trust of stakeholders, including investors, customers, and regulators. It could also lead to legal penalties, loss of contracts, and harm to the company's reputation. In addition, depending on the scale of the impact, it might cause operational disruptions and affect relationships with suppliers or strategic partners.  Looking ahead, this risk is expected to grow in an environment where regulations on human rights continue to tighten, demanding greater diligence and transparency from companies in their operations and business dealings.  For further details on Enagás' response to this risk, refer to disclosure requirement S2-4.	
				Working time							
				Adequate wages							
				Social dialogue							
				Freedom of association, the existence of works councils and the information, consultation and participation rights of workers							
				Collective bargaining, including rate of workers covered by collective agreements							
				Work-life balance							
				Health and safety							
			Equal treatment and opportunities for all	Gender equality and equal pay for work of equal value							
				Training and skills development							
				Employment and inclusion of persons with disabilities							
				Measures against violence and harassment in the workplace							
			Other work-related rights	Diversity							
				Child labour							
				Forced labour							
				Adequate housing							
				Privacy							

European Sustainability Reporting Standards (ESRS) by theme		Sustainability issues addressed by the ESRS by theme			The cells with a blue background refer to topics, subtopics, or sub-subtopics that are not applicable to Enagás' business model.																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																										
	Topic	Sub-topic	Sub-subtopic	Main topic: Enagás	Subtopic: Enagás	Description of impact, risk, or opportunity	Impact, risk or opportunity	Location of this impact/risk/opportunity	Current and anticipated effects and responses to these effects	Additional information																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
Social	S3	Affected communities	Economic, social and cultural rights	Adequate housing	Local communities	Rights of local communities and their development	Cost overruns, delays, or even temporary or permanent halts to infrastructure projects due to social protests by affected communities or significant impacts on the environment or society.	Risk	Suppliers	Stemming from the identified negative impact of this sustainability issue linked to infrastructure development projects, there is a potential risk that significant social and/or environmental impacts, or conflicts with affected groups, could lead to cost overruns, project delays, or temporary or permanent halts, as well as reputational damage for the company. These impacts are directly connected to the business model and 2025-2030 Strategic Update, particularly as new infrastructures for emerging energy carriers are developed.																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
				Adequate food																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
				Water and sanitation																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
				Land-related impacts																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
				Security-related impacts																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
			Civil and political rights	Freedom of expression							In the future, this risk is expected to grow with the implementation of the new Strategy and rising environmental and social regulations, coupled with increased public sensitivity. This situation compels the company to adopt more proactive and transparent strategies to prevent conflicts and ensure social acceptance of its projects.																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
				Freedom of assembly																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
				Impacts on human rights defenders																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
			Rights of indigenous communities	Free, prior and informed consent								For further details on how Enagás is addressing this risk, refer to disclosure requirements S3-2, S3-3, and S3-4.																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																			
				Self-determination																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
				Cultural rights																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
							Contribution to the development of the local economy through the creation of direct and indirect employment in the communities where it operates.	Positive impact	Suppliers	The company's contribution to the local economy through the creation of direct and indirect jobs in the communities where it operates has both immediate and long-term positive effects. It fosters the economic development of the regional industry and strengthens relationships with these communities. Job creation enhances the skills and abilities of the local workforce, benefiting both the company and the regional economy.																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
		Own operations	Looking ahead, this impact is anticipated to be crucial in line with the company's transition commitment, as it will lead to the creation of new jobs related to emerging energy sectors, further driving economic growth in these communities. Furthermore, indirect job creation helps establish a resilient business ecosystem that supports the company's long-term operations.																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																												
				Customers	For further details on Enagás' response to this impact, refer to disclosure requirement S3-4.																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																										

European Sustainability Reporting Standards (ESRS) by theme		Sustainability issues addressed by the ESRS by theme									
		Topic	Sub-topic	Sub-subtopic	Main topic: Enagás	Subtopic: Enagás	Description of impact, risk, or opportunity	Impact, risk or opportunity	Location of this impact/risk/opportunity	Current and anticipated effects and responses to these effects	Additional information
Social	S3	Affected communities			Local communities	Rights of local communities and their development	Impact on local communities in terms of safety, health, environmental aspects or other socio-economic factors in the construction phase.	Negative impact	Own operations	<p>In connection with the risk outlined for this sustainability issue, there is a potential negative impact during the infrastructure construction phase that directly affects local communities, particularly in health and safety, environmental, and other social areas.</p> <p>This impact is tied to the business model for all construction projects, which is a critical focus area in the long term, as outlined in the 2025-2030 Strategic Update.</p> <p>For further details on Enagás' response to this impact, refer to disclosure requirement S3-4.</p>	<p>The construction of new infrastructure, as planned in the company's 2025-2030 Strategic Update, could negatively affect local communities and the environment. Enagás has implemented various measures to avoid, minimise, mitigate, or compensate for these impacts. The likelihood of this impact occurring is directly related to the company's business model and its new 2025-2030 Strategic Update, aligning with the company's goals of ensuring security of supply and decarbonising its operations and the sector. These impacts are expected to be particularly significant in the medium and long term, coinciding with the construction and commissioning of new infrastructure.</p>
						Social action	Helping society by promoting social action initiatives and implementing volunteer programmes	Positive impact	Suppliers Own operations Customers	<p>Promoting social action initiatives, sponsorships, and patronage, along with implementing volunteer programmes, has a positive impact on society by reinforcing the company's commitment to sustainable development and the well-being of the communities where it operates. This positive effect, both in the short, medium, and long term, supports the business model and ensures a social contribution aligned with value creation for our stakeholders.</p> <p>For further details on Enagás' response to this impact, refer to disclosure requirement S3-4.</p> <p>For further details on Enagás' response to this impact, refer to disclosure requirement S3-4.</p>	<p>The current positive impact on local communities from the company's social action initiatives enhances the quality of life for various groups through projects across multiple sectors, including socioeconomic development, social welfare, education, art and culture, and humanitarian aid. In addition, some of these initiatives positively affect the environment, particularly those related to reforestation and environmental education. This positive impact is already being realised, and the company aims to sustain it in the medium and long term. To enhance the reach and effectiveness of these initiatives, Enagás often collaborates with associations, NGOs, educational institutions, and local governments.</p>
	S4	Consumers and end-users	Information-related impacts for consumers and/or end-users	Privacy							
				Freedom of expression							
				Access to (quality) information							
			Personal safety of consumers and/or end-users	Health and safety							
				Security of a person							
				Protection of children							
			Social inclusion of consumers and/or end-users	Non-discrimination							
				Access to products and services							
				Responsible marketing practices							

The cells with a blue background refer to topics, subtopics, or sub-subtopics that are not applicable to Enagás' business model.

European Sustainability Reporting Standards (ESRS) by theme	Sustainability issues addressed by the ESRS by theme										Additional information
	Topic	Sub-topic	Sub-subtopic	Main topic: Enagás	Subtopic: Enagás	Description of impact, risk, or opportunity	Impact, risk or opportunity	Location of this impact/risk/opportunity	Current and anticipated effects and responses to these effects		
G1	Business conduct	Corporate culture									
		Protection of whistle-blowers			Protection of whistle-blowers	Effective management and handling of complaints and issues reported through the whistleblowing channel.	Positive impact	Suppliers Own operations Customers	Effective management and attention to communications received through the Whistleblowing Line reinforce transparency, business ethics, and stakeholder trust, positively influencing Enagás's stakeholders. This approach fosters a culture based on integrity, listening, respect, and zero tolerance for behaviours that do not align with the code of ethics. Looking ahead, this impact is expected to continue bolstering the company's governance, which will be particularly important as it progresses with the 2025-2030 Strategic Update.  For further details on Enagás' response to this impact, refer to disclosure requirement G1-1.	This positive influence on employees and other stakeholders contributes to ensuring a safer, more ethical, and transparent work environment, safeguarding the rights of employees, suppliers, and communities affected by the company's activities. Maintaining high standards of governance and regulatory compliance is crucial for the company to ensure its operations run smoothly. The effects of this management approach are anticipated to endure in the short, medium, and long term, as an efficient whistleblowing system not only addresses current issues but also prevents future risks and continually enhances the organisational culture.	
		Animal well-being		Ethics and integrity							
		Political participation and lobbying activities		Political engagement and lobbying activities	Actively engage in developing new industry initiatives and staying informed about new trends and regulations by participating in industry associations and initiatives.	Opportunity	Own operations	Active participation in sectoral initiatives and associations enables Enagás to contribute to the improvement and progress of European Union legislative and regulatory frameworks, especially in those developments that have a direct or indirect impact on the transmission and storage business of gas, liquefied natural gas and renewable gases, as well as on the Spanish and European gas industry in general. It also allows the company to lead in sector best practices and anticipate new trends and regulations, enhancing its adaptability in a transforming energy landscape. This opportunity is directly tied to the company's business model and is crucial for the successful implementation of the 2025-2030 Strategic Update.  For further details on how Enagás is managing this opportunity, refer to disclosure requirement G1-5.			
		Management of supplier relations, including payment practices		Sustainable value chain	Supply chain management	Reputational damage and sanctions due to poor management of supplier payments	Risk	Suppliers Own operations	Enagás has recognised the risks associated with poor management of its payment processes to suppliers (negative effect on suppliers, reputational damage, sanctions, loss of trust from strategic partners, etc.). Strategically and in decision-making, the company recognises the need to continue ensuring efficient and transparent payment processes to mitigate this risk and strengthen its reputation.  For more details on how Enagás is addressing this risk, refer to disclosure requirements G1-2 and G1-6.		

European Sustainability Reporting Standards (ESRS) by theme		Sustainability issues addressed by the ESRS by theme									
		Topic	Sub-topic	Sub-subtopic	Main topic: Enagás	Subtopic: Enagás	Description of impact, risk, or opportunity	Impact, risk or opportunity	Location of this impact/risk/opportunity	Current and anticipated effects and responses to these effects	Additional information
Governance	G1	Business conduct	Management of supplier relations, including payment practices		Sustainable value chain	Supply chain management	Enhancing sustainability performance and culture among suppliers by setting sustainability criteria and focusing on development and training in sustainability.	Positive impact	Suppliers Own operations	Enhancing performance and fostering a sustainability culture among suppliers by setting requirements and offering sustainability training programmes positively impacts the company's value chain. This approach encourages operations with more sustainable partners aligned with Enagás's commitments. Enagás plans to advance its sustainable supply chain management in the coming years to align with new regulatory trends in due diligence and best practices, ensuring that this current positive impact is sustained in the medium and long term.  For further details on Enagás' response to this impact, refer to disclosure requirement G1-1.	This current positive impact benefits society by promoting more sustainable companies and supporting workers within these companies through the encouragement of good practices. It also benefits the environment by fostering more responsible environmental practices in the supply chain, such as reducing the carbon footprint. This impact is closely linked to the company's strategy and business model, as ensuring a value chain that aligns with corporate sustainability criteria is crucial for the more efficient and responsible performance of all players in the energy sector.  This impact is relevant in the short, medium, and long term.
										The existence of corporate policies and procedures to prevent and detect corruption and bribery has a direct impact on the company's business model, value chain and strategy, ensuring transparency and compliance in all its operations. These areas are particularly important for maintaining positive impacts in the deployment of the 2025-2030 Strategic Update. For further details on Enagás' response to this impact, refer to disclosure requirement G1-3.	This positive impact has an effect on the company's professionals, as well as on society at large and the value chain, ensuring an ethical and transparent business environment. This impact is directly related to the company's strategy and business model, as zero tolerance for corruption and bribery is basic principle for our work and business relationships in the medium and long term.  This impact is relevant in the short, medium, and long term.
										The risk associated with fraud or unauthorised activities by professionals or outsiders significantly affects the business model, the value chain, and the company's strategy, as it can pose a significant risk to corporate reputation and lead to financial penalties. This risk is especially critical in the new stage of development of new infrastructures on which Enagás is embarking, in line with the 2025-2030 Strategic Update.  For further details on Enagás' response to this impact, refer to disclosure requirement G1-3.	

European Sustainability Reporting Standards (ESRS) by theme	Sustainability issues addressed by the ESRS by theme										The cells with a blue background refer to topics, subtopics, or sub-subtopics that are not applicable to Enagás' business model.
	Topic	Sub-topic	Sub-subtopic	Main topic: Enagás	Subtopic: Enagás	Description of impact, risk, or opportunity	Impact, risk or opportunity	Location of this impact/risk/opportunity	Current and anticipated effects and responses to these effects	Additional information	
Entity-specific				Main topic: Enagás	Transparent communication	Developing and implementing business and commercial transparency strategies	Positive impact	Suppliers Own operations Customers	In its work with customers, Enagás believes that it currently has a positive impact through the development and implementation of business and commercial transparency strategies. This impact, linked to our business model, has a positive effect on customers, helping them as we provide the service, in decision-making and complying with applicable international standards. Enagás works to maintain this impact in the medium and long term, to the benefit of its customers and its relationship with them.  For more information on Enagás' response to this impact, see the 'Management of impacts, risks and opportunities' section of the 'Customers' section.	This impact is linked to the promotion of ethical, responsible and transparent business practices, ensuring that customer relations are conducted in an environment of transparency and compliance with enforcement requirements. This generates greater trust among stakeholders, especially customers, and improves customer relations. This impact is considered significant in the short, medium and long term for Enagás.	
					Customer safety	Failing to ensure proper supervision and quality of services	Negative impact	Own operations Customers	Enagás has identified a possible one-off impact stemming from a failure to ensure proper oversight and quality service, with effects on customers and the gas sector. This impact is associated with the company's business model, with the understanding that in the medium and long term, it could be affected by the offer of new services to customers in line with the 2025-2030 Strategic Update. For more information on Enagás' response to this impact, see the 'Management of impacts, risks and opportunities' section of the 'Customers' section.	This impact can significantly affect customers and customer relations. The time horizon of the impact is short to medium term, as any failure in oversight could have immediate consequences for operations and service, putting our relationship with customers at risk in the long term. It may also have an impact on society and/or the environment, if the failure to ensure quality service is associated with operational incidents.	
						Enhancing the quality of services and transparent communication by increasing the ability to react and identify areas for improvement, thanks to customer satisfaction evaluation processes and supervision and assurance systems.	Opportunity	Own operations Customers	Customer relations, in particular customer satisfaction evaluations, can lead to improved service offerings and communication with customers. This opportunity currently strengthens Enagás' business model by improving operational efficiency and building customer trust.  For more information on Enagás' management to take advantage of this opportunity, see the 'Management of impacts, risks and opportunities' section of the 'Customers' section.		
				Information Security	Cybersecurity and data privacy	Impacts on stakeholders due to incidents in infrastructure, equipment, and systems caused by operational failures related to cyber-attacks.	Negative impact	Suppliers Own operations Customers	This potential negative impact, linked to the success of cyber-attacks, may affect different stakeholders, compromising the security of supply and the proper provision of services by Enagás. As the company continues to move towards developing new renewable gas infrastructures, this impact becomes more likely, as the digitalisation of operations and the integration of new technologies increase exposure to cyber threats.  To lessen the chances and potential impact of such risks, Enagás must continually enhance its cybersecurity measures, adapting to and addressing emerging cyber threats.  For more information on Enagás' response to this impact, see the 'Management of impacts, risks and opportunities' section of the 'Information security' section.	Cyber-attacks can lead to operational failures with a significant impact on different stakeholders. Therefore, they can affect the company's business and its value chain. This potential negative impact is significant at present, but further pressure is expected in the medium and long term, and Enagás needs to implement appropriate measures to ensure that this impact does not materialise.	

European Sustainability Reporting Standards (ESRS) by theme	Sustainability issues addressed by the ESRS by theme										Additional information
	Topic	Sub-topic	Sub-subtopic	Main topic: Enagás	Subtopic: Enagás	Description of impact, risk, or opportunity	Impact, risk or opportunity	Location of this impact/risk/opportunity	Current and anticipated effects and responses to these effects		
Entity-specific				Information Security	Cybersecurity and data privacy	Fines and reputational damage may result from cybersecurity breaches or leaks of sensitive stakeholder data due to inadequate management.	Risk	Suppliers Own operations Customers	Cybersecurity breaches and leaks of sensitive data can have a negative impact associated with significant fines, reputational damage, service or stakeholder impacts. This risk could have a direct impact on the company's business model and value chain. As the company moves forward in the digitalisation process, the risk of cyber-attacks and exposure to vulnerabilities increases.  To further mitigate these risks, Enagás should maintain its cybersecurity and privacy management systems to identify and address any potential legal breaches that could result in fines.  For more information on Enagás' response to this risk, see the 'Management of impacts, risks and opportunities' section of the 'Information security' section.		
				Regulatory compliance	Regulatory compliance	Criminal liability for offences committed by employees or managers against workers' rights, public health, natural resources and the environment.	Risk	Own operations	Criminal liability for offences committed by employees or managers against workers' rights, public health, natural resources and the environment represents a significant risk for the company, with direct impacts on its business model, value chain, strategy and decision-making.  For more information on Enagás' response to this risk, see the 'Management of impacts, risks and opportunities' section of the 'Regulatory compliance' section.		
						Non-compliance with current legislation and internal regulations (gas, environmental, antitrust, labour and safety regulations, accounting and tax rules, Protection of Personal Data Act ('LOPD'), confidentiality, diversity and equality, etc.)	Risk	Suppliers Own operations Customers	Non-compliance with current legislation and internal regulations in key areas represents a significant risk for the company, which may result in financial penalties, reputational damage or financial loss. This risk is particularly key given the challenges the company faces in implementing the actions outlined in the 2025-2030 Strategic Update.  For more information on Enagás' response to this risk, see the 'Management of impacts, risks and opportunities' section of the 'Regulatory compliance' section.		

The cells with a blue background refer to topics, subtopics, or sub-subtopics that are not applicable to Enagás' business model.

## Resilience: crisis management and business continuity

Enagás is moving towards a resilient management model, promoting improvements in different areas such as crisis management and business continuity. This model makes it possible to increase the company's capacity to adapt to a changing environment, reducing the time required to act and recover from the possible appearance of a disruptive situation.

Enagás periodically updates its Crisis Management General Standard, adapting it to new risks, policies and emerging businesses, establishing various action committees to control incidents depending on the degree of severity and consequences of each scenario.

As part of its Global Security Plan, the company organises annual crisis management and business continuity drills, which enable it to train its professionals at both the technical and highest executive level. Likewise, to facilitate its response capacity, Enagás has maps of both corporate and local stakeholders so that, in the event of a hypothetical crisis situation, both the key people and the communication channels are identified, enabling efficient management.

In 2024, we continued to promote business continuity at the Infrastructure General Management and launched an analysis of critical processes at the Technical Management of the System General Management, establishing different actions within the company's Transformation Plan that will enable it to achieve improvements in this area.

# Management of impacts, risks, and opportunities

## Information on the materiality assessment process

### IRO-1

## Description of the processes to identify and assess material impacts, risks, and opportunities

Enagás has carried out a materiality assessment in order to identify sustainability issues that are material to the company's value (internal perspective) and to people and the environment (external perspective). All this with a focus on the short, medium and long term, taking into account both own operations and the value chain, and in a manner consistent with the strategy, the risk management models and the analysis of corporate risks of the Company.

This analysis encompasses all activities and infrastructure locations of Enagás Group companies under financial control, including both upstream and downstream stages of the value chain.

The materiality assessment is essential for identifying the main impacts, risks and opportunities faced by the company, thus highlighting the most relevant issues on which Enagás must focus its management and reporting, have action plans in place and set objectives aligned with the continuous improvement approach.

Enagás, through its Sustainability Committee, reviews the materiality analysis and updates the company's material topics prior to their approval by the Board of Directors. Given the relevance of this process, it has been included in the Internal Control System over Sustainability Reporting (for more information, see disclosure requirement [GOV-4](#)).

This assessment is based on the company's previous materiality assessment and will be reviewed annually in case of strategic updates or externalities with significant impact.

### Understanding context

For the materiality assessment, an assessment of the company's own operations and value chain was carried out; in essence, Enagás' own practices were assessed. The broader context was also assessed, including the regulatory framework, market and sectoral trends, as well as changes in stakeholder needs, among other matters.

## Identification of Impacts, Risks, and Opportunities

The main sustainability topics and sub-topics applicable to Enagás have been identified below, in line with applicable regulations, as well as an initial identification of potential impacts, risks and opportunities material to the same. For this assessment, we have used the context analysis described above, as well as internationally recognised reporting frameworks, ESG analysts and peers. Previous assessments carried out by the company, the company's due diligence system and previous sustainability information reports also served as inputs.

In this phase, the risks and opportunities arising from impacts and dependencies were considered.

These are understood to be:

- **Impact:** the effect the company has or may have on the environment and people, including any effects on their human rights that result from the company's activities or business relationships. Impacts can be actual or potential, negative or positive, short-, medium- or long-term, intended or unintended, and reversible or irreversible. They indicate the company's contribution, negative or positive, to sustainable development.
- **Risk:** Sustainability-related risks that have negative financial effects that significantly affect (or can reasonably be expected to affect) the company's cash flows, access to financing or cost of capital in the short, medium or long term.
- **Opportunity:** Sustainability-related opportunities that have positive financial effects that significantly affect (or can reasonably be expected to affect) the company's cash flows, access to financing or cost of capital in the short, medium or long term.

Subsequently, together with the internal teams responsible for managing the various areas covered, the previously identified potential impacts, risks and opportunities were reviewed. New ones were also identified. These impacts, risks and opportunities have also been assigned to the different stages of the company's value chain.

In addition, the identified risks and opportunities were checked with the company teams responsible for corporate risk management and company strategy, respectively.

### Stakeholder surveys

Following the identification of impacts, risks and opportunities, surveys were conducted with key stakeholders to ascertain their opinion on the relevance of the sustainability issues identified by the company. The stakeholders surveyed were customers, investors, regulators, professionals and members of the Sustainability Committee.

The relevance of sustainability issues to peers and sustainability analysts was also assessed on the basis of external information.

The results of these surveys and external assessments helped to establish the degree of significance of sustainability issues in the impacts, risks and opportunities valuation process ('scale' parameter):

- In terms of impact materiality, through the results of the surveys carried out with the different stakeholders, as well as the benchmark set by peers and sustainability analysts.
- In terms of financial materiality, through the results of investor surveys and the benchmark set by sustainability analysts.

## Evaluation of Impacts, Risks, and Opportunities

As in the impacts, risks and opportunities identification phase, based on the inputs considered, the impacts, risks and opportunities were assessed on the basis of the following parameters with the internal teams responsible for the management of the different areas:

- Impacts:
  - Nature: indicates whether the impact is positive or negative.
    - In the case of a negative impact, remediability shall be assessed, i.e. the degree of difficulty (economic and temporal) of returning it to its pre-impact state if the impact is negative. This is classified as not remediable, very difficult, difficult, challenging and easy.
  - Status: indicates whether it is a current or potential impact (has not yet materialised).
    - In the case of a potential impact, the probability of occurrence shall be assessed, i.e. the likelihood of the impact materialising. This is classified as high probability (>75% chance of occurrence), medium probability (>50%), low probability (>25%) and very low probability (<25%).
  - Scale: determines the degree of significance of the impact to stakeholders (significance of the associated sustainability issue). Information obtained through stakeholder surveys and the benchmark set by sustainability analysts and peers.
  - Scope: determines the physical space affected by each impact. This is classified as global, medium or limited.
- Risks and opportunities:
  - Degree: Determines the degree of significance of the opportunity or risk to stakeholders (significance of the associated sustainability issue). Information obtained through investor surveys and the sustainability analysts' benchmark.

In addition, the probability and economic valuation in the short (1 year), medium (between 1 and 5 years) and long term (more than 5 years) is determined:

- Probability: how likely it is that the opportunity or risk will materialise. This is classified as high probability (>75% chance of occurrence), medium probability (>50%), low probability (>25%) and very low probability (<25%).
- Economic valuation: effect in case of materialisation based on net profit and FFO. This is classified as high, moderate, medium or low.

In line with the procedure followed to identify risks and opportunities, the assessment of these has been checked with the company teams responsible for corporate risk management and company strategy, respectively. All this is done taking into account the differences between the methodologies applied for the assessment of risks and opportunities in this analysis and in the internal risk management system (for more information, see the 'Risk management' section in the Consolidated Management Report)<sup>15</sup> and the identification of business opportunities, as a consequence of the purposes of the different processes. However, despite the differences between the methodologies used, there is a methodological alignment resulting from the application of consistent assessment criteria. This ensures that, for example, sustainability-related risks considered critical within the internal risk management system also receive a high assessment in the dual materiality assessment.

## Results of the materiality assessment

As a result of this analysis of the relevance of various impacts, risks, and opportunities, it is concluded that all sustainability topics established by the ESRS are of relative importance to Enagás, except for "consumers and end-users," as it is not applicable to the company's business model (for more information, see the 'Customers' section in the Additional Information for Enagás) given their material impact, financial materiality, or both. Additionally, Enagás has identified three sustainability topics of relative importance that are of particular interest to Enagás: regulatory compliance, information security, and customers. It is worth noting that the issue of climate action and energy efficiency stands out due to its high rating for both materialities.

Enagás has been working for years on the management and continuous improvement of the sustainability issues identified as priorities, thus endorsing the work carried out by the company in the area of sustainability.

For more information on the impacts, risks and opportunities identified as material, see disclosure requirement [SBM-3](#).

<sup>15</sup> This link refers to unverified information within the framework of the review of the Non-Financial Information and Sustainability Information Statement.

IRO-2

Disclosure requirements in ESRS covered by the undertaking's Statement of consolidated non-financial and sustainability information

The disclosure requirements that are fulfilled in the current Statement of consolidated non-financial and sustainability information are listed below, after the application of impact and financial materiality thresholds in the double materiality analysis:

European Sustainability Reporting Standards (ESRS)	Area	Section	Disclosure requirement	Page number
GENERAL INFORMATION				
2	General disclosures	Basis for preparation	BP-1: General basis for preparation of sustainability statements	21
			BP-2: Disclosures in relation to specific circumstances	21-22
		Governance	GOV-1: The role of administrative, management and supervisory bodies	23-26
			GOV-2: Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	26-27
			GOV-3: Integration of sustainability-related performance in incentive schemes	27-28
			GOV-4: Statement on due diligence	29
			GOV-5: Risk management and internal controls over sustainability reporting	30-31
		Strategy	SBM-1: Strategy, business model and value chain	31-40
			SBM-2: Interests and views of stakeholders	40-41
			SBM-3: Material impacts, risks, and opportunities and their interaction with the strategy and business model	41-57
		Management of impacts, risks and opportunities	IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities	58-59
			IRO-2: Disclosure requirements in ESRS covered by the undertaking's sustainability statement	60-66

European Sustainability Reporting Standards (ESRS)	Area	Section	Disclosure requirement	Page number		
ENVIRONMENTAL INFORMATION						
Disclosure of information under Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)						
E1	Climate change	Governance	Related to ESRS 2 GOV-3: Integration of sustainability-related performance in incentive schemes	88		
		Strategy	E1-1: Transition plan for climate change mitigation	89-90		
			Related to ESRS 2 SBM-3: Material impacts, risks, and opportunities and their interaction with the strategy and business model	90-91		
		Management of impacts, risks and opportunities	Related to ESRS 2 IRO-1: Description of the processes to identify and assess material impacts, risks, and opportunities related to climate	92-93		
			E1-2: Policies related to climate change mitigation and adaptation	93-94		
			E1-3: Actions and resources in relation to climate change policies	94-98		
		Metrics and targets	E1-4: Targets related to climate change mitigation and adaptation	99-101		
			E1-5: Energy consumption and mix	101-102		
			E1-6: Gross Scopes 1, 2, 3 and Total GHG emissions	102-107		
			E1-7: GHG removals and GHG mitigation projects financed through carbon credits	107-108		
			E1-8: Internal carbon pricing	108		
			E1-9: Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	108-110		
			E2	Pollution	Management of impacts, risks and opportunities	Related to ESRS 2 IRO-1: Description of the processes to identify and assess material impacts, risks, and opportunities related to pollution
		E2-1: Policies related to pollution			111-112	
		E2-2: Actions and resources related to pollution			112	
E2-3: Targets related to pollution	113					
Metrics and targets	E2-4: Pollution of air, water and soil	113				
	E2-5: Substances of concern and substances of very high concern	113				
	E2-6: Anticipated financial effects from pollution-related impacts, risks and opportunities	114				
E3	Water and Marine Resources	Management of impacts, risks and opportunities	Related to ESRS 2 IRO-1: Description of the processes to identify and assess material impacts, risks, and opportunities related to water and marine resources.	116		
		E3-1: Policies related to water and marine resources	116-117			
		E3-2: Actions and resources related to water and marine resources	117			
		E3-3: Targets related to water and marine resources	118			
		Metrics and targets	E3-4: Water consumption	118-119		
	E3-5: Anticipated financial effects from water and marine resources-related impacts, risks and opportunities	119				

European Sustainability Reporting Standards (ESRS)	Area	Section	Disclosure requirement	Page number
E4	Biodiversity and Ecosystems	Strategy	E4-1: Transition plan and consideration of biodiversity and ecosystems in strategy and business model	120
			Related to ESRS 2 SBM-3: Material impacts, risks, and opportunities and their interaction with the strategy and business model	120-123
		Management of impacts, risks and opportunities	Related to ESRS 2 IRO-1: Description of the processes to identify and assess material impacts, risks, and opportunities related to biodiversity and ecosystems	123-125
			E4-2: Policies related to biodiversity and ecosystems	125
			E4-3: Actions and resources related to biodiversity and ecosystems	126-127
		Metrics and targets	E4-4: Targets related to biodiversity and ecosystems	128
			E4-5: Impact metrics related to biodiversity and ecosystems change	128
			E4-6: Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities	128
E5	Resource Use and Circular Economy	Management of impacts, risks and opportunities	Related to ESRS 2 IRO-1: Description of the processes to identify and assess material impacts, risks, and opportunities related to resource use and the circular economy	129
			E5-1: Policies related to resource use and circular economy	129-130
			E5-2: Actions and resources related to resource use and circular economy	130
		Metrics and targets	E5-3: Targets related to resource use and circular economy	131
			E5-4: Resource inflows	131
			E5-5: Resource outflows	131-133
			E5-6: Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities	133

European Sustainability Reporting Standards (ESRS)	Area	Section	Disclosure requirement	Page number
<b>SOCIAL INFORMATION</b>				
<b>S1</b>	Own workforce	Strategy	Related to ESRS 2 SBM-2: Interests and views of stakeholders	136
			Related to ESRS 2 SBM-3: Material impacts, risks, and opportunities and their interaction with the strategy and business model	136 - 138
		Management of impacts, risks and opportunities	S1-1: Policies related to own workforce	139 - 142
			S1-2: Processes for engaging with own workers and workers' representatives about impacts	142 - 143
			S1-3: Processes to remediate negative impacts and channels for own workers to raise concerns	143 - 144
			S1-4: Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	145 - 156
		Metrics and targets	S1-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	157 - 159
			S1-6: Characteristics of the undertaking's employees	159 - 162
			S1-7: Characteristics of non-employee workers in the undertaking's own workforce	162
			S1-8: Collective bargaining coverage and social dialogue	162 - 163
			S1-9: Diversity metrics	163 - 164
			S1-10: Adequate wages	164
			S1-11: Social protection	164
			S1-12: Persons with disabilities	165
			S1-13: Training and skills development metrics	165
			S1-14: Health and safety metrics	165 - 166
			S1-15: Work-life balance metrics	166
			S1-16: Compensation metrics (pay gap and total compensation)	167
			S1-17: Incidents, complaints and severe human rights impacts	167 - 171

European Sustainability Reporting Standards (ESRS)	Area	Section	Disclosure requirement	Page number
S2	Workers in the value chain	Strategy	Related to ESRS 2 SBM-2: Interests and views of stakeholders	172
			Related to ESRS 2 SBM-3: Material impacts, risks, and opportunities and their interaction with the strategy and business model	172
		Management of impacts, risks and opportunities	S2-1: Policies related to value chain workers	173 - 174
			S2-2: Processes for engaging with value chain workers about impacts	174
			S2-3: Processes to remediate negative impacts and channels for value chain workers to raise concerns	174
			S2-4: Taking action on material impacts on value chain workers, and approaches to mitigating material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	174 - 177
		Metrics and targets	S2-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	178
S3	Affected communities	Strategy	Related to ESRS 2 SBM-2: Interests and views of stakeholders	179
			Related to ESRS 2 SBM-3: Material impacts, risks, and opportunities and their interaction with the strategy and business model	179 - 180
		Management of impacts, risks and opportunities	S3-1: Policies related to affected communities	181 - 182
			S3-2: Processes for engaging with affected communities about impacts	183-184
			S3-3: Processes to remediate negative impacts and channels for affected communities to raise concerns	184
			S3-4: Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	184-188
		Metrics and targets	S3-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	189
		GOVERNANCE INFORMATION		
G1	Business Conduct	Governance	Related to ESRS 2 GOV-1: The role of administrative, management and supervisory bodies	191 - 192
		Management of impacts, risks and opportunities	Related to ESRS 2 IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities	193
			G1-1: Corporate culture and business conduct policies	193 - 198
			G1-2: Management of relationships with suppliers	198 - 201
			G1-3: Prevention and detection of corruption and bribery	201 - 202
			G1-4: Confirmed incidents of corruption or bribery	203
		Metrics and targets	G1-5: Political influence and lobbying activities	203 - 204
			G1-6: Payment practices	204

European Sustainability Reporting Standards (ESRS)	Area	Section	Disclosure requirement	Page number
ENAGÁS ADDITIONAL INFORMATION				
Regulatory compliance		Governance		206
				Cross-reference to disclosure requirements GOV-1, GOV-2, GOV-3, GOV-4, and GOV-5 in chapter 2
				206
				Cross-reference to disclosure requirements SBM-1, SBM-2, and SBM-3 in chapter 2
				206 - 207
Information security		Governance		207
				208
				Cross-reference to disclosure requirements GOV-1, GOV-2, GOV-3, GOV-4, and GOV-5 in chapter 2
				208
				Cross-reference to disclosure requirements SBM-1, SBM-2, and SBM-3 in chapter 2
		Strategy		208 - 210
				210 - 211

European Sustainability Reporting Standards (ESRS)	Area	Section	Disclosure requirement	Page number	
Customers		Governance		212	
		Strategy	Related to ESRS 2 SBM-2: Interests and views of stakeholders	212	
	Related to ESRS 2 SBM-3: Material impacts, risks, and opportunities and their interaction with the strategy and business model		212-213		
		Management of impacts, risks and opportunities	Policies related to consumers and end-users	213 - 215	
			Processes for engaging with consumers and end-users about impacts	215 - 217	
			Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	217 - 218	
			Measures related to material impacts on consumers and end-users, and approaches to mitigate material risks and opportunities related to consumers and end-users, and the effectiveness of such actions	218 - 220	
		Metrics and targets	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	220	
	REFERENCE TO OTHER APPLICABLE EU LEGISLATION				
	E1-1		Transition plan to achieve climate neutrality by 2050, paragraph 14: Regulation (EU) 2021/1119, Article 2(1)	89-90	
E1-7		GHG removals and carbon credits, paragraph 56: Regulation (EU) 2021/1119, Article 2(1)	107-108		

## Non-financial and diversity reporting requirements (Law 11/2018)

### Description of the business model: main factors and trends likely to affect its future evolution

#### Business context

In 2024, the average price of natural gas on the European spot market was around 40 euros/MWh, marking a 15% decrease from the average price in 2023. This continues the trend of price reductions since Russia's invasion of Ukraine and the energy crisis in 2022.

However, despite these lower prices, the markets remain tense and volatile, affected by ongoing conflicts in the Middle East and the war in Ukraine, as well as uncertainty linked to elections in over 100 countries worldwide. Significant elections included those for the European Parliament, which suggest the continuation of the European Green Deal and decarbonisation policies. Additionally, Trump's victory in the US presidential election was notable, as it prioritises the production and export of natural gas in the country and lifts sanctions on liquefied natural gas (LNG) projects imposed by the Biden Administration, thereby enhancing the US' role in the global gas market.

The structure of natural gas supplies in the European Union in 2024 saw total imports of Russian gas exceed 50 bcm (19% of total imports). This marks a 67% reduction compared to 2021, before the war began, but a slight increase compared to 2023.

Security of supply in the European Union has been largely underpinned by LNG, which constituted over 40% of total natural gas supplies in 2024. Regasification plants, with 35 bcm of new capacity being built in Europe and 250 bcm globally, will increasingly ensure security of supply.

The Spanish Gas System has continued to be a key player in ensuring Europe's security of supply, delivering a total of 34.5 TWh of natural gas via its international interconnections and by reloading LNG carriers. Spain also boasts one of the most diversified supply sources in the world, having received gas from 14 different countries in 2024, positioning it as a strategic LNG entry point into Europe.

Spanish terminals more than doubled their LNG bunkering operations in 2024, reaching 3.8 TWh compared to 1.5 TWh in 2023, thus advancing the decarbonisation of the maritime sector.

In Spain, demand for natural gas fell by 4% compared to 2023. This decline was mainly due to reduced gas usage for electricity generation, thanks to increased hydropower and renewable energy production. Conversely, industrial gas demand showed a recovery, with an increase of over 4%, primarily in the refining sector.

The year 2024 was also notable for the release of the final 2030 National Integrated Energy and Climate Plans (PNIECs) in most EU Member States. These plans emphasised the crucial role of green hydrogen as a decarbonisation driver. Specifically, 17 Member States set targets for electrolysis capacity totalling 52 GW, with 60% (31.5 GW) focused in the H2Med corridor countries: Spain, Portugal, France, and Germany.

Nationally, Spain's final National Integrated Energy and Climate Plan (PNIEC) increases the target for installed electrolysis capacity to 12 GW by 2030, up from 11 GW in the draft version. It maintains the goal of replacing 74% of current grey hydrogen consumption in industry and introduces a new target for the contribution of renewable fuels of non-biological origin (RNFBO) in the transport sector, set at 3.56% by 2030.

In addition, the Spanish PNIEC includes measure 4.12, which focuses on promoting the development of the Iberian H2Med hydrogen corridor. This initiative, supported by the governments of Spain, Portugal, and France, aims to establish Spain as the world's leading renewable hydrogen hub. It will achieve this by developing the initial segments of the national backbone network, linking green hydrogen production centres with domestic consumers and the two international connections to France and Portugal.

Furthermore, on April 8, 2024, the Official Journal of the European Union published the first list of Projects of Common Interest (PCI) and Projects of Mutual Interest (PMI), which features the H2Med project and the Spanish Hydrogen Backbone Network. This marks a significant advancement in the promotion of these projects.

Within this fundamental role for renewable hydrogen in the decarbonisation of the global and European energy system, very significant progress was made in 2024 that constitute a boost for hydrogen development and consolidate Spain's role as a key player.

#### Global milestones

Between November 11 and 24, 2024 the 29th Conference of the Parties to the United Nations Framework Convention (COP29) was held in Baku. Key outcomes included:

- New finance agreements, setting a collective quantified goal for climate finance (NCQG) of 300 billion dollars per year until 2035, which is triple the current target.
- The conference also established rules for the international trading of carbon credits under United Nations oversight (voluntary market), along with a mechanism for exchanging carbon credits between countries. Projects from the Clean Development Mechanism (CDM) can join this framework.

- Enagás participated in a declaration on hydrogen through UNIDO (United Nations Industrial Development Organization) and UNECE (United Nations Economic Commission for Europe). This declaration aims to promote the integration of green hydrogen and its derivatives into national energy plans and to enhance demand, particularly in end-use sectors that present decarbonisation challenges.
- A call to action was issued by 50 companies in the maritime transport value chain to promote green hydrogen. They committed to investing in zero-emission fuel infrastructure and using at least 5%-10% of energy from zero or near-zero emission sources by 2030.

## European milestones

- April 8: the first list of Projects of Common Interest (PCI) and Projects of Mutual Interest (PMI) was published in the Official Journal of the European Union (OJEU). This list includes the H2Med project and the Spanish Hydrogen Backbone Network, marking a significant advance in promoting these projects.
- April 11: CINEA opened the call for applications under the CEF-E Programme to fund PCI/PMI projects.
- April 30: the results of the first European Hydrogen Bank auction were announced, in which Spain secured three of the seven winning projects: Catalina, HYSENCIA and El Alamillo H2.
- July 15: the OJEU published the hydrogen and decarbonised gas package alongside the regulation to reduce methane emissions in the energy sector.
- September 18: the European Commission opened the window for submitting candidate projects for the second PCI/PMI list.
- October 22: the German regulator, BNetzA, approved the final plan for Germany's hydrogen network up to 2032. This plan includes a ~9,000 km hydrogen network by 2032, with 56% of it being reconverted. The investment amounted to approximately 19 billion euros, which covers new hydrogen pipelines and collaborating companies, as well as the reconversion of gas pipelines. This network is connected to H2Med via France through Hy-Fen, GRTGaz.
- December 3: the call for the second European Hydrogen Bank auction opened, running until February 20, 2025.

## Milestones in Spain

- January 11: the Spanish Parliament ratified the appointment of Enagás as the Provisional Hydrogen Transmission Network Operator (HTNO).
- April 9: the Hydrogen Technology Observatory was established.
- April 29: Enagás submitted its Hydrogen Backbone Network proposal to the Ministry for Ecological Transition and the Demographic Challenge (MITECO).
- July 30: the Council of Ministers authorised Enagás to develop the PCIs.

- September 5: the Ministry for Ecological Transition and the Demographic Challenge began the national transposition of the hydrogen and decarbonised gas package.
- September 24: the Council of Ministers approved the update to the National Energy and Climate Plan (2023-30).
- November 7: a non-binding Call for Interest for the H2Med project was launched. This aims to identify the potential needs and projects of producers, consumers, and traders of renewable hydrogen along the corridor, which is crucial for speeding up the creation of a competitive hydrogen market in Europe.
- December 16: Mibgas launched its renewable hydrogen price index.
- January 30, 2025: publication of the resolution of the CEF-E funding call, with Enagás receiving the full amount requested for studies on the H2med corridor and the initial sections of the Spanish Hydrogen Backbone Network.

## Regulatory vision to 2030

In Spain, the 2021-2026 regulatory framework is stable and transparent, and establishes a period of six-years without intermediate revision. This framework supports climate and energy targets by establishing incentives to keep the Gas system infrastructure available, and to fulfil the role assigned by the Spanish National Integrated Energy and Climate Plan for natural gas and renewable gases in the energy transition process. This shows that the use of existing gas infrastructure is essential if advances are to be made in energy transition at the lowest cost.

In 2024, very significant regulatory actions were taken to accelerate the energy transition and highlight the key role of Enagás' infrastructures for Europe's energy security, which will serve to maintain regulatory stability and anticipate the new energy model.

Enagás Transporte was appointed as the provisional hydrogen transmission network operator (HTNO). Royal Decree-Law 8/2023, of December 27, adopting measures to address the economic and social consequences of the conflicts in Ukraine and the Middle East, as well as to alleviate the effects of the drought, making it possible for the natural gas transmission network managers (Enagás Transporte, S.A.U. is the only company currently certified as a Transmission Network Manager in Spain) to exercise development functions of the hydrogen backbone network manager on a provisional basis until the final designation occurs.

Pursuant to Royal Decree-Law 8/2023, on April 29, Enagás submitted a non-binding proposal for the development of the hydrogen backbone infrastructure, projected over the next ten years.

Also in April, the Official Journal of the EU (OJEU) published the list of Projects of Common Interest (PCI) and Projects of Mutual Interest (PMI), which, for the first time, included projects aimed at developing a trans-European hydrogen infrastructure. This list featured the H2 Portugal-Spain-France-Germany corridor (H2med) and the Spanish Hydrogen Backbone Network,

alongside two H<sub>2</sub> storage projects. In the same month, CINEA opened the call for applications under the CEF-E Programme to fund PCI/PMI projects. The first list of Projects of Common Interest (PCI) and Projects of Mutual Interest (PMI) was published in the Official Journal of the European Union, under Delegated Regulation (EU) 2024/1041 of the Commission, dated November 28, 2023. This list includes the following hydrogen infrastructure projects, promoted by Enagás Infraestructuras de Hidrógeno, S.L.U.:

- Portugal-Spain hydrogen interconnector<sup>16</sup>.
- Internal hydrogen infrastructure in Spain.
- Spain-France hydrogen interconnector [currently known as 'BarMar']<sup>16</sup>.
- Hydrogen storage facilities in Spain include: 9.24.1 'H<sub>2</sub> storage North-1' and 9.24.2 'H<sub>2</sub> storage North-2'.
- The transposition of the Gas&H<sub>2</sub> Package (new Low Hydrocarbons Law, will replace the current Law 34/1998, of October 7, on the hydrocarbons sector) was commenced.

By the end of April, the outcome of the first European Hydrogen Bank auction and the announcement of a second auction represented a significant step towards establishing a European hydrogen market. Out of the seven selected renewable hydrogen production projects, three were located in Spain, with the Catalina project, which involves Enagás Renovable, being particularly noteworthy.

In June, Enagás, GRTgaz, and Teréga, in collaboration with OGE, signed an agreement to jointly develop BarMar, a crucial infrastructure for transporting hydrogen between the Iberian Peninsula and France.

In July, the hydrogen and decarbonised gas package was published in the OJEU. This package includes a Regulation and a Directive that set the framework for integrating these gases into the EU energy system, supporting decarbonisation and ensuring security of supply. This European package establishes the groundwork for creating a hydrogen system across Europe and developing a model for third-party access to hydrogen networks, with a two-year timeframe to incorporate these measures into the national legal framework. The Ministry for Ecological Transition and the Demographic Challenge has already begun this process by launching a preliminary public consultation in September 2024 to gather input from various stakeholders.

On August 14, 2024, the Spanish Secretary of State for Energy issued a Resolution that published the Council of Ministers' Agreement from July 30, 2024. This agreement authorises Enagás Infraestructuras de Hidrógeno, S.L.U., to provisionally carry out the development of Projects of Common European Interest in Hydrogen Networks. Developing these PCI infrastructure projects includes applying for authorisation, constructing, commissioning, operating, monitoring, and maintaining hydrogen pipelines and underground storage facilities.

On September 24, Royal Decree 986/2024 was published, approving the updated National Integrated Energy and Climate Plan 2023-2030 (PNIEC). This plan incorporates the EU's heightened climate ambitions, supports the ecological transition outlined in the Recovery, Transformation, and Resilience Plan (PRTR), and includes other national advancements, as well as geopolitical changes stemming from the war in Ukraine (REPowerEU). The PNIEC update lays a stronger focus on renewable hydrogen and its network infrastructures to achieve these goals.

- Increase installed electrolyser capacity to 12 GW by 2030.
- Replace 74% of the current grey hydrogen usage in industry and contribute 3.56% of renewable fuels of non-biological origin (RFNBO) in the transport sector.
- Support the development of the Iberian H<sub>2</sub>med hydrogen corridor, backed by the governments of Spain, Portugal, France, and Germany, which includes a new measure (Measure 4.12).

H<sub>2</sub>med is envisaged as the first major green corridor connecting the Iberian Peninsula with the rest of Europe. Set to be operational by 2030, it is expected to transport 2 million tonnes of green hydrogen per year from Spain, accounting for 10% of the EU's total consumption. By 2050, it is estimated that renewable hydrogen will make up 20% of all energy in Europe. The backbone network aims to link green hydrogen production centres on the Iberian Peninsula with domestic hydrogen demand, prioritising national coverage. H<sub>2</sub>med includes two cross-border infrastructures: one connecting Celorico da Beira (Portugal) to Zamora, known as CelZa, and another undersea link between Barcelona and Marseille (France), called BarMar.

These projects have been designated as projects of common interest for the European internal market (PCI) in the first list published under Delegated Regulation (EU) 2024/1041, as they are seen as crucial for enhancing and enabling international infrastructure.

In November, the H<sub>2</sub>med Call for Interest was launched, with the results to be published in February 2025. During the same month, submissions for candidate projects for the second PCI/PMI list opened.

Meanwhile, on September 24, the Council of Ministers approved the Draft Bill to re-establish the National Energy Committee (CNE), which was sent to the Congress of Deputies to continue its legislative process as a Bill. The aim of re-establishing the CNE is to enhance the regulator's institutional capacity at a critical time for the energy transition. This move addresses the increasing demand for specialisation and efficiency due to the new energy and regulatory landscape. It also supports decarbonisation and the creation of new markets, such as hydrogen, thereby boosting economic competitiveness. This enhancement of the regulator's role is crucial for the development of hydrogen. As a result, the draft bill assigns it significant responsibilities, such as developing the remuneration and tariff frameworks.

<sup>16</sup> Enagás acts as the promoter of this project in consortium with other European TSOs.

In 2024, the procedures to establish the remuneration framework for the 2027-2032 period have commenced, including revising the following circulars. In 2025, the following circulars will be processed:

- Proposed Circular amending Circular 9/2019 of December 12, establishing the methodology for determining the remuneration of natural gas transmission and liquefied natural gas plants.
- Proposed Circular to establish the financial remuneration rate for regasification, transportation, technical system

management, and activities related to natural gas distribution for the 2027-2032 regulatory period, in line with Circular 2/2019.

- Proposed Circular to amend Circular 4/2020, of March 31, which sets out the remuneration methodology for natural gas distribution.
- Proposed Circular establishing the methodology for the calculation of tolls for transmission, local networks and regasification of natural gas.

# ENVIRONMENTAL INFORMATION



	European taxonomy for sustainable activities	72
<b>E1</b>	Climate change	88
<b>E2</b>	Pollution	111
<b>E3</b>	Water and marine resources	116
<b>E4</b>	Biodiversity and ecosystems	120
<b>E5</b>	Resource use and circular economy	129

# DISCLOSURE OF INFORMATION UNDER ARTICLE 8 OF REGULATION (EU) 2020/852 (TAXONOMY REGULATION)

In the framework of the EU Sustainable Finance Action Plan, the EU Taxonomy for Sustainable Activities was developed ([Regulation 2020/852](#) and associated legislation<sup>17</sup>). It aims to establish criteria for determining whether an activity is considered environmentally sustainable for the purpose of determining the degree of environmental sustainability of an investment and to facilitate the use of a common concept of socially sustainable investment by Member States and the European Union.

In the various associated Delegated Regulations, technical selection criteria have been established to determine the conditions under which an economic activity is considered to contribute substantially to environmental objectives: climate change mitigation, adaptation to climate change, sustainable use and protection of water and marine resources, transition to a circular economy, prevention and control of pollution, and protection and restoration of biodiversity and ecosystems.

In addition, the European Commission has published several communications on the interpretation of the legal provisions (FAQs) included in the delegated regulations, which have contributed to the interpretation of the implementing legislation. However, the current regulatory framework is under development, which implies a continuous review of the criteria and methodologies established by the company to respond to the established requirements.

## Eligibility and alignment concepts

An activity is considered eligible when it has the potential to substantially contribute to the corresponding environmental target, while an activity is considered aligned when it additionally meets the criteria of substantial contribution, do no significant harm (DNSH) and the minimum social safeguards set out in the taxonomy regulation, which ensure that the activity is carried out in compliance with characteristics that ensure a contribution to the environmental targets set by the European Union.

## Assessment of the eligibility of Enagás' activities

Since 2021, Enagás has been assessing the eligibility of its activities regarding the mitigation and adaptation to climate change targets. Since 2023, in line with the reporting requirements, Enagás also assesses the eligibility of its activities regarding the other four environmental targets.

As a result of this assessment, Enagás has identified eligible activities that have the potential to contribute to three of the environmental targets covered by the EU Taxonomy:

### Mitigation and climate change adaptation

They correspond to activities associated with the area of renewable gases: mainly the adaptation of infrastructure to be able to transport these renewable gases, to the construction of hydrogen transmission and distribution pipelines and hydrogen storage (see disclosure requirement [SBM-1](#) in chapter 2).

- **Activity 4.14 CCM. Transmission and distribution networks for renewable and low-carbon gases:** Enagás, an independent European TSO, is an international benchmark in the development and maintenance of gas infrastructures and the operation and management of gas networks. In addition, since December 2023, Enagás has been designated as Provisional Hydrogen Transmission Network Operator (HTNO) in Spain and in 2024 it has been authorised to provisionally exercise the functions of developing European Projects of Common Interest (PCI) for hydrogen networks.

For all these reasons, and in line with one of the growth drivers of the 2025-2030 Strategic Update, Enagás is working on the renewal of gas transmission and distribution infrastructures to promote the integration of hydrogen and other low-carbon gases and on the construction of new transmission and distribution networks for hydrogen and other low-carbon gases.

- **Activity 4.12 CCM. Storage of hydrogen:** Enagás has three underground natural gas storage facilities. In line with one of the growth drivers of the 2025-2030 Strategic Update, Enagás is currently working on the conversion of these infrastructures into hydrogen storage facilities and the construction of new facilities.
- **Activity 6.15 CCM. Infrastructure enabling road transport and public transport:** Enagás' subsidiary Scale Gas has a 700 bar HRS (Hydrogen Refuelling Station) with the capacity to supply hydrogen-powered electric vehicles in Madrid (Spain). This activity is eligible, as the hydrogen refuelling station is considered to be an infrastructure for the circulation of vehicles with zero CO<sub>2</sub> exhaust emissions.

<sup>17</sup>[Regulation \(EU\) 2021/2139](#). [Delegated Regulation \(EU\) 2021/2178](#). [Delegated Regulation \(EU\) 2022/1214](#). [Delegated Regulation \(EU\) 2023/2485](#) and [Delegated Regulation \(EU\) 2023/2486](#).

- Activity 4.1 CCM. Power generation using solar photovoltaic technology: Enagás considers eligible projects aimed at generating electricity through photovoltaic panels for self-consumption at some of its facilities, thus improving energy efficiency and reducing greenhouse gas emissions.
- Activity 3.10 CCM. Manufacture of hydrogen: Enagás considers as eligible the renewable hydrogen manufacture projects for self-consumption that it develops at some of its facilities, thus enabling the improvement of energy efficiency and the reduction of greenhouse gas emissions.
- Activity 7.3 CCM. Installation, maintenance and repair of energy efficient equipment: Enagás considers projects for the installation and replacement of energy-efficient light sources as eligible.
- Activity 7.4 CCM. Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings): Enagás considers projects to install charging stations for electric vehicles in its facilities' parking spaces to be eligible.
- Activity 8.1 CCM. Data processing, hosting and related activities: Enagás considers projects for the renovation of storage arrays at Enagás' data centres to be eligible.
- Activity 8.2 CCM. Data-driven solutions for GHG emissions reductions: Enagás considers the company's carbon footprint digitalisation and modelling project to be eligible as it is based on the collection, transmission and storage of data, as well as its modelling and use, which will enable the company to reduce its greenhouse gas emissions.

## Transition to a circular economy

- Activity 3.3 EC. Demolition and wrecking of buildings and other structures: Enagás holds that the project to seal off and permanently abandon the Castor underground gas storage wells is eligible, as it forms part of the above-mentioned underground storage dismantling project. All of the above is in accordance with the 'demolition of wells and boreholes' activity included in the description of the activity. Although this infrastructure does not form part of the Enagás Group, the Spanish Ministry for Ecological Transition and the Demographic Challenge appointed Enagás Transporte S.A.U. to carry out this activity<sup>18</sup>. The demolition of buildings at risk of collapse at our facilities is also eligible.

Once the eligible economic activities were identified, for each of them, the projects implemented during the year were identified.

## Assessment of the alignment of Enagás' activities

Enagás has analysed the alignment of its activities that contribute to the objective of climate change mitigation and those activities that also contribute to the objective of transition to a circular economy.

To assess alignment, it has been analysed whether eligible projects comply with the criteria of substantial contribution defined in the Delegated Regulation (EU) 2021/2139: technical selection criteria that do not cause significant harm to any of the other environmental objectives and comply with the established minimum social safeguards.

In order to assess compliance with the requirements set out by the Taxonomy, Enagás has assessed its existing policies, procedures and processes at a corporate level, as well as detailed documentation at project level.

In assessing the substantial contribution criteria of Taxonomy activities aligned with the climate change mitigation target:

- In the activities 4.14 CCM. Transmission and distribution networks for renewable and low-carbon gases and 4.12 CCM. Storage of hydrogen. Documents such as the technical reports of the projects have been assessed to ensure that the nature of the projects under consideration complies with the nature of the activity itself, which is the main requirement for assessing compliance.
- Activity 6.15 CCM. Infrastructure enabling road transport and public transport, part of the work of our subsidiary Scale Gas, also meets the criteria, as it is related to enabling hydrogen refuelling stations.
- Activity 4.1 CCM. Power generation using solar photovoltaic technology. It fulfils the criteria, as it is linked to the operation of solar panels to generate electricity for self-consumption.
- In relation to the projects associated with the activity 3.10 CCM. Manufacture of hydrogen. It should be noted that these consist of hydrogen production for self-consumption. For these projects, the EU Taxonomy regulations requires threshold requirements to ensure greenhouse gas emission reductions. Although Enagás has included requirements in the investment plan to ensure that the design of the hydrogen manufacturing process complies with the thresholds established by the technical criteria to ensure the reduction of greenhouse gas emissions, given that these have not yet been implemented, it is not possible to verify compliance with the technical criteria. Therefore, projects belonging to this activity are not considered to be aligned.

<sup>18</sup> Resolution of November 6, 2019, of the Secretary of State for Energy, publishing the Agreement of the Council of Ministers of October 31, 2019, which ends the hibernation of the 'Castor' underground storage facility.

agreeing to their dismantling and ordering the sealing and definitive abandonment of the wells.

- Activity 7.3 CCM. Installation, maintenance and repair of energy efficient equipment meets the requirements since the installed light sources are energy efficient according to the applicable regulations.
- Also, activity 7.4 CCM. Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings), meets the criteria as well, as it is linked to the installation of charging stations.
- In relation to the projects of activity 8.1 CCM. Data processing, hosting and related activities: it has not been possible to obtain independent third-party verification of whether the project to renovate the storage arrays at Enagás' data centres has applied all pertinent practices to comply with the technical selection criterion of substantial contribution to the mitigation of climate change. Therefore, the project pertaining to this activity is considered non-aligned.
- The project is eligible under Activity 8.2 CCM. Data-driven solutions for GHG emissions reductions. It is currently in a very early stage, so it has not yet been possible to verify if the solution has reduced greenhouse gas emissions. No independent third party has yet been asked to calculate and verify life-cycle greenhouse gas emissions.

In assessing the substantial contribution criteria of Taxonomy activities according to the transition to a circular economy target:

- According to Activity 3.3 CE. Demolition and wrecking of buildings and other structures: there is a demolition project for a building at risk of collapse at our facilities (at the Cartagena LNG regasification terminal). Although there was a waste management plan, a prior external audit was not carried out in accordance with the Construction and Demolition Waste Protocol in the EU, considering it non-aligned for not complying with the technical selection criterion mentioned above. Likewise, the project for the sealing and definitive abandonment of the Castor underground gas storage wells is still at a very early stage, with a waste management plan aligned with the technical selection criteria and in line with the fulfilment of the rest of the requirements in the next phases.

### Do no significant harm criteria (DNSH)

Compliance with the do no significant harm (DNSH) to the other objectives criteria is assessed below for eligible activities that meet the substantial contribution criteria:

- 4.14 CCM. Transmission and distribution networks for renewable and low-carbon gases:
  - Climate change adaptation: Enagás has a physical climate risk analysis for its current infrastructures. Where applicable, it also has control and management measures in place to mitigate these (for more information, see disclosure requirement IRO-1 in chapter E1).

For new construction projects, these are currently at a very early stage. However, Enagás is preparing initial project documents which already include specific analyses of the vulnerability of projects to climate-related hazards.

- Sustainable use and protection of water and marine resources and protection and restoration of biodiversity and ecosystems: existing facilities with significant environmental impacts have integrated environmental authorisations or environmental licences, in accordance with the environmental requirements set by the relevant authorities. In order to obtain these authorisations, Enagás carried out studies to assess potential impacts, establishing (where applicable) measures to avoid, mitigate and/or compensate for these negative impacts. In addition, in the event of significant modifications to existing facilities, the procedure provides for new impacts to be assessed and measures to be taken.

The company also has an ISO 14001 certified environmental management system and a natural capital and biodiversity management model.

For new construction projects, these are currently at a very early stage. However, Enagás is preparing initial project documents in which the projects' environmental impact is already being assessed. Corresponding Environmental Impact Assessments will be carried out in the coming years with more exhaustive assessments.

- Transition to a circular economy: not applicable.
- Pollution prevention and control: Enagás has an ISO 50001-certified Energy Management System and has established energy efficiency criteria in its equipment procurement requirements via their technical specifications.

This criterion is not yet applicable to new construction projects as it corresponds to criteria to be applied in the Detailed Engineering phase, at which point the equipment characteristics (including energy efficiency) will be assessed.

### • 4.12 CCM. Storage of hydrogen:

- Climate change adaptation: Enagás has a physical climate risk analysis for its current infrastructures. Where applicable, it also has control and management measures in place to mitigate these (for more information, see disclosure requirement IRO-1 in chapter E1).

For new construction projects, these are currently at a very early stage. However, Enagás is preparing Initial Project Documents which already include specific analyses of the vulnerability of projects to climate-related hazards.

- Sustainable use and protection of water and marine resources: not applicable.
- Transition to a circular economy: the company has an ISO 14001-certified environmental management system and takes specific actions in the field of circular economy. Likewise, each project has its own waste management plan. In addition, Enagás Transporte S.A.U obtained the 'Zero Waste' certification in accordance with AENOR's specific regulations, which recognises the company's progress in maximising the volume of waste recycled or recovered, as well as minimising the waste generated.
- Pollution prevention and control: this criterion is not yet applicable as it corresponds to criteria to be applied in later phases, such as the detailed engineering phase, where the control of risks inherent to major accidents involving hazardous materials will be assessed.
- Protection and restoration of biodiversity and ecosystems: current facilities with significant environmental impacts have integrated environmental authorisations or environmental licences, in accordance with the environmental requirements set by the relevant authorities. In order to obtain these authorisations, Enagás carried out studies to assess potential impacts, establishing (where applicable) measures to avoid, mitigate and/or compensate for these negative impacts. In addition, in the event of significant modifications to existing facilities, the procedure provides for new impacts to be assessed and measures to be taken.

The company also has an ISO 14001 certified environmental management system and a natural capital and biodiversity management model.

For new construction projects, these are currently at a very early stage. However, Enagás is preparing initial project documents in which the projects' environmental impact is already being assessed. Corresponding environmental impact assessments will be carried out in the coming years with more exhaustive assessments.

- 6.15 CCM. Infrastructure enabling road transport and public transport:
  - Climate change adaptation: Enagás has a physical climate risk analysis for its current infrastructures. Where applicable, it also has control and management measures in place to mitigate these (for more information, see disclosure requirement IRO-1 in chapter E1).
  - An environmental report was prepared during the installation phase of the hydrogen supply unit. It assessed the environmental impact on the sustainable use and protection of water and marine resources, the transition to a circular economy, pollution prevention and control, and the protection and recovery of biodiversity and ecosystems. The report also outlined the necessary corrective measures.

#### • 4.1 CCM. Power generation using solar photovoltaic technology:

- Climate change adaptation: Enagás has a physical climate risk analysis for its current infrastructures. Where applicable, it also has control and management measures in place to mitigate these (for more information, see disclosure requirement IRO-1 in chapter E1).
- Sustainable use and protection of water and marine resources: not applicable.
- Transition to a circular economy: in the power generation projects using solar photovoltaic technology at company facilities, equipment has been purchased whose technical specifications show that it meets the criteria of high durability and recyclability and that it is easy to dismantle and refurbish.
- Pollution prevention and control: not applicable.

- Protection and restoration of biodiversity and ecosystems: current facilities with significant environmental impacts have integrated environmental authorisations or environmental licences, in accordance with the environmental requirements set by the relevant authorities. In order to obtain these authorisations, Enagás carried out studies to assess potential impacts, establishing (where applicable) measures to avoid, mitigate and/or compensate for these negative impacts. In addition, in the event of significant modifications to existing facilities, the procedure provides for new impacts to be assessed and measures to be taken.

The company also has an ISO 14001 certified environmental management system and a natural capital and biodiversity management model.

#### • 7.3 CCM. Installation, maintenance and repair of energy efficient equipment:

- Climate change adaptation: Enagás has a physical climate risk analysis for its current infrastructures. Where applicable, it also has control and management measures in place to mitigate these (for more information, see disclosure requirement IRO-1 in chapter E1).
- Sustainable use and protection of water and marine resources: not applicable.
- Transition to a circular economy: not applicable.
- Pollution prevention and control: the light sources installed are certified as energy efficient.
- Protection and restoration of biodiversity and ecosystems: not applicable.

- 7.4 CCM. Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings):

- Climate change adaptation: Enagás has a physical climate risk analysis for its current infrastructures. Where applicable, it also has control and management measures in place to mitigate these (for more information, see disclosure requirement IRO-1 in chapter E1).
- Sustainable use and protection of water and marine resources: not applicable.
- Transition to a circular economy: not applicable.
- Pollution prevention and control: not applicable.
- Protection and restoration of biodiversity and ecosystems: not applicable.

- 3.3. EC. Demolition and wrecking of buildings and other structures:

In relation to the project to seal and definitively abandon the Castor underground gas storage wells, which meets the criteria for substantial contribution depending on the stage of the project:

- In terms of climate change mitigation, the removal of waste that contributes to climate change is not anticipated due to the nature of the installation, thereby complying with Regulation (EU) No. 517/2014 and Regulation (EU) No. 1005/2009.
- Climate change adaptation: Enagás has a physical climate risk analysis for its current infrastructures. Where applicable, it also has control and management measures in place to mitigate these (for more information, see disclosure requirement IRO-1 in chapter E1).
- Sustainable use and protection of water and marine resources, pollution prevention and control and protection and restoration of biodiversity and ecosystems: this project has an integrated environmental statement issued by the Spanish Government's Directorate General for Environmental Quality and Assessment, which establishes the actions to be implemented by Enagás to minimise, mitigate and/or avoid negative impacts on the indicated environmental aspects.

### Minimum safeguards

The Taxonomy Regulation requires the company to carry out its activities in compliance with minimum safeguards in terms of human rights, corruption prevention, proper tax management and respect for fair competition. The different mechanisms that the company has in place to ensure compliance with these requirements are set out below.

- Human rights: Enagás has a Human Rights Policy, which includes the necessary commitments to ensure human rights due diligence (see disclosure requirement S1-1 for more information). This policy commits to developing and maintaining a due diligence system aimed at anticipating, preventing, mitigating, and/or remedying negative impacts on people (both its own workforce and those in the value chain), the environment, and society.

Enagás also facilitates its employees, as well as its suppliers, contractors and those who collaborate with it or act on its behalf, including business partners, to resolve any doubts or to report any irregularities or breaches through the Whistleblowing Line ([canal.etico@enagas.es](mailto:canal.etico@enagas.es)) or any other means the company may set up in the future. The complainant receives updated information of the status of their report at all times (for more information on the Whistleblowing Line, see disclosure requirement G1-1).

Communications to the Line can be made anonymously and are handled confidentially. This means they cannot be disclosed to the user or any third party without the informant's consent, ensuring the protection of the whistleblower's identity. Enagás will not tolerate any form of retaliation against individuals who, in good faith, use the Whistleblowing Line to raise concerns or report potential breaches of the Code of Ethics or relevant regulations, nor against those who assist in investigations into alleged misconduct.

- Corruption: Enagás has a corporate Code of Ethics and various policies, all approved by the Board of Directors, related to business conduct issues (for more information, see disclosure requirement G1-1):
  - Enagás Group's Code of Ethics: establishes the conduct that is expected from all the professionals in the company, irrespective of their responsibilities and their geographic or functional location. It is structured in accordance with the company's values and includes Enagás' principles in matters related to each of its values.
  - Anti-Fraud, Corruption and Bribery Policy: this Policy reflects the vehement opposition to the committing of illicit or unlawful acts and its firm will to combat and prevent them, for the purpose of fulfilling its 'zero tolerance' principles. This policy is aligned with the United Nations Convention against Corruption.

In relation to the prevention and detection of corruption and bribery (for more information, see disclosure requirement G1-3), all of the company's activities have been assessed with respect to potential corruption risks. The company has a control framework in place to prevent and mitigate such risks, especially the risk of corruption in dealings with public officials or other third parties with which Enagás works. In this context, Enagás has established clear guidelines for action: to accurately record all payments to third parties and not to accept or make inappropriate payments, such as facilitation payments, payments in kind or commissions, or advantages or privileges of any kind for unethical purposes. These measures also contribute to the prevention of potentially more serious acts, such as money laundering. Of course, in order to avoid any appearance of money laundering, both the offer and the acceptance of payments in cash or equivalent are expressly prohibited. Enagás pays 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 non-cooperative jurisdictions under current Spanish tax law, payments from entities where it is not possible to identify the parties or the final beneficiaries, among others.

Enagás also collaborates with the authorities if they require help to investigate possible cases in the markets in which Enagás operates. It also provides the information they may request in a transparent manner.

The Enagás Corruption Prevention Programme is based on the ISO 37001 standard on anti-bribery management systems, and is laid out in the Enagás Anti-Fraud, Corruption and Bribery Policy, and the internal regulations which implement it.

- **Taxation:** Enagás adopts a focus of responsible tax practice based on prudence and aligned with the recommendations set out in the OECD Guidelines for Multinational Enterprises.

The Responsible Tax Practice Policy, approved by the Board of Directors, sets out the strategy and principles that must guide the conduct of all employees, senior managers and directors of Enagás, as well as third parties with whom the company has relationships.

Enagás adheres to the Code of Good Tax Practices, and presents a Fiscal Transparency Report in line with the company's commitment to tax transparency. The Board of Directors reviews and approves this report on an annual basis.

Moreover, in accordance with the public reporting commitments set out in the Fiscal Policy, the company publishes in this report the total tax contribution and the taxes paid in the different jurisdictions where the company operated through affiliates.

With regard to non-cooperative jurisdiction under current Spanish tax laws, and in accordance with the Fiscal Policy, Enagás does not use opaque structures in order to reduce its tax burden, nor does it carry out artificial operations not linked to its business activity to reduce taxation. Likewise, it will not make investments in or through territories classified as non-cooperative jurisdiction under current Spanish tax laws in order to reduce its tax burden. The Enagás Group does not currently have a presence or carry out any activities in territories classified as non-cooperative jurisdiction under current Spanish tax laws.

- **Fair competition:** as part of the company's Compliance Management System, Enagás has implemented an Antitrust Programme whose purpose is not only to avoid or reduce any possible administrative sanctions in this issue, but also to promote a corporate culture of ethics and compliance that respects the regulations that defend free competition. The pillars of the Antitrust Programme are:
  - The Antitrust Policy establishes the bases and mechanisms to promote a culture of business ethics that is conscious and respectful of the principles of free competition, and sets out the essential guidelines for corporate and employee behaviour in this regard.
  - The Antitrust General Standard describes in a structured manner the elements that Enagás has established for the prevention, detection and management of risks, in order to comply with the provisions of antitrust regulation and to achieve the company's strategic and operational goals and objectives where Compliance is concerned.

This Standard is aligned with the recommendations in this area of the National Commission on Markets and Competition. To this end, the main purpose of the Standard is to structure an environment of prevention, detection and early management of antitrust risks, as well as to reduce any undesired effects in the event that they do materialise, contributing to the creation of a culture of ethics and respect for the law among all professionals in all applicable areas, so that all can reflect it in their daily conduct.

In 2023, Enagás approved a guide to best practices in antitrust matters. This has been made available to all professionals; it enables them to prevent, detect and react in a timely manner to conduct likely to be anti-competitive or generate liability for the company in its relations with other economic operators and/or affect its reputation. In addition, antitrust training courses have been held for those employees considered to be at a higher risk in this area.

## Calculation of key performance indicators

The identification of the key performance indicators for the projects associated with the taxonomic activities has been carried out after the closure of the annual accounting consolidation. Projects have been identified for accounting purposes by project code, thus eliminating the potential risk of double counting. In the analysis of the Enagás Group's key indicators 'Total (A+B)', transactions between Enagás Group companies have not been considered.

Based on the organisation's existing formal accounting and consolidation procedures, the different economic indicators detailed in the Taxonomy Regulation have been calculated and prepared, taking into account the considerations detailed below.

As for the denominator, the following information relates to eligibility and alignment.

- **Turnover:** revenues from regulated and non-regulated activities and other operating revenues of the Enagás Group (See '[Note 2.1.a. Operating profit, Income](#)' of the Consolidated Annual Accounts).
- **CapEx:** investments in material and intangible fixed assets of the Enagás Group, discounting the effect of the IFRS16 accounting regulations (sum of the additions of material fixed assets in '[Note 2.4. Property, plant and equipment, Supplementary information on IFRS16](#)' and additions of intangible fixed assets in '[Note 2.5. Intangible fixed assets](#)', discounting the additions by IFRS16 of '[Note 2.4. Property, plant and equipment, Supplementary information on IFRS16](#)' in the Consolidated Annual Accounts). No business combinations have taken place in the last three financial years.

- **OpEx:** non-capitalised direct costs that relate to research and development, building renovation measures, short-term leases, maintenance and repairs and other direct expenses related to the day-to-day maintenance of property, plant and equipment assets by the company or a third party to whom activities are outsourced and that are necessary to ensure the continued effective operation of such assets. Wages and salaries of personnel involved in the maintenance of the facilities related to the identified activities have not been included as it is not possible to separate them at the accounting level.

Regarding the numerator:

- **Eligible and aligned:** information related to projects that conform with the description of activities included in the taxonomy and comply with substantial contribution criteria, principles of no significant harm to other objectives (DNSH) and minimum social safeguards:
  - **Turnover:** revenues from regulated and non-regulated activities and other operating revenues associated with economic activities that conform to the taxonomy.
  - **CapEx:** all allocations during the year to identified project assets associated with economic activities that conform to the taxonomy and those investments that are part of a plan to expand economic activities that conform to the taxonomy or to enable taxonomy-eligible economic activities to conform to the taxonomy. All this without taking into account amortisation, depreciation or value adjustments. CapEx is the consolidation of the investments allocated to the projects assessed; it is determined using the company's accounting systems, reflecting the amounts recorded in the investment work orders for the goods and services needed for the projects to achieve their full scope<sup>19</sup>.
  - **OpEx:** includes operating expenses associated with economic activities that conform to the taxonomy, specifically research and development and maintenance expenses. OpEx is the consolidation of operating expenses that meet the criteria set out in applicable regulations, allocated to the projects analysed, and is determined using the company's accounting systems to reflect the amounts recorded in the work orders.

The criteria applied for each activity are detailed below:

- **Activity 4.14 CCM. Transmission and distribution networks for renewable and low-carbon gases:**
  - **Turnover:** this includes revenues generated from the transmission of hydrogen and other low-carbon gases are allocated here. For 2024, revenues from biomethane connection studies at Enagás Transporte S.A.U. are included.

- **CapEx:** this includes additions to assets related to the renewal of gas transmission and distribution infrastructures to facilitate the integration of hydrogen (including the necessary auxiliary equipment) and other low-carbon gases and the construction of new transmission and distribution networks for hydrogen or other low-carbon gases by the companies Enagás Transporte S.A.U., Enagás S.A., Enagás Infraestructuras de Hidrógeno, S.L. and Enagás Transporte del Norte S.L. It also includes investment in the studies and research required to adapt the infrastructures.

In line with the taxonomy, for those investments related to the replacement of auxiliary equipment to support hydrogen transmission, only the proportional volume of the investment that is related to the transmission capacity of hydrogen and low-carbon gases is considered.

In relation to projects for the construction of new hydrogen transmission networks, Enagás has an investment plan for 2030 in line with its strategy, and has therefore considered investment in these assets despite their initial nature, as they will be aligned by then.

- **OpEx:** this includes research and development expenses related to the activities of Enagás Transporte, S.A.U.
- **Activity 4.12 CCM. Storage of hydrogen:**
  - **Turnover:** this includes revenues generated from hydrogen storage. There is no income from this activity in 2024, as it has not yet started.
  - **CapEx:** this includes additions to assets related to the conversion of these infrastructures into hydrogen storage facilities and the construction of other hydrogen storage facilities of Enagás Transporte S.A.U. Investment in studies and research necessary for the development of the activity is also included.

In line with the taxonomy, for those investments related to the retrofitting of auxiliary equipment to support hydrogen storage, only the proportional volume of the investment that is related to the storage capacity of hydrogen and low-carbon gases is considered.

- **OpEx:** there were no operating expenses associated with this activity during 2024.

<sup>19</sup> To calculate CapEx in the 2023 report, the figure obtained in the forecast amount for year N-1 was reduced; it was then increased in the investment forecast for year N, if applicable and provided for. In 2024, in order to ensure consistency in the calculation methodology for the key performance indicators of the Taxonomy Regulation and the CapEx indicator in the financial statements, forecasts were no longer taken into account. As a result of this change, the information for the previous year has been recalculated: Indicator: 2023 CapEx: A.1 Environmentally sustainable activities (conforming to the taxonomy): Activity 4.14 Transmission and distribution networks for renewable and low-carbon gases: 3,506,484 euros, revised figure for comparison:

3,538,518 euros; Activity 4.12 Storage of hydrogen: figure reported in the previous year: 1,186,401 euros, revised figure for comparison: 1,469,452 euros; Activity 4.1 Power generation using solar photovoltaic technology: figure reported in the previous year: 908,974 euros, revised figure for comparison: 890,1662 euros; Activity 7.4 Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings); figure reported in the previous year: 115,781 euros, revised figure for comparison: 49,887 euros.

◦ Activity 6.15 CCM. Infrastructure enabling road transport and public transport:

- Turnover: revenue generated by the HRS (Hydrogen Refuelling Station) of the company Scale Gas Solutions, S.L.<sup>20</sup> is allocated here. This corresponds to the invoicing issued to customers under existing contracts.
- OpEx: there were no additions to assets associated with this activity during 2024.
- OpEx: this includes HRS operating expenses. The following items are included: repairs, maintenance and spare parts.

◦ Activity 4.1 CCM. Power generation using solar photovoltaic technology:

- Turnover: the electricity generated is self-consumed at the company's facilities, and there is no income from this activity.
- CapEx: this includes additions in assets related to solar photovoltaic technology that enable power generation by the companies Enagás Transporte S.A.U. and Efficiency for LNG Applications, S.L.
- OpEx: this includes operating expenses associated with the maintenance and repair of photovoltaic power generation assets.

◦ Activity 7.4 CCM. Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings):

- Turnover: the charging service for electric vehicles is for the company's vehicle fleet and for employees' vehicles, and there is no income from this activity.
- CapEx: this includes additions to assets related to the installation of charging stations at Enagás Transporte S.A.U. facilities.
- OpEx: this includes operating expenses associated with the maintenance and repair of charging stations for electric vehicles. There were no operating expenses associated with this activity during 2024.

◦ Activity 7.3 CCM. Installation, maintenance and repair of energy efficient equipment:

- Turnover: this project involves installing energy-efficient lighting in our facilities, with no income generated from this activity.
- CapEx: this includes additions to assets related to the installation of lighting sources by Enagás Transporte S.A.U.
- OpEx: this includes the operating costs related to the installation of these lighting sources. There were no operating expenses associated with this activity during 2024.

◦ Activity 3.3 EC. Demolition and wrecking of buildings and other structures:

In relation to the project for the sealing and definitive abandonment of the Castor underground gas storage wells:

- Turnover: Given the nature of the project, this is the allocation of the expense incurred in the year (OpEx without considering taxonomy criteria) applying an industrial margin.
- CapEx: given the nature of the project, there are no additions to related assets.
- OpEx: operating expenses for the sealing and definitive abandonment of the Castor underground gas storage wells of Enagás Transporte S.A.U., mainly dismantling work.

• Eligible and non-aligned: information relating to projects that fit the description of the activities included in the taxonomy, but after assessment are deemed not to comply with the criteria of substantial contribution or the principles of do no significant harm (DNSH) to other goals.

◦ Activity 3.10 CCM. Manufacture of hydrogen: as these are projects in development that have not yet been launched, it is not possible to verify their technical requirements; consequently, compliance with the established thresholds cannot be guaranteed. Therefore, all projects are considered eligible but non-aligned.

- Turnover: the renewable hydrogen generated will be self-consumed at the company's facilities, and there is no income from this activity.
- CapEx: this includes additions in assets related to the renewable hydrogen production activity for self-consumption.
- OpEx: this includes operating expenses associated with the maintenance and repair of the renewable hydrogen production assets. There were no operating expenses associated with this activity during 2024.

◦ Activity 8.1 CCM. Data processing, hosting and related activities: it has not been possible to obtain independent third-party verification of whether the project to renovate the storage arrays at Enagás' data centres has applied all pertinent practices to comply with the technical selection criterion of substantial contribution to the mitigation of climate change. Therefore, the project pertaining to this activity is considered non-aligned.

- Turnover: as this is an internal data centre, there is no revenue from this activity.
- CapEx: this includes additions to assets related to the refurbishment of storage arrays at Enagás' data centres.
- OpEx: this includes operating expenses of the activity associated with the storage of data using data centres.

<sup>20</sup> In line with the provisions of disclosure requirement BP-1 on the scope of financial and non-financial information, the financial information of this company is included.

There were no operating expenses associated with this activity during 2024.

- Activity 8.2 CCM. Data-driven solutions for GHG emissions reductions: given the early stage of the project, it has not yet been possible to verify whether the solution has reduced greenhouse gas emissions or to have an independent third party calculate and verify life cycle greenhouse gas emissions. Therefore, the project pertaining to this activity is considered non-aligned.
  - Turnover: as this is a data-driven solution for internal use, there is no revenue from this activity.
  - CapEx: includes costs associated with the development of data-driven solutions.
  - OpEx: this includes operating expenses for the development of the solution. There were no operating expenses associated with this activity during 2024.

- Activity 3.3 EC. Demolition and wrecking of buildings and other structures:

In relation to the project to demolish a building at the Enagás facilities at risk of collapse:

- Turnover: this involves the demolition of a building at the facilities of Enagás Transporte SAU. No income is derived from this activity.
- CapEx: additions to assets related to the demolition project.
- OpEx: there were no operating expenses associated with this project during 2024.

Details of the key performance indicators in the framework of the European Taxonomy for Sustainable Activities are given below.

Absolute turnover

Fiscal year 2024	Year		Substantial contribution criteria								No significant harm criteria ('Does not cause significant harm')												
Economic activities	Code(s) <sup>(1)</sup>	Absolute turnover	Proportion of turnover	Climate change mitigation	Climate change adaptation	Water and marine	Pollution	Circular economy	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity and ecosystems	Minimum safeguards	Proportion of taxonomy-aligned (A.1) or -eligible (A.2) turnover, year 2023	Category (enabling activity)	Category (transitional activity)				
Text		Currency (€)	%	Y; N;	Y; N;	Y; N;	Y; N;	Y; N;	Y; N;	(Y/N)	(Y/N)	(Y/N)	(Y/N)	(Y/N)	(Y/N)	(Y/N)	%	F	T				
A. TAXONOMY-ELIGIBLE ACTIVITIES																							
A.1 Environmentally sustainable activities (Taxonomy-aligned)																							
Power generation using solar photovoltaic technology	4.1 CCM	0	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%						
Storage of hydrogen	4.12	0	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	F					
Transmission and distribution networks for renewable and low-carbon gases	4.14	60,000	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%						
Infrastructure enabling road transport and public transport	6.15 CCM	119,613	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	F					
Installation, maintenance and repair of energy efficient equipment	7.3 CCM	0	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	F					
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	7.4 CCM	0	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	F					
Demolition and wrecking of buildings and other structures	3.3 CE	15,252,977	1.7%	N/EL	N/EL	N/EL	N/EL	EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%						
Turnover of environmentally sustainable activities		15,432,590	1.7%	0.0%	0.0%	0.0%	0.0%	1.7%	0.0%	Y	Y	Y	Y	Y	Y	Y	0.01%						
(Taxonomy-aligned) (A.1)																							
Of which: facilitators		119,613	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	Y	Y	Y	Y	Y	Y	Y	100%	F					
Of which: transitional		0	0.0%	0.0%						Y	Y	Y	Y	Y	Y	Y	0.0%		T				
A.2. Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																							
Manufacture of hydrogen	3.10 CCM / 3.10 CCA	0	0.0%	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL														
Power generation using solar photovoltaic technology	4.1 CCM / 4.1 CCA	0	0.0%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%						
Data processing, hosting and related activities	8.1 CCM / 8.1 CCA	0	0.0%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%						
Data-driven solutions for GHG emissions reductions	8.2 CCM / 8.2 CCA	0	0.0%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%						
Demolition and wrecking of buildings and other structures	3.3 CE	0	0.0%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.0%						
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%								0.0%						
A. Turnover of Taxonomy-eligible activities		15,432,590	1.7%	1.7%	0.0%	0.0%	0.0%	0.0%	0.0%								0.01%						
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																							
Turnover of Taxonomy non-eligible activities (B)		897,785,410	98.3%																				
Total		913,218,000	100.0%																				

Turnover ratio / total turnover

(1)	which conforms to the taxonomy by target	eligible according to taxonomy by target
CCM	0.0%	0.0%
CCA	0.0%	0.0%
WTR	0.0%	0.0%
EC	1.7%	1.7%
PPC	0.0%	0.0%
BIO	0.0%	0.0%

(1) The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the section number of the activity in the relevant Appendix covering the objective, i.e.:

- Climate change mitigation: CCM
- Climate change adaptation: CCA
- Water and marine resources: WTR
- Circular economy: EC
- Pollution prevention and control: PPC
- Biodiversity and ecosystems: BIO

CapEx

Fiscal year 2024				Year		Substantial contribution criteria					No significant harm criteria ("Does not cause significant harm")									
Economic activities	Code(s) <sup>(1)</sup>	Absolute CapEx	Proportion of CapEx	Climate change mitigation	Climate change adaptation	Water and marine	Pollution	Circular economy	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine	Pollution	Circular economy	Biodiversity and ecosystems	Minimum safeguards	Proportion of taxonomy-aligned (A.1) or -eligible (A.2) CapEx, year 2023	Category (enabling activity)	Category (transitional activity)	
		Currency (€)	%	Y; N;	Y; N;	Y; N;	Y; N;	Y; N;	Y; N;	(Y/N)	(Y/N)	(Y/N)	(Y/N)	(Y/N)	(Y/N)	(Y/N)	%	F	T	
A. TAXONOMY-ELIGIBLE ACTIVITIES																				
A.1 Environmentally sustainable activities (Taxonomy-aligned)																				
Power generation using solar photovoltaic technology	4.1 CCM	275,199	0.3%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.6%			
Storage of hydrogen	4.12	495,864	0.6%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.9%	F		
Transmission and distribution networks for renewable and low-carbon gases	4.14	4,905,888	5.9%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	2.3%			
Infrastructure enabling road transport and public transport	6.15 CCM	0	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	F		
Installation, maintenance and repair of energy efficient equipment	7.3 CCM	54,412	0.1%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	F		
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	7.4 CCM	73,076	0.1%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	F		
Demolition and wrecking of buildings and other structures	3.3 CE	0	0.0%	N/EL	N/EL	N/EL	N/EL	EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%			
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		5,804,438	7.0%	7.0%	0.0%	0.0%	0.0%	0.0%	0.0%	Y	Y	Y	Y	Y	Y	Y	3.8%			
Of which: facilitators		623,352	0.8%	0.8%	0.0%	0.0%	0.0%	0.0%	0.0%	Y	Y	Y	Y	Y	Y	Y	25.6%	F		
Of which: transitional		0	0.0%	0.0%						Y	Y	Y	Y	Y	Y	Y	0.0%		T	
A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																				
				N/EL	N/EL	N/EL	N/EL	N/EL	N/EL											
Manufacture of hydrogen	3.10 CCM / 3.10 CCA	3,372	0.0%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.5%			
Power generation using solar photovoltaic technology	4.1 CCM / 4.1 CCA	0	0.0%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.5%			
Data processing, hosting and related activities	8.1 CCM / 8.1 CCA	194,309	0.2%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.3%			
Data-driven solutions for GHG emissions reductions	8.2 CCM / 8.2 CCA	74,914	0.1%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%			
Demolition and wrecking of buildings and other structures	3.3 CE	28,213	0.0%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.0%			
CapEx from activities eligible according to the taxonomy but not environmentally sustainable (activities that do not conform with the taxonomy) (A.2)		300,807	0.4%	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%								1.3%			
A. CapEx of taxonomy-eligible activities (A.1+A.2)		6,105,246	7.4%	7.4%	0.0%	0.0%	0.0%	0.0%	0.0%								5.1%			
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																				
CapEx from ineligible activities according to taxonomy (B)		76,446,755	92.6%																	
Total		82,552,000	100.0%																	

CapEx ratio /Total CapEx

(1)	which conforms to the taxonomy by target	eligible according to taxonomy by target
CCM	7.0%	7.4%
CCA	0.0%	0.4%
WTR	0.0%	0.0%
EC	0.0%	0.0%
PPC	0.0%	0.0%
BIO	0.0%	0.0%

(1) The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the section number of the activity in the relevant Appendix covering the objective, i.e.:

- Climate change mitigation: CCM
- Climate change adaptation: CCA
- Water and marine resources: WTR
- Circular economy: EC
- Pollution prevention and control: PPC
- Biodiversity and ecosystems: BIO

OpEx

Fiscal year 2024				Year							Substantial contribution criteria							No significant harm criteria ('Does not cause significant harm')								
Economic activities				Code(s) <sup>(1)</sup>	OpEx	Proportion of OpEx	Climate change mitigation	Climate change adaptation	Water and marine	Pollution	Circular economy	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine	Pollution	Circular economy	Biodiversity and ecosystems	Minimum safeguards	Proportion of taxonomy-aligned (A.1) or -eligible (A.2) OpEx, year 2023	Category (enabling activity) / Category (transitional activity)					
																					Currency (€)	%	Y; N;	Y; N;	Y; N;	Y; N;
A. TAXONOMY-ELIGIBLE ACTIVITIES																										
A.1 Environmentally sustainable activities (Taxonomy-aligned)																										
Power generation using solar photovoltaic technology	4.1 CCM	4,398	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%									
Storage of hydrogen	4.12 CCM	0	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	F								
Transmission and distribution networks for renewable and low-carbon gases	4.14 CCM	1,348,615	1.9%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.1%									
Infrastructure enabling road transport and public transport	6.15 CCM	41,907	0.1%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.1%	F								
Installation, maintenance and repair of energy efficient equipment	7.3 CCM	0	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	F								
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	7.4 CCM	0	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	F								
Demolition and wrecking of buildings and other structures	3.3 CE	3,540,237	5.0%	N/EL	N/EL	N/EL	N/EL	EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%									
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		4,935,157	7.0%	2.0%	0.0%	0.0%	0.0%	5.0%	0.0%	Y	Y	Y	Y	Y	Y	Y	0.2%									
Of which: facilitators		41,907	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	Y	Y	Y	Y	Y	Y	Y	50.4%	F								
Of which: transitional		0	0.0%	0.0%						Y	Y	Y	Y	Y	Y	Y	0.0%		T							
A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																										
				N/EL	N/EL	N/EL	N/EL	N/EL	N/EL																	
Manufacture of hydrogen	3.10 CCM / 3.10 CCA	0	0.0%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%									
Power generation using solar photovoltaic technology	4.1 CCM / 4.1 CCA	0	0.0%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%									
Data processing, hosting and related activities	8.1 CCM / 8.1 CCA	0	0.0%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%									
Data-driven solutions for GHG emissions reductions	8.2 CCM / 8.2 CCA	0	0.0%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%									
Demolition and wrecking of buildings and other structures	3.3 CE	0	0.0%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.1%									
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		0	0.0%	0.0 %	0.0 %	0.0 %	0.0 %	0.0 %	0.0 %								0.1 %									
A. OpEx of taxonomy-eligible activities (A.1+A.2)		4,935,157	7.0%	2.0%	0.0%	0.0%	0.0%	5.0%	0.0%								0.3 %									
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																										
OpEx of non-eligible activities (B)		65,454,694	93.0%																							
Total		70,389,851	100.0%																							

OpEx ratio/Total OpEx

(1)	which conforms to the taxonomy by target	eligible according to taxonomy by target
CCM	2.0%	2.0%
CCA	0.0%	0.0%
WTR	0.0%	0.0%
EC	5.0%	5.0%
PPC	0.0%	0.0%
BIO	0.0%	0.0%

(1) The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the section number of the activity in the relevant Appendix covering the objective, i.e.:

- Climate change mitigation: CCM
- Climate change adaptation: CCA
- Water and marine resources: WTR
- Circular economy: EC
- Pollution prevention and control: PPC
- Biodiversity and ecosystems: BIO

The increase in eligible and aligned CapEx under the taxonomy (7.0% in 2024 compared to 3.7% in 2023) reflects the progress made by the company in line with the 2025-2030 Strategic Update. It also indicates its potential to contribute to climate change mitigation objectives by transforming its activities to align with the taxonomy. The investments included in the 2025-2030 Strategic Update envisage that 83% of these investments by 2030 (3.35 billion euros) will be eligible, as they belong to activities defined by the EU Taxonomy Regulation as contributing to the environmental objective of climate change mitigation. These eligible investments include those associated with hydrogen infrastructure, biomethane connections, renovation of infrastructure to carry hydrogen and CO<sub>2</sub> transmission, among others.

Currently, the economic activities covered by the Delegated Regulation (EU) 2022/1214 of the Commission, of March 9, 2022, are not included in the Enagás business model.

### Activities specified in the Delegated Regulation (EU) 2022/1214 of the Commission of March 9, 2022

Nuclear energy related activities	Enagás activity
The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No
The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No
Fossil gas related activities	Enagás activity
The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	No
The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	No
The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	No

## Control measures established by Enagás in the framework of the EU Taxonomy Report

In order to meet all the reporting requirements defined in the Taxonomy Regulation, Enagás has an environmental taxonomy reporting procedure which sets out a methodology for preparing the annual eligibility and alignment exercise through the collection of the necessary information. In this process, and in order to ensure compliance with the disclosure standards, the financial area is mainly involved in extracting the financial information and ensuring its equivalence with the Consolidated Annual Accounts. The infrastructure and sustainability areas are mainly involved in identifying projects and assessing their compliance with the Taxonomy Regulation requirements.

In addition, the Control System for Sustainability Information (for more information see disclosure requirement GOV-5) covers the reporting cycles for the key performance indicators required by the Taxonomy Regulation that are most relevant to Enagás (CapEx and OpEx). This entails assigning responsibilities in the calculation and reporting of indicators, as well as defining and implementing controls that improve the segregation of duties and reduce the risk of completeness and accuracy of information as well as the risk of non-compliance with regulations.

# E1. CLIMATE CHANGE

## Governance

### GOV-3

### Integration of sustainability-related performance in incentive schemes

At Enagás there is a governance structure led by the Board of Directors that supervises the company's climate change performance. The Board of Directors is informed on a quarterly basis about the risk control processes, where climate change risks and opportunities are integrated. The Sustainability and Appointments Committee, through the Sustainability Committee, approves and monitors the CO<sub>2</sub> emissions reduction targets linked to variable remuneration as well as initiatives that help achieve said reduction that are included in the Energy Efficiency and Emissions Reduction Plan. Furthermore, the Audit and Compliance Committee supervises the efficiency of risk control and management systems and assesses the possible impact of climate change. The Executive Committee establishes the overall risk management strategy and global limits for the company, and also reviews the level of risk exposure and corrective actions.

The Sustainability Committee is made up of the company's main General Managements, including the Energy Transition General Management. This General Management presides over the functions of Sustainability and Climate Action, Strategy and National and International Regulation, areas that provide the input for the definition of the decarbonisation strategy, as well as the identification of risks and opportunities derived from climate change.

The Health and Safety, Environment and Quality Committee periodically assesses and manages issues related to climate change associated with business processes, impact assessment studies and the evaluation of environmental aspects.

There are also various working groups reporting to these committees, such as the Energy Efficiency and Emissions Reduction Group, responsible for drafting and monitoring the Energy Efficiency Plan and setting the company's emissions reduction targets, among other matters.

The aim is to achieve Net Zero by 2040 for scopes 1 and 2, and by 2050 for scope 3. To this end, it has outlined a decarbonisation pathway with emission reduction targets by 2030 and 2040, and additionally by 2050 for scope 3, aligned with the 1.5°C temperature increase scenario.

In line with this commitment, Enagás has set annual targets related to climate change and the energy transition. These are included in the annual target management programme and are therefore linked to variable remuneration (for more information, see disclosure requirement GOV-2 in chapter 2). These targets account for 20% of Enagás' variable remuneration and are broken down along the following lines:

- Total greenhouse gas emission reductions (Scopes 1 and 2).
- Reduction of methane emissions.
- Proposal of actions and investments to boost the Energy Transition framework (H2med, Hydrogen backbone, etc.).
- Future business development: CO<sub>2</sub> and other renewable molecules.
- Incorporation of technologies and knowledge to develop new businesses (HTNO, CO<sub>2</sub>, NH<sub>3</sub>, etc.).

Moreover, Enagás has a Long-Term Incentive Plan (ILP) in place, requiring the fulfilment of targets aligned with strategic priorities, thus linking remuneration to the commitment to long-term management (for more information see disclosure requirement GOV-3). Specifically, 12% of this Long-Term Incentive target is linked to climate-related considerations:

- Reduction of CO<sub>2</sub> emissions in line with the decarbonisation pathway (emissions 2024 vs. emissions 2021).
- Investment in renewable gases: investment and associated studies regarding the adaptation of infrastructures for the transmission of renewable gases and development of infrastructures dedicated to the transmission and storage of renewable gases

# Strategy

E1-1

## Transition plan for climate change mitigation

The company's 2025-2030 Strategic Update (for more information, see disclosure requirement SBM-1 in chapter 2) comprises Enagás' transition plan to mitigate climate change. It has been approved by the Board of Directors. This plan sets out the investments and actions needed to ensure the goal of Net Zero by 2040 for Scope 1 and 2 and by 2050 for Scope 3. These targets have been set based on the cross-sector methodology of the Science-Based Targets initiative (SBTi)<sup>21</sup>.

This strategy has a clear purpose: to contribute to security of supply and decarbonisation, creating value, working towards sustainable and profitable growth and focusing on Spain and Europe. Therefore, the climate change mitigation actions that the company plans to carry out involve highlighting the value of gas infrastructures and accelerating the deployment of renewable gases, leveraging existing infrastructures. Enagás' goal with this Plan is to become the leading TSO and HNO in Europe<sup>22</sup>.

Enagás maintains a policy of liquidity and financial planning with the capacity to adapt to new investments in the hydrogen network. It also has proven access to capital markets, as well as bank and institutional financing.

There are essentially two main courses of action to mitigate climate change: decarbonisation of the energy sector and decarbonisation of own operations.

### Decarbonisation of the energy sector

Enagás prioritises the development of hydrogen infrastructure as a key axis for contributing to security of supply and decarbonisation. The company has set up the subsidiary Enagás Infraestructuras de Hidrógeno S.L.U. to separate its work as a natural gas transmission system operator (TSO) from its work as the same for hydrogen, in compliance with national and European law and plans.

These activities are eligible under Regulation 2020/852 on the establishment of a framework to facilitate sustainable investment (hydrogen transmission, storage of hydrogen, CO<sub>2</sub> transmission, etc.), because of their contribution to the climate change mitigation objective. For further details, see 'Disclosure of information under Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)'.

Enagás plans to invest 3.125 billion euros in hydrogen infrastructure, including underground storage facilities and a hydrogen network.

Among the key development areas is a focus on other molecules related to the energy transition, such as carbon dioxide and ammonia. This strategy builds on our capabilities and assets and aligns with our vision to adapt regasification plants into multi-molecule terminals.

In 2024, Enagás has allocated 7.0% of its CapEx (over 5.8 million euros) and 2.5% of its OpEx (nearly 1.7 million euros) to activities that support the climate change mitigation target and are taxonomy-aligned. For more information, see the '[Disclosure of information under Article 8 of Regulation \(EU\) 2020/852 \(Taxonomy Regulation\)](#)' section. However, it is estimated that in 2024, Enagás has allocated a gross CapEx of 87 million euros to activities related to natural gas<sup>23</sup>.

The 2025-2030 Strategic Update envisage that 83% of planned investments by 2030 (3.365 billion euros) will be eligible, as they belong to activities defined by the EU Taxonomy Regulation as contributing to the environmental objective of climate change mitigation. These eligible investments include, in addition to those associated with hydrogen infrastructure, biomethane connections and the necessary infrastructure for the development of CO<sub>2</sub> logistics, among others.

### Decarbonisation of own operations

Enagás is committed to the decarbonisation of its own operations and its value chain. The company has established a decarbonisation pathway to reach Net Zero by 2040 for Scope 1 and 2 and by 2050 for Scope 3. These targets are based on a 1.5°C temperature increase scenario in line with the Paris Agreement. They are also linked to the company's overall performance (for more information, see disclosure requirement E1-4). To reach these objectives, Enagás has reviewed and updated its Plan for the electrification of turbocompressors at compressor stations and underground storage facilities, as well as establishing other emissions reduction actions (for more information, see disclosure requirement E1-3).

Enagás' most greenhouse gas-intensive assets are the turbocompressors in its compressor stations. We therefore plan to replace them with electrically driven compressors powered by electricity with guarantees of renewable origin. This electrification plan provides for the replacement of the turbocompressors with the highest expected usage by 2040 (approximate CapEx of 106 million euros by 2030), leaving 135,303 tonnes of CO<sub>2</sub>e as locked-

21 As of the preparation of this report, the Science Based Targets Initiative (SBTi) has not yet defined a methodology for the Oil & Gas sector that covers Enagás' activities (midstream), so these targets have not been validated by SBTi. However, Enagás incorporates the main recommendations of the Science Based Targets Initiative in the methodology for setting its targets. Once the methodology for Oil & Gas is approved, Enagás will ensure compliance to align with the goal of limiting global warming to 1.5°C, as established in the Paris Agreement.

22 Enagás is excluded from the EU Paris-aligned Benchmarks.

23 The estimate was made considering the gross additions of tangible and intangible assets of the companies with NACE codes corresponding to the Oil and Gas - Midstream and Downstream sectors, Energy Production and Utilities sector, and Oil and Gas - Upstream sector and services (for more information, see the SBM-1 disclosure requirement in Chapter 1) and subtracting the eligible asset additions according to the EU Taxonomy Regulation.

in emissions<sup>24</sup> by 2030, corresponding to Scope 1 and 2 emissions from assets whose electrification is not planned because their use is expected to decline. Enagás considered these locked-in emissions when establishing its 2030 decarbonisation pathway, with the aim of ensuring that they do not jeopardise our ability to reach the targets.

SBM-3

Material impacts, risks, and opportunities and their interaction with the strategy and business model

Enagás’ climate resilience analysis ranges from mitigation to adaptation, with a focus on decarbonisation and carbon neutrality, considering the risks and opportunities related to climate change in its own operations and value chain (affiliates, supply chain and customers). In addition, the transition plan for climate change mitigation - the 2025-2030 Strategic Update - integrates the physical and transitional risks arising from climate change, considering short, medium and long-term time horizons, as well as opportunities with adaptation and resilience criteria (for more information, see disclosure requirement E1-1) To this end, Enagás has taken into account all the assets and activities identified as being at risk in the establishment of the strategy. This includes a detailed assessment of each asset and activity, the identification of specific vulnerabilities and the implementation of appropriate mitigation measures.

The constant evolution of regulation, technology and stakeholder expectations - together with the inherent variability of the climate - presents a complex scenario with uncertainties. Our resilience analysis addresses this complexity through a flexible and adaptive strategy, enabling us to identify opportunities and manage risks in a constantly changing environment.

Enagás has conducted an analysis to determine the impacts, risks and opportunities, assessing which of these are materially relevant regarding climate change. For more information on this assessment in relation to climate change and its results, see disclosure requirements IRO-1 (in this chapter) and E1-9. The results of this analysis were integrated into the company's materiality assessment, as described in disclosure requirement IRO-1 in chapter 2. This analysis takes into account Enagás’ strategy and business model, covering all internal activities and the locations of the company's infrastructure. It also considers the upstream and downstream phases of the value chain.

Enagás maintains a policy of liquidity and financial planning with the capacity to adapt to new investments in the hydrogen network. It also has proven access to capital markets, as well as bank and institutional financing.

In terms of the ability to redeploy, upgrade or decommission existing assets, Enagás has made significant progress in the timing of renewable hydrogen as a key vector for decarbonisation. During the last quarter of 2024, the company applied for funding from the Connecting Europe Facility (CEF) to carry out studies for its Projects of Common Interest (PCI), which include the H2med corridor, the Spanish backbone and the two associated storage facilities. These projects reflect Enagás’ ability to adapt its portfolio of products and services to the new demands of the energy market.

In addition, Enagás invests in the training and professional development of its workforce to ensure that they are prepared to face the challenges of climate change and take advantage of the opportunities that arise. The company encourages participation in working groups and collaborative projects that enable employees to acquire new skills and knowledge relevant to the energy transition.

The material impacts, risks and opportunities identified from this analysis are outlined below: The mitigation actions and resources taken into account are detailed in disclosure requirement E1-3.

Table of impacts

Topic	Sub-topic	Impact	Nature
Climate action and energy efficiency	Climate change mitigation	High direct (scope 1) and indirect (scope 3) greenhouse gas emissions due to the company's own operations and those of its value chain.	Negative - Current
	Energy	Contribute to the transition of the energy model towards a more sustainable version by integrating renewable gases	Positive - Potential

24 There are no locked-in emissions corresponding to Scope 3.

## Table of risks and opportunities

Topic	Sub-topic	Risk / Opportunity	Nature
<b>Climate action and energy efficiency</b>	Climate change adaptation	Operational cost overruns due to natural disasters that damage the company's infrastructures or due to the adaptation of the company's infrastructures to the consequences of climate change, as the case may be.	Physical risk
		Reputational deterioration that may negatively impact the valuation of intangibles by stakeholders, due to loss of relevance in sustainability indices for not reaching the expected standard of climate management or due to climate change impacts.	Transition risk
		Failure to meet the announced carbon neutrality commitments due to the materialisation of the identified transition risk factors, among others	Transition risk
	Climate change mitigation	Worsening financing conditions / attraction of capital flows for the development of activities not aligned with the EU taxonomy of sustainable activities or similar	Transition risk
		The value of the assets is recovered with the current remuneration life; in the long term, there may be possible lower revenues for the company due to lower remuneration associated to the extension of the assets' useful life (Spain business)	Transition risk
		Hydrogen infrastructure development	Opportunity
		New logistics services that promote natural gas consumption	Opportunity
		Development of infrastructure for CO <sub>2</sub> transport and storage	Opportunity

Enagás has been provisionally appointed as the manager of the Spanish Hydrogen Backbone Network (provisional HTNO), with Enagás Infraestructuras de Hidrógeno S.L.U. authorised to temporarily carry out the development of European Projects of Common Interest for hydrogen networks. In these new activities, the company is evaluating the significance of climate change, as well as the potential impacts, risks (including physical and climate) and opportunities associated, during the initial conceptual phase before conducting an Environmental Impact Assessment (EIA).

# Management of impacts, risks, and opportunities

## IRO-1

### Description of the processes to identify and assess material impacts, risks, and opportunities related to climate

Enagás has conducted an analysis to determine the impacts, risks, and opportunities, assessing the materiality of these in relation to climate change. The results of this analysis were integrated into the company's materiality assessment, as described in disclosure requirement IRO-1 in chapter 2. This analysis takes into account Enagás' strategy and business model, covering all internal activities and the locations of the company's infrastructure. It also considers the upstream and downstream phases of the value chain.

This analysis is carried out on an annual basis in a working group in which the teams charged with the corporate management of Strategy, Risks and Finance, among others, are involved.

For more information on the impacts, risks and opportunities identified as material, see [disclosure requirement SBM-3](#) in this chapter.

### Analysis of climate-related risks

Enagás has identified current and potential sources of greenhouse gases from its own activities (all its facilities) and in its value chain (for more information, see disclosure requirement E1-6), assessing the associated actual and potential impacts on climate change.

### Climate-related risk analysis

At Enagás, the processes for identifying and assessing climate risks are integrated into the corporate risk control and management model, which ensures that the company's targets are met in a predictable manner and with a medium-moderate total risk profile. This model makes it possible to identify and quantify the risks likely to affect the company's performance, including those arising from climate change. These risks are framed within the company's risk taxonomy (basically, physical risks are 'operational and technological' risks and transition risks are 'strategic and business' risks). Quantifying these risks allows them to be integrated into the 2025-2030 Strategic Update and targets to be set in order to minimise risks and maximise opportunities.

To define the level of each of these risks, the impact and the expected probability of occurrence have been determined for the different time horizons.

### Risk assessment methodology

Enagás follows the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD) (for more information, see the Annex 'TCFD Content Index' of the Consolidated Management Report)<sup>25</sup> in its management of climate risks and has a methodology for their identification, prioritisation and economic quantification. In accordance with the classification provided by the TCFD standard, physical risks (extreme weather events, sea level rise) and transitional risks (regulatory, technological, market and reputational) are identified and assessed using the same RCP scenarios<sup>26</sup>.

The assessment methodology allows us to assess the probability of occurrence and financial impact of each different temperature scenario for the RCPs and time horizons considered: short term 2025 (aligned with the company's annual budget), medium term 2026-2030 (aligned with the company's 2025-2030 Strategic Update, regulatory period and the PNIEC) and long term beyond 2031 (aligned with European decarbonisation objectives and the PNIEC).

Measuring climate change-derived risks means estimating possible prospective climate and business scenarios that could eventually have a negative impact on the company's interests. 'Standard' methodologies are used for measurement according to the risk typology:

- Physical risks at all company sites are assessed by stochastic methods, using standard climate models (XDI tool, AEMET models) to evaluate exposure to climate factors related to temperature (e.g. fires), wind (e.g. extreme winds), water (e.g. river and coastal flooding) and solid mass (e.g. earth movements, extreme winds). This was done by conducting sensitivity analyses and stress tests on the most important RCP 4.5 and RCP 8.5 scenarios from the sixth report (AR6) of the Intergovernmental Panel on Climate Change (IPCC), for the short, medium and long time horizons (the latter, up to 2030 and 2050).
- Expert assessments are also available to evaluate the need for additional adaptation and prevention measures. This analysis is carried out using the specific geo-spatial coordinates of each facility. In particular, heat maps are used for some larger assets to determine critical points for each of the different threats that affect them<sup>27</sup>.
- Transition risks (technological, regulatory, market, reputational) are assessed using deterministic methods. For this purpose, the company's projections and its 2025-2030 Strategic Update are taken as a base scenario, against which sensitivity analysis are carried out based on the scenarios set out by the International Energy Agency (IEA) in its World Energy Outlook 2024 report (STEPS, APS and NZE). This analysis is completed with additional information on the relevant variables by business and geographical area for the short, medium and long time horizons (the latter to 2030). To assess these transition risks, the

<sup>25</sup> This link refers to unverified information within the framework of the review of the Non-Financial Information and Sustainability Information Statement.

<sup>26</sup> Representative Concentration Pathways (RCPs) that represent a theoretical projection of the greenhouse gas concentration trajectory adopted by the Intergovernmental Panel on Climate Change (IPCC).

<sup>27</sup> In some cases, such as extreme rainfall, there are certain limitations in the RCP scenario projections when providing annual average impacts and maximum impacts.

variables of magnitude, probability and duration have been considered.

Within these transition risks, it is worth highlighting the identification of a risk linked to assets whose useful lives will not be extended, given that they will not accompany the company in the long term in its transition towards carbon neutrality.

The physical and transition risks linked to climate change have a clear interconnection with other risks included in our Corporate Risk Map, as they either strongly influence other risks or are influenced by others. To follow up on this, there is an

interconnections map reflecting how uncertainty in the geopolitical context, the market and regulatory environment, or changes in European policies have a direct impact on physical and transition risks.

This methodology for analysing climate-related risks has also been used for preparing the information in section 'a) Information on the impact and management of climate change' in note 4.6 Other Information in the Consolidated Annual Accounts, ensuring information consistency in both documents.

Reference scenarios

IPCC physical scenarios	Transition scenarios (IEA/PNIEC)	Description
RCP 8.5	<ul style="list-style-type: none"><li>No change - Business as Usual (BAU).</li></ul>	<ul style="list-style-type: none"><li>Climate policies are not implemented.</li><li>Very significant increase in emissions.</li></ul>
RCP 6.0	<ul style="list-style-type: none"><li>On trend - Stated Policies Scenario (STEPS).</li><li>PNIEC baseline scenario.</li></ul>	<ul style="list-style-type: none"><li>Trend-aligned evolution of climate policies.</li><li>Emissions growth in excess of the Paris Agreement target.</li><li>Scenario compatible with an average temperature increase in the year 2100 of 2.7°C.</li></ul>
RCP 4.5	<ul style="list-style-type: none"><li>Advertised policies - Announced Pledges Scenarios (APS).</li></ul>	<ul style="list-style-type: none"><li>Significant policy changes, as needed to meet the Paris Agreement target.</li></ul>
RCP 2.6	<ul style="list-style-type: none"><li>Neutrality by 2050 (NZE 2050).</li><li>PNIEC target scenario.</li></ul>	<ul style="list-style-type: none"><li>The APS is compatible with an average temperature increase of 1.7°C, and Net Zero with an increase of 1.5°C by 2100.</li></ul>

Analysis of climate-related opportunities

In line with the European Union's energy sector decarbonisation policy, and framed within the company's 2025-2030 Strategic Update, Enagás has identified opportunities arising from climate change linked to changes in our business model and/or services offered in the short, medium and long terms. These opportunities have been assessed using viability, profitability, adaptation and resilience criteria, allowing identified risks to be mitigated by committing to the company's transformation and its contribution to the decarbonisation of the energy sector.

In line with the European Union's commitment to meeting its climate targets and the key role that renewable hydrogen plays in achieving them, Enagás' development of hydrogen transmission and storage infrastructure will be of vital importance in the development of the new hydrogen market. In addition, in line with our commitment to decarbonisation, Enagás has the opportunity to position itself in other midstream businesses associated with other molecules related to the energy transition (CO<sub>2</sub> and NH<sub>3</sub>). Enagás also promotes innovation and flexibility in its operations by exploring new technologies.

For this analysis, the reference climate scenarios indicated in the climate-related risk analysis were taken into account, as was alignment with the European Union's energy policies to accelerate the energy transition.

E1-2

Policies related to climate change mitigation and adaptation

Enagás has a [Climate Action Policy](#), also approved by the Board of Directors, which sets out key commitments in addressing climate change mitigation, climate change adaptation, energy efficiency, and the use of renewable energy sources. This policy includes the commitments necessary to guarantee due diligence in climate action, aimed at driving decarbonisation and thus contributing to the energy transition process. These commitments have been identified as relevant issues for Enagás, and include the following highlights:

- Drive decarbonisation beyond direct operations, addressing the value chain through:
  - Promoting the development of renewable gases and the development and adaptation of networks to transport them.
  - Collaborating with affiliates, the supply chain, customers and industry associations domestically and internationally.
- Integrating the physical and transition risks arising from climate change in short, medium and long term time horizons, as well as the opportunities, into the business strategy by building in appropriate assessment, management and mitigation mechanisms that take into account adaptation and resilience criteria.

- Establish a decarbonisation pathway towards Net Zero by 2040, including scope 1 and 2 emissions reduction targets, and by 2050 including scope 3 emissions reduction targets, aligned with the 1.5°C scenario.
- Include its targets in the short- and long-term variable remuneration incentive schemes for all company professionals covered by these schemes.
- Achieve Net Zero by 2040 for scope 1 and 2, and by 2050 for scope 3, by applying the greenhouse gas emissions mitigation hierarchy:
  - Prioritising energy savings and efficiency measures, as well as emission reduction measures with the greatest decarbonisation impact.
  - Increasing the use of renewable energy for self-consumption.
  - Offsetting residual emissions once the maximum reduction level is reached with available technology, giving preference to nature-based solutions.
- Calculating and verifying the carbon footprint regularly and ensuring maximum data reliability.
- Providing training and information to ensure that the Company's employees and third parties it interacts with are aware of and understand the obligations of the Climate Action Policy.
- Stepping up efforts to promote responsible climate and energy policies through participation in platforms, associations or forums, ensuring alignment of these activities to the Paris Agreement.

In 2024, this policy was updated to align the company's commitments with those required by the European Sustainability Reporting Standards developed by EFRAG, as well as with the best trends in the field.

This policy applies and is communicated to all employees and managers of all companies making up the Enagás Group, including any affiliates effectively controlled by it, within the limitations established in the regulations applicable. Consequently, it covers all activities of Enagás Group companies globally.

In affiliates where Enagás does not have effective control, it is recommended that their Boards promote principles aligned with this policy. The company also promotes the application of the policy's principles, wherever possible, to temporary joint ventures, joint ventures, and other similar partnerships or entities. The company also emphasises these principles and commitments with contractors, suppliers, and collaborators, particularly regarding the supply chain.

The policy is accessible to stakeholders on the company's [corporate website](#), as well as on the corporate Intranet for all employees.

This policy sets out that the Board of Directors, through the Sustainability and Appointments Committee, is responsible for overseeing climate action performance. The Sustainability and Appointments Committee, through the Sustainability Committee<sup>28</sup>, is also responsible for setting targets and plans of action and monitoring climate performance. The Audit and Compliance Committee supervises the efficiency of risk control and management systems and assesses the possible impact of climate change. For its part, the Executive Committee oversees and implements the overall risk management strategy agreed by the Board of Directors, as well as the global limits for the company, and also reviews the level of risk exposure and corrective actions. Similarly, the Health and Safety, Environment and Quality Committee periodically assesses and manages issues related to climate change associated with business processes, impact assessment studies and the evaluation of environmental aspects.

By doing so, the company makes commitments to address the impacts, risks and opportunities identified as significant. For more details, refer to the table of impacts included in the SBM-3 disclosure requirement in this chapter.

In addition, through the Ethical Principles and Guidelines for Suppliers, Enagás considers that its suppliers and contractors shall 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 (for more information, see disclosure requirement G1-1).

### E1-3

## Actions and resources in relation to climate change policies

### Decarbonisation of own operations

In order to meet the carbon neutrality and scope 1 and 2 emissions reduction targets established in the decarbonisation pathway, Enagás is applying the mitigation hierarchy by implementing specific actions that the company has identified and planned as part of its Energy Efficiency and Emissions Reduction Plan.

### Energy Efficiency and Emissions Reduction Plan

At Enagás, energy efficiency plays a key role in emissions reduction and considerable efforts have been made in this regard. In recent years, since 2015, we have reduced our CO<sub>2</sub> emissions by 53% by taking energy efficiency measures.

During the 2015-2024 period, the Energy Efficiency and Emissions Reduction Plan (PEERE) has enabled the avoidance of 1,130,332 tonnes of CO<sub>2</sub>e. These emissions include the accumulated emissions prevented as a result of the measures of the Energy Efficiency and Emissions Reduction Plan implemented from 2015 to 2024.

We are working to ensure the continuous improvement of the energy efficiency of our infrastructures. As such, we have an energy management system certified according to the ISO 50001 standard that allows us to identify opportunities to improve the energy performance of our facilities and to evaluate progress in the reduction of energy consumption. Enagás has been implementing regular campaigns to publicise and raise awareness on this issue for years.

Through its Efficiency and Emissions Reduction Plan, defined on an annual basis, Enagás establishes specific measures aimed at ensuring that its facilities continue to increase their

energy efficiency and consequently reduce emissions. Enagás also focuses on specific initiatives to reduce methane emissions.

The measures put in place for the year are monitored and followed-up on a quarterly basis, and, on an annual basis, a follow-up of measures taken in previous years is carried out. An analysis will be carried out in early 2025 to determine the measures to be applied during the year. These will be similar in nature to those for 2024 and will include those planned for 2024 that could not be implemented.

Below are the main measures taken in 2024, which involved approximately 1.78 million euros OpEx (related to methane emissions reduction measures) and a CapEx investment of 2.95 million euros. This information is detailed in notes '2.1 Operating Profit' and '2.4. Property, plant and equipment' in the Consolidated Annual Accounts). In 2025, a similar amount of OpEx and CapEx is planned for energy efficiency measures.

## Energy efficiency and emissions reduction measures implemented during 2024

Energy efficiency and emissions reduction measures <sup>29</sup>	Savings type	Energy savings achieved in 2024 (GWh)(2) <sup>30</sup>	Emission reductions achieved in 2024 (tonnes of CO <sub>2</sub> e)
Installation of frequency inverters on the GA-224F seawater return pump of the Cartagena Plant	Electricity	0.07	0
Partial replacement of the lighting in the Yela underground storage facility with LEDs (light-emitting diodes)	Electricity	0.002	0
Installation of photovoltaic panels in position 23	Natural gas	0.07	0
Installation of photovoltaic canopy at the Zaragoza metrology centre	Electricity	0.08	0
Installation of a photovoltaic facility at the Almendralejo compressor station	Electricity	0.72	0
Installation of frequency inverters on GA-246C seawater collection pumps of the Cartagena Plant	Electricity	0.18	0
Replacement of pneumatic valves at the J-17 wellhead at Serrablo	Natural gas	0.19	304.32
Installation of 3-way valves in the pilot systems of the ERM 9.03.2 regulators and ERM 4.03 regulators of the Bañeras centre	Natural gas	0.001	2.05
Replacement of pressure safety valves at the Serrablo underground storage facility plant and wells	Natural gas	0.09	148.66
LDAR (Leak Detection and Repair) campaign at regasification terminals	Natural gas	0.79	1,256.80
LDAR (Leak Detection and Repair) campaign for underground storage facilities	Natural gas	0.26	424.53
LDAR (Leak Detection and Repair) campaigns in transmission	Natural gas	3.18	5,112.17
<b>TOTAL</b>		<b>5.46</b>	<b>7,263.70</b>

<sup>29</sup> Including those emissions reduction or efficiency measures verified in 2024 and completed in the last quarter of 2023 or before the last quarter of 2024, considering that sufficient time has elapsed for savings to be measured.

<sup>30</sup> The energy savings achieved are calculated on the basis of the energy consumption of the previous year.

In general terms, the measures included in the Energy Efficiency and Emissions Reduction Plan can be classified according to their nature:

### Turbocompressor electrification plan

Enagás is working on a plan to electrify the turbocompressors at compressor stations and underground storage facilities by 2040. This is estimated to reduce emissions by approximately 92,516 tonnes of CO<sub>2</sub>e by 2030 and 93,008 tonnes by 2040 (for more information, see disclosure requirement E1-4). The plan is revised and updated in line with the operating context and taking into account the following premises in the selection of facilities:

- Act on the facilities that are going to be more intensive in operation (higher CO<sub>2</sub> emissions).
- Make the most of the useful remunerative life of the facilities.
- Match interventions to the need for maintenance development to minimise costs.
- Act on facilities with restrictions, either due to atmospheric emissions (NO<sub>x</sub> emission limits) or due to operational problems which could compromise their operation.
- Have H<sub>2</sub>-ready facilities distributed along the main axes of the Gas System.

This plan foresees the electrification of 14 turbocompressors in the 2023-2040 period. In 2023, the first two electric motors were installed (15 million euros of CapEx). Enagás continues to make progress to complete the plan established for 2040, which is expected to involve a total CapEx of 106 million euros.

In 2024, a total of 2.7 million euros has been invested in the electrification of turbocompressors<sup>31</sup> (figure included in Note '2.4. Property, plant and equipment' in the Consolidated Annual Accounts).

### Methane emissions reduction measures

During 2024, various methane reduction measures were implemented that enabled Enagás to achieve a -46% reduction in methane emissions compared to the 2015 base year considered for setting its targets aligned with the Global Methane Alliance initiative. The main measures implemented in 2024, which have entailed OpEx of approximately 1.78 million euros and a CapEx investment of 382,487 euros, are listed below (information included, respectively, in notes '2.1 Operating profit' and '2.4. Property, plant and equipment' in the Consolidated Annual Accounts).

With the entry into force of the new Regulation (EU) 2024/1787 of the European Parliament and of the Council of June 13, 2024, on the reduction of methane emissions in the energy sector and amending Regulation (EU) 2019/942, a number of measures are planned for implementation, including the following:

<sup>31</sup> In line with the UE Taxonomy Regulation, investments related to the replacement of auxiliary equipment that support hydrogen transmission, only consider the proportional volume of the investment that is related to the transmission capacity of hydrogen and low-carbon gases. Therefore, only 10% of these investments are included as eligible and aligned reported CapEx for

Measure	Implementation period	Planned investment (CapEx) (thousands of euros)
<b>Facility upgrades</b>		
Replacement of leaking valves	2025-2026	1,680
Removal of venting in compression stations	2026-2030	54,075
Modification of position 41.10 to prevent gas venting associated with in-line inspections (ILI)	2026-2028	160
<b>Production of green hydrogen to reduce internal consumption</b>		
Huelva regasification terminal	2025-2026	752
Cartagena regasification terminal	2025-2026	994
Barcelona regasification terminal	2026-2029	1,840
Musel regasification terminal	2026-2029	1,515
<b>Equipment</b>		
Acquisition of mobile compressors to recover gas released during maintenance of compression stations and in-line inspections	2026-2029	1,110
Purchase of portable flares	2025-2027	70
<b>Systems</b>		
Enhanced application for monitoring methane emissions	2025	100

These measures are expected to reduce emissions by about 54% by 2030 and 86% by 2040 compared to 2024 levels (for more details, see disclosure requirement E1-4).

In addition, the company continues to make progress in reducing the uncertainty of methane emissions data under the OGMP2.0 (Oil and Gas Methane Partnership) initiative, to which it adheres. This is an initiative for the reporting of methane emissions in line with the European Union Methane Emission Reduction Strategy.

In 2024, the International Methane Emissions Observatory (IMEO) recognised Enagás with its highest rating, 'Gold Standard', for the fourth consecutive year, highlighting its methane emissions plan as one of the most robust and detailed in the framework of 'The Oil & Gas Methane Partnership 2.0' (OGMP 2.0), as well as the improved reliability of methane data for both the assets over which Enagás has operational control and for its affiliates.

In this area, Enagás has carried out several actions in 2024 applying continuous technological improvement, among which the following are noteworthy:

- Emissions are measured using top-down technologies, such as CH<sub>4</sub> Airborne Remote Monitoring (CHARM) from a helicopter, and SENSIA semi-fixed cameras. This data will be reconciled with the Enagás inventory. These measurements allow Enagás to compare localised emissions with bottom-up inspections and

activity 4.14 CCM. Transmission and distribution networks for renewable and low-carbon gases. For more information, see the 'Disclosure of information under Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)' section.

draw lessons learned in order to make further progress on mitigating these emissions in the framework of the OGMP2.0 initiative.

- Development and continuous improvement of a digital application to record venting and fugitive emissions in the transmission network and adapt to new methane regulations. This application allowed for the more detailed monitoring of venting at regasification terminals and underground storage facilities and during transmission and to obtain the information broken down in accordance with the OGMP2.0 reporting framework.
- Leadership in the research project promoted by GERG (European Gas Research Group). Enagás coordinated and led a pioneering global innovation project to provide guidelines on how reconciliation should be carried out at source and site level. After testing the performance of 12 state-of-the-art technologies (nine top-down and three bottom-up) to assess their accuracy and reliability for the quantification of methane emissions, a pilot reconciliation project was carried out. A series of measurements were taken at an operating compressor station, allowing methodologies for the reconciliation and verification of the reported data to be evaluated. In 2024, the project was completed, which led to the establishment of general recommendations for the reconciliation process at transmission, storage and regasification facilities.
- Participation in a project focusing on methane emissions from the operation of analysis equipment. Specifically, a benchmarking exercise was carried out to identify the emissions produced by the different analysis systems installed in the infrastructures. In this way, emissions and some practises to eliminate/reduce them could be identified. It is being investigated how the project can be extended to test the effectiveness of new technologies to eliminate emissions.

### Other emission reduction measures

Enagás also implements other measures that entail significant emissions reductions, including the purchase of electricity with renewable energy guarantees of origin. These efforts have resulted in an 19% reduction in total scope 1 and 2 emissions in 2024. As mentioned above, it is a company goal to maintain this supply from renewable sources in order to reduce emissions from electricity to zero. This means signing contracts with electricity providers in which renewable origin is guaranteed for the duration of the contract.

### Emissions offsetting

Enagás' decarbonisation strategy is based on prioritising measures to reduce emissions and subsequently offsetting emissions that cannot be reduced for technical reasons (for more information, see disclosure requirement [E1-7](#)).

Enagás' methodology establishes that emissions are offset annually after the close of the year; consequently, in 2024, 37,856 euros were spent on the purchase of carbon credits to cover 8,520 tonnes of CO<sub>2</sub>e in 2023. For further information, see note '4.6 Other Information' in the Consolidated Annual Accounts. In 2025, carbon credits will be purchased to cover the 5,839 tonnes of CO<sub>2</sub>e from 2024.

### Decarbonisation of the energy sector and the value chain

Enagás is also extending its commitment to decarbonisation all the way down its value chain. In order to achieve the established scope 3 emission reduction targets (for more information, see disclosure requirement [E1-4](#)), the company is working on the following medium- and long-term lines:

#### Renewable gases

Essentially, in 2024, the adaptation of existing infrastructure and the development of new infrastructure for renewable gases has continued (for more information, see disclosure requirements [E1-1](#) and [SBM-1 in Chapter 2](#)).

In this regard, one of the main areas of the company's technological innovation focuses on the evolution of the gas infrastructure in line with the decarbonisation of the energy sector, considering the inclusion of hydrogen and other renewable gases in a pure or mixed state in the company's infrastructures. In this field, collaboration projects with other TSOs and companies such as 'HyLoop+', 'The Next Pangea' and 'Hystorenew', among others, stand out. In 2024, of the 17.6 million euros allocated to technological innovation (CapEx and OpEx), 4.1 million euros relate to activities related to hydrogen and other renewable gases. For more information, refer to notes '2.4. Property, plant and equipment' and '2.1 Operating Profit' in the Consolidated Annual Accounts<sup>32</sup>.

In addition, through its subsidiary Enagás Renewable, it promotes renewable gas production projects. All this will allow these to be progressively incorporated in the energy model in order to decarbonise the entire natural gas value chain. Enagás plans to invest, in line with its 2025-2030 Strategic Update, 65 million euros by 2030 in this affiliate (CapEx).

#### New logistics services

In 2024, we continued to promote new uses for natural gas in mobility, mainly in land and maritime transport (for more information, see disclosure requirements [E1-1](#) and [SBM-1 in chapter 2](#)). In line with its 2025-2030 Strategic Update, Enagás plans to invest approximately 46 million euros by 2030.

#### Other matters

In addition, Enagás will continue to work during 2024 on other links in the value chain, such as affiliates and the supply chain<sup>33</sup>:

<sup>32</sup> This figure comprises the costs associated with the approved projects (amount entered as R&D expenses in the '[Other operating expenses](#)' section

of the Consolidated Annual Accounts), procurement of R&D, personnel expenses and the purchase of equipment and instruments.

<sup>33</sup> The cost of these initiatives is not significant.

- Collaboration with industry and associations on decarbonisation.
- Promotion of decarbonisation at Enagás affiliates: emissions reduction and energy efficiency measures are among the critical management standards that Enagás extends to its affiliates. In addition, a climate action due diligence analysis has been performed on all our affiliates, which has allowed us to verify the progress of the companies in terms of setting emission reduction targets, as well as in terms of calculating and reporting methane emissions and evaluating best practices for reducing methane emissions. Regarding this last point, Enagás will continue to monitor methane emissions through the OGMP2.0 reporting framework.
- Promotion of decarbonisation in the supply chain: Enagás has several platforms to approve and evaluate its suppliers' performance (for more information, see disclosure requirement [G1-2](#)). In this way, Enagás evaluates its main suppliers in terms of climate action and identifies working areas aimed at reducing its carbon footprint.

Enagás is in the process of establishing a methodology to enable the quantification of the emission reductions associated with these initiatives in the coming years.

Enagás has planned all the mentioned actions and their corresponding investments aimed at decarbonising both its operations and the energy sector, as outlined in its 2025-2030 Strategic Update.

# Metrics and targets

E1-4

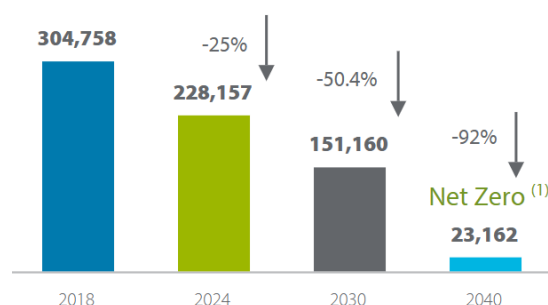
## Targets related to climate change mitigation and adaptation

Enagás has made the commitment to reach Net Zero by 2040 for scope 1 and 2 (covering all own activities), and by 2050 for scope 3. To this end, it has outlined a decarbonisation pathway with emissions reduction targets for 2030, 2040 and 2050, taking into account forecast demand for natural gas and other renewable gases, as well as new technologies. These targets have been set based on the methodology of the Science-Based Targets initiative (SBTi).<sup>34</sup> These reduction targets are aligned with the carbon neutrality commitment set out in Enagás' Climate Action Policy (for more information, see disclosure requirement [E1-2](#)) and with the decarbonisation commitments required by stakeholders, such as investors.

### Scopes 1 and 2 emissions reduction targets

In 2024, Enagás remained on track to meet its emissions reduction targets to reach Net Zero by 2040, having achieved a 25% reduction compared to 2018.

#### Scopes 1 and 2 emissions reduction targets (tonnes of CO<sub>2</sub>e)



Year		Emissions target			
		Scopes 1 and 2		Scope 1	Scope 2
		Tonnes of CO <sub>2</sub> e	Percentage of change	Tonnes of CO <sub>2</sub> e	
2018	Base year	304,758		274,458	30,300
2024	Real data	228,157	-25.0 %	228,157	0
2030	Target	151,160	-50.4 %	151,160	0
2040	Net Zero Target <sup>(1)</sup>	23,162	-92.0 %	23,162	0

(1) Reduction of our CO<sub>2</sub>e emissions by at least 90% and offsetting of residual emissions with nature-based solutions projects.

Each year, Enagás sets the goal of ensuring that the electricity it consumes at 100% of its facilities comes with renewable energy guarantees of origin (in 2024, electricity consumption amounted to 216,018 MWh).

The Scope 1 and 2 emission reduction targets include the Global Methane Alliance methane emissions reduction commitment, which will reduce methane emissions from our business by 45% by 2025 and 60% by 2030, compared to 2015 levels.

We held to our emissions reduction targets linked to variable remuneration (for more information, see the disclosure requirement [GOV-3](#) on chapter 2), including the emissions reduction targets in both the annual Target Management Programme and the Long-Term Incentive Plan.

As part of the annual Target Management Programme, for 2024, the company set a target of a 5% reduction in Scope 1 and 2 emissions compared to 2023 (279,917 tonnes of CO<sub>2</sub>e). This target was met, achieving a 22.6% reduction in emissions compared to the previous year, a percentage significantly higher than the decrease in demand for natural gas, which fell by almost 4% in 2024. This reduction was made possible by the implementation of energy efficiency and emissions reduction measures that have enabled us to meet the targets set for 2024.

In 2024, this decarbonisation pathway has been adjusted to the status of planned emissions reduction measures. As a result, the scope 1 and 2 emissions reduction target set for 2026 has been eliminated, as the implementation of some of these measures has been delayed until 2029.

Enagás has achieved its goal of zero emissions from electricity consumption (scope 2) at its facilities thanks to its acquisition of 100% of supplied electricity for all facilities with renewable energy guarantees of origin, as well as continuing its commitment to the self-generation of power produced through efficient, clean and renewable sources with an emission factor of zero.

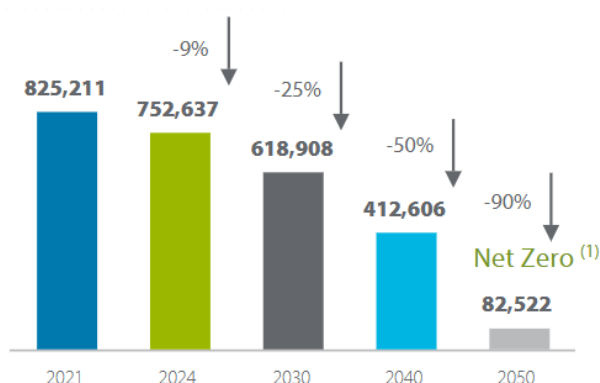
<sup>34</sup> At the date of preparation of this report, the Science Based Targets Initiative (SBTi) has not yet defined a methodology for the Oil&Gas sector that covers Enagás' activities (midstream), so these targets have not yet been validated by SBTi. However, Enagás incorporates the main recommendations of the Science Based

Targets Initiative in its target setting methodology. Once the methodology for Oil & Gas is approved, Enagás will ensure compliance to align with the goal of limiting global warming to 1.5 °C, as set out in the Paris Agreement.

## Scope 3 emissions reduction targets

In addition, the company has set the following targets for the reduction of its indirect Scope 3 emissions by 2050. Enagás, in its efforts to decarbonise and remain firm in its compliance with efforts to limit global warming to 1.5°C, is committed to reaching Net Zero by 2050, reducing its scope 3 emissions by more than 90% and offsetting residual emissions with nature-based projects.

### Scope 3 emissions reduction targets (tonnes of CO<sub>2</sub>e)<sup>35 36</sup>



Year		Emissions target	
		Scope 3	
		Tonnes of CO <sub>2</sub> e	Percentage of change
2021	Base year	825,211	
2024	Real data	752,637	-8.8 %
2030	Target	618,908	-25.0 %
2040	Target	412,606	-50.0 %
2050	Net Zero Target <sup>(1)</sup>	82,522	-90.0 %

(1) Reduction of our CO<sub>2</sub>e emissions by at least 90% and offsetting of residual emissions with nature-based solutions projects.

In 2024, Enagás reduced its Scope 3 emissions by 9% compared to the base year 2021, thus moving towards the decarbonisation of its value chain and in line with the targets set.

## Methodology for setting targets

All these targets have been set in line with the following commitments included in the Climate Action Policy:

- Defining a decarbonisation pathway towards carbon neutrality including emission reduction targets (Scopes 1, 2 and 3) aligned with the 1.5°C scenario and included in the short- and long-term variable remuneration incentive programmes.

- Achieving carbon neutrality by 2040 (Scopes 1 and 2) by applying the greenhouse gas mitigation hierarchy.

The scope of these targets is the same as that included in the Enagás Carbon Footprint calculation (for more information, see disclosure requirement E1-6).

The selected base year of these targets is considered representative from the point of view of volume of activity, companies and activities covered. In 2024 no significant changes occurred in any of the three variables mentioned that could be subject to an adjustment of the base year emissions calculation. Therefore, no need to modify the calculation of the base year has been identified.

One of the key assumptions for the establishment of the emission reduction pathway was the forecast future demand for natural gas, modelled internally. This factor significantly impacts the self-consumption of natural gas at our compression stations, which is the main source of our scope 1 emissions.

These targets have been set taking into account the commitments adopted through adherence to various international climate action initiatives:

- Science-Based Targets<sup>37</sup>: targets have been defined based on the general methodology following the absolute contraction approach, aiming for a linear reduction of 4.2% over the target period.
- We Mean Business: we are committed to driving policies towards a low-carbon economy, setting a carbon price and reporting climate change information in corporate publications.
- Global Methane Alliance: we are committed to reducing methane emissions from our activity by 45% by 2025 and 60% by 2030 with respect to 2015 figures.
- Methane Guiding Principles: we have signed up to commitments on methane emissions reduction and transparency.

Although best practices in the sector have been followed in setting these targets, Enagás has not externally ensured its decarbonisation pathway.

Enagás monitors the degree of compliance with these targets on a monthly basis. This allows it to identify significant changes or trends, as well as to take decisions to implement any measures needed to meet these targets.

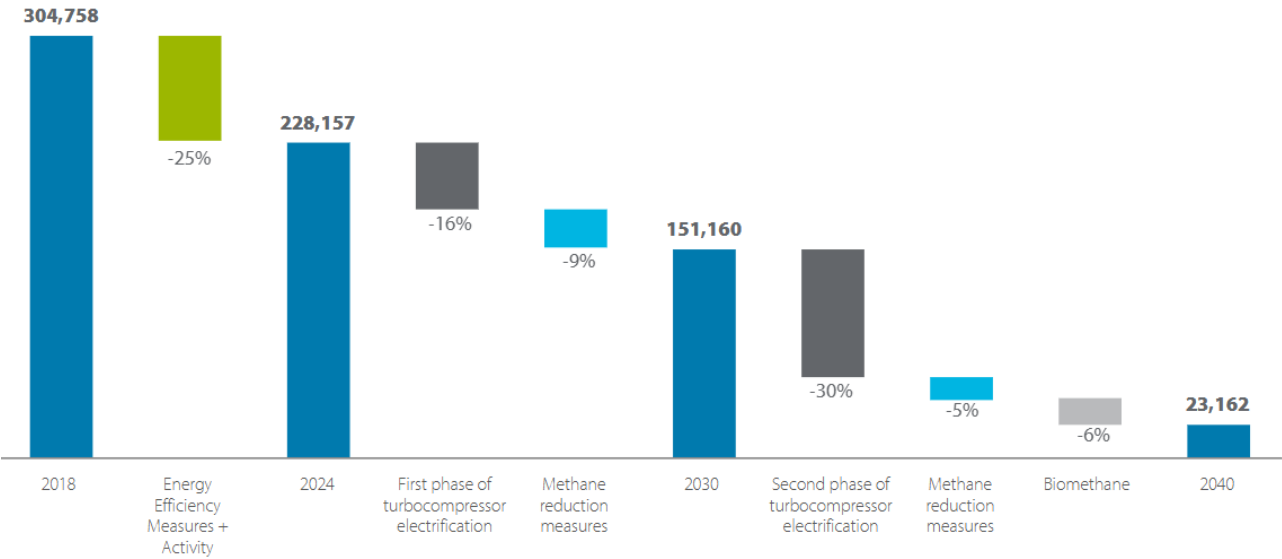
Enagás promotes various decarbonisation levers aligned with the Climate Transition Plan to achieve the targets described above, as described in disclosure requirement E1-3.

<sup>35</sup> According to the SBTi methodology and aligned with a 'well below 2°C' scenario by 2030 and compatible with limiting global warming to 1.5°C by 2050.

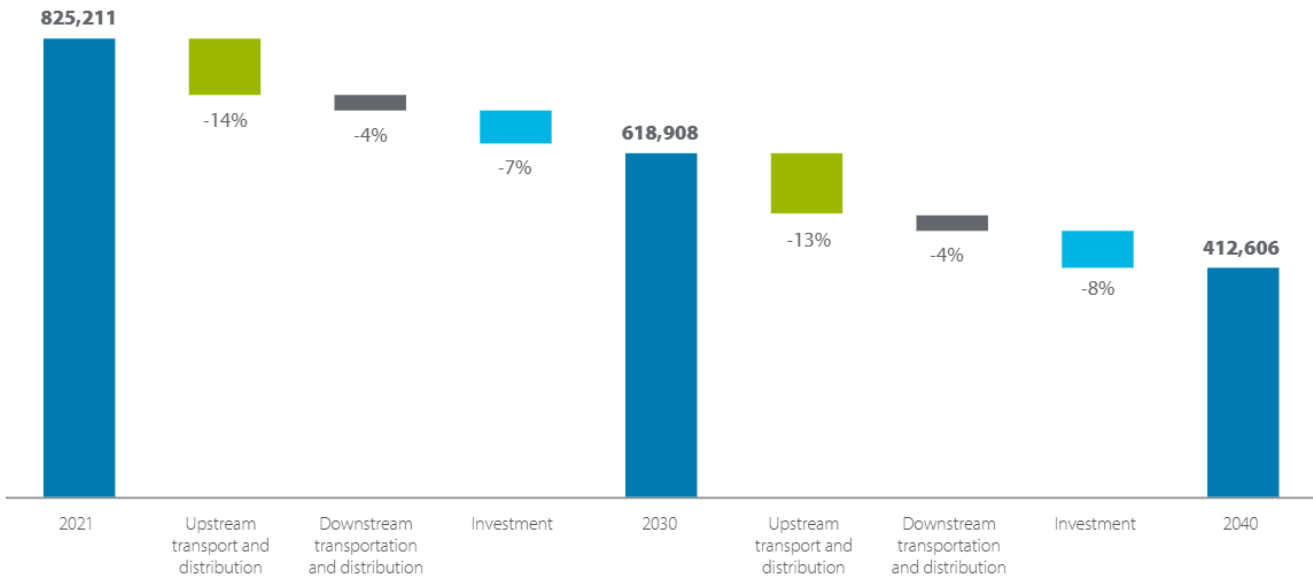
<sup>36</sup> The selected base year is considered representative from the point of view of selected categories. Targets corresponding to 100% of indirect Scope 3 emissions, the most significant of which include emissions derived from natural gas flowing on and off our infrastructure network, emissions from our affiliates and our main suppliers (GHG Protocol categories 1, 2, 3, 4, 5, 6, 7, 9, 11, 15).

<sup>37</sup> At the date of preparation of this report, the Science Based Targets Initiative (SBTi) has not yet defined a methodology for the Oil&Gas sector that covers Enagás' activities (midstream), so these targets have not yet been validated by SBTi. However, Enagás incorporates the main recommendations of the Science Based Targets Initiative in its target setting methodology.

Contribution of levers to scope 1 and 2 targets (tonnes of CO<sub>2</sub>e)



Contribution of levers to scope 3 targets (tonnes of CO<sub>2</sub>e) <sup>(1)</sup>



(1) Enagás has defined the main actions to be carried out in the coming years to comply with the Scope 3 decarbonization targets (for more information, see disclosure requirement E1-3), the definition of the contributions of these levers from 2040 onwards presents major challenges given the indirect nature of these emissions, the complexity of the value chains involved and the lack of standardized methodologies.

### E1-5

## Energy consumption and mix

The information on energy consumption comes from real consumption data derived from the activity itself. This is obtained from meters or internal sources, meaning that 100% of the data is of primary origin.

Enagás consumes electricity with guarantees of renewable origin in all its facilities. In 2024, the percentage of electricity with a guarantee of renewable origin over total electricity consumption

from the grid was 100% in all facilities. In other words, all electricity consumed by Enagás has a zero emission factor.

In 2024, own electricity generation from renewable, clean or efficient sources reached 14,811 MWh, representing approximately 7% of total electricity consumption. Part of the energy generated is delivered to the national grid and another part is consumed at Enagás' own facilities. The energy sent back to the grid (7,674 MWh) helps reduce 1,995 tonnes of CO<sub>2</sub> for third parties, contributes to reducing the national electricity mix factor and reinforces the principles of the circular economy, whereby Enagás' surplus electricity is used by third parties, thereby reducing their carbon footprint.

## Energy consumption (MWh) <sup>(1)</sup>

Energy consumption and mix	Comparison	2023	2024
1) Consumption of fuel from coal and coal derivatives (MWh)	-	0	0
2) Fuel consumption from crude oil and petroleum products (MWh)	3 %	9,843	10,121
3) Fuel consumption from natural gas (MWh)	-25 %	1,297,540	967,881
4) Fuel consumption from other fossil fuel sources (MWh)	-	0	0
5) Consumption of electricity, heat, steam and cooling purchased or acquired from fossil sources (MWh)	-	0	0
6) Total fossil energy consumption (MWh) (calculated as the sum of lines 1-5)	-25 %	1,307,383	978,002
Share of fossil sources in total energy consumption (%)	-4.28 %	85.84 %	82.17 %
7) Consumption of fuel from nuclear sources (MWh)	-	0	0
Share of nuclear sources in total energy consumption (%)	-	— %	— %
8) Fuel consumption from renewable sources, such as biomass (which also includes industrial and municipal bio-waste, biogas, renewable hydrogen, etc.) (MWh)	-	0	0
9) Consumption of electricity, heat, steam and cooling purchased or procured from renewable sources (MWh)	-0.29 %	206,473	205,871
10) Consumption of self-generated renewable energy (MWh)	30 %	119	155
11) Total renewable energy consumption (MWh) (calculated as the sum of lines 8-10)	-0.27 %	206,592	206,026
Share of renewables in total energy consumption (%)		13.56 %	17.3 %
12) Consumption of energy from other clean sources (use of waste heat and/or pressure jumps)	-23 %	9,098	6,983
Share of clean sources in total energy consumption (%)	-1.67 %	0.60 %	0.59 %
<b>Total energy consumption (MWh)</b>	<b>-22 %</b>	<b>1,523,073</b>	<b>1,191,011</b>

(1) These parameters have been verified by an independent third party (SGS) within the carbon footprint verification framework, in line with ISO 14064.

## Renewable and non-renewable energy consumption (MWh)

	2023	2024
Renewable energy	206,592	206,026
Non-renewable energy	1,316,481	984,985
<b>Total energy consumed</b>	<b>1,523,073</b>	<b>1,191,011</b>

## Energy intensity per net income

	2023	2024	% Change
Total energy consumption from activities in sectors with high climate impact per net income from activities in sectors with high climate impact <sup>(1)</sup> (MWh / M€)	1,728.8	1,356.0	-22 %

(1) Enagás considers as net income from activities in sectors with high climate impact income directly related to the natural gas sector. These are the Enagás Group companies which, according to their NACE code, belong in the 'Oil and gas - Midstream and Downstream', 'Energy production and utilities' and 'Oil and gas - Upstream and services' sectors as set out in the ESRS (for more information, see disclosure requirement SBM-1 and note 2.1 Operating income in the Consolidated Annual Accounts).

The indicator of water intensity relative to total revenue is not the most accurate measure of our environmental performance, as 97.5% of our revenue (100% of income from sectors with a high climate impact) comes from regulated activities determined by the current regulatory framework. This revenue is defined by a methodology that does not consider the level of use of gas infrastructure, which is the parameter related to environmental impacts.

### E1-6

## Gross Scopes 1, 2, 3 and Total GHG emissions

Enagás' carbon footprint is ISO 14064:2019 certified and is registered in the carbon footprint record of the Ministry for Ecological Transition and the Demographic Challenge.



Enagás, from 2018 to 2024, has reduced its Scope 1 and 2 emissions by 25% thanks to the measures included in its Efficiency and Emissions Reduction Plan.

## Scopes 1, 2 and 3 CO<sub>2</sub> emissions (tonnes of CO<sub>2</sub>e)<sup>(7)</sup>

	Retrospective					Milestones and target years				
	Base year	Base year data	2023	2024	Change (%)	2025	2030	2040	2050	Target % per year / base year
Scope 1 GHG emissions										
Scope 1 gross GHG emissions (tonnes of CO <sub>2</sub> e)	2018	274,458	294,649	228,157	-23%	0%	-50%	-92%	-92%	-17%
Percentage of scope 1 GHG emissions from regulated emissions trading systems (%)	N/A	N/A	70%	66%	-6%	N/A	N/A	N/A	N/A	N/A
Scope 2 GHG emissions										
Location-based scope 2 gross GHG emissions (tonnes of CO <sub>2</sub> e)	2018	72,078	58,644	52,003	-11%	0%	0%	0%	0%	-28%
Market-based scope 2 gross GHG emissions (tonnes of CO <sub>2</sub> e)	2018	30,300	0	0	0%	-100%	-100%	-100%	-100%	-100%
Significant scope 3 GHG emissions										
Gross total indirect GHG emissions (Scope 3) (tonnes of CO <sub>2</sub> e)	2021	825,211	723,986	752,636	4%	0%	0%	0%	0%	-9%
1 Goods and services purchased	2021	22,094	45,735	50,546						N/A
Optional subcategory: Cloud computing and data centre services	2021	0	0	0	0%					
2 Capital goods	2021	6,197	13,087	6,609	-49%					
3 Activities related to energy production (not included in scopes 1 or 2)	2021	36,468	42,228	29,737	-30%					
4 Transportation and distribution in earlier stages	2021	402,205	458,204	274,157	-40%					
5 Waste generated during operation	2021	172	68	15	-78%					
6 Business travel	2021	206	1,195	538	-55%					
7 Employee commuting	2021	398	447	564						
8 Assets leased in previous stages	2021		N/A	N/A						
9 Transportation and distribution	2021	122,209	114,693	269,126	135%					
10 Transformation of products sold	2021		N/A	N/A						
11 Use of products sold (1)	2021		0	0						
12 End-of-life treatment of sold products (2)	2021		N/A	N/A						
13 Assets leased in later stages (3)	2021		N/A	N/A						
14 Franchises (5)	2021		N/A	N/A						
15 Investments (4)	2021	235,261	48,329	121,344	151%					
Total GHG emissions										
Total GHG emissions (location-based) (tonnes of CO <sub>2</sub> e)	N/A	1,171,747	1,077,279	1,032,796	-4%	N/A	N/A	N/A	N/A	N/A
Total GHG emissions (market-based) (tonnes of CO <sub>2</sub> e)	N/A	1,129,969	1,018,635	980,793	-4%	N/A	N/A	N/A	N/A	N/A

(1) Category 11 emissions from gas use are considered to correspond to the same emissions as GHG Protocol Cat. 9 emissions from distribution companies. This is due to the nature of our business, as Enagás does not own or sell natural gas, and therefore we consider distribution companies to be end customers of our services, and their emissions to be the final ones linked to the natural gas we transport.

(2) This category is not applicable to Enagás as our activity is limited to the transmission of natural gas, classified within the midstream segment. Enagás is not the owner of the gas at any stage of the value chain and is not responsible for emissions related to the end-of-life treatment of products or the processing of products for sale.

(3) This category is not applicable to Enagás as we do not operate any upstream or downstream leased assets.

(4) Includes emissions from Enagás' affiliates, specifically the Bahía de Bizkaia Gas (BBG) Regasification Terminal; Sagunto Regasification Terminal (Saggas); LNG Regasification Terminal from the operator DESFA; Trans Adriatic Pipeline (TAP); Enagás Renewable; Scale Gas.

(5) This category is not applicable to Enagás because the company does not have franchises.

(6) In addition to the emission factors used in the calculation of Scope 1 and 2 emissions, the following emission factors have been considered for the calculation of Scope 3 emissions:

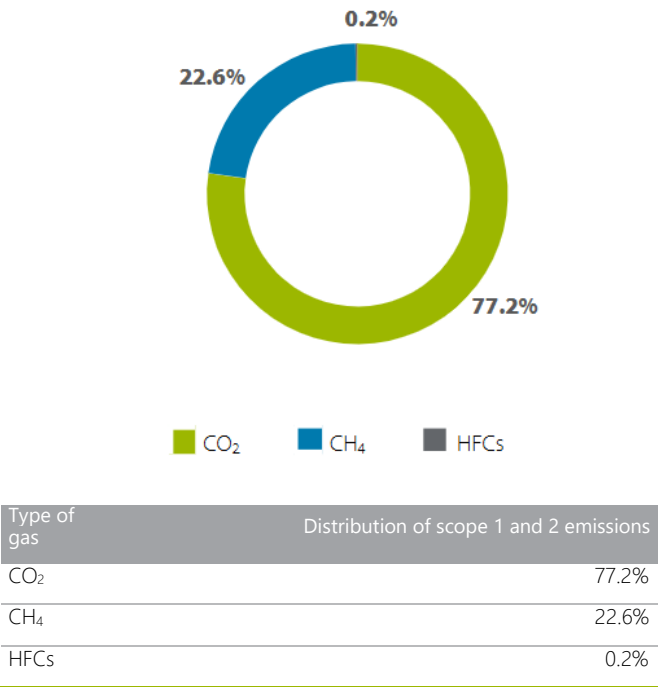
- Maritime transport: DEFRA, Pestaña Fuels, Maritime Oil. 2023. version 1.

- Air transport: Aviation: COMMISSION IMPLEMENTING REGULATION (EU) 2018/2066 of December 19, 2018, on the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/87/EC of the European Parliament and of the Council and amending Commission Regulation (EU) No 601/2012 (<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R2066>). Using emission factor (Annex 3.2 Table 1) 3.10/ 3.10/ 3.15 tonnes of CO<sub>2</sub>/tonnes of fuel for the density provided by the same source of 0.8 kg/litre (Article 53).

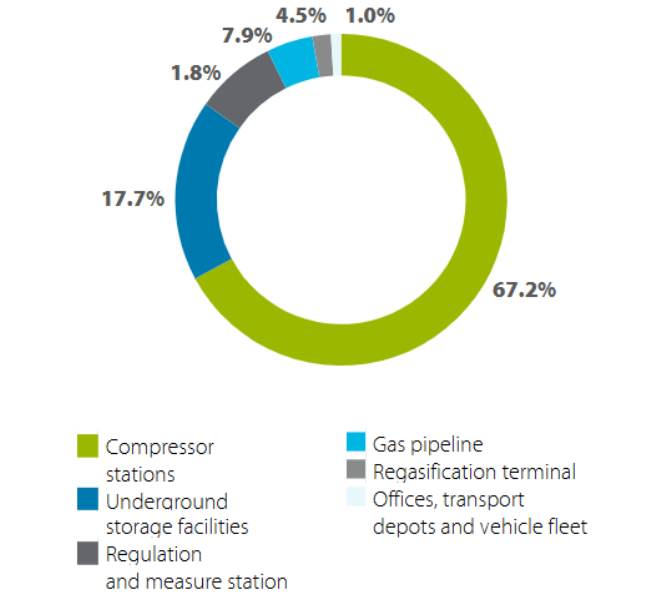
(7) These parameters have been verified by an independent third party (SGS) within the carbon footprint verification framework, in line with ISO 14064

Scopes 1 and 2

Distribution of scope 1 and 2 emissions by gas type in 2024 <sup>38</sup>

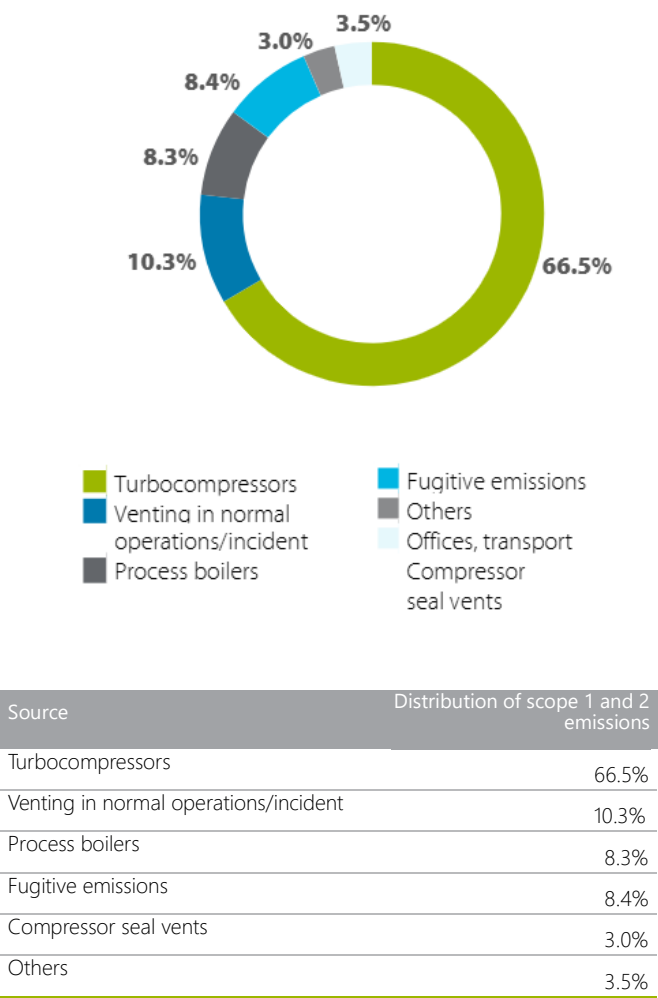


Distribution of scope 1 and 2 emissions by facility type in 2024



Type of installation	Distribution of scope 1 and 2 emissions
Compressor stations	67.2%
Underground storage facilities	17.7%
Regulation and metering stations	7.9%
Gas pipeline	4.5%
Regasification terminal	1.8%
Offices, transport depots and vehicle fleet	1.0%

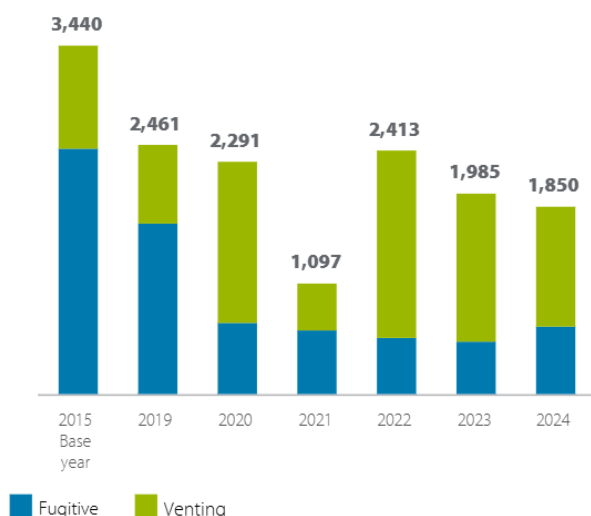
Distribution of scope 1 and 2 emissions by source in 2024



<sup>38</sup>Enagás assumes an oxidation factor of 1 in the combustion of natural gas; in other words, it is assumed that all the gas burned is transformed into CO<sub>2</sub>, with no unburned CH<sub>4</sub> or N<sub>2</sub>O emitted. Enagás uses an oxidation factor of 1 in line with the requirements set out in the EU ETS emission allowances

regulations. It also does not emit the greenhouse gases NF<sub>3</sub> or PFCs. Emissions of SF<sub>6</sub> are not significant, representing less than 0.1% of the year's emissions.

## Change in Scope 1 methane emissions (tones of CH<sub>4</sub>)



77.2% of Enagás' scope 1 emissions correspond to CO<sub>2</sub> emissions generated mainly during the combustion of natural gas in stationary sources, i.e. turbocompressors, boilers, flares, etc. Methane emissions, which account for 22.6% of the footprint, are mainly due to natural gas venting (63%) and fugitive emissions (37%). Venting may occur as a result of operation and maintenance, operating safety, pneumatic valves and analysis equipment such as chromatographs. For their part, fugitive emissions correspond to uncontrolled gas leaks in the equipment (flanges, connectors, etc.). The latter have increased by 26.8% compared to the previous year. With regard to gas losses, in 2024 they represented 0.0023% and 0.00005% in transmission and storage activities respectively.

Globally, emissions of this gas (CH<sub>4</sub>) have decreased by 7% compared to 2023, mainly due to:

- Improved data recording on venting at regasification terminals and underground storage facilities and during transmission thanks to the development of a computer application that improves data collection and consolidation.
- Improvements in the quantification methodology, incorporating the guidelines that are being developed at the international level.
- Improvements to incident detection, quantification and reporting.

Enagás' adherence to the methane emissions reporting framework of the Oil & Gas Methane Partnership 2.0 (OGMP2.0), together with significant efforts to reduce the uncertainty of this data, entail a constant review of our quantification methodology. In this regard, the Enagás Implementation Plan for maintaining the Gold Standard involves the review of all our methane sources and therefore, the possibility of incorporating possible new sources in the coming years. In addition, various measurements have been carried out with new technologies that allow data reconciliation. This comprehensive review will continue in the coming period, by which time Enagás expects to achieve the

highest data quality in line with OGMP commitments and deadlines.

Regarding scope 2 emissions, these are at zero according to the market-based methodology, given that in 2024 100% of electrical energy consumed had renewable guarantees of origin (GoO).

### Scope 1 GHG emissions from regulated emissions trading systems

66.1% of emissions included in the Carbon Footprint (scopes 1 and 2) are included in the EU Emissions Trading System (EU ETS).

In 2024, 55,637 emission allowances were received through free allocation (50,881 in 2023) and 40,000 emission allowances were purchased (274,000 in 2023) to cover the period's emission rights needs.

### Scope 3

In 2024, emissions increased by 4% compared to 2023. This was mainly due to downstream distribution, a category that increased by more than 100%.

In 2024, Enagás reached an agreement to sell its 30.2% stake in the American company Tallgrass Energy to Blackstone Infrastructure Partners. This has no impact on scope 3 in our carbon footprint, as we did not have quantifiable data on the emissions of this affiliate. Enagás also increased its stake in the Hanseatic Energy Hub (HEH) consortium to 15% to build Germany's first onshore liquefied natural gas terminal. Last year, it also sold the Soto La Marina compressor station in Mexico. All of this will have an impact on the company's scope 3 emissions. All of this will have an impact on the company's Scope 3 emissions in the coming year. In the data for 2024, data from the company Enagás Renewable, for which no data was previously available, has been included.

### Methodology for calculating the Carbon Footprint

Enagás establishes the operational limits of its organisation; it operates within Spain. To this end, it has identified the emissions associated with its operations (by sources and facilities), classifying them as direct or indirect emissions according to the categories established in UNE-EN ISO 14064:2019 and their correlation with the scopes defined by the GHG Protocol:

- Direct emissions: emissions from Enagás' own operations (scope 1: emissions from sources such as stationary combustion, mobile combustion, fugitive emissions, etc.).
- Indirect emissions are those produced as a consequence of the generation of electricity, heat or steam. At Enagás, these are the emissions related to the energy we consume in our work. Emissions from power generation and consumption at facilities.
- The remaining indirect emissions correspond to organisational activities that come from sources that are not owned and controlled by Enagás, i.e. in its value chain.

## Scopes 1 and 2

Enagás identifies all sources of emissions in its tool. Each month and year, Enagás compiles all activity and consumption data from various sources, including manuals and internal applications. Activity data is then converted into the equivalent CO<sub>2</sub> emissions for all identified emission sources at each facility, using emission factors. These factors are drawn from the MITECO calculator and other sources such as DEFRA.

The calculations made for scope 1 and 2 of the Enagás carbon footprint are based on real consumption data derived from the activity itself, obtained from meters or internal sources. In other words, 100% of the data are of primary origin. This is why Enagás does not make exclusions in these scopes. It accounts for 100% of the emissions associated with its operation.

For scope 2, Enagás calculates its market-based emissions on the basis of the factor of the contracted suppliers. This is zero, as it has guarantees of origin. It also calculates the derived emissions using a location-based methodology, thus being able to track its consumption.

## Scope 3

In addition to its activity chain's impact on emissions, Enagás includes the impact of the gas transmitted by the company in the natural gas value chain in its Scope 3 emissions. It is important to note that the gas Enagás transports through its infrastructure is not owned by the company. Therefore, Enagás includes only the emissions associated with the services it provides to its customers – specifically, the transmission of this gas – in its scope 3 emissions. Emissions that cannot be calculated or estimated due to insufficient information are excluded from this scope and represent less than 5% of all categories. And the rest of the categories do not apply to Enagás' own activity (Categories excluded by activity 8, 10, 12, 13 and 14).

These categories include:

- Category 1: Procurement of goods and services and Category 2: Capital or production goods. For both categories, scope 1 and 2 emissions were estimated together with reported and unreported turnover by suppliers through the responses given to a questionnaire we provided.
- Category 3: activities related to energy production that are not included in scopes 1 or 2; primary data obtained from consumption associated with Enagás that have not been included in scope 1 and 2.
- Category 4: upstream transmission and distribution. This includes consumption derived from the transport of LNG using tanker vessels. Two external and public sources are used to extract emission factors by vessel name and year and the distance travelled by each vessel. With these two elements, we obtain the tonnes of CO<sub>2</sub>e involved in the transport of the vessels to Enagás plants. In addition, helicopter fuel used for on shore-off shore transit is included as primary data, as is data for aerial and maritime land surveillance.

- Category 5: waste generated during operation, includes emissions derived from the transport, management and treatment of waste generated at Enagás facilities. Different DEFRA emission factors are used depending on the treatment of the waste; along with the amount of waste transported, these used to calculate the tonnes of CO<sub>2</sub> corresponding to each process.
- Categories 6 and 7: business travel and employee commuting. For business travel, primary data is available from contracted travel agencies. For employee commuting, a generic estimate from the Ministry for the Ecological Transition and the Demographic Challenge is used. This calculates commute emissions by number of employees, taking into account positions and teleworking hours.
- Category 9: downstream transmission and distribution. Given that Enagás does not own the gas it transports, emissions in this category are estimated with the emissions of Spanish distributors by consulting the best available and updated data, ensuring that there have been no significant changes in the final period that could cause a deviation from the data. Category 11 emissions from gas use are considered to correspond to the same emissions as Category 9 emissions from distribution companies. This is due to the nature of Enagás' business, as the company does not own or sell natural gas, and therefore considers distribution companies to be end customers of its services, and their emissions to be the final ones linked to the natural gas that Enagás transports.
- Category 15, Investments. It includes the issues of affiliates, attributing the figure proportional to the percentage of ownership of their scope 1 and 2. Scope 1 and 2 emissions at affiliates are primary data, provided by the affiliates themselves. In the event that data is not available in time, an estimate is made using data from the previous year, ensuring that there are no relevant changes. In 2024, the emissions of this category have been estimated with the 2023 emissions data of the investee companies.

Scope 3 emissions account for 63% of the categories calculated with primary data and 37% of the estimated ones.

In 2021, Enagás reviewed the indirect emissions relevance analysis according to the criteria set out by the ISO 14064 standard, namely: volume of emissions in each category with respect to the total, level of influence, access to information, data accuracy and relevance. As a result of the significance analysis, the categories corresponding to upstream transmission and distribution of goods, downstream transmission and distribution, purchased goods, investments and fuel and energy related activities not included in scope 1 and scope 2 have been classified as relevant. It should be noted that, although only five categories were identified as significant, Enagás is aware of the importance of emissions linked to the value chain and reports all categories in a bid for transparency.

## Greenhouse gas emissions intensity

Greenhouse gas emissions intensity (scope 1, 2 and 3) per net income

	2023	2024	% Change
Total GHG emissions (location-based) per net income (tonnes of CO <sub>2</sub> e / M€)	1,171.0	1,130.0	-0.04
Total GHG emissions (market-based) per net income (tonnes of CO <sub>2</sub> e / M€)	1,107.0	1,074.0	-0.03

1 Enagás considers as net income the revenues indicated in note 2.1 Operating income in the Consolidated Annual Accounts.

Total GHG emissions intensity calculated with respect to net income - although a standard and widely used indicator - does not represent the most precise unit to measure our environmental performance, as 97.5% of our income comes from regulated activities. The current regulatory framework's methodology to determine this revenue does not consider the level of use of gas infrastructure, which is the parameter related to environmental impacts.

Enagás assesses efficiency in terms of emissions (emissions intensity) through indicators aligned with the emissions derived from the most significant energy consumption and activity data with which Enagás has identified correlations. For this reason, the ratios for each facility type and the overall ratio of total Scope 1 and 2 emissions to total compressed, injected and regasified gas are included below.

## Infrastructure activity data

		Unit	2023	2024	2024 vs. 2023 (%)
<b>Regasification terminals</b>	Regasified gas, tank and ship loading at regasification terminals	GWh	138,870	103,282	-26%
<b>Compressor stations</b>	Compressed gas at Compressor stations	GWh	260,424	180,039	-51%
<b>Underground storage facilities</b>	Total net injection underground storage facilities	GWh	7,009	8,821	26%
	Total gross withdrawal from underground storage facilities	GWh	8,194	10,370	26%

### E1-7

## GHG removals and GHG mitigation projects financed through carbon credits

Enagás' decarbonisation strategy is based on prioritising measures to reduce emissions and subsequently offsetting emissions that cannot be reduced for technical reasons. Enagás follows certain criteria to offset its residual emissions:

- Mitigation hierarchy: only proceed to offset residual emissions once the maximum level of reduction has been achieved with the available technology.

## Scopes 1 and 2 GHG emissions intensity

	2023	2024	% Change
Emissions at compressor stations with respect to compressed gas at compressor stations (tonnes of CO <sub>2</sub> e at compressor stations/TWh)	870.2	863.0	-0.01
Emissions in storage facilities with respect to gas injected into underground storage facilities (tonnes of CO <sub>2</sub> e in storage facilities/TWh)	5,095.2	4,571.6	-0.10
Emissions at plants with respect to gas regasified at LNG regasification terminals (tonnes of CO <sub>2</sub> e at terminals/TWh)	55.00	46.6	-0.15
Emissions with respect to total compressed, injected and regasified gas (tonnes of CO <sub>2</sub> e/TWh)	780.7	834.5	0.07

At a facility level, 67.2% of emissions are concentrated at compressor stations, followed by underground storage facilities, which account for 17.7%. In terms of emission sources, 66.5% of the total emission footprint (Scope 1 and 2) is generated by the self-consumption of natural gas in turbocompressors at compressor stations and underground storage facilities. In this regard, Enagás has an ambitious turbocompressor electrification plan to progressively replace natural gas compressors with electric compressors, thereby reducing emissions and helping to achieve the targets set out in the decarbonisation pathway. In 2023 and 2024, two turbocompressors were electrified.

- Offset against credits generated by projects that meet the following requirements:
  - Be located in geographic areas where the company is present.
  - Have quality certificates that guarantee the solvency and reliability of the projects.
  - Prioritise nature-based solutions.

Therefore, after applying these criteria, in 2024 Enagás spent 37,856 euros on purchasing carbon credits to offset 8,520 tonnes of CO<sub>2</sub>e for the 2023 financial year. For more information, refer to note '4.6 Other Information' in the Consolidated Annual Accounts. In 2025 it will offset the emissions derived from its regasification terminals, the Euskadour compressor station, the corporate fleet and headquarters via the cancellation of carbon

credits amounting 5,839 tonnes of CO<sub>2</sub>e, corresponding to 2024. In this way, these facilities have maintained the carbon neutrality they achieved in 2017 (in the case of Euskadour, 2020). This compensation was carried out with the purchase and cancellation of carbon credits for avoided-deforestation projects in Peru and the Motor Verde reforestation project in Spain, developed by Repsol and Sylvestris<sup>39</sup>.

Carbon credits cancelled in reporting year	2023	2024	Change
Total (tonnes of CO <sub>2</sub> e)	8,520	5,839	-31.47 %
Proportion of phase-out projects (%)	0%	0%	Not applicable
Proportion of reduction projects (%)	100%	100%	0%
Recognised quality standard Verified Carbon Standard (VCS) (%)	99%	98%	-1%
Recognised quality standard Registration with the OECC (Spanish Office for Climate Change) (%)	1%	2%	100%
Proportion of projects within the EU (%)	1%	2%	100%
Proportion of carbon credits that can be considered as corresponding adjustments (%)	99%	98%	(1%)

Carbon credits expected to be cancelled in the future	Quantity to 2025
Total (tonnes of CO <sub>2</sub> e)	5,986

Enagás plans to continue its decarbonisation pathway, reaching net zero in 2040 for scope 1 and 2. During this period, it will prioritise the reduction and elimination of emissions, committing to offsetting the remaining emissions in 2040 and in 2050 for scope 3. It will do so by offsetting its residual emissions with carbon credits from projects associated with nature-based solutions (reforestation) certified under recognised standards (for more information, see disclosure requirement [E1-4](#)).

Enagás is not working on GHG elimination and/or storage projects in its own operations, nor has it contributed to any projects in its value chain.

E1-8

Internal carbon pricing

The Enagás Internal Carbon Price is applied uniformly to all facilities and each business unit. There are numerous uses for it at the company. The main ones are:

- Monetisation of GHG emissions and inclusion of GHG emissions in business plans in order to optimise decision-making when evaluating projects with associated capital investment.

- Risk management.
- Planning of the company's sustainability strategy.
- Integration in Climate Change Risk Analysis for strategic operational decision making.
- Ensure compliance with GHG regulations.
- Drive domestic behavioural change to reduce GHG emissions, as well as increase energy efficiency and low-carbon investments.

The internal carbon pricing scheme was used, with 228,157 tonnes of scope 1 CO<sub>2</sub> covered by this system (23.3% of total generated emissions and 100% of scope 1 and 2 emissions).

The Internal Carbon Price is updated quarterly based on market forecasts. In 2024, an average price of 65.85 euros per tonne of CO<sub>2</sub> was set, provided by the company SENDECO2. In addition, forecasts were made for the 2025-2030 period based on information provided by the company's Carbon Pulse, which averages the estimated values of a significant number of market analysts (last updated in April 2024)<sup>40</sup> and for 2040 based on the International Energy Agency's (IEA) 'Announced Commitments Scenario' for advanced economies with Net Zero commitments.

E1-9

Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

Enagás is working to ensure compliance with the disclosure requirement in future reporting years. However, the company has been working for years to identify and quantify climate risks and opportunities in line with the methodology described in disclosure requirement [SBM-3](#).

For more information on the financial effects of risks, see section 'a) Information on the impact and management of climate change' in note '4.6 Other Information' of the Consolidated Annual Accounts of the Enagás Group.

<sup>39</sup> Carbon credits from projects to reduce or eliminate GHG emissions within the value chain are not included.

<sup>40</sup> This is a comprehensive methodology that combines market analysis as well as regulatory and economic factors. It is supported by sources and data backed by the scientific community and international organisations.

## Climate change risks

Risks		Time horizon	Scenarios	Level of risk	Risk control and management measures
Factors	Events				
Physical risks	Natural disasters or adverse weather conditions: • River and coastal flooding. • Fires. • Earth movements. • Extreme winds, among others <sup>(1)</sup> .	Long term	RCP 4.5	Medium scenario: <b>Tolerable</b> Probability: medium Impact: 8.6% net profit <sup>(2)</sup>	<ul style="list-style-type: none"> <li>Environmental certifications (ISO 14001 and EMAS).</li> <li>Emergency response action plans.</li> <li>Procedures for the investigation and monitoring of incidents.</li> <li>Development of demand scenarios that determine the infrastructure to develop in order to guarantee security of supply.</li> <li>Insurance policy covering catastrophic damage.</li> <li>Review of plans for adaptation to climate change in infrastructures and the associated investments.</li> </ul>
			RCP 8.5	Stress scenario (remote) <sup>(3)</sup> : <b>Tolerable</b> Probability: low Impact: 15.5% net profit <sup>(2)</sup>	
			NZE 2050	<b>Tolerable</b> Probability: low Impact: moderate (Qualitative assessment)	
Transition risks	Increased demand for transparency and climate action from regulators, society, shareholders and others.	Short, medium and long term	NZE 2050	<b>Tolerable</b> Probability: low Impact: moderate (Qualitative assessment)	<ul style="list-style-type: none"> <li>Corporate positioning on climate change including Net Zero target by 2040 for Scopes 1 and 2 and by 2050 for Scope 3.</li> <li>Leadership in the main sustainability indices such as CDP Climate or Dow Jones Best In Class Index.</li> <li>Priority in the 2025-2030 Strategic Update.</li> <li>Fluent, direct communication with stakeholders.</li> <li>Periodic roadshows with significant shareholders, minority shareholders, analysts and proxies, with the very active participation of the Department of Sustainability and Climate Action.</li> </ul>
	Worsening financing conditions	Medium term	NZE 2050	<b>Tolerable</b> Probability: moderate Impact: medium (Qualitative assessment)	<ul style="list-style-type: none"> <li>Development of renewable gas projects aligned with the EU Taxonomy and the ESG requirements of regulators and investors that will enable sustainable debt issuance and improved financing conditions.</li> </ul>
	The speed of renewable energy deployment will condition the offsetting of lower revenues from measures implemented by authorities and governments in response to climate change.	Long term	NZE 2050	<b>Acceptable</b> Probability: low Impact: 1.6% net profit <sup>(4)</sup>	<ul style="list-style-type: none"> <li>Promotion of the development of renewable gases, especially renewable hydrogen.</li> <li>Promotion of the development of new technologies and infrastructures for the capture, transmission and storage or use of CO<sub>2</sub> and small-scale liquefaction</li> <li>Promotion of new services and uses of natural gas in the transportation (sea, rail and road), industrial and household sectors.</li> <li>Use of natural gas as a backup for the electricity system.</li> <li>Long-term customer contracts.</li> <li>'Take or pay' business model not exposed to demand variation.</li> </ul>
				Medium scenario <b>Acceptable</b> Probability: medium-moderate Impact: low 0.2% net profit	
				Worst case (NZE) <b>Acceptable</b> Very low probability Impact: 0.5% net profit	
	The delay or non-development of the turbocompressor electrification plan, the availability of biomethane for its use as well as the evolution of its prices.	Medium term	STEP APS NZE 2050	<b>Tolerable</b> Probability: medium-moderate Impact: low (Qualitative assessment)	<ul style="list-style-type: none"> <li>Energy Efficiency and Emissions Reduction Plan.</li> <li>Promotion of the development of gas from renewable sources and its integration in gas infrastructures.</li> <li>Promotion of the development of new technologies and infrastructures for the capture, transmission and storage or use of CO<sub>2</sub> and small-scale liquefaction.</li> <li>Nature-based solutions for offsetting residual emissions.</li> </ul>

(1) Although it is not considered as a climatic factor to be assessed, the risk of tsunami has been included in the analysis of the plants due to their location.

(2) The economic impact amounts to 24,802,656 euros in the medium scenario and 44,564,447 euros in the stress scenario. The estimated cost of managing the lines of action is 6 million euros per year.

(3) The impact of a stress scenario (a scenario with a remote probability of occurrence) has been analysed for the case of tsunami and extreme damage from other climatic factors.

(4) The economic impact amounts to 6 million euros. No significant estimated cost of managing the measures has been identified.

Level of risk    ■ Acceptable    ■ Tolerable    ■ Significant    ■ Critical

## Climate change opportunities

Opportunity	Lines of action	Impact <sup>(1)</sup>
<b>Hydrogen infrastructure development</b>	<ul style="list-style-type: none"> <li>Spanish and European Hydrogen Backbone Network (H2Med).</li> <li>Research and development of salt caverns for storage.</li> <li>Joint Ventures for technological development and the promotion of renewable hydrogen production and transmission infrastructures.</li> <li>Projects under study focus on the use of hydrogen in mobility and auxiliary machinery applications.</li> </ul>	High
<b>New logistics services that promote natural gas consumption</b>	<ul style="list-style-type: none"> <li>Design and development of new services in infrastructures, turning them into logistical centres for LNG supply.</li> <li>Development of other new services: bunkering (refuelling LNG, between tanks or from a satellite plant to a tank), small scale (refuelling small LNG tanks), bulk breaking (refuelling LNG in medium-sized tanks and trucks), parking gas (long-term storage of gas in tanks).</li> <li>Extension of the tank refuelling service.</li> <li>Mobility: gas and hydrogen refuelling stations.</li> </ul>	Average
<b>Development of infrastructure for CO<sub>2</sub> transport and storage</b>	<ul style="list-style-type: none"> <li>Positioning as an independent operator of CO<sub>2</sub> infrastructures</li> <li>Development of necessary CO<sub>2</sub> infrastructures in Spain in cooperation with customers, authorities, distributors and other partners (Spanish CO<sub>2</sub> backbone)</li> <li>Build up Enagás' plants as multi-molecular hubs.</li> <li>Development of CO<sub>2</sub> transport and storage projects by Enagás affiliates.</li> </ul>	Low

(1) Investments eligible under the EU taxonomy for the 2025-2030 period amount to 3,365 billion euros, accounting for 83% of the total planned investment for that time frame. This new investment cycle, primarily focused on developing hydrogen infrastructure and, to a lesser degree, other key molecules in the energy transition like CO<sub>2</sub>, is expected to lead to an average annual EBITDA growth of 2.5% from 2024 to 2030 for Enagás. Investment will ramp up from 2027, driving the average annual EBITDA growth to 9.5% from 2026 to 2030.

# E2. POLLUTION

## Management of impacts, risks, and opportunities

IRO-1

### Description of the processes to identify and assess material impacts, risks, and opportunities related to pollution

Enagás has conducted an analysis to identify impacts, risks, and opportunities and to assess which are material concerning pollution, as outlined in disclosure requirement [IRO-1](#) in chapter 2<sup>41</sup>.

This analysis encompasses all activities and infrastructure locations of companies under financial control, including both upstream and downstream stages of the value chain. In identifying potential impacts, risks and opportunities related to pollution, Enagás has pinpointed the main pollutants at its facilities that are subject to environmental regulations. These regulations are considered to be linked with more significant impacts and the risk of penalties.

The table below details the impacts identified as having relative importance from the analysis:

Table of impacts

Topic	Sub-topic	Impact	Nature
Pollution	Air pollution	The deterioration of air quality due to the emission of pollutants associated with energy consumption in the organisation's operations.	Negative - Current

Enagás has been provisionally appointed as the manager of the Spanish Hydrogen Backbone Network (provisional HTNO), with Enagás Infraestructuras de Hidrógeno S.L.U. authorised to temporarily carry out the development of European Projects of Common Interest for hydrogen networks. Currently, no material impacts, risks, or opportunities have been identified related to this new activity. However, Enagás is in the process of examining the relevance of pollution, along with potential impacts, risks, and opportunities in an initial conceptual stage before conducting the Environmental Impact Assessment (EIA).

The main non-greenhouse gases emitted at our facilities are CO, SOx, NOx, PM<sub>10</sub> particles and Non-Methane Volatile Organic Compounds (NMVOC). The emissions of these polluting gases are produced by the consumption of natural gas and diesel by different equipment, particularly in compressor stations.

Below are listed the company's facilities and activities where the impacts are considered material, based on criteria such as the volume and trends of atmospheric pollution (92% of the self-consumption of all company compressor stations).

### Facilities with significant negative impact

Enagás facilities	
Compressor stations (CS)	
Chinchilla Compressor Station	Córdoba Compressor Station
Haro Compressor Station	Villar de Arnedo Compressor Station
Alcázar de San Juan Compressor Station	Coreses Compressor Station
Montesa Compressor Station	Almodóvar Compressor Station

E2-1

### Pollution-related policies

Enagás has an [Environmental Policy](#), approved by the Board of Directors, that outlines key commitments for environmental protection and aspects related to the Environmental Management System. These commitments address atmospheric pollution, identified as relevant issue for Enagás, and include the following highlights:

- Prevent, control, and mitigate negative impacts associated with air pollution (emissions of non-greenhouse gases: CO, NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub> and COVDM).
- Identify and implement preventive measures to achieve established targets and prevent environmental accidents, as well as corrective measures (including emergency responses) to control and minimise environmental impact in the event of accidents.

In 2024, this policy was revised following a corporate decision to split the former combined Health and Safety, Environment, and Quality Policy into three distinct policies. This change enables more effective implementation of commitments related to these crucial aspects of the business.

This policy applies and has been communicated to all employees and managers of all companies making up the Enagás Group, including any affiliates effectively controlled by it, within the

<sup>41</sup> Sub-topics 'microplastics' and 'substances of concern' have not been included in the materiality analysis as they are not relevant to the company's business model.

limitations established in the regulations applicable. Consequently, it covers all activities of Enagás Group companies globally.

In affiliates where Enagás does not have effective control, it is recommended that their Boards promote principles aligned with this policy. The company also promotes the application of the policy's principles, wherever possible, to temporary joint ventures, joint ventures, and other similar partnerships or entities. The company also emphasises these principles and commitments with contractors, suppliers, and collaborators, particularly regarding the supply chain.

The policy is accessible to stakeholders on the company's [corporate website](#), as well as on the corporate Intranet for all employees.

The policy assigns the Board of Directors, through the Sustainability and Appointments Committee, the responsibility for guiding, supervising, and controlling the company's environmental strategy and policy, as well as managing related risks and public information. The Health and Safety, Environment, and Quality Integrated Management System Committee is tasked with setting the basic guidelines for developing and monitoring the integrated management system. It is also responsible for coordinating relevant actions and reporting to the Executive Committee. The various company Departments are responsible for setting and prioritising action plans, targets, and monitoring indicators.

In addition, Enagás has a [Climate Action Policy](#), also approved by the Board of Directors, which sets out key commitments in addressing climate change mitigation, climate change adaptation, energy efficiency, and the use of renewable energy sources. For further details about this policy, please refer to disclosure requirement [E1-2](#).

By doing so, the company makes commitments to address impacts identified as significant. For more details, refer to the table of impacts included in the [IRO-1](#) disclosure requirement in this chapter.

In addition, through the [Ethical Principles and Guidelines for Suppliers](#), Enagás considers that its suppliers and contractors shall 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 pollution prevention (for more information, see disclosure requirement G1-1).

## E2-2

## Pollution-related actions and resources

The Company fulfils its environmental commitments, as detailed in its Environmental Policy, through its management system. 100% of Enagás activity is [ISO 14001](#) standard certified. In 2024, more than 47 thousands of euros in OpEx was allocated to this certification for internal and external verifications and for monitoring legal requirements (see note '2.1 Operating profit' in the Consolidated Annual Accounts for details). Furthermore, the Serrablo and Yela storage facilities and the Huelva and Barcelona regasification terminals are [EMAS](#) (Eco-Management and Audit Scheme) certified.

Enagás evaluates the environmental aspects and impacts of its construction, operation, and maintenance activities via its Environmental Management System. Among these environmental aspects, pollution is particularly noteworthy. Environmental monitoring is carried out through audits, environmental surveillance programmes, assessments of legal compliance at all facilities and monitoring of environmental indicators and improvement plans.

Enagás regularly provides training and raises environmental awareness among its employees, covering issues related to pollution.

To prevent atmospheric pollution, Enagás periodically conducts regulatory monitoring in areas required by current legislation. Additionally, the company voluntarily performs self-monitoring to cover most of the combustion sources within its operations.

In 2024, the monitoring actions taken at the compressor stations were as follows:

- Periodic regulatory inspections (conducted by an authorised inspection organisation (AIO)). A total of 40 measurements were carried out during the year (90% of them with favourable results). These measurements have incurred an OpEx cost of 46,799 euros (see note '2.1 Operating profit' of the Consolidated Annual Accounts for details).
- Annual TESTO check carried out with their own resources (analysing team and Enagás employees). A total of 40 TESTO measurements were carried out during 2024, 95% of which were favourable. The cost of maintaining this equipment has amounted to 9,921 euros in OpEx (see note '2.1 Operating profit' in the Consolidated Annual Accounts for details).

In both cases, when an unfavourable measurement appears, Enagás carries out the necessary maintenance and repeats the measurement to ensure compliance.

In 2025, Enagás will continue to implement similar control measures, maintaining both the number of inspections and the level of operating expenses as were undertaken during the year.

Both the regulatory inspections and the internal TESTO checks are planned annually for every facility as part of the 'Atmospheric Monitoring Programme'.

Furthermore, Enagás employs mitigation strategies aimed at reducing emissions of atmospheric pollutants by implementing specific actions identified and planned within the framework of its Energy Efficiency and Emission Reduction Plan. For further details, refer to disclosure requirement [E1-3](#).

Metrics and targets

E2-3

Targets related to pollution

Due to the nature of these atmospheric emissions, the CO<sub>2</sub> reduction targets set by the company (for further details, see disclosure requirement E1-4) are directly linked to reducing the emissions of the specified non-greenhouse gases.

For 2024, Enagás has voluntarily set an annual target to reduce NO<sub>x</sub> emissions by 5%<sup>42</sup> compared to 2023 levels (0.03 Kg NO<sub>x</sub>/GWh activity<sup>43</sup>) across all its facilities. This goal will primarily be achieved through the Energy Efficiency and Emissions Reduction Plan. This is a preliminary objective, for which Enagás has achieved compliance by 2024, achieving a reduction of 19% in emissions compared to the previous year (249 tonnes in 2023 vs 191 tonnes in 2024). This is aligned with Enagás’ reduction by 22.6% of its scope 1 and 2 emissions compared to the previous year. It is a significantly higher percentage than the decrease in demand for natural gas, which in 2024 fell by almost 4%. This reduction was possible thanks to the implementation of energy efficiency and emissions reduction measures.

This voluntary target aligns with the commitment set out in the Environmental Policy to establish goals aimed at minimising impacts and dependencies on less significant environmental aspects, such as NO<sub>x</sub> emissions.

Compliance with this target and the identification of improvement actions are reviewed annually as part of Enagás’ monitoring of natural gas and diesel consumption in the equipment across its facilities.

E2-4

Pollution of air, water and soil

Non-GHG emissions (tonnes) <sup>(1)</sup>

	2022	2023	2024
NOx	329	249	191
CO	44	41	29
SOx	4	4	3
PM <sub>10</sub> /PST	3	5	3
NMVOC	11	10	7
NH <sub>3</sub>	8	6	5
PAH	2.1·10 <sup>-05</sup>	1.6·10 <sup>-05</sup>	1.2·10 <sup>-05</sup>
Ma	1.2·10 <sup>-06</sup>	1.1·10 <sup>-06</sup>	1.1·10 <sup>-06</sup>
Cd	2·10 <sup>-07</sup>	1.9·10 <sup>-07</sup>	1.8·10 <sup>-07</sup>
Cr	4·10 <sup>-06</sup>	3.7·10 <sup>-06</sup>	3.7·10 <sup>-06</sup>
Cu	6·10 <sup>-06</sup>	5.6·10 <sup>-06</sup>	5.5·10 <sup>-06</sup>
Hg	2.2·10 <sup>-06</sup>	2·10 <sup>-06</sup>	2·10 <sup>-06</sup>
Ni	2·10 <sup>-07</sup>	1.9·10 <sup>-07</sup>	1.8·10 <sup>-07</sup>
Pb	3·10 <sup>-06</sup>	2.8·10 <sup>-06</sup>	2.8·10 <sup>-06</sup>
Zn	0.0012	0.0011	0.0011
Benzene	0.039	0.03	0.024

(1) The reported amount of polycyclic aromatic hydrocarbons (PAH) includes the compounds Benzo(a)pyrene, Benzo(b)fluoranthene, Benzo(k)fluoranthene and Indeno(1,2,3-cd)pyrene.

The reported values are calculated based on fossil fuel consumption data for operational activities, sourced from Enagás’ Reading and Measurement System software tool (SLM) and fuel purchase invoices, along with specific emission factors for each pollutant<sup>44</sup>. The source of the emission factors used for the calculation of these pollutant emissions is the EMEP/EEA air pollutant emission inventory guidebook 2023, by the European Environment Agency.

Enagás has chosen this quantification methodology because direct measurements are not taken annually at all emission sources. This approach ensures the accurate quantification of atmospheric pollutant emissions associated with all the company’s activities and facilities.

E2-5

Substances of concern and substances of very high concern

Enagás does not handle substances of concern or very high concern in its operations and, as such, does not consider these sustainability issues to be significant for the company.

<sup>42</sup> This target aligns with the company’s greenhouse gas emissions reduction goals, as they are directly related (following the methodology outlined in disclosure requirement E1-4). These targets are not based on scientific criteria, and stakeholders have not participated in setting them.

<sup>43</sup> The specific pollutant load is defined as the mass of pollutant emitted per mass of product manufactured. Enagás does not sell products but provides services, so the specific load is based on the company’s activities, which

include the sum of the following: regasified gas (GWh), loading of tankers and ships at regasification terminals (GWh), compressed gas at compressor stations (GWh), and total injection and extraction at underground storage facilities (GWh).

<sup>44</sup> These parameters have only been verified by the verification provider and not validated by any other external body.

E2-6

Expected financial implications of pollution-related risks and opportunities

The company's materiality analysis has not identified any significant risks or opportunities associated with pollution. However, Enagás has an environmental liability policy that covers the costs of preventing and remedying any damage to the environment inside or outside the company's facilities, with an annual aggregate liability limit of 20 million euros per claim. It also has an industrial liability policy that covers compensation payments to third parties arising from sudden, accidental and unforeseen pollution or contamination with a limit of 300 million euros per claim.

## Non-financial and diversity reporting requirements (Law 11/2018)

### Significant environmental fines and penalties

Enagás has not received any significant fines or penalties during 2024 (neither did it in 2023). To be classified as significant, they must have a significant impact from a financial or reputational point of view.

### Pollution

Measures to prevent, reduce or repair air pollution specific to an activity, including noise and light pollution

Noise at Enagás' facilities is produced by the operation of regulators, turbines, vaporisers and pumps, among others. Regular environmental noise measurements are carried out at all facilities, where legally required, around their perimeter to ensure that noise levels remain within the limits established in applicable legislation. In those cases where deviations are found, corrective actions are implemented (acoustic screens, silencers, soundproofing, etc.).

With regard to light pollution, Enagás has also reduced night-time lighting at its facilities by switching off the lighting at night, with the exception of regasification terminals, where minimum perimeter lighting is maintained.

# E3. WATER AND MARINE RESOURCES

## Management of impacts, risks, and opportunities

IRO-1

### Description of the processes to identify and assess material impacts, risks, and opportunities related to water and marine resources

Enagás has conducted an analysis to determine the impacts, risks, and opportunities, assessing the materiality of these in relation to water and marine resources, as outlined in disclosure requirement [IRO-1](#) in chapter 2. This analysis encompasses all activities and infrastructure locations of companies under financial control, including both upstream and downstream stages of the value chain.

From an initial analysis, Enagás has not identified any activities that have material impacts on water and marine resources either upstream or downstream in its value chain. This analysis considered the relevance and criticality of these activities to the company.

Below is a detailed account of the impacts deemed significant as a result of this analysis:

Table of impacts

Topic	Sub-topic	Impact	Nature
Water and marine resources management	Water	Reduction in water resources due to the consumption of water from municipal networks, underground sources, or surface sources.	Negative - Current
	consumption		

Enagás has been provisionally appointed as the manager of the Spanish Hydrogen Backbone Network (provisional HTNO), with Enagás Infraestructuras de Hidrógeno S.L.U. authorised to temporarily carry out the development of European Projects of Common Interest for hydrogen networks. Currently, no material impacts, risks, or opportunities have been identified in relation to this new activity. However, Enagás is already examining the relevance of water and marine resources, as well as the potential impacts, risks, and opportunities, in an initial conceptual stage before the Environmental Impact Assessment (EIA).

The following section identifies the company's facilities and activities where the negative impact is material, based on criteria such as trends in water consumption, volume of water consumption, areas experiencing high water stress, and/or situations where water use is restricted due to resource scarcity:

### Facilities with significant negative impact

Enagás facilities	Geographical area (Municipality / Autonomous Community / Country)	River basin	Cause of materiality
Regasification terminals			
Barcelona	Barcelona/Catalonia/Spain	Internal River Basin Authorities ('C.H.') of Catalonia	Consumption restriction situations due to scarcity of water resources
Cartagena	Cartagena/Murcia/Spain	Segura River Basin Authority	Extremely high water stress zone Evolution of water consumption
Huelva	Palos de la Frontera/Andalucía/Spain	Guadalquivir River Basin Authority	High water stress zone Evolution of water consumption
Underground storage facilities			
Yela	Brihuega/Castilla La Mancha/Spain	Tajo River Basin Authority	High water stress zone

E3-1

### Policies related to water and marine resources

Enagás has an [Environmental Policy](#), approved by the Board of Directors, that outlines key commitments for environmental protection and aspects related to the Environmental Management System. These commitments include those concerning water and marine resources (use and consumption of water), which have been identified as important issues for Enagás. Key commitments include:

- Minimising water consumption and using marine resources responsibly in our operations.
- Using more sustainable water supply methods.
- Preventing and addressing potential water pollution that could result from our activities.

In 2024, this policy was revised following a corporate decision to split the former combined Health and Safety, Environment, and Quality Policy into three distinct policies. This change enables more effective implementation of commitments related to these crucial aspects of the business.

This policy applies and is communicated to all employees and managers of all companies making up the Enagás Group, including any affiliates effectively controlled by it, within the limitations established in the regulations applicable. The policy applies to all activities conducted by Enagás Group companies across all the regions where they operate, including those in areas facing water risk and high water stress.

In affiliates where Enagás does not have effective control, it is recommended that their Boards promote principles aligned with this policy. The company also promotes the application of the policy's principles, to the extent possible, to temporary joint ventures, joint ventures, and other similar partnerships or entities. The company also emphasises these principles and commitments with contractors, suppliers, and collaborators, particularly regarding the supply chain.

The policy is accessible to stakeholders on the company's [corporate website](#), as well as on the corporate Intranet for all employees.

The policy assigns the Board of Directors, through the Sustainability and Appointments Committee, the responsibility for guiding, supervising, and controlling the company's environmental strategy and policy, as well as managing related risks and public information. The Health and Safety, Environment, and Quality Integrated Management System Committee is tasked with setting the basic guidelines for developing and monitoring the integrated management system. It is also responsible for coordinating relevant actions and reporting to the Executive Committee. The various company Departments are responsible for setting and prioritising action plans, targets, and monitoring indicators.

By doing so, the company makes commitments to address impacts identified as significant. For more details, refer to the table of impacts included in the IRO-1 disclosure requirement in this chapter.

In addition, through the Ethical Principles and Guidelines for Suppliers, Enagás considers that its suppliers and contractors shall 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 efficiency in the use of resources (for more information, see disclosure requirement G1-1).

## E3-2

### Actions and resources related to water and marine resources

The company undertakes its environmental commitments (as outlined in the Environmental Policy) through its management system. 100% of Enagás activity is [ISO 14001](#) standard certified. In 2024, more than 47 thousands of euros in OpEx was allocated to this certification for internal and external verifications and for monitoring legal requirements (see note '2.1 Operating profit' in the Consolidated Annual Accounts for details). Furthermore, the Serrablo and Yela storage facilities and the Huelva and Barcelona regasification terminals are EMAS (Eco-Management and Audit Scheme) certified.

Enagás evaluates the environmental aspects and impacts of its construction, operation, and maintenance activities via its Environmental Management System. Among these environmental aspects, water consumption is particularly noteworthy. Environmental monitoring is carried out each year through audits, environmental surveillance programmes, assessments of legal compliance at all facilities and monitoring of environmental indicators and improvement plans.

Enagás regularly conducts training and awareness programmes for its workforce on environmental issues, including those related to water and marine resources.

The company has a General Plan for Reducing Water Consumption at its facilities, and carries out individualised monitoring of consumption trends at its facilities on a yearly basis in order to identify improvements in water efficiency. Based on this monitoring, Enagás implements measures to reduce water usage. In 2024, the following stand out:

- Rainwater recovery systems.
- Implementation of mechanical weeding in fields to replace water-diluted herbicides in areas facing water risk. At the Barcelona regasification terminal, these measures and other best practices aimed at reducing water use – such as significantly decreasing irrigation and increasing the use of the desalination plant – have achieved a 73% reduction in consumption compared to 2022, the year before these measures were introduced. The implementation of mechanical weeding has also significantly reduced pesticide use, from 1,300 litres in 2022 to 350 litres in 2024. In 2024, implementing this measure resulted in an operating expense of 28,123.50 euros. See note '2.1 Operating profit' in the Consolidated Annual Accounts for details. Enagás plans to continue with this initiative in the coming year, allocating an equivalent amount of money.

These measures have been deployed in areas classified as high water stress by the 'Aqueduct' tool of the World Resources Institute (WRI) Water Risk Atlas. At Enagás, areas designated as water risk are considered to be those under water stress.

Metrics and targets

E3-3

Targets related to water and marine resources

Enagás has voluntarily established targets to cut water consumption at facilities deemed significant (see ESRs 2 IRO-1 disclosure requirement), implementing necessary measures to ensure these targets are met.

Globally, the aim for 2024 is to decrease annual sanitary water collection from municipal networks by 2% compared to 2023 levels (1,789 m³ reduction) across all company facilities<sup>45</sup>. This goal has been preliminarily set by targeting reductions at facilities where water use exceeds their three-year average consumption. In 2024, Enagás achieved this target with a 25.2% reduction in its water withdrawal from the public network compared to the previous year (for more information, see disclosure requirement E3-4).

This voluntary target aligns with the commitment in the Environmental Policy to set objectives aimed at minimising impacts and dependencies on less significant environmental factors, such as water consumption<sup>46</sup>.

Monitoring compliance with these targets and identifying areas for improvement are conducted annually through the evaluation of environmental aspects.

E3-4

Water consumption

At Enagás, we do not consume water in our production processes. Water consumption in 2024 was 55,866 m³ (including the 2,209 m³ of seawater collected at the Barcelona terminal for desalination), a figure that represents only 0.001% of the total water withdrawn.

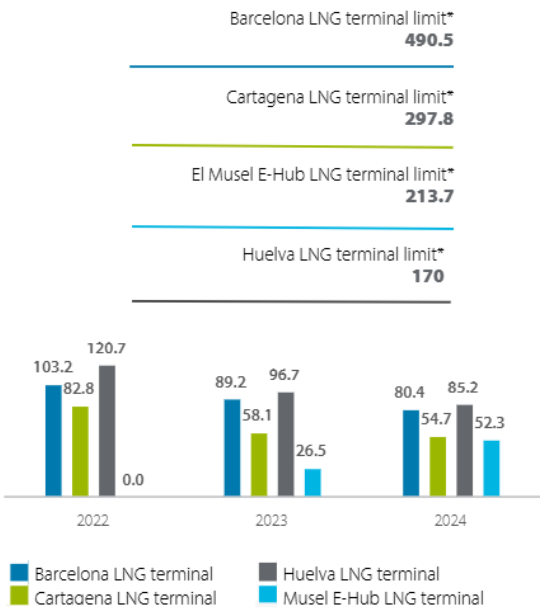
Water collected, discharged and consumed (m³)<sup>(1)</sup>

	2022	2023 <sup>(2)</sup>	2024
Water collected (m³)	306,916,449	270,498,111	272,635,121
Water discharged (m³)	306,863,023	270,407,832	272,579,255
Water consumed (m³) (water collected minus water discharged)	53,426	90,279	55,866

(1) These parameters have only been verified by the verification provider and not validated by any other external body. In those facilities for which a quantification of the water discharged is not available, an estimate is made based on the water captured (11% for LNG regasification plants and subway storage facilities, 50% for compressor stations and 85% for other facilities).  
(2) In 2023, stored water (10,857 m³) was considered as water withdrawn (270,508,968 m³ were reported as water withdrawn and 101,136 m³ as water consumed). In 2024, these data have been recalculated considering stored water as water that does not affect the final balance (for more information, see disclosure requirement BP-2 in chapter 2).

The main collection of water that Enagás carries out is that of seawater for use in floodwater vaporisers or at regasification terminals. The volume of water taken is directly proportional to the quantity of gas regasified. This seawater accounts for 99.9% of the total water withdrawn and is returned in such a way that its nature is maintained (the decrease in temperature is minimal and does not affect the marine ecosystem).

Seawater withdrawn and returned to its source (hm³)



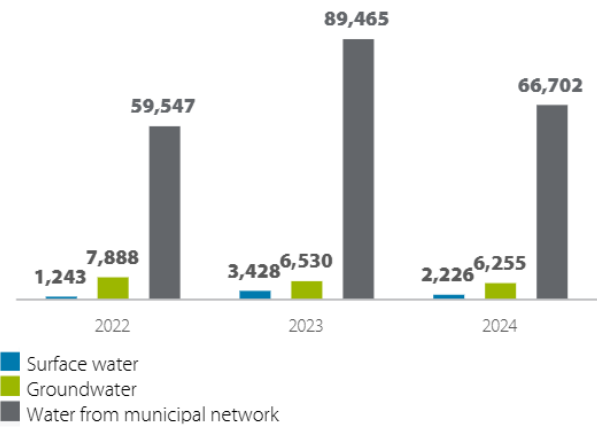
\* Legal extraction limit established for each Regasification Terminal

The aggregate figure for water withdrawn at the four LNG regasification terminals (Barcelona, Huelva, Cartagena and Musel E-Hub) remained virtually the same in 2024 as in 2023 (+0.8%). This stability was due to a combination of reduced regasification activity at the Barcelona, Huelva and Cartagena LNG regasification terminals and increased regasification activity at the Musel E-Hub following its start-up.

<sup>45</sup> Including facilities with a significant negative impact (for more information, see the table in the IRO-1 disclosure requirement in this chapter).

<sup>46</sup> The target is not based on scientific criteria or ecological thresholds. Furthermore, stakeholders were not involved in setting it.

Water collected from other sources (m<sup>3</sup>) <sup>(1)</sup>



In 2024, water withdrawn from public mains fell mainly due to the adoption of water-saving measures at the Barcelona LNG regasification terminal and the water leak detection and monitoring campaign carried out at the Cartagena LNG regasification terminal. Thanks to these actions, consumption from public mains fell from 89,465 m<sup>3</sup> in 2023 to 66,702 m<sup>3</sup> in 2024, representing a reduction of 25.2%, thus meeting the target of a 2% reduction in water withdrawn set for 2024.

Of the 75,183 m<sup>3</sup> withdrawn in 2024 from surface water, groundwater and public mains for sanitation, irrigation and fire-fighting equipment, 20,450 m<sup>3</sup> were discharged. This water is mainly discharged into the sewage system and septic tanks, in the latter case complying with all the limit values established by the relevant authorities. As a result, no improvements in wastewater quality have been identified.

Enagás also has fire suppression ponds or water tanks at its facilities, with an estimated volume of stored water of 10,857 m<sup>3</sup> (unchanged with respect to the previous year). At the Denia and Lumbier compressor stations, these ponds are filled using recycled rainwater. During 2024, 24.5 m<sup>3</sup> of rainwater was collected at the Lumbier compressor station and 30 m<sup>3</sup> at the Denia compressor station. This water was reused (representing 0.1% of the total water consumed).

Regarding facilities with a significant negative impact in water-stressed areas (for more information, see the table in disclosure requirement IRO-1 of this chapter), 28,864 m<sup>3</sup> of water have been consumed.

Water withdrawn is obtained from flow metres, while water discharged is estimated from water withdrawn at most facilities. Stored water is an estimate based on the capacities of the fire suppression ponds which are kept full.

Water intensity (m<sup>3</sup>)

	2022	2023	2024
Water intensity: water consumed relative to total revenue (m <sup>3</sup> /million euros)	55.1	98.2	61.2

The indicator of water intensity relative to total revenue is not the most accurate measure of our environmental performance, as 97.5% of our revenue comes from regulated activities determined by the current regulatory framework. This revenue is defined by a methodology that does not consider the level of use of gas infrastructure, which is the parameter related to environmental impacts.

E3-5

Expected financial impacts of risks and opportunities related to water and marine resources

In the materiality analysis conducted, the company did not identify any material risks or opportunities related to water and marine resources. However, Enagás has an environmental liability policy that covers the costs of preventing and remedying any damage to the environment inside or outside the company's facilities, with an annual aggregate liability limit of 20 million euros per claim. It also has an industrial liability policy that covers compensation payments to third parties arising from sudden, accidental and unforeseen pollution or contamination with a limit of 300 million euros per claim.

# E4. BIODIVERSITY AND ECOSYSTEMS

## Strategy

E4-1

### Transition plan and consideration of biodiversity and ecosystems in strategy and business model

Enagás analyses the risks and opportunities related to biodiversity and ecosystems to reduce vulnerability and enhance the resilience of its business model. Following this, it assesses the impacts of its activities on biodiversity, examining how factors like land use changes, resource use, climate change, and pollution affect ecosystems. This assessment is tailored to each phase of a facility's life cycle, from construction to decommissioning. So far, given the company's current business model, the analysis has primarily focused on the operation phase, identifying an impact of relative importance (for more details, see disclosure requirement [IRO-1](#)). Enagás has implemented the actions needed to appropriately manage this impact, without causing significant changes to the existing business model or strategy (for more information, see disclosure requirement [E4-3](#)).

However, the update of the 2025-2030 Strategic Update focuses heavily on new construction projects. Given the potential risk of cost overruns, delays, or unavailability due to the protection of endangered species or biodiversity, the company is exposed to such risks in upcoming projects. Enagás is already examining the various impacts and opportunities that the future hydrogen network may have on biodiversity and is considering measures to mitigate these impacts. An example of this approach is the

development of Initial Project Documents (IPD), which primarily aim to identify and analyse environmental impacts, while proposing mitigation and risk management measures concerning biodiversity. Additionally, Concept Plans for Public Participation are prepared for areas likely to be affected by the future hydrogen network, enabling stakeholders to be heard and actions to be taken accordingly.

In the coming years, Enagás will delve deeper into the impacts, risks, and opportunities arising from these new projects, along with the potential financial implications and their effects on the company's business model and strategy. This analysis will be conducted in accordance with the methodology outlined in the [IRO-1](#) disclosure requirement. It will help identify the actions needed to minimise these effects and to adapt to and manage associated risks, ensuring the company's resilience.

SBM-3

### Material impacts, risks, and opportunities and their interaction with the strategy and business model

The following details the areas sensitive to biodiversity where our operational sites are located and assesses whether they have a significant negative impact on biodiversity. This information is detailed for sites of material significance (for more details, see disclosure requirement [IRO-1](#) of this standard).

It is important to highlight that no significant negative impacts have been identified concerning land degradation, desertification, or soil sealing.

## Sites of material significance and their impact on biodiversity-sensitive areas

Material sites in own operations	Figure	Protected area (most unfavourable habitat conservation status) <sup>47</sup>	Significant negative impact <sup>1</sup>
<b>Regasification terminals</b>			
Barcelona			No
Cartagena			No
Huelva			No
Musel			No
<b>Underground storage facilities</b>			
Yela			No
Serrablo	Site of Community Importance (Habitats Directive)	El Pirineo	No
Gaviota	Biosphere reserve (National)	Urdaibai (B)	No
	Special Protection Area for Birds (Natura 2000 Network)	Urdaibaiko itsasadarra / Urdaibai estuary (B)	No
Castor			No
<b>Compressor stations (CS)</b>			
Tivissa CS			No
Montesa CS			No
Paterna CS			No
Crevillente CS			No
Zaragoza CS			No
Haro CS			No
Bañeras CS			No
Algete CS			No
Dos Hermanas CS			No
Lumbier CS			No
Villafranca de Córdoba CS			No
Almodóvar del Campo CS			No
Coreses CS			No
Alcázar de San Juan CS			No
Almendralejo CS			No
Villar de Arnedo CS			No
Chinchilla CS			No
Denia CS	Natural Park (National)	Marjal de Pego - Oliva (B)	No
	Wetlands (National)	Raons river mouth and waterfront	No
	Wetlands (National)	Marjal de Pego - Oliva (B)	No
	Special Protection Area for Birds (Natura 2000 Network)	Marjal de Pego - Oliva (B)	No
Euskadour CS			No

<sup>47</sup>In order to determine the protected spaces affected by the presence of Enagás facilities, in addition to the actual surface area occupied by the facility, an area of influence has been taken into account. The area of influence varies according to the type of facility. It is 100 metres for underground storage facilities, regasification terminals and compressor stations, and 2 metres on each side of the line for gas pipelines.

In addition, the habitat types listed in Appendix I of the Habitats Directive are structured into 9 major habitat groups. For each of the habitat groups, there are sub-groups for different habitat types of Community interest. The degree of conservation of these sub-groups for each protected area is taken from the database of Spanish Natura 2000 Network protected areas provided by the Ministry for Ecological Transition and the Demographic Challenge. Once we know the protected area where the company is present, we can determine the conservation status of each of the habitats it contains. Given the large number of protected spaces, and in order to make this information easier to read, the company is providing the degree of conservation of the most unfavourable habitat contained in each of these spaces.

Material sites in own operations	Figure	Protected area (most unfavourable habitat conservation status) <sup>47</sup>	Significant negative impact <sup>1</sup>
<b>Gas pipeline network</b>			
Gas pipeline	Special Areas of Conservation (Habitats Directive)	Vegas, cuestras y páramos del sureste de Madrid (C), Guadiato-Bembazar (C), Cuenca del río Guadarrama (B), Sistema Prelitoral meridional (B), Planas y estepas de la margen derecha del Ebro (C), Sierra de Guadarrama (B), Embalse de Cornalvo y Sierra Bermeja (B), Sierra de Ugarra (B), Guadalmellato (C), Montes de Toledo (B), Telera-Acumuer (C), Aizkorri-Aratz (C), Montes de Miranda de Ebro y Ameyugo (B), Cuencas de los ríos Jarama y Henares (C), Sierra Morena (C), Suroeste de la Sierra de Cardeña y Montoro (C), Yesos de la Ribera Estellesa (B), Monegros (C), Massís de Bonastre (C), Tivissa-Vandellòs-Llaberia (C), Cuenca del río Manzanares (C), Valle del Cuerpo de Hombre (B), Granadilla (B), Los Alcornocales (C), Doñana (C), Monfragüe (B), Río y Embalse del Ebro (C), Hoces del Alto Ebro y Rudrón (C), Sierras del Campanario y Las Cabras (C), Sierra de Cabrera-Bedar (C), Ramblas de Gergal, Tabernas y Sur de Sierra Alhamilla (C), Secans del Montsià (C), Sierras de Santo Domingo y Caballera y río Onsella (B), Montaña Central de León (B), Cuencas del Rumblar, Guadalen y Guadalmena (C)	Yes
	Special Areas of Conservation (Birds Directive)	Massís de Bonastre (C), Campiña sur - Embalse de Arroyo Conejos (C), Tivissa-Vandellòs-Llaberia (C), Sistema Prelitoral meridional (B), Secans del Montsià (C), Matarranya - Aiguabarreix (B), Estepas de Belchite -El Planerón - La Lomaza (B), Llanos de Cáceres y Sierra de Fuentes (B), Embalse de Cornalvo y Sierra Bermeja (B), Área esteparia de la margen derecha del río Guadarrama (C), Cortados y cantiles de los ríos Jarama y Manzanares (C), Montes de Toledo (B), Carrizales y sotos de Aranjuez (C), Montes de Miranda de Ebro y Ameyugo (B), La Sierra de Escalona y su entorno (C), Sierra Morena (C), Área esteparia del este de Albacete (C), Sierra de Martés-Muela de Cortes (B), La Retuerta y Saladas de Sástago (C), Los Alcornocales (C), Monfragüe y las Dehesas del Entorno (B), Sierra de Guadarrama (B), Hoces del Alto Ebro y Rudrón (C), Espacio marino del poniente y norte de Ibiza (A), Plataforma-talud marinos del Cabo de la Nao (C), Sierras del Gigante-Pericay, Lomas del Buitre-Río Luchena y Sierra de la Torrecilla (B), Alto Guadiato (C), Estepas cerealistas de los ríos Jarama y Henares (C), Espacio marino de la Ria de Mundaka-Cabo de Ogoño (C), Serres de Mariola i el Carrascar de la Font Roja (C), Doñana (C), Sierras de Santo Domingo y Caballera y río Onsella (B), Campiñas de Sevilla (B), Lagunas de Villafafila (B), Páramo Leonés (C)	Yes
	Sites of Community Importance SCI (SPA/SCA)	Guadalmellato (C), Guadiato-Bembazar (C), Los Alcornocales (C), Doñana (C), Sierras del Campanario y las Cabras (C), Sierra de Cabrera-Bedar (C), Ramblas de Gergal, Tabernas y Sur de Sierra Alhamilla (C), Alto Guadiato (C), Campiñas de Sevilla (B), Cuencas del Rumblar, Guadalen y Guadalmena (C), Suroeste de la Sierra de Cardeña y Montoro (C)	Yes
	Special Protection Plan (SPP)	Secans del Montsià (C), Serres de Pàndols-Cavalls (C), Muntanyes de Tivissa-Vandellòs (C), Serra de Llaberia (C), Massís de Bonastre (C)	Yes
	Regional Park	Curso Medio del Río Guadarrama y su entorno (B), Cuenca del río Manzanares (C), Ejes de los Cursos Bajos de los Ríos Manzanares y Jarama (C)	Yes
	Natural Park	Sierra de Guadarrama (B), Embalse de Cornalvo and Sierra Bermeja (B), Aizkorri-Aratz (C), Valle de Alcudia and Sierra Madrona (C), Oyambre (C), Los Alcornocales (C), Hoces del Alto Ebro and Rudrón (C), Doñana (C), Las Ubiñas-La Mesa (C), Llanos de Cáceres and Sierra de Fuentes (B), Llanos de Cáceres and Sierra de Fuentes (B)	Yes
	Area of Regional Interest	Llanos de Cáceres y Sierra de Fuentes (B)	Yes
	Protected Landscape	Valle del Río Hungría (C), La Sierra de Escalona y su entorno (C), Río y Embalse del Ebro (C)	Yes
	European Ecological Network Area (Natura 2000)	Río y Embalse del Ebro (C)	Yes
	Nature Reserve	Lagunas de Villafafila (B)	Yes
	Site of Community Importance (Habitats Directive)	La Sierra de Escalona y su entorno (C), Dehesa del Estero y Montes de Moguer (C), Serres de Mariola i el Carrascar de la Font Roja (C)	Yes
	Municipal Natural Site	El Tello (C)	Yes
	Ramsar Site, Wetlands of International Importance	Marjal de Pego-Oliva (B), Doñana (C), Mediterranean cetacean migration corridor (C)	Yes
	Marine Protected Area	Mediterranean cetacean migration corridor (C)	Yes
	Biosphere Reserve	Urdaibai (B)	Yes
	Marine Protected Area (OSPAR)	Marine area of the Ria de Mundaka-Cabo de Ogoño (C)	Yes

<sup>1</sup> For more information on the significant adverse effect analysis, see the IRO-1 disclosure requirement within this chapter.

Enagás has also identified the endangered species included on the IUCN Red List with habitats in the areas where it operates in order to prevent effects on them. The following table shows the number of IUCN Red List species identified around Enagás’ facilities, without this signifying any impact or threat derived from the company’s activity.

Presence of endangered species in infrastructures with significant negative impact

	Critically endangered (CR)	Endangered (EN)
Gas pipeline	35	84

Management of impacts, risks, and opportunities

IRO-1

Description of the processes to identify and assess material impacts, risks, and opportunities related to biodiversity and ecosystems

Enagás has conducted an analysis to identify relevant impacts, risks, and opportunities concerning biodiversity and ecosystems. This process aligns with the LEAP methodology, which has been incorporated into the company’s materiality analysis, as outlined in the [IRO-1](#) disclosure requirement in chapter 2. This analysis encompasses all activities and infrastructure locations of companies under financial control, including both upstream and downstream stages of the value chain.

The material impacts identified from this analysis are outlined below:

Table of impacts

Topic	Sub-topic	Impact	Nature
Biodiversity	Terrestrial and fluvial ecosystems	Impacts affecting the health of terrestrial ecosystems and their natural resources, stemming from maintenance activities on pipeline infrastructure, such as weeding, in both protected areas and other ecologically valuable regions.	Negative - Current

For further details on sites located in biodiversity-sensitive areas, refer to disclosure requirement [SBM-3](#). For more information on biodiversity-related mitigation measures, see disclosure requirement [E4-3](#).

Enagás has been provisionally appointed as the manager of the Spanish Hydrogen Backbone Network (provisional HTNO), with Enagás Infraestructuras de Hidrógeno S.L.U. authorised to temporarily carry out the development of European Projects of Common Interest for hydrogen networks. For these new activities, the company is examining the importance of biodiversity and ecosystems, alongside the potential impacts, dependencies, risks, and opportunities associated with all phases of the project. This analysis takes place in the initial conceptual stage before the Environmental Impact Assessment (EIA).

Analysis of impacts, risks, and opportunities using the LEAP methodology

Since 2023, Enagás has applied the LEAP (Locate, Evaluate, Assess, Prepare) process from the TCFD (Taskforce on Nature-related Financial Disclosures) framework across the entire life cycle of our assets. This process has identified the impacts, risks, and opportunities highlighted in the materiality analysis<sup>48</sup>.

Understanding the protected areas where we operate and the species inhabiting the regions influenced by our facilities is crucial for effectively managing our activities. This involves assessing the actual and potential impacts on biodiversity and ecosystems to prevent harm and implement mitigation measures, or to develop recovery and conservation projects.

Identification of priority areas

According to the TCFD reporting framework, a facility is a priority if it is located in a sensitive location and has a materiality relationship with one of the valued aspects of nature (impacts and dependencies).

Enagás has evaluated which of its facilities are in biodiversity-sensitive areas and concluded that it has sites both within and near these areas. For this evaluation, three geographic information sources were used:

- The World Database on Protected Areas (WDPA), which provides global information on protected areas to assess ecosystem integrity.
- The Biodiversity Integrity Index (BII) shows the presence of areas rich in biodiversity where there are high risks associated with the loss or deterioration of nature.
- Overall Water Risk (OWR), which is used to assess water stress.

To evaluate the materiality of the sites, impacts and dependencies were identified and assessed based on the five drivers of biodiversity loss outlined by the Intergovernmental Platform on Biodiversity and Ecosystem Services (IPBES): land use change, climate change, resource use, pollution, and biodiversity.

The significant impacts and dependencies during the infrastructure operation phase are detailed below. This analysis also considered the potential ecosystem services affected.

48 Enagás has not included systemic risks in this analysis.

## Significant impacts and dependencies associated with the operation

Impact driver	Impact or dependence			Main preventive and mitigation actions for impacts and risks
	Type of impact or dependency	Valuation	Description	
<b>Climate change</b>	Dependency	Moderate	Situations affecting the operation: increase in natural disasters and adverse weather conditions (floods, landslides, fires, etc.). For more details, refer to the <a href="#">IRO-1</a> disclosure requirement of chapter E1.	<ul style="list-style-type: none"> <li>• Environmental certifications (ISO 14001 and EMAS).</li> <li>• Emergency response action plans.</li> <li>• Procedures for the investigation and monitoring of incidents.</li> <li>• Development of demand scenarios that determine the infrastructure to develop in order to guarantee secure supply.</li> <li>• Emergency response action plan.</li> <li>• Insurance policy covering catastrophic damage.</li> <li>• Review of plans for adaptation to climate change in infrastructures and the associated</li> <li>• Ecosystem restoration and preservation</li> <li>• Pilot initiatives for vegetation control through nature-based solutions (extensive livestock management)</li> </ul>
<b>Biodiversity and climate change</b>	Negative impact	Low	Weed control and removal of vegetation along the pipeline route	
<b>Change of land use</b>	Dependency	Low	Regulation/standards related to pipeline maintenance work <sup>(1)</sup>	

(1) The dependency relates to the identified negative impact because the regulation concerning gas pipeline maintenance work results in weeding and the removal of plant species.

This analysis concludes that during the operation phase, the significant negative impact is solely on gas pipelines. For more details on the infrastructure, refer to the SBM-3 disclosure requirement in this chapter. Specifically, 56% of the pipelines are classified as priority because they are situated in protected areas, where the negative impact arises from weeding and the removal of plant species along the route. This situation is significantly dependent on the regulations associated with maintenance work (for further information, see disclosure requirement E4-5).

### Risks arising from nature and biodiversity

Drawing from these impacts and dependencies, Enagás, in collaboration with the company's materiality analysis and risk assessment processes, identifies and evaluates the risks associated with nature and biodiversity.

The identified physical risks are linked to our dependence on ecosystems, while regulatory and reputational risks stem from impacts on these ecosystems. In addition, some risks concern specific environmental issues, such as greenhouse gas emissions or protected species, as illustrated in the table below.

## Type of risk

Type of risk	Risks	Level of risk	Main mitigating actions
<b>Physical risks</b>	Operational cost overruns due to natural disasters	Tolerable	<ul style="list-style-type: none"> <li>• Forecast contingencies associated with infrastructure development projects.</li> </ul>
<b>Strategic and business risks</b>	Cost overruns, delays or unavailability due to protection of protected species or biodiversity	Tolerable	<ul style="list-style-type: none"> <li>• Monitoring of infrastructure development projects to identify potential cost overruns, detours or contingencies.</li> </ul>
<b>Regulatory risks</b>	Delays or failure to obtain authorisations, licences or permits due to negative environmental impacts	Acceptable	<ul style="list-style-type: none"> <li>• Previous experience in resolving this type of contingency.</li> </ul>
	Regulatory and legal non-compliance (environmental regulation), including liability for contractor non-compliance	Tolerable	<ul style="list-style-type: none"> <li>• Enagás' Environment Policy, the principles of which are embodied in the Enagás Environmental Management System, certified in accordance with ISO 14001.</li> <li>• Environmental Impact Assessment (EIA) according to the typology and applicable regulations (subject to public record with stakeholder consultation processes).</li> </ul>
<b>Reputational risks</b>	Negative stakeholder perception of the natural capital and biodiversity management	Acceptable	<ul style="list-style-type: none"> <li>• Carrying out actions aimed at avoiding, minimising, restoring and rehabilitating, compensating for environmental impacts.</li> <li>• Sustainable Management Model, Sustainable Management Plan with lines of action for Natural Capital and Biodiversity Management.</li> </ul>

Level of risk: Acceptable / Tolerable / Significant / Critical

## Information and consultation processes

For infrastructure construction projects, Enagás conducts environmental impact studies based on the project's type and relevant regulations. These studies include consultation processes with stakeholders (for more information, see disclosure requirement S3-2). This approach enables us to integrate best practices during the design and construction phases to minimise environmental impact.

In connection with the occupation of private property during construction projects, a regulated procedure is applicable in Spain which includes public information and consultation with the entities affected, which also guarantees transparency in the construction of infrastructure and equal treatment before the law.

### E4-2

## Policies related to biodiversity and ecosystems

Enagás has an [Environmental Policy](#), approved by the Board of Directors, that outlines key commitments for environmental protection and aspects related to the Environmental Management System. These commitments include those related to biodiversity and ecosystems, identified as key issues for Enagás, with the following highlights:

- Integrating biodiversity conservation into the company's activities – including design, construction, operation, maintenance, technical management, and dismantling of energy infrastructures – by regularly assessing the dependencies and impacts of these activities on natural capital and implementing specific initiatives within the company's environmental management plans and programmes.
- Preserving ecosystems and their biodiversity across Enagás' activities and areas of operation through actions aligned with the impact mitigation hierarchy. The company emphasises the importance of identifying threatened ecosystems, habitats, species, and communities for each project in order to monitor them and implement prevention and mitigation measures. Planning for the development of energy infrastructures is also crucial, with a focus on minimising necessary installations, reducing energy resource requirements, and enhancing operational efficiency. Efforts are made to minimise infrastructure placement in protected areas and to prioritise expanding existing pipelines over creating new routes. The importance of making design adjustments to prevent habitat fragmentation and following existing infrastructure corridors wherever possible is highlighted.
- Energy infrastructures should be built and operated to minimise their impact on ecosystems, habitats, and endangered species, all of which have environmental, social, economic, cultural, or scientific significance.
- The company also develops programmes for species recovery and soil restoration through decompaction and topsoil replacement. Revegetating affected land involves sowing herbaceous species and planting shrubs and trees that are compatible with the local environment and do not threaten the area's biological diversity.

Enagás remains committed to its policy of 'No net loss and net positive impact on nature and biodiversity'.

In 2024, this policy was revised following a corporate decision to split the former combined Health and Safety, Environment, and Quality Policy into three distinct policies. This change enables more effective implementation of commitments related to these crucial aspects of the business.

This policy applies and is communicated to all employees and managers of all companies making up the Enagás Group, including any affiliates effectively controlled by it, within the limitations established in the regulations applicable. Consequently, it covers all activities of Enagás Group companies globally.

In affiliates where Enagás does not have effective control, it is recommended that their Boards promote principles aligned with this policy. The company also promotes the application of the policy's principles, to the extent possible, to temporary joint ventures, joint ventures, and other similar partnerships or entities. The company also emphasises these principles and commitments with contractors, suppliers, and collaborators, particularly regarding the supply chain.

The policy is accessible to stakeholders on the company's [corporate website](#), as well as on the corporate Intranet for all employees.

The policy assigns the Board of Directors, through the Sustainability and Appointments Committee, the responsibility for guiding, supervising, and controlling the company's environmental strategy and policy, as well as managing related risks and public information. The Health and Safety, Environment, and Quality Integrated Management System Committee is tasked with setting the basic guidelines for developing and monitoring the integrated management system. It is also responsible for coordinating relevant actions and reporting to the Executive Committee. The various company Departments are responsible for setting and prioritising action plans, targets, and monitoring indicators.

By doing so, the company makes commitments to address impacts identified as significant. For more details, refer to the table of impacts included in the IRO-1 disclosure requirement in this chapter.

In addition, through the Ethical Principles and Guidelines for Suppliers, Enagás considers that its suppliers and contractors shall 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 the preservation of nature and its biodiversity (for more information, see disclosure requirement G1-1).

## E4-3

## Actions and resources related to biodiversity and ecosystems

Enagás is committed to managing biodiversity based on a hierarchy of impact mitigation, with the aim of preserving ecosystems and their biodiversity within our activities and operational areas. This management approach involves:

- Avoiding impacts on sensitive areas concerning biodiversity and species with high ecological value.
- Applying nature-based solutions to minimise the impacts generated.
- Striving to closely match the types of habitats and species affected during both restoration and compensation efforts.

Enagás conducts annual environmental assessments of operational infrastructures and Environmental Impact Assessments (EIA) for new construction projects, depending on the type and applicable regulations. These assessments cover 802 operational facilities occupying an area of 3.8 km<sup>2</sup>. These evaluations help Enagás identify the necessary mitigation measures for biodiversity and ecosystems, ensuring the allocation of resources required for their implementation. So far, the company has not established biodiversity offsets as part of its mitigation measures.

In the case of gas pipeline construction projects, the route design already takes into account criteria for minimising the impact on local plant and animal wildlife, and for avoiding the occupation of private property. In addition, whenever possible, we follow existing infrastructure corridors or reduce track widths to protect areas of natural vegetation, protected zones, or other regions of ecological interest. We also prioritise using existing pipeline routes over creating new ones, and we make design adjustments to minimise or prevent habitat and ecosystem fragmentation.

Enagás has undertaken various projects focused on biodiversity and ecosystems, particularly noteworthy are our collaborative initiatives and nature-based solutions:

### Vegetation control through extensive livestock management

Since 2016, Enagás has been working on collaborative projects with different stakeholders (environmental companies, other companies, Public Administrations and farmers) to carry out vegetation control through the pasturing of range livestock (horses) along gas pipelines.

The results obtained over the years have demonstrated the effectiveness and benefits of the use of livestock, for example in the growth of plant cover resulting from the animals' activity.

This is the case for gas pipeline sections located in the province of Huesca, attached to the Caspe Transmission Centre and the Sabiñánigo Transmission Centre, and the sections located in the Alto Bernesga Biosphere Reserve (León). In these sections, regular grazing is used as the most sustainable solution for vegetation control, due to its high positive impact on the environment and the community:

- Fertilisation and soil disturbance by livestock has a favourable effect on flora and fauna, increasing biodiversity. For this reason, the International Union for Conservation of Nature (IUCN) is assessing its classification as a nature-based solution.
- This highlights the ability of the local livestock sector to deliver ecosystem services while utilising indigenous expertise. Through initiatives like the online Grazing Round Tables, Enagás engages directly with local livestock farmers, energy companies, universities, and environmental organisations via a biannual, in-person communication forum.

Since 2023, an assessment of the impact of these actions on natural capital has been carried out, with the aim of learning about differential biodiversity rates in areas with livestock activity compared to areas without it. To this end, several samplings were carried out during the year to measure the following aspects:

- Landscape impact indicators:
  - Diversity and richness of tree, shrub, and herbaceous species (including floristic richness).
  - Changes in the vegetation layer.
- Biodiversity indicators for pollinating and soil-dwelling arthropods:
  - Total and relative abundance.
  - Functional biodiversity.
  - Arthropod richness.
  - Diversity indices.

Previous results obtained after sampling were favourable, reinforcing the positive effect of livestock on the biodiversity of the grazed area.

In 2024, the company spent 66,815 euros (OpEx) on the development of this project. See note '2.1 Operating profit' in the Consolidated Annual Accounts for details. Enagás plans to continue this initiative in the following financial year, carrying out similar activities and earmarking a comparable budget.

### Collaboration with associations

Since 2023, Enagás has had a five-year partnership agreement with the Bearded Vulture Conservation Foundation, focusing on socio-environmental initiatives to conserve biodiversity in the mountainous regions of northern and central Spain. A key initiative is the 'Annual programme for the recovery of bearded vultures from nests with low reproductive success', aimed at increasing the population through captive breeding and subsequent release into the wild. During 2024, Enagás allocated 15,000 euros (OpEx) to collaborate with this Foundation. See note '2.1 Operating profit' in the Consolidated Annual Accounts for details.

Furthermore, Enagás has teamed up with the Foundation for the Protection of Wild Animals (FAPAS) in 2024, with efforts concentrated on conserving the brown bear in the Valgrande-Pajares Valley by bolstering trophic resources. The aim is to improve the quality of the ecosystem and natural habitat through natural seed dispersal in order to increase the bear population by creating the most suitable environment and natural trophic resources for feeding. Efforts to enhance the bear’s habitat include installing protective systems for beehives and planting trees that provide food. Collaboration with this Foundation amounted to a total of 85,320 euros in 2024 (OpEx). See note ‘2.1 Operating profit’ in the Consolidated Annual Accounts for details.

In the coming years, Enagás aims to continue its collaborations with biodiversity-related associations and those tied to ecosystems where we have an active presence, tailoring our involvement to the specific projects developed, which will involve similar financial costs.

# Metrics and targets

E4-4

## Targets related to biodiversity and ecosystems

Evaluating the state of biodiversity and how it responds to human disturbances is a challenging endeavour, due to the complex web of interactions within ecosystems. The diversity of factors affecting biodiversity makes it difficult to define assessment methodologies, indicators, metrics, and ecological thresholds.

Aligned with our commitments to achieve no net loss of biodiversity in energy infrastructure construction and operation by 2040, and to create a positive impact on nature by 2050 as outlined in our Environmental Policy, Enagás has set specific biodiversity targets for all its construction activities. These targets align with the Kunming-Montreal Global Biodiversity Framework and the EU Biodiversity Strategy<sup>49</sup>:

- By 2024, we aim to restore 100% of the areas affected by construction projects from the second half of 2023 that were not completely restored in the previous year, as well as all construction projects from the first half of 2024 (57,146 m<sup>2</sup> restored). This goal has been met this year with the restoration of 100% of the altered areas in the alternative route of the León-Oviedo gas pipeline project (for more information, see disclosure requirement E4-5). This target will also apply in 2025, with the objective of restoring 100% of the affected area.

Moreover, Enagás employs biodiversity offset strategies, such as using carbon credits from deforestation prevention projects (for more details, see disclosure requirement [E1-7](#)) and engaging in collaborative projects with associations (for further information, see block '[Processes to remediate negative impacts and channels for customers to raise concerns](#)'), to fulfil these commitments.

Restoration is intended to occur as soon as possible following disruption, although it may sometimes take place in the subsequent months. Thus, the degree of achievement of this target is assessed at the project level after its completion. The degree of achievement is then evaluated at a company level on an annual basis considering only the projects completed during the year and an interval of two years. The construction project manager monitors the altered and restored surface areas throughout the project's development to oversee these targets.

These targets align with our Environmental Policy's commitment to setting goals for neutrality and generating a positive net impact on the most significant environmental aspects, including: No net loss and net positive impact on nature and biodiversity (for more information, see disclosure requirement [E4-2](#)).

The table '[Impacts and dependencies associated with the operation](#)', found in disclosure requirement [IRO-1](#) of this standard, outlines the impacts and dependencies on natural capital. It highlights ecosystem restoration and preservation, as well as avoiding deforestation, as key actions to prevent and mitigate impacts.

E4-5

## Impact metrics related to biodiversity and ecosystems change

In 2024, Enagás' priority infrastructures<sup>50</sup> occupied a surface area of 4.5 km<sup>2</sup> of land located in Protected Natural Spaces: Natura 2000 Network (LIC/ZEPA), Ramsar wetlands and Biosphere Reserve, representing 11% of the total area occupied by the company's facilities<sup>51</sup>.

In 2024, a number of construction projects were carried out using the corridors of other existing infrastructures and existing accesses to the work area were also used, thus reducing the damage to soil and waters. These projects restored 100% of the affected land, returning it to its previous state as soon as possible after its alteration<sup>52</sup> (57,146 m<sup>2</sup> altered, 57,146 m<sup>2</sup> restored and 31,730 m<sup>2</sup> revegetated). This minimises the risk of erosion and helps re-establish the land's natural watershed, as well as the state of affected habitats and the landscape.

E4-6

## Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities

The materiality analysis did not reveal any significant risks or opportunities associated with biodiversity and ecosystems. However, Enagás has an environmental liability policy that covers the costs of preventing and remedying any damage to the environment inside or outside the company's facilities, with an annual aggregate liability limit of 20 million euros per claim. It also has an industrial liability policy that covers compensation payments to third parties arising from sudden, accidental and unforeseen pollution or contamination with a limit of 300 million euros per claim.

<sup>49</sup> Target linked to the restoration mitigation measure. It is associated with regulatory requirements set by public authorities and is not based on scientific targets or ecological thresholds. Biodiversity offsets are not being considered in setting this target.

<sup>50</sup> Enagás' priority facilities refer to the gas pipeline network, which has been analysed as a single site.

<sup>51</sup> The information was obtained by overlaying cartographic layers of Protected Natural Areas (for more information, see the [IRO-1](#) disclosure requirement)

with the geographical coordinates of Enagás' infrastructure. This parameter has only been verified by the verification provider and not validated by any other external body.

<sup>52</sup> Considering construction projects in the second half of 2023 that were not restored in the past financial year and construction projects in the first half of 2024. These parameters have only been verified by the verification provider and not validated by any other external body.

# E5. RESOURCE USE AND CIRCULAR ECONOMY

## Management of impacts, risks, and opportunities

### IRO-1

### Description of the processes to identify and assess material impacts, risks, and opportunities related to resource use and the circular economy

Enagás has conducted an analysis to identify impacts, risks, and opportunities, assessing which are materially significant concerning resource use and the circular economy, as detailed in the [IRO-1](#) disclosure requirement in chapter 2. This analysis encompasses all activities and infrastructure locations of companies under financial control, including both upstream and downstream stages of the value chain.

In identifying potential impacts, risks and opportunities related to resource inputs, outputs, and waste, Enagás has incorporated the identification of the primary resources and waste generated by activity at its facilities, along with the applicable environmental regulations. This analysis is based on historical information from environmental evaluations carried out at our facilities within the framework of the environmental management systems, as well as on monitoring of applicable environmental legislation.

Below is a detailed account of the impacts deemed significant as a result of this analysis:

#### Table of impacts

Topic	Sub-topic	Impact	Nature
Circular economy	Waste management	Generation of hazardous and non-hazardous waste	Negative - Current

Enagás has been provisionally appointed as the manager of the Spanish Hydrogen Backbone Network (provisional HTNO), with Enagás Infraestructuras de Hidrógeno S.L.U. authorised to temporarily carry out the development of European Projects of Common Interest for hydrogen networks. In these new activities, the company is evaluating the significance of resource use and the circular economy, as well as the potential impacts, risks, and opportunities, during the initial conceptual phase before conducting an Environmental Impact Assessment (EIA).

The following table identifies the company's facilities and activities where the negative impact is relatively significant based on the criteria of waste generation volume and type:

### Facilities with significant negative impact

Enagás facilities	
Regasification terminals	Underground storage facilities
Barcelona	Yela
Cartagena	Serrablo
Huelva	Gaviota
Musel	Castor

### E5-1

### Policies related to resource use and the circular economy

Enagás has an [Environmental Policy](#), approved by the Board of Directors, that outlines key commitments for environmental protection and aspects related to the Environmental Management System. These commitments address issues vital to Enagás, such as efficient resource use and the circular economy. A key focus is managing towards zero waste by following the waste hierarchy and prioritising waste prevention.

In 2024, this policy was revised following a corporate decision to split the former combined Health and Safety, Environment, and Quality Policy into three distinct policies. This change enables more effective implementation of commitments related to these crucial aspects of the business.

This policy applies and is communicated to all employees and managers of all companies making up the Enagás Group, including any affiliates effectively controlled by it, within the limitations established in the regulations applicable. Consequently, it covers all activities of Enagás Group companies globally.

In affiliates where Enagás does not have effective control, it is recommended that their Boards promote principles aligned with this policy. The company also promotes the application of the policy's principles, wherever possible, to temporary joint ventures, joint ventures, and other similar partnerships or entities. The company also emphasises these principles and commitments with contractors, suppliers, and collaborators, particularly regarding the supply chain.

The policy is accessible to stakeholders on the company's [corporate website](#), as well as on the corporate Intranet for all employees.

The policy assigns the Board of Directors, through the Sustainability and Appointments Committee, the responsibility for guiding, supervising, and controlling the company's environmental strategy and policy, as well as managing related risks and public information. The Health and Safety, Environment, and Quality Integrated Management System Committee is tasked with setting the basic guidelines for developing and monitoring the integrated management system. It is also responsible for coordinating relevant actions and reporting to the Executive Committee. The various company Departments are responsible for setting and prioritising action plans, targets, and monitoring indicators.

By doing so, the company makes commitments to address impacts identified as significant. For more details, refer to the table of impacts included in the [IRO-1](#) disclosure requirement in this chapter.

In addition, through the Ethical Principles and Guidelines for Suppliers, Enagás considers that its suppliers and contractors shall 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 waste management and recovery and efficiency in the use of resources (for more information, see disclosure requirement G1-1).

## E5-2

### Actions and resources related to resource use and the circular economy

The Company fulfils its environmental commitments, as detailed in its Environmental Policy, through its management system. 100% of Enagás activity is [ISO 14001](#) standard certified. In 2024, more than 47 thousands of euros in OpEx was spent on this certification for conducting internal and external verifications and monitoring legal requirements. See note '2.1 Operating profit' of the Consolidated Annual Accounts for details. Furthermore, the Serrablo and Yela storage facilities and the Huelva and Barcelona regasification terminals are [EMAS](#) (Eco-Management and Audit Scheme) certified.

Enagás evaluates the environmental aspects and impacts of its construction, operation, and maintenance activities via its Environmental Management System. Notable environmental considerations include the consumption of auxiliary materials and waste generation. Environmental monitoring is carried out through audits, environmental surveillance programmes, assessments of legal compliance at all facilities and monitoring of environmental indicators and improvement plans.

Enagás regularly offers environmental training and awareness programmes for its workforce, covering topics such as resource use and the circular economy.

In line with its commitment to the circular economy, in 2024, Enagás renewed the [Zero Waste certification from AENOR](#)<sup>53</sup>, which recognises the company's progress in maximising the volume of waste recycled or recovered, as well as minimising the waste generated.

In its commitment to advancing the circular economy, Enagás undertakes initiatives focused on the efficient use of materials, reducing consumption, and managing waste in accordance with the waste hierarchy. During the year, the following actions were implemented:

- Waste management at all facilities prioritises, where feasible, reuse or recovery, aligning with the commitments in the Environmental Policy. As a result, in 2024, Enagás recycled and/or recovered 95.7 % of the waste generated (91.6% in 2023). More information can be found in disclosure requirement E5-5. Enagás employs authorised waste managers to handle waste management outside the company's facilities. In 2024, Enagás has allocated more than 659 thousands of euros for the management of this waste (OpEx) (see note '2.1 Operating profit' in the Consolidated Annual Accounts for details), including payment to waste managers and a waste management platform. A similar budget is expected for the next financial year<sup>54</sup>.
- At the Serrablo underground storage facility, a methanol water regeneration plant recovered 121,103 litres of methanol in 2024 (8,366 litres in 2023) by treating 1,204.07 tonnes of methanol-laden water. This treatment resulted in savings of 108,366 euros in external waste management costs.
- Recycling of triethylene glycol (TEG) used in the gas drying process at Yela and Serrablo underground storage facilities by subjecting it to a distillation process that optimises the life cycle of this product.
- Enagás has also entered into a collaboration agreement with Oroel to study the durability and life cycle of the personal protective clothing used across all its facilities.
- In 2024, merchandise and books without monetary value were donated to the NGO Asociación Solidaria Universitaria and the NGO Construyendo Futuro.

Enagás plans to continue with these actions in the coming year.

<sup>53</sup> Waste management certification for 2023, which resulted in a 'Zero Waste' certificate for Enagás Transporte S.A.U. (the Barcelona plant is outside the scope of this certification).

<sup>54</sup> Payments to waste managers depend on the volume of waste generated, which is directly linked to operational activity.

# Metrics and targets

E5-3

## Targets related to resource use and the circular economy

In its various contracts with waste managers, the company has set out the treatments to be applied to each waste product in line with applicable legislation and its commitments, which include the annual target of treating (recycling/recovering) a percentage equal to or greater than 90% of all hazardous and non-hazardous waste generated during the year. Furthermore, Enagás has developed a plan with initiatives aimed at increasing the percentage of waste recovery at its facilities, as well as specific measures to minimise waste generation, prioritising prevention according to the waste hierarchy. For more information, refer to disclosure requirement [E5-2](#).

In 2024, Enagás met its goal of recycling and/or recovering 90% of the total waste it generated. This equates to a target of 2,522.28 tonnes recycled/recovered with an actual recovery or recycling rate of 95.7% (2,682.85 tonnes recycled/recovered). For more information, refer to disclosure requirement [E5-5](#).

Moreover, the Serrablo underground storage facility has set a target to regenerate at least 50% of the methanol-laden water it produces each year through its own regeneration plant (1,471.15 tonnes managed in total). By 2024, the facility exceeded this goal, treating more than 81.8% of the methanol water generated (1,204.07 tonnes).

These voluntary targets align with the waste hierarchy levels that focus on preparing for reuse, recycling, and other forms of recovery.<sup>55</sup>

However, they align with the commitment in the Environmental Policy to establish goals for neutrality and a positive net impact on key environmental aspects, such as achieving zero waste.

Enagás monitors compliance with these targets and identifies improvement actions on a quarterly basis through its waste management oversight. Additionally, the annual assessment of environmental aspects highlights new improvement actions. The company ensures that all necessary resources, both material and human, are available to implement the identified actions.

<sup>55</sup> These objectives are not based on scientific criteria, but on the criteria established by AENOR's Zero Waste certification. Stakeholders were not involved in setting them, nor were ecological thresholds considered.

E5-4

## Resource inflows

Enagás does not use raw materials in its production process but only consumes auxiliary materials<sup>56</sup>. As a result, no significant impacts, risks, or opportunities have been identified related to resource input.

Nevertheless, Enagás is committed to promoting the circular economy through the efficient use of these auxiliary materials, reducing consumption, pollution, waste generation and its impact on the environment while encouraging innovation.

E5-5

## Resource outflows

### Waste from the transmission and storage of natural gas

According to the European Waste Catalogue, the LER codes for waste from the purification and transmission of natural gas are as follows:

- 05 07 01\* Wastes containing mercury
- 05 07 02 Wastes containing sulphur
- 05 07 99 Wastes not otherwise specified

In 2024, the company did not produce any waste in the first two categories (05 07 01\*, 05 07 02). For the category '05 07 99 Wastes not otherwise specified', the waste generated includes wood and inert industrial materials.

### Hazardous waste

After gas is extracted from underground storage, it needs to be treated to meet quality standards before it enters the transmission network. Initially, the liquid phase (comprising water and methanol) is separated from the gas phase. Then, triethylene glycol (TEG) is used in a counterflow process to dry the gas. Following this, the gas is odourised and measured before being fed into the transmission network.

The physical separation of the liquid and gaseous phases produces methanol-laden water, which is the main waste product for the company. Its generation is closely tied to the system's gas demand.

Other hazardous wastes include depleted TEG, water-oil-detergent mixtures, aqueous cleaning fluids, as well as absorbents, rags, filtering materials, and nickel-cadmium batteries.

<sup>56</sup> The main auxiliary materials include tetrahydrothiophene (THT), sodium hypochlorite, chlorine dioxide, methanol, and triethylene glycol (TEG). For more information, see the Requirements section of '[Non-financial and diversity reporting requirements \(Law 11/2018\)](#)'.

As a result of inspection and maintenance activities on our infrastructure, a quantity of waste is occasionally generated that is classified as naturally occurring radioactive waste. This natural radioactivity originates from the natural gas itself, which has had prolonged contact with geological structures containing radioactive elements at the extraction site. Consequently, Enagás cannot implement measures to reduce the generation of this type of waste. To manage this waste, Enagás transfers it to ENRESA (Empresa Nacional de Residuos Radiactivos) for appropriate handling. In 2024, 0.0083 tonnes of radioactive waste were generated<sup>57</sup> (0.0451 tonnes in 2023).

Non-hazardous waste

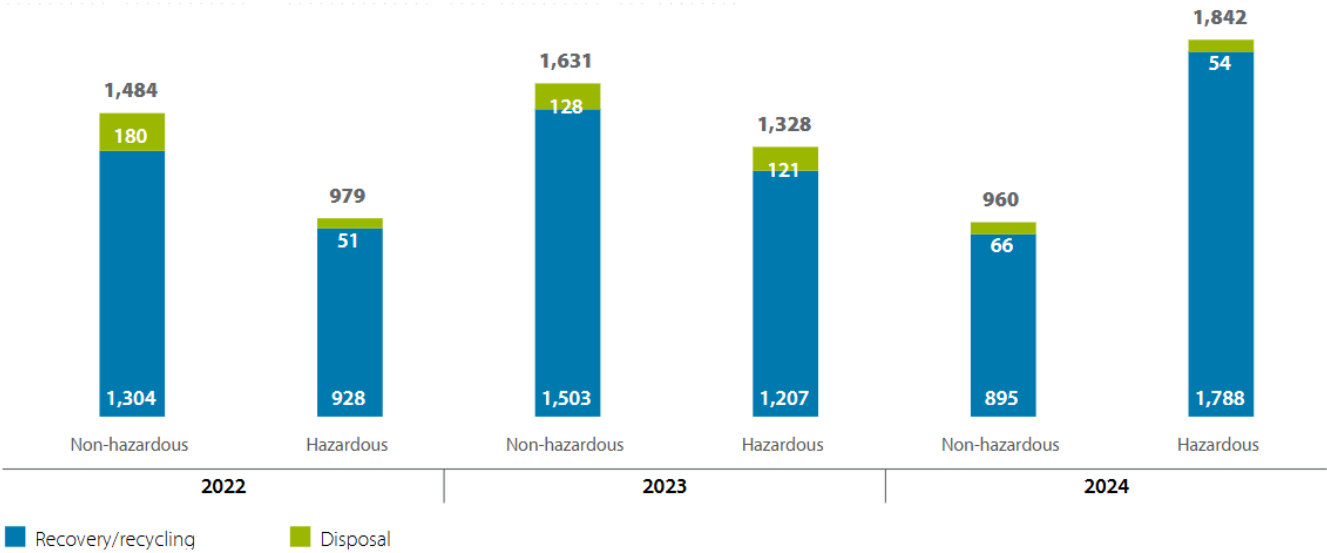
As a result of facility use by individuals, various types of non-hazardous domestic waste are generated. The most notable

types include municipal solid waste, rubble or scrap metal, and paper and cardboard.

Waste generation and management

Enagás has a waste management platform that guarantees better traceability of the treatment of the waste generated in its facilities, greater control of management documentation in accordance with national requirements and those of each autonomous community and optimal communication with the government. The reported data are based on direct measurements of the waste quantity and treatment types, as provided by waste managers through the platform. This information on waste generation and management is verified by AENOR as part of their 'Zero Waste' certification (for more information, see disclosure requirement [E5-2](#)).

Waste generated and managed by type of waste (tonnes)



<sup>57</sup> This radioactive waste has not been included in the 'Waste generated and managed by waste type' figure nor the 'Waste generated and managed by

waste type and waste destination' table due to the particularity of the waste and because it is not suitable for any kind of treatment.

## Waste generated and managed by waste typology and waste destination (t)

Type of waste	Waste destination	2022	2023	2024
Non-hazardous	Recovery	Preparation for re-use	0.0	0.0
		Recycling	1,285.1	1,391.5
		Other recovery operations	19.1	111.9
	<b>Total recovery</b>	<b>1,304.2</b>	<b>1,503.4</b>	<b>894.6</b>
	Disposal	Incineration (with energy recovery)	0.0	0.0
		Incineration (without energy recovery)	0.0	0.0
		Transfer to a landfill	28.5	22.1
		Other disposal operations	151.9	105.6
	<b>Total elimination</b>	<b>180.4</b>	<b>127.7</b>	<b>65.6</b>
	<b>Total non-hazardous waste</b>	<b>1,484.6</b>	<b>1,631.1</b>	<b>960.2</b>
Hazardous	Recovery	Preparation for re-use	0.1	0.0
		Recycling	893.6	1,120.8
		Other recovery operations	34.6	86.2
	<b>Total recovery</b>	<b>928.3</b>	<b>1,207.0</b>	<b>1,788.3</b>
	Disposal	Incineration (with energy recovery)	0.0	0.0
		Incineration (without energy recovery)	0.5	1.8
		Transfer to a landfill	4.9	15.6
		Other disposal operations	45.7	102.9
	<b>Total elimination</b>	<b>51.1</b>	<b>120.3</b>	<b>54.1</b>
	<b>Total hazardous waste</b>	<b>979.4</b>	<b>1,327.3</b>	<b>1,842.4</b>

## Waste by treatment type (t)

		2022	2023	2024
Waste recovered	Amount (t)	2,232.5	2,710.4	2,682.8
	%	91%	92%	96%
Waste disposed of	Amount (t)	231.5	248.1	119.7
	%	9%	8%	4%
Total generated waste		2,464.0	2,958.5	2,802.5

Solid waste generated and managed by treatment (t)<sup>(1)</sup>

		2022	2023	2024
<b>Recovery / recycling <sup>(2)</sup></b>		<b>727.6</b>	<b>681.4</b>	<b>589.8</b>
Disposal	Incineration (with energy recovery)	0.0	0.0	0.0
	Incineration (without energy recovery)	0.5	0.1	0.1
	Transfer to a landfill	33.3	38.1	15.5
	Other disposal operations	7.6	11.8	5.8
<b>Total elimination</b>		<b>41.4</b>	<b>50.0</b>	<b>21.4</b>
Total solid waste generated		769.0	731.4	611.2

(1) Excludes contaminated soils produced by accidents and soaked sepiolite (clean-up material for small spills).

(2) Includes energy recovery, capture, recycling and other recovery treatments.

## E5-6

## Expected financial impact of risks and opportunities related to resource use and the circular economy

In its materiality analysis, the company did not identify any significant risks or opportunities associated with resources and the circular economy.

However, Enagás has an environmental liability policy that covers the costs of preventing and remedying any damage to the environment inside or outside the company's facilities, with an

annual aggregate liability limit of 20 million euros per claim. It also has an industrial liability policy that covers compensation payments to third parties arising from sudden, accidental and unforeseen pollution or contamination with a limit of 300 million euros per claim.

# Non-financial and diversity reporting requirements (Law 11/2018)

## Detailed information on the current and foreseeable effects of the company's activities on the environment

### The amount of provisions and guarantees for environmental risks

Enagás facilities have a useful life set out during their design and construction. Enagás makes investments and technical improvements to extend the useful life of its assets while maintaining the required levels of safety, quality, environmental protection and efficiency.

Once the company's facilities have reached the end of their useful lives, as part of the decommissioning process, Enagás will establish decommissioning and rehabilitation plans that consider the possible impacts on the environment and local communities, taking into account the different stakeholders and involving local communities. Enagás has recorded financial provisions for the dismantling of all its regasification terminals and underground storage facilities, amounting to more than 237 thousands of euros.

Although the useful life of the underground storage facilities has not yet ended, these infrastructures already have detailed closure and rehabilitation plans as required by the Hydrocarbons Law. In the case of pipelines, decommissioning plans are regularly updated in line with annual maintenance plans.

In the last three years, no Enagás facilities were closed down.

## Circular economy and waste prevention and management

### Actions to combat food waste

Given the company's activity and the material topics identified, food waste is not a relevant issue for the company.

### Sustainable use of resources

#### Consumption of raw materials and the measures adopted to improve efficiency in their use

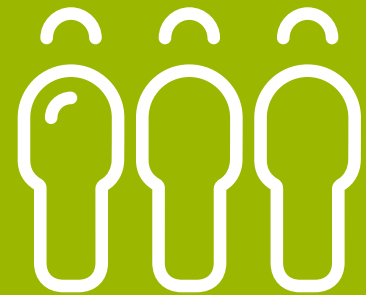
Enagás does not consume raw materials in its production process; only auxiliary materials are used. Enagás is committed to promoting the circular economy through the efficient use of these materials, reducing consumption, pollution, waste generation and its impact on the environment while encouraging innovation.

## Consumption of main auxiliary materials

Auxiliary material	2022	2023	2024
Tetrahydrothiophene (THT) (kg)	440,839	391,783	132,752
Sodium hypochlorite (kg)	523,882 <sup>(1)</sup>	554,282	397,370
Chlorine dioxide (kg)	45,695	9,946	3,920
Methanol (litres)	265,030	431,894	597,756
Triethylene glycol (TEG) (litres)	2,050	3,127	7,825

In 2024, there was an increase in methanol consumption (38% compared to 2023) and in triethylene glycol consumption (150% compared to 2023). These products are used in the gas extraction process in underground storage facilities, and their variation is directly related to the increase in extraction activity (which increased more than 26% compared to 2023).

# SOCIAL INFORMATION



<b>S1</b>	Own workforce	136
<b>S2</b>	Workers in the value chain	172
<b>S3</b>	Affected communities	179

# S1. OWN WORKFORCE

## Strategy

### SBM-2

### Interests and views of stakeholders

Enagás' professionals are one of the company's main stakeholders, a commitment that is reflected in the different policies, actions and goals described in this chapter. In order to ensure proper alignment between the interests and opinions of the company's own workforce and its strategies, Enagás has different channels to meet their needs and concerns (for more information, see disclosure requirement S1-3).

In 2024, we launched a specific consultation with key stakeholders, including the company's own employees, as part of the company's materiality assessment (for more information, see disclosure requirement IRO-1). Through this consultation, more than 50% of employees have expressed their opinion on the company's strategy and on the most significant sustainability issues.

These stakeholder opinions have been used to determine the impacts, risks and opportunities identified in the materiality assessment (for more information, see disclosure requirement IRO-1 in chapter 2). These were also determined on the basis of a prior analysis of the company's business model and strategy, i.e. based on an analysis of Enagás' own practices.

### Digital Transformation Plan

In order to address the company's strategic challenges and meet the interests of its professionals, Enagás has presented its 2024-2026 Digital Transformation Plan. This Plan, coordinated and sponsored by senior management, promotes a culture change with a priority focus on digitalisation and people.

This Digital Transformation Plan is articulated around a model based on large areas or domains. For each of these domains, two reference layers are included, namely strategy and culture. There are three major transformation levers: talent, operating model, technology and data. There are also two cross-cutting layers: cybersecurity and adoption and change management.

The Digital Transformation Plan integrates both the vision of People and that of Digitalisation, approaching the transformation from two points of view:

- People: equipping professionals with new skills, leadership models, organisation, new ways of working and management frameworks that enable them to deal effectively with future challenges.
- Digitalisation: equipping professionals with the technology and data they need to become agile and adapt to new scenarios.

To coordinate the management of related projects and initiatives, a Transformation Office has been set up. This office oversees the vision and impact of the transformation, ensuring team and initiative coordination, as well as supporting proper communication and change management.

This new Digital Transformation Plan highlights the importance of the collaboration of Enagás professionals as an active part of the change, participating in the identification and development of initiatives as work teams as well as ensuring success and the measurement of the impact on results.

### SBM-3

### Material impacts, risks, and opportunities and their interaction with the strategy and business model

#### Enagás own workforce

At year-end 2024, Enagás' own workforce that could be significantly affected by the company was distributed as follows:

- 1,362 employees (1353.2 FTEs).
- Non-employee workers:
  - 13 people hired through temporary employment companies who were doing work at Enagás, mainly to replace professionals who are temporarily absent (13 in 2023).
  - 70 people with scholarships (55 people in 2023).
  - Enagás has no non-employee workers working as independent contractors.

#### Impacts, risks and opportunities

Enagás has conducted a materiality analysis to identify own workforce impacts, risks, and opportunities, as detailed in the IRO-1 disclosure requirement. This analysis encompasses all activities and infrastructure locations of companies under financial control, including both upstream and downstream stages of the value chain.

This materiality assessment has identified the impacts, risks and opportunities arising from Enagás' current business model. The 2025-2030 Strategic Update is tailored to the results of this materiality assessment, based on the implementation of policies, actions and targets to manage the impacts, risks and opportunities identified as material. In this assessment, Enagás did not identify any material impact on its own workforce as a result of the Transition Plan.

In general terms, it is the Transformation Plan deployed in the company that aims to address these identified impacts, risks and opportunities with specific actions in line with the new update to the Enagás Strategy.

As a result of this assessment, the following positive and negative material impacts have been identified as affecting mainly employees.

## Table of impacts

Topic	Sub-topic	Impact	Nature	Scope
People	Stable, quality employment	Maintenance of quality employment through the provision of jobs with short, medium and long-term stability and favourable working conditions for workers.	Consistently positive - Current	All employees
	Satisfaction and motivation of professionals	Use of programmes and policies to ensure the well-being of professionals in the workplace	Consistently positive - Current	All employee and non-employee workers
	Collective bargaining	The right of professionals to join trade unions to promote and defend their economic and social interests without discrimination.	Consistently positive - Current	All employees
	Work-life balance and co-responsibility	Improving the balance between the different aspects of professionals' lives thanks to the implementation of a comprehensive plan of measures favouring work-life balance and co-responsibility.	Consistently positive - Current	All employees
	Health and safety	Implementation of occupational health and safety plans, protocols and training for the company's professionals to improve the performance of their duties in a safe and healthy manner.	Consistently positive - Current	All employee and non-employee workers
		Possibility of harmful work situations for professionals that generate insecurity in the work environment, including situations that negatively affect both mental and physical health.	Negative related to individual cases - Potential	All employee and non-employee workers
	Awareness and development of in-house talent	Professional development and qualification of workforce through appraisals and development plans, as well as continuous learning and training	Consistently positive - Current	All employees
	Diversity and inclusion	Ensure non-discrimination and equal opportunities, regardless of gender, race, ethnicity or other personal characteristics, through the implementation of policies, strategies and action plans	Consistently positive - Current	All employee and non-employee workers

## Table of risks and opportunities

Topic	Sub-topic	Risk / Opportunity	Nature
People	Collective bargaining	Establishment of a fair and stable employment framework through collective bargaining to strengthen the employment relationship, raise professional satisfaction, commitment and expertise and contribute to a more productive working environment in a collaborative climate	Opportunity
	Health and safety	Economic and reputational consequences resulting from serious incidents involving professionals during operations, such as fatal workplace accidents	Risk
	Awareness and development of in-house talent	Optimisation of operational efficiency by promoting professional development and training for internal workforce	Opportunity
Human rights	Human rights of own workforce	Reputational improvement and improvement of the due diligence management model for the protection of human rights, derived from the company's alignment with international initiatives and principles in defence of human rights (UN, ILO, etc.).	Opportunity

When identifying and assessing these impacts, risks and opportunities, different characteristics of the company's own workforce have been examined, such as place of work, gender, inclusion (or not) in the collective bargaining agreement, age range, etc. The conclusion is that no material impacts, risks or opportunities for specific groups of people have been identified.

Enagás has not identified any operations with a significant risk of forced labour, compulsory labour or child labour. However, Enagás guarantees these human rights and the stability and quality of employment by implementing various measures, such as those reflected in the [IV Collective Bargaining Agreement of the Enagás Group](#).

# Management of impacts, risks, and opportunities

## S1-1

### Policies related to own workforce

People management is a key area for the company, which enables Enagás to equip itself with the resources required for the deployment of its strategy.

Enagás has set out commitments to effectively manage the impacts, risks, and opportunities related to own workforce mentioned above in its [Group Code of Ethics](#), as well as in more specific policies approved by the Board of Directors (for further details on the Code of Ethics, refer to disclosure requirement [G1-1](#)). The company thus establishes commitments addressing the significant impacts, risks, and opportunities identified:

#### Link between significant impacts, risks, and opportunities and corporate policies

Topic	Sub-topic	Impact, risk or opportunity	Nature	Corporate policies
People	Stable, quality employment	Maintenance of quality employment through the provision of jobs with short, medium and long-term stability and favourable working conditions for workers.	Impact	Code of Ethics Human Capital Management Policy Human Rights Policy Collective Bargaining Agreement
	Satisfaction and motivation of professionals	Use of programmes and policies to ensure the well-being of professionals in the workplace	Impact	Code of Ethics Human Capital Management Policy Human Rights Policy Diversity and Inclusion Policy Collective Bargaining Agreement
	Collective bargaining	The right of professionals to join trade unions to promote and defend their economic and social interests without discrimination.	Impact	Code of Ethics Human Capital Management Policy Human Rights Policy Collective Bargaining Agreement
	Work-life balance and co-responsibility	Improving the balance between the different aspects of professionals' lives thanks to the implementation of a comprehensive plan of measures favouring work-life balance and co-responsibility.	Impact	Code of Ethics Human Capital Management Policy Human Rights Policy Collective Bargaining Agreement
	Health and safety	Implementation of occupational health and safety plans, protocols and training for the company's professionals to improve the performance of their duties in a safe and healthy manner.	Impact	Code of Ethics Human Capital Management Policy Human Rights Policy Health and Safety Policy
		Possibility of harmful work situations for professionals that generate insecurity in the work environment, including situations that negatively affect both mental and physical health	Impact	Code of Ethics Human Capital Management Policy Human Rights Policy Health and Safety Policy
	Awareness and development of in-house talent	Professional development and qualification of workforce through appraisals and development plans, as well as continuous learning and training	Impact	Code of Ethics Human Capital Management Policy Human Rights Policy Collective Bargaining Agreement
	Diversity and inclusion	Ensure non-discrimination and equal opportunities, regardless of gender, race, ethnicity or other personal characteristics, through the implementation of policies, strategies and action plans	Impact	Code of Ethics Human Capital Management Policy Diversity and Inclusion Policy Human Rights Policy Collective Bargaining Agreement
	Collective bargaining	Establishment of a fair and stable employment framework through collective bargaining to strengthen the employment relationship, raise professional satisfaction, commitment and expertise and contribute to a more productive working environment in a collaborative climate	Opportunity	Code of Ethics Human Capital Management Policy Diversity and Inclusion Policy Human Rights Policy Collective Bargaining Agreement
	Health and safety	Economic and reputational consequences resulting from serious incidents involving professionals during operations, such as fatal workplace accidents	Risk	Code of Ethics Human Capital Management Policy Health and Safety Policy Human Rights Policy
Human rights	Development of in-house talent	Optimisation of operational efficiency by promoting professional development and training for internal workforce	Opportunity	Code of Ethics Human Capital Management Policy Human Rights Policy Collective Bargaining Agreement
	Human rights of own workforce	Reputational improvement and improvement of the due diligence management model for the protection of human rights, derived from the company's alignment with international initiatives and principles in defence of human rights (UN, ILO, etc.).	Opportunity	Code of Ethics Human Capital Management Policy Diversity and Inclusion Policy Human Rights Policy

## Salaried workforce

### Corporate policies

- [Human Capital Management Policy](#): it includes commitments in the area of human capital management aimed at attracting, developing and retaining talent, providing the company with the skills and competencies, company size and structure, processes, tools and management models necessary to roll out its strategy, as well as offering a value proposition to professionals.

This policy was updated in 2024 to align the objectives and commitments made in the transformation plan, as well as to reinforce the commitment to transparency of information and its alignment with trends and best practices in talent management.

- [Human Rights Policy](#): this outlines Enagás' commitments to ensure due diligence in human rights areas. These commitments align with relevant internationally recognised instruments, including:
  - The United Nations Guiding Principles on Business and Human Rights.
  - The United Nations (UN) International Bill of Human Rights and its associated covenants (the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights).
  - The OECD Due Diligence Guidance for Responsible Business Conduct.
  - The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.
  - The International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and its core conventions.
  - The Universal Declaration of Human Rights.

This policy addresses respect for human rights, including labour rights and the rights of society, customers and local communities. Explicitly included are freedom of association, human trafficking and forced labour, compulsory labour and child labour.

The policy commits to developing and maintaining a due diligence system aimed at anticipating, preventing, mitigating, and/or remedying negative impacts on people (both its own workforce and those in the value chain), the environment, and society. This is achieved by regularly taking the following actions, which are based on a continuous improvement approach and cooperation with stakeholders:

- Establish mechanisms to identify, assess and prioritise actual and/or potential negative impacts on human rights arising from the company's own activities and those of the value chain in all geographical areas where the company is present.
- Implement actions to avoid, prevent, or mitigate identified negative impacts, within the company's sphere of influence, should they materialise. This will prevent associated human rights violation risks.

- Monitor the actions taken to ensure that they have achieved their purpose, thereby assessing the effectiveness of the due diligence system.

- Accountability to stakeholders on the due diligence system through public reporting.

In 2024, this policy was updated to strengthen the company's commitment to developing and maintaining a human rights due diligence system, as outlined in the European Sustainability Reporting Standards developed by EFRAG, the proposed Sustainability Due Diligence Directive, and the OECD Due Diligence Guidance for Responsible Business Conduct.

- [Diversity and Inclusion Policy](#): it includes the commitments and lines of action to position diversity management and inclusion as key elements of its global strategy. This policy promotes equal opportunities as the central axis around which human resources policies should be oriented, with the aim of creating strategic assets and promoting the full personal and professional development of company employees at all times, thus consolidating the right of all professionals to truly equal opportunities and equal treatment. It also includes the integration of diversity in the main human resources processes such as access to employment, personal progress and professional development and promotion, all while guaranteeing a management free of bias associated with differences.

Through this Policy, Enagás expresses its firm commitment to equal opportunities and non-discrimination, expressly rejecting any direct or indirect discrimination, harassment or other forms of intolerance based on, among others, gender, age, disability, nationality or culture, race, religious beliefs, thought and sexual orientation, or any other personal, family, economic or social circumstance that may be a cause of discrimination.

Enagás is committed to integrating in the organisation the richness provided by the confluence of knowledge, skills and different experiences, by managing the diversity of its professionals in the areas of gender, age, disability, nationality and culture, race, religious beliefs, thought and sexual orientation, or any other personal, family, economic or social circumstance that may be a cause of discrimination.

#### Diversity leadership:

The Board of Directors is responsible for the orientation, supervision and control of the company's diversity and inclusion strategy and policy. For its part, the Sustainability, Appointments and Remuneration Committee is responsible for controlling and monitoring diversity and inclusion.

In terms of management, although not specifically reflected in the Policy, Enagás has a specific People and Diversity Department, reporting to the People and Transformation General Manager. This General Manager is a member of the Executive Committee reporting directly to the CEO; his duties include the development and maintenance of Enagás' Diversity and Inclusion Strategy.

## Company diversity targets:

Enagás sets gender diversity targets as part of its annual and three-year company objectives. These targets are linked to the variable remuneration of all Enagás professionals, including the CEO, thus linking remuneration to diversity goals. For further details, see disclosure requirement [GOV-3 in chapter 2](#).

The Diversity and Inclusion Master Plan, as well as the company's 2nd Gender Equality Plan, define specific measures to ensure compliance with these targets. In addition, last year, Enagás approved a set of specific measures planned for the company's LGBTI community.

## Company diversity targets

Mechanism	Term	Indicator	Target value	Final value	Percentage achieved	
<b>Company targets 2024</b>	2024	Percentage of promotion of the less-represented gender in management positions	40%	40%	Target achieved	✓
	2024	Number of persons of the less-represented gender hired as a percentage of total workforce	40%	46%	Target achieved	✓
<b>Company targets 2025</b>	2025	Number of persons of the less-represented gender hired as a percentage of total	45%		In progress	
	2025	Percentage of candidates with cultural diversity in external recruitment processes	15%		In progress	
<b>Targets for long-term incentives 2022- 2024</b>	2024	Percentage of women on the Board of Directors	40%	40%	Target achieved	✓
	2024	Percentage of women in managerial and pre-managerial positions	40%	41%	Target achieved	✓
	2024	Percentage of promotions that are women in managerial and pre-managerial positions	50%	48%	Target not achieved	✗
<b>Targets for long-term incentives 2025-2027</b>	2027	Percentage of women in managerial and pre-managerial positions	40%		In progress	
	2027	Percentage of women in infrastructure	20%		In progress	

- [Health and Safety Policy](#): this includes commitments relating to safety (covering individuals, infrastructure, the environment, and road safety), as well as physical and emotional well-being. In order to comply with the commitments described in this policy, Enagás has established a Safety, Health and Well-being management model, certified in accordance with the following regulations and standards: ISO 45001, ISO 39001 and WHO (World Health Organisation) Healthy Workplace.

In 2024, this policy was revised following a corporate decision to split the former combined Health and Safety, Environment, and Quality Policy into three distinct policies. This change enables more effective implementation of commitments related to these crucial aspects of the business.

The Code of Ethics and all other policies are applicable and communicated to all employees and directors within the Enagás Group, including those of affiliates over which it has effective control, subject to the constraints of the relevant regulations. Therefore, these policies apply to all activities undertaken by Enagás Group companies across all the regions where they operate.

In affiliates where Enagás does not have effective control, the Board of Directors recommends promoting principles and guidelines that are consistent with those outlined in the Code of Ethics and the previously mentioned policies. The company also seeks to encourage, as much as possible, the adoption of the Code of Ethics and related policies by temporary joint

ventures, joint ventures, and other comparable associations or entities. The company also emphasises principles and commitments aligned with the Code of Ethics and company policies with contractors, suppliers, and collaborators, particularly regarding the supply chain.

The Code of Ethics and all policies are accessible to stakeholders on the company's [corporate website](#), as well as on the corporate Intranet for all employees.

These policies assign the Board of Directors the responsibility for guiding, overseeing, and monitoring strategy, policies, risks, objectives, and performance concerning the management of issues related to the subject matter of each policy (human capital, diversity and inclusion, human rights and health and safety). It is also the responsibility of the committees set up at the Board of Directors level to oversee and monitor the aforementioned matters (Sustainability and Appointments Committee for human capital, diversity and inclusion and human rights, and the Remuneration Committee for diversity and inclusion). On the other hand, in the area of Health and Safety, the Health and Safety, Environment, and Quality Integrated Management System Committee is tasked with setting the basic guidelines for developing and monitoring the integrated management system. It is also responsible for coordinating relevant actions and reporting to the Executive Committee. In addition, various departments within the company are tasked with setting up action plans, goals, and monitoring indicators.

It should be noted that all of the above policies are in line with the relevant internationally recognised standards, including the UN Guiding Principles on Business and Human Rights.

### Collective Bargaining Agreement

In 2024, following a negotiation process, the company signed the Enagás Group's IV Collective Bargaining Agreement (2023-2026) with the aim of guaranteeing a stable framework of working conditions for four years in order to meet the company's new challenges, in line with the strategic plan. As established in the Agreement, regardless of its commercial configuration, and strictly for labour law purposes, the Group includes companies in which Enagás' stake is equal to or greater than 50%, provided that Enagás organises and manages the workers and their labour activity is within the scope of representation of the Trade Union Federations of the Unions that signed the Agreement. This agreement applies all Group employees except Senior Management, Directors, Managers and Coordinators, as well as professionals who have signed a contract with the company that excludes them from the agreement.

The agreement regulates matters such as work organisation, remuneration, professional promotion, training, working hours, holidays, leave and contract suspensions, geographical mobility, risk prevention, social benefits, collective representation rights and trade union rights, among others. The People and Transformation General Manager, a member of the Executive Committee, is responsible for the effective implementation of the Collective Bargaining Agreement.

### Non-employee workers

All the policies described above, with the exception of the collective bargaining agreement, also apply to non-employee workers. Suppliers and contractors are also subject to the [Ethical Principles and Guidelines for Suppliers, which are available to all stakeholders on the corporate website](#). Among the commitments it contains, aligned with the company's Code of Ethics are those related to:

- Health and safety protection. Health and safety protection and compliance with the health and safety policy.
- Respect for human rights via 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. Of special relevance is the commitment not to tolerate child or forced labour, and the duty to ensure respect for freedom of association and collective bargaining in the workplace. Moreover, the commitment to expressly reject abuse of authority, harassment, and any other behaviour that could create an intimidating, offensive, or hostile work environment is also included.
- Equal opportunities and non-discrimination.

## S1-2

### Processes for engaging with own workers and workers' representatives about impacts

In line with the company's corporate commitments regarding own workforce, Enagás has established various procedures and channels to facilitate communication and collaboration so that own workforce can convey to the company their concerns and needs related to labour issues identified as material. In summary, the main channels are:

- **Workplace climate surveys:** As part of the Global Employee Listening Strategy, Enagás has been conducting a workplace climate survey every two years since 2008, allowing all its employees to participate in assessing the company's general situation, with the aim of gathering their views on various issues that will enable the company to improve and advance as a whole.

This initiative has evolved over the years and now includes regular surveys that help understand how employees see different areas, as well as measuring the company's organisational climate, professionals' experience and sustainable engagement index. This climate survey is the central pillar of the Global Employee Listening Strategy, and stands out for its voluntary, anonymous and confidential nature, covering all sustainability issues with material impacts, risks or opportunities

Through this survey, the company assesses whether employees are aware of the mechanisms in place for Management to listen to ideas, complaints and/or suggestions, as well as Enagás' harassment prevention and action procedure.

- **Collective bargaining:** In 2024, the company signed the Enagás Group's fourth collective bargaining agreement to provide it with a framework of employment stability until 2026 in line with the current socio-economic climate and the needs and evolution of the company (for more information, see disclosure requirement S1-1). This collective bargaining agreement was the result of various collective negotiations conducted during the previous year between the company and workers' representatives.

In addition, Enagás enters into collective bargaining and carries out regular consultations with the workers' legal representation regarding working conditions, remuneration, dispute resolution, internal relations and issues of mutual concern. In 2024, various working group meetings were held with social representatives, including meetings to negotiate the Enagás Group's IV Collective Bargaining Agreement and the ordinary meetings of the joint committees established in the Collective Bargaining Agreement, the Equality Plan, the Pension Plan and the LGBTI panel. All of this has led to various agreements, among which the following stand out: the final agreement document issued by the Negotiating Committee for the IV Collective Bargaining Agreement of the

Enagás Group, the new Protocol for Prevention and Action in any case of workplace harassment, and the set of measures planned to support equality and non-discrimination against LGBTI people at Enagás.

- Mechanisms for professionals to participate in the framework of the Digital Transformation Plan. Enagás has various communication mechanisms in place to facilitate and coordinate employee collaboration with the framework of the Digital Transformation Plan, from the conception of initiatives and employee involvement to their completion and the compilation of lessons learned (for more information, see disclosure requirement SBM-2):
  - 'Transforma' inbox to channel ideas, reflections and questions about the Plan.
  - Cultural and transformational challenge-solving events.
  - Other communication channels, such as the project team, to activate professional participation.
- Specifically in health and safety:
  - Health and Safety Committees: Enagás has various employee representative bodies where they may exercise their participation and consultation rights. Different committees comprise health and safety officers and management representatives. The Health and Safety Committees<sup>58</sup> meet every three months, while the Group and Enagás Transporte SAU Intercentre Health and Safety Committees meet with a frequency set out in the Collective Bargaining Agreement. The results produced by these committees and an effectiveness assessment are reviewed annually through the Management System Management Review. Enagás gathers information on these channels and the associated processes in the communication in SMAC matters procedure and the operating procedures of the integrated management committees.
  - Own workforce, both employees and non-employee workers, have access to various channels through which they can participate in and consult the operation, implementation and assessment of the management system. These include the suggestions and questions box, bulletin board, forms, meetings, internal memos, informational pamphlets, posters and/or electronic communications, as well as any other method that can be documented and guarantees receipt by the intended recipient. Additionally, there are cross-company and cascading communication channels that also cover health and safety issues. Enagás also has a chatbot (virtual assistant) to answer the most frequently asked health and safety questions. Enagás collects information on these channels and the associated processes in the communication procedure for safety, environment and quality.
  - Evaluation of psychosocial factors: Enagás carries out this assessment every five years for all its professionals.

Psychosocial factors are factors that may appear in the work environment related to matters such as the organisation, the work contents or task execution. These may affect both people's well-being or health and work progress. The psychosocial factor evaluation is a tool whose main objective is to provide information that allows different areas of the company to receive psychosocial diagnoses, in turn allowing them to take improvement actions appropriate to the risks detected and the environment in which they are to be carried out. This evaluation is carried out through a voluntary, anonymous and confidential survey. Enagás collects information on this channel and the associated process in the communication procedures on safety, environment and quality and risk assessment methodologies.

Enagás has a Collective Bargaining Agreement (for more information, see disclosure requirement S1-1) that regulates sustainability issues with positive and negative impacts identified as material. Through collective bargaining, the workers, through the corresponding trade union sections, present their suggestions and/or proposals to the company.

At management level, Enagás has a specific People and Transformation General Management. This is the area responsible for ensuring that this collaboration takes place effectively through all the processes described above, as well as ensuring that the results serve as the basis for the company's approach, covering all the identified material impacts. The People and Transformation General Manager sits on the Executive Committee and reports directly to the CEO.

### S1-3

## Processes to remediate negative impacts and channels for own workers to express concerns

Enagás provides its own workforce with different mechanisms for raising and/or addressing negative impacts or complaints related to labour issues:

- Whistleblowing Line: All the company's own workforce, as well as third parties with which the company has relations, have this channel available to report any reasonable sign of irregularities, illegal acts or behaviour contrary to the commitments set out in the Code of Ethics. Managing and investigating notifications will follow the guidelines set out in the Procedure for handling notifications and queries concerning irregularities or breaches of the Ethics and Compliance Model. For further details on the Whistleblowing Line, such as how to gain access or its no retaliation policy, see disclosure requirement G1-1.
- When it comes to workplace harassment prevention, Enagás has a [Prevention and Action Protocol for any Situation of Harassment in the Workplace](#), the aim of which is to set out guidelines for identifying a situation of harassment, whether

<sup>58</sup> Health and Safety Committees are established, as per regulation, for centres with more than 50 workers. In those centres with less than 50

employees at which there is a Prevention Delegate, health and safety meetings are held on a regular basis.

psychological or moral, sexual, or on the basis of gender, sexual orientation or identity or gender expression. It aims to resolve a discriminatory situation, ensuring that the rights of the victims are guaranteed at all times and has been brought into line with the legal provisions in force in 2024.

The protocol expressly states that the victim may choose to use the Whistleblowing Line or report the harassment verbally to the Head of the People and Diversity General Management in situations where it is expected that simply informing the aggressor of the intimidating and offensive consequences of his/her conduct will solve the problem quickly and efficiently.

The Ethical Compliance Committee is responsible for the overall management of this Protocol, ensuring its correct application, dissemination, monitoring and continuous improvement, so that it is always in tune with actual operations, and must ensure agility, diligence and speed in the investigation and resolution of reported conduct, which must be carried out without undue delay, respecting the timelines established for each part of the process. The person chairing the Ethical Compliance Committee may fully delegate to People and Diversity General Management the conduct of the proceedings and the taking of any action deemed necessary to clarify the facts and prepare the report on the alleged harassment under investigation, which shall include the conclusions, possible mitigating or aggravating circumstances and a proposal for possible action to be taken. Any of the parties can request the intervention of the workers' legal representative or the relevant prevention delegate at any time.

- **Direct contact with the area responsible for people management:** any member of the workforce can directly contact the teams responsible for different employment issues (discrimination, remuneration, development and training, work-life balance, etc.) via email, telephone or in person. On this occasion, it is the responsibility of the department in question to monitor and oversee the complaint or issue raised, with the aim of ensuring the channel is effective and a proper response is provided in a timely fashion.
- **Direct contact with trade unions:** professionals can contact workers' representatives and/or trade unions to resolve any incidents, as well as to manage other needs. Contact can be established through various channels, both in person and remotely, such as via email.
- **Specifically, in the area of health and safety,** Enagás has an internal procedure for reporting risks or anomalies that any employee may encounter as they work, without risk of possible reprisals, as well as an action and communication procedure for serious and imminent risks. There are various channels for establishing these communications, such as Health and Safety Committees and meetings, workers' representatives, an electronic suggestion mailbox available to all professionals, and coordination meetings with contractors, through the prevention service or through those directly responsible, and a specific mailbox enabled on the SACE platform for contractors and suppliers (including non-employee workers). Along these lines, continuous sensitivity-

raising and awareness-raising campaigns are carried out with the aim of promoting a culture of risk observation and hazard warnings where necessary.

Enagás has a digital tool to manage its Integrated Management System. This aims to ensure that impacts and opportunities for improvement detected in the different preventive activities are properly handled by identifying, scheduling and assigning those responsible for corrective actions and assessing their effectiveness in resolving the incident.

Enagás has a procedure for action, notification, investigation and statistical analysis of all incidents.

If the following circumstances arise, a specialised investigation using a cause analysis methodology is carried out, which generates a specific register:

- Incidents with a risk score above a specific level, established according to the method included in the procedure.
- By request of the Intercentre Health and Safety Committee and/or the Health and Safety Committee of the facility, the chain of command or the Prevention Service.
- Major or fatal accidents.
- Major accidents according to RD 840/2015.

Following the investigation, a report is produced including the causes of the incident, the potential risk assessment, the corrective actions identified, the persons responsible for carrying out and monitoring the corrective measures (including those that affect the risk assessment review or changes to the management system), as well as resources and timelines, following the procedure for managing corrective actions.

The criteria used for recording and consolidating reported accident data is based on the OSHA standard.

In the event of any accident, Enagás has a procedure of lessons learned where the method of dissemination is established that uses a cascade approach so that it reaches all personnel at the company.

Following any risk assessment, corrective actions are established to mitigate the relevant identified risks, and the effectiveness of the action is subsequently evaluated. The tool allows all activities, incidents and corrective actions to be recorded, as well as associated indicators to be collected. This is to facilitate the review of these results by management, potentially leading to improvements in the management system.

Through this workplace climate survey (for more information, see disclosure requirement S1-2), the company assesses whether employees are aware of the mechanisms in place for Management to listen to ideas, complaints and/or suggestions, as well as Enagás' harassment prevention and action procedure.

## S1-4

# Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

## Stable, quality employment

In relation to the management of the positive material impact 'Maintenance of quality employment through the provision of jobs with short, medium and long-term stability and favourable working conditions for workers', Enagás maintains stable, quality employment with a high percentage of permanent, full-time contracts.

Enagás' commitment to its workforce is supported by an organisational culture based on flexibility, responsibility, respect and mutual commitment. A project that links the continuous improvement of the company with raising the quality of the professional and personal lives of all of us who are part of it.

In this regard, Enagás ensured that the following were maintained in 2024:

- Quality in employment, ensuring the provision of adequate wages higher than minimum wage (at Enagás, minimum wage is 1.66 times higher). Their review, as agreed in the Collective Bargaining Agreement, takes as a reference the cumulative CPI (Consumer Price Index) over the term of the agreement. In 2024, Enagás allocated over 105 million euros to wages and salaries for its employees. For details, see section b) Personnel expenses, of note 2.1 operating profit in the Consolidated Annual Accounts.
- Flexibility in terms of time and space, establishing mechanisms that allow working hours to be monitored, including overtime, the remuneration for which is specifically regulated in the Collective Bargaining Agreement.
- In addition, Enagás enters into collective bargaining and carries out regular consultations with the workers' legal representation regarding working conditions, remuneration, dispute resolution, internal relations and issues of mutual concern. For further details, see the 'Collective bargaining' section in this disclosure requirement.

Enagás evaluates the satisfaction of its employees via the actions carried out to manage the impacts indicated by the workplace climate survey.

## Satisfaction and motivation of professionals

In relation to the management of the positive material impact 'Use of programmes and policies to ensure the well-being of professionals in the workplace', Enagás has carried out its workplace climate survey. This survey is part of the Global Listening Strategy, in line with the Company's Digital Transformation Plan.

Enagás launched the workplace climate survey in 2024 under the slogan 'Tu experiencia nos mueve' (Your experience moves us). Its aim is to gather the views of Enagás professionals on various issues that will enable the company to improve and advance as a whole. This survey is conducted regularly every two years, and it is sent to all employees for their participation.

The 2024 survey reflects changes that, in line with market trends and the company's current context, make up 4 thematic blocks: sustainable engagement, high-performance employee experience, culture, and overall satisfaction and eNPS (employer recommendation index). The workplace climate survey is an inclusive process that gives a voice to all employees to express themselves, while preserving the confidentiality of individual opinion. It allows us to measure key indicators in order to design action plans that foster high levels of sustainable engagement and employee experience as key levers to retaining talent and achieving business objectives.

The project provides a digital diagnosis at the organisational level. Different levels of segmentation can also be obtained, allowing data-driven decisions to be made in a very agile way. This also allows us to identify changes in subsequent audits.

That year, participation by our professionals increased compared to the previous survey, reaching 78% (77% in 2022). Overall professional satisfaction stood at 71% (72% in 2022) and the sustainable engagement index at 82% (82% in 2022), the latter remaining in line with external benchmarks.

In the culture dimension, results orientation and a focus on people predominate, with 81% responding favourably the four dimensions assessed (innovation and adaptation to change, people, results orientation and hierarchy and procedures).

The Employee Experience metric received a 76% favourable score, making the company stand out for its ability to inspire employees around its purpose, generate high levels of trust in its leadership, drive a competitive market position through intense customer focus, agility and innovation, and recognise employees through tailored, differentiated, transparent and equitable compensation and benefits. The eNPS stands at 42, the average in Spain being 5.

As conclusions of the results of the climate survey, 94% of professionals consider Enagás a good place to work, and most of them understand how their work contributes to the business objectives.

To carry out this project, Enagás relied on the services of an external consultant and two professionals from the company. They assessed, established and coordinated the process, setting out the framework of strengths and opportunities regarding people with a possible impact on business results.

The Listening to Employees project contributes to the achievement of the company's 2025-2030 Strategic Update and to the commitment established in the Human Capital Management Policy to position professionals at the centre of the management model and improve their experience throughout their life cycle, ensuring the commitment, engagement and development of Enagás' key talent.

In 2025, to continue with the Global Listening Strategy, the following actions will be taken:

- Establishment of action plans derived from the areas for improvement found through the survey.
- Launch of a brief survey to monitor the global listening process; by randomly selecting a representative sample of the company (50% of the workforce), this survey aimed to gather the views of Enagás persons in order to continue identifying opportunities for improvement and deepen the degree of knowledge of the professionals on the projects implemented by the company. The initiative, in line with the Enagás Digital Transformation Plan, will aim to strengthen the commitment and development of people in order to continue growing as a company.
- Launch of a specific survey on social benefits and work-life balance measures aimed at all company professionals. The purpose of this survey will be to give Enagás professionals the opportunity to share their thoughts on a series of measures provided by the company to support co-responsibility and facilitate work-life balance.

Enagás evaluates the satisfaction of its employees via the actions carried out to manage the impacts indicated by the workplace climate survey.

In 2024, Enagás's main operating expenses (OpEx) for these initiatives will primarily involve the hours of employees working on designing the survey model, completing the survey, and collaboratively developing the associated action plans. These expenses are covered under wages and salaries in the Consolidated Annual Accounts (see section b) Personnel expenses, in note 2.1. operating profit).

## Collective bargaining

Enagás carried out various actions during the year to manage the positive material impact 'The right of professionals to join trade unions to promote and defend their economic and social interests without discrimination' and the material opportunity 'Establishment of a fair and stable employment framework through collective bargaining to strengthen the employment relationship, raise professional satisfaction, commitment and expertise and contribute to a more productive work environment in a collaborative climate'.

## Signing of the new collective bargaining agreement

In 2024, the company signed the Enagás Group's IV Collective Bargaining Agreement with the aim of guaranteeing a stable framework of working conditions for four years in order to meet the company's new challenges, in line with the Strategic Plan. The agreement was ratified unanimously by the company and the workers' representatives.

This new framework is an agreement that allows the company to advance its objectives in a context of great challenges and profound transformation, where the talent, technical capacity and commitment of the people who make up Enagás is fundamental.

## Collective bargaining and consultations with the workers' legal representation

Enagás enters into collective bargaining and carries out regular consultations with the workers' legal representation regarding working conditions, remuneration, dispute resolution, internal relations and issues of mutual concern. In 2024, the LGBTI panel was created, and various working group meetings were held with social representatives, including meetings to negotiate the Measures Planned for LGBTI People at Enagás and the ordinary meetings of the joint committees established in the Collective Bargaining Agreement, the Equality Plan and the Pension Plan. All of this has led to various agreements, including the updating of the Protocol for Prevention and Action in any Case of Workplace Harassment, incorporating the legal requirements regarding LGBTI people.

In 2024, Enagás's main operating expenses (OpEx) related to these collective bargaining actions will primarily involve the hours worked by employees from the people and diversity department, who lead the negotiation process, and by workers' representatives, who engage in negotiations during their working hours. These costs are included under wages and salaries in the Consolidated Annual Accounts (for more details, see section b) Personnel expenses, in note 2.1. operating profit).

## Work-life balance and co-responsibility

For Enagás, work-life balance means reconciling professionals' needs and interests with those of the company. For this reason, the company took the following actions last year to promote the positive material impact 'Improving the balance between the different aspects of professionals' lives thanks to the implementation of a comprehensive plan of measures favouring work-life balance and co-responsibility':

In 2024, Enagás was again [certified as a Family-Friendly Company](#), a certification it has held since 2007; it obtained the highest rating (A+ Level) for excellence in work-life balance from the Más Familia Foundation. Work-life balance is a voluntary commitment that Enagás has made to contribute to the professional and personal success of its workforce.

To this end, in 2024 the company has more than 120 measures aimed at reconciling the different aspects of people's lives. They support professional and personal development and facilitate a balance between the different dimensions of each person's life, as well as those of their immediate family. Work-

life balance becomes a key instrument to guarantee equality of opportunity.

Enagás believes that the Family-Friendly Company model is integrated into the management of the business and is a valuable tool that has also allowed the company to be perceived as an excellent place to work. The Family-Friendly Company model is subject to an external audit, which evaluates, among other aspects, the return on investment of work-life balance and obliges the company to always be in a process of continuous improvement.

Some of the relevant reconciliation measures available to our professionals<sup>59</sup> in 2024 are as follows:

### Family

- Flexible Remuneration Plan: includes health insurance, childcare, travel card, remuneration in shares and training.
- Study allowance for children of professionals covered by the collective agreement.
- 80% subsidy on special schooling expenses for professionals who have children with disabilities.
- 'Día sin Cole' (No School Day) programme and subsidised urban summer camps in Madrid for professionals' children on workdays throughout the school year<sup>60</sup>.
- Specific measures for female workers who are victims of gender-based violence.
- VivoFacil Family Support Programme:
  - 'Mi Asistente' (My Assistant) personal manager, which takes care of all necessary day-to-day procedures and information.
  - Free assistance with various administrative processes, such as procedures for vehicle purchase and sale, procedures for the birth of a child, renewal of driving licences, applications for or renewal of licences and visas, applications for certificates and reports and procedures involving municipal records.
  - Free service for selecting domestic helpers and healthcare personnel.
  - Services for making online wills and living wills, expert legal advice, signings before a notary public and registrations.
  - Specialised treatment (physiotherapy, speech therapy) and 56 free hours of home help service in the event of convalescence, illness or accident.
  - Digital erasure service to remove personal information from the Internet.
  - 'My mediator' service, offering the assistance of a person authorised by the Ministry of Justice for conflict resolution.
  - Ecological washing of the professional's personal vehicle.

### Work flexibility

- Flexibility in start times and lunch break.
- Flexible working (teleworking)<sup>61</sup>
- Shorter workday during the summer and every Friday throughout the year.
- Division of annual leave into a maximum of four periods.

### Quality employment

- Annual medical check-up and flu vaccine campaigns.
- 90% subsidy on the cost of private medical healthcare insurance for professionals and 100% for their children. Medical cover on international trips.
- Meal subsidies (canteens, financial aid, restaurant vouchers).
- Temporary disability allowance: payment of 100% of the fixed gross annual salary in the event of illness, accident or parental leave and childcare.
- Extension of the period during which a reduction in working hours for childcare purposes can be requested (until the child is 14).
- Access to a programme of discounts and exclusive prices on a wide range of online products, services and leisure.
- Pension plans for employees with two years' effective or recognised service.
- Healthy food corner<sup>18</sup>.
- Help towards sports activities.
- Lactation room<sup>18</sup>.

Enagás has continued developing its 'Reconexión' (Reconnection) programme, a support programme designed for Enagás professionals who return to the company after parental leave, a leave of absence to care for a child or dependent family member, or prolonged temporary disability, with the aim of facilitating their adaptation and return.

For the eighth consecutive year, Enagás is offering its training programme 'Aliados con la educación' (Education Allies) in 2024, together with the NGO 'Educar es Todo' (Education is Everything). This programme consists of four online training sessions that offer professionals the opportunity to learn and answer their education-related questions with different renowned experts.

Enagás monitors the use of these work-life balance measures, promoting awareness of the same and encouraging their present implementation at the company.

In 2024, Enagás has allocated over 3.2 million euros to contributions to external pension funds and more than 10 million euros to other personnel expenses. These include several work-life balance measures, such as the flexible remuneration plan, healthcare, and meal expense subsidies (for further information, refer to section b) Personnel expenses, in note 2.1. operating profit).

<sup>59</sup> Unless the scope is specified, these measures are aimed at 100% of the workforce of the category to which they apply, including both full- and part-time professionals.

<sup>60</sup> At corporate headquarters, where 44% of the company's professionals and 70% of its women are located.

<sup>61</sup> For all positions compatible with this type of work.

## Health and safety

The following is a summary of various actions carried out by Enagás during the year to manage the positive material impact 'Implementation of occupational health and safety plans, protocols and training for the company's professionals to improve the performance of their duties in a safe and healthy manner', the negative material impact 'Possibility of harmful work situations for professionals that generate insecurity in the work environment, including situations that negatively affect both mental and physical health' and the material risk 'Economic and reputational consequences arising from serious incidents involving professionals during operations, such as fatal workplace accidents'.

### Health and Safety Management System

The Enagás Group Health and Safety Management System is certified under ISO 45001 and has procedures and systems that seek to prevent injuries and illnesses caused by working conditions in addition to the protection and health promotion of professionals.

Enagás also has a Road Traffic Safety Management System certified in accordance with ISO 39001. On this topic, the company has a Mobility and Road Safety Plan, a vehicle use protocol, a Sustainable and Safe Fleet management procedure and a Road Safety Best Practices Guide for the management of the company fleet.

In general terms, the main actions carried out in 2024 within the framework of these certifications were as follows:

- Organisational context: analysis of the needs and expectations of own workforce and other stakeholders.
- Leadership and commitment: establishment of clear workplace health and safety policies and goals for each of the Group's companies.
- Planning: identification of hazards, assessment of risks and opportunities, and establishment of mitigation actions.
- Support and operation: ensuring the availability of resources, training and adequate communication, as well as change and emergency management.
- Evaluation and improvement: internal and external audits, performance review and implementation of continuous improvement actions.

In the area of health and safety, the monitoring and effectiveness of the management system is carried out through the annual Management Review Committee.

The cost of the safety management system is mainly associated with the cost of the Prevention Service's own workforce (included in the information reported in section b) personnel expenses in note 2.1 Operating income in the Consolidated Annual Accounts for 2024), and the cost of external audits (approximately 25,000 euros in 2024) (information included in note '2.1 Operating income' in the Consolidated Annual Accounts).

## Training and awareness-raising

Health and Safety training is a key part of any preventative action to improve worker awareness and protection from the hazards that may be present in daily operations. This is why Enagás has designed a training schedule for all different job profiles at the company that sets out the specific training activities needed for each risk group. In 2024, these activities notably included training regarding work with dangerous goods, explosive atmospheres, storage of chemical products, hygiene and ergonomics, first aid and road safety, among others.

In 2024, a total of 11,991 hours of health and safety training were provided (12,206 hours in 2023); 65% of professionals received training (60% in 2023). The cost of these training hours surpassed 142 thousands of euros in 2024. In 2025, training actions for professionals will continue to take place, with a continuous approach both in terms of training hours and budget.

In addition, during the 2024 fiscal year, more than 40 messages were sent to all Enagás workforce through the corporate mailbox with bite-sized facts promoting health programmes (Steppers challenge, vaccinations, etc.), talks on different topics (choking, fostering social relations and avoiding unwanted loneliness, etc.), etc. For example, on the occasion of World Road Safety Day, which is commemorated every year on June 10, Enagás organised various initiatives to raise awareness among its professionals so that they take extreme care at the wheel.

In 2024, Enagás carried on the 'Guide Project' campaign to guide employees towards a culture of health and safety through the acquisition of knowledge and good habits that enable people to maintain their well-being in the professional and personal spheres. The actions launched within the framework of this project include an awareness-raising campaign on best safety practices promoted by the members of the Executive Committee, as well as informative videos on safety guidelines in innovation projects, as well as road safety and road safety habits. We have also implemented an awareness-raising campaign of 'safety moments' and 'safety walks' promoted by the Executive Committee.

The estimated cost of these corporate communication and awareness activities in 2024 is over 30,000 euros (see note '2.1 Operating profit' in the Consolidated Annual Accounts for details).

### Psychosocial risk assessment

In 2024, the review of the planned psychosocial risk assessments was completed. This fiscal year, 600 professionals were assessed using both quantitative and qualitative data, the latter involving more than 100 individual interviews. Preliminary results show favourable results in areas such as worker interest and compensation, psychological demands and autonomy. In 2025, the establishment and implementation of corrective actions to manage the identified areas with the greatest room for improvement will continue.

The cost of this assessment includes the cost of the specialised external prevention service that provided support by carrying out the psychosocial risk assessment in 2024 (35,000 euros) (see note '2.1 Operating income' in the Consolidated Annual Accounts for details), as well as the cost of the Prevention Service's own workforce (included in the information reported in section b) personnel expenses in note 2.1 Operating income in the Consolidated Annual Accounts for 2024).

## Emergency management

Enagás is moving towards a resilient management model, promoting improvements in different areas of accident and emergency management. As part of its Global Security Plan, the organisation organises annual legal drills to reduce the response time and possible consequences of an emergency. In 2024, 36 legal drills were conducted at facilities. Likewise, to facilitate its response capacity, Enagás has maps of both corporate and local stakeholders so that, in the event of a hypothetical crisis situation, both the key people and the communication channels are identified, enabling efficient management.

Enagás also periodically reviews its emergency and self-protection plans and establishes emergency collaboration agreements with the authorities in each Autonomous Community through the signing of agreements in order to achieve a rapid, effective response in the event of a possible crisis situation. In 2024, 14 emergency/self-protection plans for different facilities were updated.

Emergency plans are sent to the relevant public administrations so that they can be taken into account in external emergency plans and in for any communication of information of public interest that may be required.

In 2025, work will continue along the aforementioned lines, carrying out drills, reinforcing emergency agreements with the Autonomous Communities and updating the corresponding emergency/self-protection plans.

## Healthy Workplace

Enagás is certified as a Healthy Workplace according to the protocol of the World Health Organisation. The Management System encompasses aspects and information regarding the physical working environment, the psychosocial environment, personal health resources and community participation.

In addition, there is an agreement with an external prevention service to provide coverage to the occupational medicine and health monitoring speciality at all centres.

Enagás' head office has a doctor to provide primary care to its own workforce and deal with emergencies among professionals and contractors. The Gaviota platform also has a nursing service and remote assistance from a medical service. In addition, Enagás offers its employees private medical insurance at a subsidised rate. Through the 'VivoFácil' family assistance programme available to all professionals, there are also health benefits such as physiotherapy and speech therapy.

In 2024, Enagás launched once again its Steppers Challenge, part of the company's 'BienEstar' project, with the aim of beating the sedentary lifestyle and improving its professionals'

health. Last year, the number of steps increased proportionally with respect to the previous year. Participants reached 348 million steps taken during the three-week competition.

Other initiatives promoting the physical and mental well-being of our professionals through measures such as encouraging healthy eating, regular physical activity and improving the health of professionals and their environment continued this year.

The company has a specific Emotional Well-being programme whose main objective is to provide professionals with tools to improve their emotional management and prevent stress at work. This programme includes a range of actions, such as stress management workshops (involving 80% of the company), a mindfulness programme, a digital well-being programme, emotional management improvement programme, relaxation and sleep hygiene workshops, interventions by a specialised psychologist to bring together work teams and awareness of digital switch-off.

In 2024, we launched a programme called 'Catching your sleep', mainly aimed at shift workers, where circadian rhythms are comprehensively assessed with the aim of detecting sleep or performance problems and possible solutions.

Related to the improvement of nutrition, in 2024, sessions took place with a personalised service featuring nutrition experts available to professionals at headquarters.

## Updates to the medical service

Besides the specific medical check-up for each position, Enagás also carries out voluntary basic analytics, a cholesterol breakdown, prostate cancer check-ups for men over 45 years of age, an electrocardiogram and a colon cancer diagnostic test. In 2024, cardiovascular risk parameters, a nutritional assessment, a diabetes development risk assessment and a fatty liver index risk assessment were also included in the survey.

Enagás has implemented a programme to encourage professionals to gather the necessary knowledge to become promoters of their own health. In 2024, the following actions were carried out:

- 405 medical consultations of Enagás workforce plus 47 of external personnel.
- 1,152 health examinations.
- 1,120 examinations for high blood pressure and cardiovascular risk (including 74 blood tests and 50 blood pressure measurements in the medical service, both at specific times and in follow-up).
- 478 tests of early diagnosis of prostate cancer.
- 374 tests of early diagnosis of colon cancer.
- 409 flu vaccinations and one other type of vaccination administered.

With the aim of promoting a healthy lifestyle among employees, Enagás provides professionals with healthy and natural food at the head office and in infrastructure canteens. Enagás also has a locker room, showers and bicycle parking facilities on its premises.

The cost of actions related to Healthy Workplace in 2024, including those related to physical and emotional well-being and the medical service, was approximately 276,000 euros (see note '2.1 Operating income' in the Consolidated Annual Accounts for details). In addition, there is the cost associated with personnel expenses for the Prevention Service's own workforce who participate in these actions (included in the information reported in section b) personnel expenses in note 2.1 Operating income in the Consolidated Annual Accounts for 2024).

## Diversity and inclusion

Enagás promotes a culture that ensures a diverse and inclusive environment, and fosters a working environment in which trust and mutual respect prevail and where integration and recognition of individual merit are hallmarks of the company. All this by promoting actions and initiatives associated with managing the positive impact 'Ensure non-discrimination and equal opportunities, regardless of gender, race, ethnicity or other personal characteristics, through the implementation of policies, strategies and action plans'.

Enagás has designed a Diversity and Equality Master Plan whose objective is to guarantee equal opportunities by fostering a diverse and inclusive environment. This supports the company's Diversity and Inclusion Strategy (gender diversity, disability, generational diversity, diversity of thought, cultural diversity and LGBTI). Among the actions included in this plan and carried out in 2024, the following stand out:

- In 2024, one meeting of the Diversity Committee was held with the aim of monitoring the company's commitments. This involved the company's management team and middle management in the Diversity and Inclusion Strategy, promoting inclusion in their areas of responsibility, being active and prominent advocates of inclusive practices and leadership. This provides a space for sharing experiences, reflecting, finding synergies and proposing concrete actions to advance with a sustainable, inclusive and egalitarian model of people management. This Committee is composed of directors representing all areas of the company.
- The Diversity Allies Network held six meetings to continue working to promote an inclusive culture. This network, made up of 90 professionals from all areas of the company, is an initiative that aims to raise awareness of the importance of having diverse and inclusive environments in all areas of life, including the workplace. This is a voluntary space open to all Enagás employees who want to support and defend diversity and inclusion, both inside and outside the company.

In May and June 2024, in commemoration of European Diversity Month, the company relied on the involvement of the professionals that make up this network. Their testimonies raised the visibility of the six axes of diversity that make up the company's Diversity and Inclusion Strategy. In

this regard, seven Enagás professionals shared with the entire organisation the personal icons that inspire, motivate and move them to form part of this network of allies, as well as the reason why they focus on a particular axis.

In order to be able to monitor and evaluate the effectiveness of these actions and initiatives, Enagás has included a category on Diversity and Inclusion in the climate survey, with general questions and other explicit questions on each area of diversity. Moreover, in 2024, the company launched a tool to self-evaluate inclusive behaviour at the company.

In 2024, Enagás allocated over 110 thousands of euros (OpEx) to the diversity and inclusion initiatives listed below (see note '2.1 Operating profit' in the Consolidated Annual Accounts for details). In 2025, Enagás plans to continue these efforts with a similar budget.

## Non-discrimination

The company is determined to create diverse and inclusive work environments, where each and every person feels that they can be themselves and that they are valued, without prejudice, for their work and their talent. In 2024, Enagás continued its specific programme on cognitive biases aimed at Directors and managers, as well as those in the diversity allies network, to help develop a culture favourable to the diversity and inclusion model that the company seeks. Its goal is to help identify the presence of biases and assess their influence and impact on interpersonal interactions and management, providing team managers with both the necessary tools to be aware of their existence and the measures and actions available to eliminate them. In 2024, this training was extended to all professionals through online bite-size trainings, which included the self-assessment tool 'I am an inclusive person'.

## Gender diversity

Enagás has an [Equality Plan](#) that sets out a framework for action to promote effective equality, equity, merit, personal progress, shared responsibility and work-life balance among all professionals.

The Equality Plan covers nine areas of application:

- Awareness-raising and communication
- Hiring and recruitment
- Training, promotion and professional development
- Remuneration
- Hazardous situations for women in the workplace: harassment
- Gender-based violence
- Under-representation of women
- Co-responsibility in the exercise of rights to personal, family and working life
- Working conditions and workplace health

Each of the above points includes and develops specific measures with execution deadlines and prioritisation. These guarantee the principle of equal treatment and opportunities between women and men and non-discrimination on the basis

of sex in all policies, procedures and actions of the company's Human Resources management.

### Gender diversity programmes

In 2024 Enagás has promoted measures aimed at increasing the participation of women in positions of responsibility, such as the 'Promociona' and the 'Progresa' projects. They are being developed in collaboration with the CEOE, and aim to create networking groups based on the sharing of experiences to provide high-potential women with the tools and skills necessary to boost their professional careers and take on positions of high responsibility in the future. Other programmes have been launch, which contribute to the achievement of the company's strategic targets, recognising, promoting and developing female talent and guaranteeing equal opportunities and non-discrimination principles. These are:

- The Management Development Programme 'Women with High Potential', together with the EOI.
- The mentoring programme for managers, AED Lead Mentoring.
- Executive programme for women in digital and human leadership (LDH).
- External mentoring with PWN (Professional Women's Network) Madrid, an organisation which, among other ends, is dedicated to the organisation of activities aimed at promoting gender equality, female leadership, respect for diversity, inequality reduction, the promotion of social justice and the empowerment of women.
- The management development programme: STEM Woman/Engineer and Manager.

In 2024, 15 women (18 in 2023) participated in one of the female management development programmes in which Enagás participates.

### Other actions

The company has also carried out the following gender diversity initiatives during the year:

- Adjusted pay gap analysis in the framework of the European Directive on Pay Transparency and Equal Pay.
- Holding a meeting of female managers with the CEO to deepen solutions to boost female leadership and STEM careers. Various proposals emerged from the meeting, including: organising 'science camps' for sons and daughters, improving Enagás' employer brand through networks used by children and young people, mentoring and coaching processes for female professionals, raising awareness of prejudices and stereotypes, promoting women's leadership at regasification terminals and facilities, building Enagás' presence at job fairs, scholarships at facilities for recent female graduates, increasing the company's involvement in educational systems and continuing to build female role models, among other proposals.
- Signing of an agreement with the Spanish Association of Women in Energy (AEMENER) with the aim of ensuring that

the presence of women in all areas of the company is balanced and that the teams are diverse, through the promotion of female careers in technology, science, mathematics and engineering.

- Membership of the ClosinGap Association to promote economic growth through gender equality. This initiative seeks to promote and accelerate social transformation towards an economy without gender gaps in both private and public-private partnerships.
- Participation in the DEI MaKers programme.
- Volunteering activity with the Exit Foundation's Coach project, which seeks to guide and motivate young people in situations of social vulnerability.
- Participation in forums and working groups by the Diversity team and other company professionals as ambassadors of Enagás' commitments.
- Awareness-raising campaigns on co-responsibility through the Enagás training programme 'Aliados con la educación' (Education Allies).
- Closing event for the #EllasTeLoCuentan (#Shetellingyou) campaign, which was launched in 2022 with the aim of improving the company's employer brand in the search for and recruitment of talent, in recognition of all the people who participated in it.

### Generational diversity

The company is a partner of the Generation and Talent Observatory which encourages innovation and promotes active policies of generational diversity based on values and ethics. Enagás also collaborates in the dissemination of best practices in this area through Capital Radio's Human Resources forum, where it highlights the richness of the confluence of different generations in the workplace, and has sponsored and collaborated in various studies such as 'Diagnosis of generational diversity: analysis of intergenerational talent in companies', 'Intergenerational leadership' and 'Intergenerational health and well-being'.

In 2024, Enagás collaborated in the closure of the Diversity Excellence 360° Management Model, the aim of which was to establish a tool for comprehensive diversity management in the workplace. Following the project's completion in 2023, the conclusions of the study were presented in 2024.

Additionally, Enagás professionals have been provided with online training on generational diversity, deepening the intergenerational culture present at the company.

### Disability

The Certification Committee of the Bequal Foundation, a non-profit organisation that recognises organisations that are socially responsible towards people with disabilities, has renewed Enagás' certification in the PLUS category. This certification recognises the company's commitment to people with disabilities as one of the main lines of action included in its Diversity and Inclusion policy. In 2024, Enagás successfully passed the second review of this certification, which will remain valid until November 2025.

In addition, Enagás has taken action to improve accessibility for people with disabilities, such as the progressive elimination of architectural barriers at our facilities and the 'AA' accessibility level of our corporate website.

Other initiatives carried out during the year included the following:

- Launch of the corporate volunteering initiative on artificial intelligence training for people with disabilities.
- Raising awareness of disability through the campaign 'For the sum of abilities', the purpose of which was to provide all professionals with an external confidential and personalised advice service on disability issues, together with the Fundación Juan XXIII.

## LGBTI diversity

The company has signed a collaboration agreement with REDI (Business Network for LGBTI Inclusion).

As part of International LGBTI Pride Day, Enagás has organised initiatives to raise awareness of LGBTI people in the workplace, based, among other things, on the testimonies of people who have joined the Allies network for this axis of diversity at the company.

In addition, in 2024 the company established a planned set of measures to promote equality and non-discrimination against LGBTI people at Enagás. To this end, the following measures have been taken:

- Formalisation and monitoring of the negotiating committee to establish a set of measures and actions that guarantee equality and non-discrimination against LGBTI people.
- Elaboration of a report on the current situation in order to establish a planned set of measures and resources to achieve real and effective equality for LGBTI people.
- Updates to the Prevention and Action Protocol for workplace harassment, incorporating aspects related to the LGBTI community.

This document takes on the challenges of today's world in the following areas of action:

- Equal treatment and non-discrimination.
- Access to employment.
- Professional classification and promotion.
- Training, awareness and language.
- Diverse, safe and inclusive work environments.
- Leave and social benefits.
- Disciplinary regime.

## Cultural diversity

In 2024, Enagás promoted cultural diversity in access to employment, focusing on the search for international profiles. The resulted in the hiring of nine people in 2024 born outside Spain (representing 13.84% of all new hires).

In addition, the Diversity Allies Network has boosted this axis of diversity, aiming to work towards the inclusion of all groups, with an explicit focus on Cultural Diversity.

In June 2024, an awareness-raising talk on cultural diversity was given to the entire Enagás workforce.

## Awareness and development of in-house talent

Enagás carries out different actions to manage the material impact 'Professional development and qualification of workforce through appraisals and development plans, as well as continuous learning and training' and the opportunity 'Optimisation of operational efficiency by promoting professional development and training for internal workforce':

### Awareness of in-house talent

In order to deliver on our Human Capital commitments related to talent development and retention, we have a number of talent awareness initiatives across the company as a whole. To this end, we take as a reference our Leadership Model; in it, skills and behaviours are classified and categorised for all professional levels, allowing us to identify strengths and areas for improvement for each and every one of our professionals

Focused and focusing on the collective excluded from the agreement, there is a management-by-objectives model to align professionals' individual performance and contribution with the company's strategic challenges, via the annual definition of measurable and defined objectives for each excluded professional with regular monitoring by their managers, through the annual variable remuneration of professionals. These assessments are carried out annually with the support of our HR digital platform Workday, and serve as a base for promoting continuous improvement and designing personal development plans (for more information, see disclosure requirement S1-13).

Likewise, for workers covered by the Collective Bargaining Agreement, we have the Performance Evaluation (for more information, see disclosure requirement S1-13). This is an annual points-based evaluation system that takes into account six factors:

- Assessment of the manager using our skills model, which is carried out through our digital Workday platform.
- Training associated with the completion of training pathways.
- Performance of objective tests of skills and aptitudes.
- Innovation, through participation in our corporate entrepreneurship programme.
- Knowledge transmission, through the creation of bite-size facts that any employee can create and upload to Workday so that they can be viewed and assessed by any professional.
- Career path that takes into account a professional's average evaluations over the last five years.

In addition, and with the aim of continuing to work on adapting the capabilities of the management team to successfully face the challenges of updating the 2025-2030 Strategic Update and the Digital Transformation Plan, the

Leadership Development Programme is being continued. In 2024, we continued to develop the 40 professionals of the Directors team (members of the Executive Committee and Directors of the company) with both individual and group actions to promote the development of skills and critical capabilities for Enagás. In addition, of the other members of the management team, 111 managers and referents have participated in a 360° evaluation process (evaluation by their managers, teams and peers and/or internal customers) to provide them with an expanded vision of their strengths and areas for improvement. This process has been carried out through a digital platform provided by an external supplier.

Associated with the identification of employees' potential for promotions, and with the goal of fostering professionals' self-development and self-knowledge, Development Centre days were held. At these, through various techniques and simulation exercises provided by an external provider, participants obtain personalised feedback on their potential strengths and areas for improvement with a view to the performance of different roles and responsibilities. In 2024, in response to the company's organisational needs during the year, 40 professionals (43 in 2023) participated in a talent identification programme.

Lastly, with the aim of continuing to promote feedback culture at the company and fostering open communication, Enagás' digital platform workday enables all professionals to receive and give feedback to other professionals. This aims to encourage the identification of improvements at work and to recognise achievements.

### Professional development programmes

The information obtained from the different evaluations of professionals enables all of them to design customised development plans through our digital platform Workday. In addition, they can receive specific online training through the Workday platform on the main recommendations for pursuing an Individual Development Plan, as well as receive personalised advice. These individualised development plans are approached from an integral perspective, following the 70:20:10 learning model. 70% refers to actions based on experiential learning, 20% to actions derived from mentoring and coaching processes and 10% to formal learning derived from more traditional training itineraries.

In relation to the first area of experiential learning, in addition to concrete actions that each employee proposes in their current situation, internal rotation programmes are fostered at company level so that new knowledge can be applied to real situations, and participation in transversal projects or temporary assignments can also be taken advantage of. In 2024, there were 78 internal movements (144 in 2023), of which 16 were promotions and 62 horizontal movements. 33% of hirings selected internal candidates (46% in 2023).

In relation to the second area, namely exposure or informal learning, there is the option of carrying out internal and/or external coaching and mentoring programmes. These programmes contribute to the achievement of the company's strategic objectives, and their main benefits are the development and retention of talent, increased satisfaction and

motivation of professionals, improved internal communication and teamwork, increased productivity, leadership development and strategic vision, as well as the promotion of female talent and the increased presence of women in positions of responsibility.

- Enagás promotes personalised coaching programmes aimed at working on the capabilities and skills necessary for the performance of each professional, facing times of change or undertaking new roles. In 2024, 35 professionals participated in coaching programmes (29 professionals in 2023). In addition, professionals in the company have received training and are certified in coaching; they are therefore qualified to carry out internal coaching processes.
- Enagás continued to strengthen its internal mentoring programme, aimed at all company professionals. This programme allows for two-way learning between peers. 53 professionals (27 mentees and 27 mentors) have participated in it. We have also continued to promote participation in external mentoring programs, in which 94 professionals (88 mentees and 8 mentors) participated during 2024. The aim of these external programmes is to encourage and enable professionals to reach senior management positions, to foster their development and to receive advice from more senior professionals from a company other than their own, allowing for a greater exchange of experiences.

Finally, the third area - education - promotes a culture of continuous learning, putting the employee at the centre, empowering them and providing them with the capacity for self-development through training ecosystems where they can access different learning programmes and initiatives.

### Training

Enagás is committed to training its professionals from when they join the company and throughout their professional career.

Training begins with the Enagás Welcome Plan, which includes communication and training activities. It includes e-learning training on aspects such as the Code of Ethics, a corporate defence programme, a corruption prevention programme, human rights and equality, among others, which are compulsory for all professionals, and face-to-face training on the Enagás value chain that offers professionals a global vision of the company's business. As a complement to this plan, new recruits participate in a buddy programme; during their Enagás onboarding process, they are accompanied by a colleague who guides and helps them as they take their first steps.

Besides, depending on the type of work the person performs, a training plan has been designed in areas related to operations, maintenance, security and administrative management.

Additionally, as part of Enagás' strategy to promote the continuous training of our professionals to guarantee success in the performance of their duties, there are customised training schedules for each of the company's profiles and levels. These schedules are set out to generate progressive improvements in professionals' qualification levels, anticipating their short- and long-term needs, and include corporate,

operation and maintenance, environmental and health and safety training.

During 2024, and in line with the initiatives framed in the Digital Transformation Plan (for more information, see disclosure requirement [SBM-2](#)) aimed at promoting the development of new skills and knowledge to face future challenges, we launched itineraries in new training areas such as Agility and New Ways of Working, Digital Transformation and Hydrogen. These initiatives also reinforce our commitment to guaranteeing an agile, resilient and digital organisation with a greater capacity to adapt to strategic challenges, as set out in the Enagás Human Capital Management Policy.

The training associated with all of these training itineraries (training considered mandatory) represents 29% of the training hours and 13% of the economic investment per professional. This covers the entire company, that is, all professionals must complete the different training courses in the periods established for each of them.

Additionally, we have programmes based on the skills and behaviours established for each profile associated with our leadership model. We also have training, upskilling and reskilling programmes that provide technical training to new employees, allowing them to take on new roles and participate in new projects and initiatives.

This Enagás training activity is driven by the new Enagás Corporate University, where over 10% of the workforce participate as trainers in different programmes. Beyond classroom and on-the-job training, virtual training, e-learning, mobile training and communities of practice, we also promote the use of experiential technologies, allowing real cases to be simulated and people to learn from experience without putting people's safety at risk or modifying infrastructure operations.

Enagás' commitment to establish and develop the necessary competencies and skills in its professionals to achieve its strategic objectives is evidenced by a training penetration rate<sup>62</sup> of 99.1 % in 2024 (94.9% in 2023), an average of 57.2 hours of training per professional (58.1 hours in 2023) and an average investment of 1,138.9 euros per professional (1,096 euros in 2023). In 2024, investment in training (OpEx) exceeded 1.8 million euros, compared to 1.5 million euros in 2023 (see note '2.1 Operating profit' in the Consolidated Annual Accounts for details).

Enagás assesses the satisfaction of professionals who have received training; this increased in 2024 compared with the previous year, reaching 8.9 out of 10 (8.8 in 2023).

Within the framework of the Enagás Knowledge Management Model, with the aim of promoting the dissemination and transfer of critical knowledge generated within the company, especially in Infrastructure, the company has continued to work on a series of initiatives, including the promotion of social

learning so that professionals can earn and share knowledge through the 'Expert Talk' programme (in 2024, 7 sessions on different topics have been held). In this programme, experts and company leaders share their knowledge with the rest of the company's professionals through monthly lectures on relevant topics in the gas sector, and the creation of lessons on different subjects that other professionals can consult. Likewise, in order to minimise knowledge loss, we continue with the critical knowledge transfer plans linked to the relay plans.

## Human rights

### Identification of rights and risk assessment

Human rights management is addressed using a continuous improvement approach aligned with our Sustainable Management Model. Enagás has a global system in place to identify human rights violation risks and impacts on a regular basis.

The identification of these violation risks and impacts is carried out for different points of the company's value chain both current (Enagás activities with management control, affiliates without management control and supply chain and customers) and potential (analysis of new business opportunities), taking into account international standards based on location and activity<sup>63</sup>, communications and consultations with stakeholders, as well as consultations with external experts in human rights. The human rights identified include labour rights, safety, the environment, ethics and integrity, as well as fundamental rights.

The evaluation of the identified violation risks is carried out through the following assessments:

- Assessment of country-specific risks.
- Corporate risk map.
- Assessments of safety risks in work places and facilities.
- Assessments of environmental impact/ environmental risks.
- Supply chain assessments.

In the assessments carried out in 2024, Enagás considers the level of violation risk to be low across the board due to the measures that the company has implemented as part of its Sustainable Management Model. Thus, Enagás has human rights risk prevention and mitigation plans in all the geographical areas in which the company operates. These plans include the following main measures for each of the main issues identified and target the identified vulnerable groups<sup>64</sup>. These measures have been set out according to the company's capacity to influence the different points of its value chain.

It is the responsibility of the different areas of the company to establish, within their management scope (people, supply chain, local communities, etc.), action plans, objectives and

<sup>62</sup> The training penetration rate is the number of professionals who have received at least one training activity during the year out of the total number of employees at year-end.

<sup>63</sup>The World Bank, UNICEF, The Economist Intelligence Unit, IPIECA, The Danish Institute for Human Rights, etc.

<sup>64</sup>Within the framework of the risk assessments that Enagás carries out each year, vulnerable groups have been identified among the stakeholders (professionals, local communities and suppliers). In these cases, action is focused.

monitoring indicators to ensure compliance with the commitments established in the policy and to mitigate the risks and negative impacts identified. They are also responsible for periodically evaluating possible changes in risks and impacts.

During the 2024 assessments - as in the assessments of the previous two years (100% of the assets covered in the last three years) - Enagás did not find any human rights violations, so no remediation actions were required.

In addition to human rights violation risks, Enagás, in an integrated manner with the company's risk assessment processes, identifies and assesses the risk level of each of the risks associated with human rights. These identified risks relate to human rights related to labour practices and to society and local communities:

- Work practices: operational and technological risks and criminal liability.

- Society and local communities: strategic, business, compliance and model risks.

In 2025 Enagás will review its Due Diligence Processes in relation to own operations and third parties, focusing on the protection of Human Rights and the Environment, in line with the new European Directive on this issue.

Enagás provides an online training programme for all professionals so that they can learn the company's methods for ensuring compliance with human rights.

## Human rights assessed in own workforce

Human rights assessed	Assessment result	Measures to reduce the level of risk
<b>LABOUR PRACTICES</b>		
The right to decent work and the rejection of forced, compulsory and child labour	Low risk of violation	Enagás guarantees stability and quality of employment, a commitment that is reflected in its Human Capital Management Policy. The Enagás Collective Bargaining Agreement prohibits the company from employing minors of under 16 years of age.
Right to rest and leisure	Low risk of violation	Enagás improves and extends the periods and conditions of rest and leisure established in current legislation (flexibility in start times and lunch break, intensive working days during the summer and every Friday throughout the year, division of annual leave into a maximum of four periods, etc.).
Right to family life	Low risk of violation	Enagás improves and extends paid leave beyond the provisions of current labour regulations (death of a close relative, illness, reduced working hours for childcare, special circumstances, etc.).
Freedom of association	Low risk of violation	Enagás professionals can freely exercise their right to belong to trade unions in order to promote and defend their economic and social interests without this being the basis for discrimination, and any agreement or decision by the company contrary to this principle is deemed null and void, as established in the Enagás Group Collective Bargaining Agreement.
Collective bargaining	Low risk of violation	Enagás has in place a collective bargaining agreement, in line with its Human Capital Management Policy, which enters into collective negotiations and carries out regular consultations with authorised employee representatives.
Workplace non-discrimination and diversity	Low risk of violation	The company has in place a Diversity and Inclusion Strategy, a Diversity and Inclusion Policy, an Equality Plan and a Prevention and Action Protocol at the disposal of its professionals for any situation of workplace harassment. This protocol provides a confidential channel for reporting workplace harassment (canal.etico@enagas.es).
Fair and favourable remuneration	Low risk of violation	Part-time employees receive remuneration that is proportional to the salary of full-time employees, with identical employee benefits. In addition, in 2024, Enagás' minimum salary was 1.66 times the minimum inter-professional salary in Spain.
Living wage	Low risk of violation	Enagás is committed to establishing a salary high enough for all its professionals to have a decent standard of living, sufficient to cover basic needs in accordance with the local cost of living.
Right to a safe working environment	Low risk of violation	Enagás' Occupational Risk Prevention Management System, certified under ISO 45001, provides mechanisms for identifying and preventing incidents.
Right to life, liberty and security of person	Low risk of violation	The company exercises due diligence when rendering its services in order to prevent errors or omissions that could harm the life, health or safety of consumers or others who may be affected. It also complies with national laws and relevant international guidelines.
Right to freedom of opinion, expression and information	Low risk of violation	Enagás has various clear and transparent internal communication channels that allow workers to communicate with senior management.

Repair procedures and mechanisms

Enagás also has in place procedures for redress should there be non-compliance with any of the previously mentioned human rights, such as:

- Procedure for the management of consultations and reporting regarding irregularities or breaches of the Code of Ethics.
- Self-protection and interior emergency plans, the incident and transmission network emergency response action plan and the procedures regulating it, the accident and incident management procedure and procedure for reporting them to stakeholders (crisis manual, incident reporting, etc.).
- Procedure for compensation and indemnification for gas pipeline routes through private property areas.

Additionally, as mechanisms for redress, Enagás has in place a Whistleblowing Line (accessible to all stakeholders) and an Ethical Compliance Committee. There are also corporate mailboxes available for specific areas.

# Metrics and targets

S1-5

## Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

### Stable, quality employment

In order to boost the positive material impact 'Maintenance of quality employment through the provision of jobs with stability in the short, medium and long term and favourable working conditions for workers', the company has set the goal of creating an environment where all professionals can achieve personal well-being, offering working conditions propitious to professional growth, facilitating a balance between the different aspects of people's lives. Related to the implementation of fair wages, Enagás aims to maintain a minimum salary above the national minimum wage<sup>65</sup>. In 2024, this minimum wage was set at 1.66 times the national minimum wage, thereby achieving the target. Workers' legal representatives have been involved in defining, monitoring performance, and identifying improvements related to this goal, as salary ranges for employees covered by the collective agreement are established through collective bargaining negotiations.

This goal is aligned with the commitment to stable and quality employment included in the Human Capital Policy.

### Satisfaction and motivation of professionals

To enhance the positive impact identified as 'Use of programmes and policies to ensure the occupational well-being of professionals', the company aimed to maintain the sustainable commitment index results from the 2022 workplace climate survey at 82% in 2024<sup>66</sup>. Enagás achieved this goal by recording an 82% sustainable commitment index in the latest workplace climate survey. Professionals have been involved in monitoring this goal by being informed of the survey results and participating in the identification of lessons or improvements through action plans developed by multidisciplinary teams.

This goal is aligned with the commitment established in the Human Capital Management Policy to position professionals at the centre of the management model and improve their experience throughout their life cycle, ensuring the commitment, engagement and development of Enagás' key talent.

### Collective bargaining

In order to boost the positive material impact 'The right of employees to join trade unions to promote and defend their economic and social interests without discrimination' and to manage the material opportunity 'Establishment of a fair and stable employment framework through collective bargaining to strengthen the employment relationship, raise professional satisfaction, commitment and expertise and contribute to a more productive work environment in a collaborative climate', in 2024 the company set the target of signing a memorandum of understanding for the entry into force of the Enagás Group IV Collective Bargaining Agreement<sup>67</sup>. This goal was reached in 2024 with the signing of the new Collective Agreement, with workers' representatives involved in its definition, monitoring, and improvements.

This goal is aligned with our commitment to ensure respect for collective bargaining in the labour sphere included in the Enagás Group's Code of Ethics.

### Work-life balance and co-responsibility

In order to boost the positive material impact 'Improving the balance between the different aspects of professionals' lives thanks to the implementation of a comprehensive plan of measures favouring work-life balance and co-responsibility', the company has set the goal of maintaining its level of excellence in the efr certification in 2024. This means that the measures are aimed at 100% of the employees, with a distribution of more than 120 measures across the following blocks<sup>68</sup>:

- Quality employment.
- Time and location flexibility.
- Family support.
- Professional development.
- Equal opportunities.

The goal set by the company was achieved with 128 measures aimed at 100% of employees, maintaining the above-mentioned measures and fostering an organisational culture based on flexibility, responsibility, respect and mutual commitment. A sustainable project that links the continuous improvement of the company with raising the quality of the professional and personal lives of all of us who are part of it.

This objective is aligned with the commitment to respect labour rights, with a special focus on the area of work-life balance and co-responsibility, as reflected in its Human Capital Policy.

<sup>65</sup> Given the nature of this goal, which is not meant for comparison, setting a base year is not applicable.

<sup>66</sup> However, professionals or workers' representatives were not directly involved in setting this goal.

<sup>67</sup> Given the nature of this goal, as it is not meant for comparison, setting a base year is not applicable.

<sup>68</sup> Given the nature of this goal, as it is not meant for comparison, setting a base year is not applicable. Professionals or workers' representatives have not been directly involved in the definition, performance monitoring, or identification of lessons learned from this goal.

## Health and safety

In order to boost the positive material impact 'Implementation of occupational health and safety plans, protocols and training for the company's professionals to improve the performance of their duties in a safe and healthy manner', reduce the negative material impact 'Possibility of harmful work situations for professionals that generate insecurity in the work environment, including situations that negatively affect both mental and physical health' and manage the materiality risk of 'Economic and reputational consequences of serious incidents affecting professionals during operations, such as, for example, injuries, accidents, among others' the company has set the following targets for each strategic commitment in 2024. These are included in the annual Health and Safety Programmes for each Enagás Group company. The goals are as follows<sup>69</sup>:

- Promotion of health and well-being:
  - To achieve 80% compliance with the actions planned in the #Well-being programme. This programme includes specific activities aimed at improving indicators of physical, mental, and occupational well-being, as well as nutrition. These actions directly impact the issues identified in 'Implementation of occupational health and safety plans, protocols and training for the company's professionals to improve the performance of their duties in a safe and healthy manner' and 'Occupational hazards such as harassment, stress, discrimination, injuries, accidents, among others, that create insecurity in the work environment'. All planned actions for 2024 have been completed, fully meeting this target.
- Promotion of Health and Safety Culture:
  - Production and dissemination of four awareness-raising videos of the Health and Safety Culture Guide project. The purpose of these videos is to enhance leadership, integration, and a culture of health and safety among our professionals. They cover various topics, including change management related to new molecules, health, road safety, and management system processes. These actions have a direct impact on the identified impact 'Implementation of occupational health and safety plans, protocols and training for the company's professionals to improve the performance of their duties in a safe and healthy manner'. All four awareness-raising videos were produced in 2024, achieving this objective.
  - The 'safety walks' process has been fully implemented at the senior management level to highlight the importance of health and safety across the organisational structure and to share best practices as a method for continuous learning in a safe and healthy manner. These actions have a direct impact on the identified impact 'Implementation of occupational health and safety plans, protocols and training for the company's professionals to improve the performance of their duties in a safe and healthy manner'. All planned actions for 2024 have been completed, meeting this goal.

- Change management: innovation, transformation and new processes.
  - Deliver 100% of the training courses scheduled for the company's own employees on hydrogen, with the aim of adequate change management and training in the new risks and measures associated with the new molecules (hydrogen) as a driver for the transformation plan projects. All planned content and courses for 2024 were completed, fulfilling this target.
  - Dissemination of the Guide to project safety management: broadcasting of an informative video. Both targets have a direct effect on the identified impact 'Implementation of occupational health and safety plans, protocols and training for the company's professionals to improve the performance of their duties in a safe and healthy manner'. All planned actions for 2024 have been completed, fully meeting this target.
- Promoting resilience in management:
  - Conducting 100% of the planned crisis management and business continuity drills to understand and practise preparation, resolution, and recovery actions following a crisis or emergency, thereby achieving a resilient structure. These actions directly impact 'Economic and reputational consequences arising from serious incidents involving professionals during operations, such as fatal workplace accidents' and 'Implementation of occupational health and safety plans, protocols and training for the company's professionals to improve the performance of their duties in a safe and healthy manner'. The planned drills for 2024 have been completed, thus meeting this objective.
- Promotion of road safety:
  - The results of the mobility and road safety plan have been shared with all Enagás professionals to raise awareness about risk levels and the necessary preventive measures. These actions directly impact the identified issues of 'Implementation of occupational health and safety plans, protocols and training for the company's professionals to improve the performance of their duties in a safe and healthy manner' and 'Economic and reputational consequences arising from serious incidents involving professionals during operations, such as fatal workplace accidents'. The mobility plan results for 2024 have been disseminated using audiovisual material, fulfilling this objective.

All these targets are integrated into the Global Health and Safety Plan, which is drawn up annually at company level, which means that it affects all professionals. It includes, in addition to those indicated here, other targets to achieve continuous improvement in this area. These targets are set on the basis of:

- The analysis of compliance indicators from the previous year.

<sup>69</sup> Given their nature, as they are not meant for comparison, setting a base year is not applicable.

- Proposals submitted to the Health and Safety Committees of each company.
- The identification of impacts and opportunities for improvement resulting from the previous year's preventive activity.

Workers' representatives are involved in establishing these objectives through the Enagás Group's Health and Safety Committee. The management team monitors each goal through the SMAC Committees of each company, demonstrating its commitment to health and safety.

All these objectives have been fully achieved, with 100% of the planned measures met in 2024.

## Diversity and inclusion

In order to boost the positive material impact 'Ensure non-discrimination and equal opportunity, regardless of gender, race, ethnicity or other personal characteristics, through the implementation of policies, strategies and action plans', the company has established the diversity and inclusion goals described in the table 'Company Diversity Objectives' in disclosure requirement S1-1<sup>70</sup>, in order to strengthen the company's commitment to a balanced presence of gender diversity. The Equality Plan Monitoring Committee, comprising worker and company representatives, has helped define, monitor performance, and identify lessons learned from these goals.

These objectives are in line with the commitment reflected in the Human Capital Management Policy to strategically manage diverse and inclusive talent in order to build a team of professionals prepared to face current and future challenges,

All targets set by the company are voluntary and are part of the company's variable remuneration targets for all employees. Enagás monitors compliance with these on a quarterly basis, identifying actions aligned with these targets in order to contribute to their achievement.

Each year, Enagás sets new diversity and inclusion targets as part of the company's annual objectives, ensuring that they are aligned with best practices in this area.

## Awareness and development of in-house talent

In order to boost the positive material impact 'Professional development and qualification of workforce through appraisals and development plans, as well as continuous learning and training' and to manage the opportunity 'Optimisation of operational efficiency by promoting professional development and training for internal workforce', Enagás has set the following targets for 2024:

- At least 75% of all professionals, including professionals both covered and not covered by the Collective Bargaining Agreement, receive at least one annual performance review<sup>71</sup>. In 2024, this target was reached, with 79.1% of professionals evaluated.
- Enagás aims for the training penetration rate<sup>72</sup> to exceed 90% in 2024, considering all its employees<sup>73</sup>. In 2024, this target was reached, with a 99.1% training penetration rate.

These goals are aligned with the commitments of the Human Capital Management Policy, which seeks to establish and develop the necessary skills and capabilities in professionals to achieve our strategic objectives, as well as to foster talent management that places the professional at the centre, promotes self-development and self-learning, and ensures the commitment, engagement and development of key talent.

## Human rights

Enagás has not established measurable results-oriented targets for 2024 to manage the identified opportunity 'Reputational improvement and improvement of the due diligence management model for the protection of human rights, derived from the company's alignment with international initiatives and principles in defence of human rights (UN, ILO, etc.)'.

The main reason is that the company has a robust due diligence system that Enagás will continue to manage and improve in the coming years, thereby fulfilling the commitment to developing and maintaining an adequate due diligence system set out in its Human Rights Policy.

In 2025, the company will also assess the alignment of its due diligence system with the requirements of the Sustainability Due Diligence Directive and sustainability best practices, from which measurable and result-oriented targets will be derived in the coming years.

### S1-6

## Characteristics of the undertaking's employees

Below is the distribution of the 1,362 employees (1,353.2 FTEs<sup>74</sup>) at Enagás by gender, country and contract type at year-end (See section '2.1 Operating income, b) personnel expenses' of the Consolidated Annual Accounts).

Enagás maintains stable, quality employment levels with high percentages of permanent and full-time contracts.

<sup>70</sup> Given the nature of this goal, as it is not meant for comparison, setting a base year is not applicable.

<sup>71</sup> Given the nature of this goal, as it is not meant for comparison, setting a base year is not applicable. Professionals or workers' representatives have not been directly involved in the definition, performance monitoring, or identification of lessons learned from this goal.

<sup>72</sup> The training penetration rate is the number of professionals who have received at least one training activity during the year out of the total number of employees at year-end.

<sup>73</sup> Given the nature of this goal, as it is not meant for comparison, setting a base year is not applicable. Professionals or workers' representatives have not been directly involved in the definition, performance monitoring, or identification of lessons learned from this goal.

<sup>74</sup> Full-time equivalent.

Information on the gender 'Other' is based on information reported on a voluntary basis by the employees themselves.

Number of employees by gender at year-end  
(no. of persons)

Gender	2022	2023	2024
Women	409	401	409
Men	956	953	952
Other <sup>1</sup>	N.D.	N.D.	1
<b>Total employees</b>	<b>1,365</b>	<b>1,354</b>	<b>1,362</b>

(1) Information not available for 2022 and 2023, as it is based on information voluntarily reported by employees and first requested in 2024.

Number of average employees by gender during  
the year (no. of persons)

Gender	2022	2023	2024
Women	393	402	406
Men	954	953	947
Other <sup>1</sup>	N.D.	N.D.	1
<b>Total employees</b>	<b>1,347</b>	<b>1,355</b>	<b>1,354</b>

(1) Information not available for 2022 and 2023, as it is based on information voluntarily reported by employees and first requested in 2024.

Number of employees per country at year-end  
(no. of persons)

Country	2022	2023	2024
Spain	1,353	1,352	1,359
Other countries <sup>(1)</sup>	12	2	3
Belgium	3	2	3
Kuwait	4	0	0
Peru	3	0	0
Greece	1	0	0
Mexico	1	0	0
France	0	0	0
Chile	0	0	0
<b>Total employees</b>	<b>1,365</b>	<b>1,354</b>	<b>1,362</b>

(1) 100% of professionals outside Spain have a permanent full-time contract.

Employees by gender and contract type at year-end (no. of persons)<sup>(1) (2)</sup>

	2022			2023			2024		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
No. of employees	409	956	<b>1,365</b>	401	953	<b>1,354</b>	409	953	<b>1,362</b>
No. of permanent employees	386	929	<b>1,315</b>	383	932	<b>1,315</b>	386	929	<b>1,315</b>
No. of temporary employees	23	27	<b>50</b>	18	21	<b>39</b>	23	24	<b>47</b>
No. of full-time employees	387	944	<b>1,331</b>	378	938	<b>1,316</b>	384	939	<b>1,323</b>
No. of part-time employees	22	12	<b>34</b>	23	15	<b>38</b>	25	14	<b>39</b>

(1) For confidentiality reasons, and given the non-materiality of the representation of the gender 'other', in the breakdown by gender, sex information has been used for the calculation. For further details, see disclosure requirement S1-6.

(2) Enagás does not have any zero-hours contracts.

Employees by country and contract type at year-end (no. of persons)<sup>75</sup>

	2022						
	Spain	Belgium	Kuwait	Peru	Mexico	Greece	Total
No. of employees	1,353	3	4	3	1	1	<b>1,365</b>
No. of permanent employees	1,303	3	4	3	1	1	<b>1,315</b>
No. of temporary employees	50	0	0	0	0	0	<b>50</b>
No. of full-time employees	1,318	3	4	3	1	1	<b>1,330</b>
No. of part-time employees	35	0	0	0	0	0	<b>35</b>

	2023						
	Spain	Belgium	Kuwait	Peru	Mexico	Greece	Total
No. of employees	1,352	2	0	0	0	0	<b>1,354</b>
No. of permanent employees	1,313	2	0	0	0	0	<b>1,315</b>
No. of temporary employees	39	0	0	0	0	0	<b>39</b>
No. of full-time employees	1,314	2	0	0	0	0	<b>1,316</b>
No. of part-time employees	38	0	0	0	0	0	<b>38</b>

	2024						
	Spain	Belgium	Kuwait	Peru	Mexico	Greece	Total
No. of employees	1,359	3	0	0	0	0	<b>1,362</b>
No. of permanent employees	1,312	3	0	0	0	0	<b>1,315</b>
No. of temporary employees	47	0	0	0	0	0	<b>47</b>
No. of full-time employees	1,320	3	0	0	0	0	<b>1,323</b>
No. of part-time employees	39	0	0	0	0	0	<b>39</b>

Number of employees who have been on leave during the year by gender (no. of persons)<sup>(1)(2)</sup>

	2022	2023	2024
Women	35	33	22
Men	56	39	26
Total	91	72	48

(1) For confidentiality reasons, and given the non-materiality of the representation of the gender 'other', in the breakdown by gender, sex information has been used for the calculation. For further details, see disclosure requirement S1-6.

(2) For information reporting purposes, only the departures of personnel with permanent contracts are considered, including voluntary departures, retirements, programmed dismissals, involuntary dismissals, among others.

<sup>75</sup> Enagás does not have any zero-hours contracts.

## Voluntary and absolute turnover rate by gender<sup>(1)</sup>

	2022			2023			2024		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
Voluntary turnover rate <sup>(2)</sup>	3%	1%	<b>2%</b>	6%	2%	<b>3%</b>	3%	1%	<b>2%</b>
Absolute turnover rate <sup>(3)</sup>	9%	6%	<b>7%</b>	9%	4%	<b>5%</b>	6%	3%	<b>4%</b>

(1) For confidentiality reasons, and given the non-materiality of the representation of the gender 'other', in the breakdown by gender, sex information has been used for the calculation. For further details, see disclosure requirement S1-6.

(2) Voluntary turnover rate calculated as the ratio of voluntary departures during the year to the workforce with permanent contracts at year-end.

(3) Absolute turnover rate calculated as the ratio of all professional departures (regardless of their nature) during the year to the workforce with permanent contracts at year-end.

### S1-7

## Characteristics of non-employee workers in the undertaking's own workforce

In addition, in Enagás there are non-employee workers, among which the following are the most notable:

- People hired through temporary employment agencies who were working at Enagás, mainly to stand in for professionals who are temporarily absent (e.g. long-term sick leave, paternity and/or maternity leave, etc.)
- People with training scholarships

Enagás has no independent contractors among its non-employee workers.

### Number of non-employee workers at year-end (no. of persons)

	2022	2023	2024
Workers hired through employment agencies	9	13	13
Workers with training scholarships	45	55	70

### Average number of non-employee workers during the year (no. of persons)

	2022	2023	2024
Workers hired through employment agencies	30	32	45
Workers with training scholarships	136	127	159

### S1-8

## Collective bargaining coverage and social dialogue

Enagás has its own collective bargaining agreement for the Enagás Group covering more than half of all employees (for more information, see disclosure requirement S1-2)<sup>76</sup>.

For employees not included in the Enagás Group's Collective Bargaining Agreement, the regulations governing working conditions in general are those outlined in the Spanish Workers' Statute. However, those conditions of the Enagás Group Collective Bargaining Agreement that improve on those established in the Workers' Statute are applicable to 100% of the workforce.

Furthermore, all employees in Spain, with the exception of the CEO, are represented by workers' representatives (99.9% of the workforce in 2024).

<sup>76</sup> Enagás does not have a European Works Council.

## Percentage of employees covered by the Enagás Group Collective Bargaining Agreement and represented in the workplace at year-end

	2022			2023			2024		
	Coverage of the collective bargaining agreement		Social dialogue	Coverage of the collective bargaining agreement		Social dialogue	Coverage of the collective bargaining agreement		Social dialogue
	Employees - EEA (for countries with more than 50 employees, representing more than 10% of the total number of employees)	Employees - Non-EEA (for countries with more than 50 employees, representing more than 10% of the total number of employees)	Workplace representation (EEA) (for countries with more than 50 employees, representing more than 10% of the total number of employees)	Employees - EEA (for countries with more than 50 employees, representing more than 10% of the total number of employees)	Employees - Non-EEA (for countries with more than 50 employees, representing more than 10% of the total number of employees)	Workplace representation (EEA) (for countries with more than 50 employees, representing more than 10% of the total number of employees)	Employees - EEA (for countries with more than 50 employees, representing more than 10% of the total number of employees)	Employees - Non-EEA (for countries with more than 50 employees, representing more than 10% of the total number of employees)	Workplace representation (EEA) (for countries with more than 50 employees, representing more than 10% of the total number of employees)
0–19%									
20–39%									
40–59%	Spain <sup>(1)</sup>			Spain <sup>(2)</sup>			Spain <sup>(3)</sup>		
60–79%									
80–100%	Spain			Spain			Spain		

Enagás only has more than 50 salaried employees in Spain

(1) 50.8%

(2) 51.6%

(3) 52.9%

### S1-9

## Diversity metrics

### Number of employees in senior management by gender at year-end <sup>(1)</sup>

Categories	Senior Management								
	Executive Committee (One level of reporting to the Chief Executive Officer)			Other managers (Two levels of reporting to the Chief Executive Officer)			Total		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
<b>2022</b>									
Number of employees	3	6	9	13	20	33	16	26	42
Percentage	33%	67%	100%	39%	61%	100%	38%	62%	100%
<b>2023</b>									
Number of employees	3	6	9	13	18	31	16	24	40
Percentage	33%	67%	100%	42%	58%	100%	40%	60%	100%
<b>2024</b>									
Number of employees	4	6	10	10	18	28	14	24	38
Percentage	40%	60%	100%	36%	64%	100%	37%	63%	100%

(1) For confidentiality reasons, and given the non-materiality of the representation of the gender 'other', in the breakdown by gender, sex information has been used for the calculation. For further details, see disclosure requirement S1-6.

## Number of employees by gender and age group at year-end <sup>(1)</sup>

	2022				2023				2024			
	Men	Women	Total	Percentage	Men	Women	Total	Percentage	Men	Women	Total	Percentage
<30 years	57	40	97	7.1%	49	37	86	6.4%	49	40	89	6.5%
30-50 years	565	267	832	61.0%	552	256	808	59.7%	528	263	791	58.1%
>50 years	334	102	436	31.9%	352	108	460	34.0%	376	106	482	35.4%
<b>Total</b>	<b>956</b>	<b>409</b>	<b>1,365</b>	<b>100.0%</b>	<b>953</b>	<b>401</b>	<b>1,354</b>	<b>100.0%</b>	<b>953</b>	<b>409</b>	<b>1,362</b>	<b>100.0%</b>
<b>Percentage</b>	<b>70.0%</b>	<b>30.0%</b>	<b>100.0%</b>		<b>70.4%</b>	<b>29.6%</b>	<b>100.0%</b>		<b>70.0%</b>	<b>30.0%</b>	<b>100.0%</b>	

(1) For confidentiality reasons, and given the non-materiality of the representation of the gender 'other', in the breakdown by gender, sex information has been used for the calculation. For further details, see disclosure requirement S1-6.

### S1-10

## Adequate wages

The Enagás compensation model factors in considerations of equality and non-discrimination, with adequate remuneration for professional worth, skills, experience, responsibility and results achieved. Being consistent with Enagás' inclusive culture, where there is a commitment to incorporate diversity and inclusion management as a key element to connect talent and grow as a Company.

Furthermore, the Enagás Collective Bargaining Agreement sets out different salary levels based exclusively upon objective work criteria. In 2024, the Enagás minimum wage set in the Collective Bargaining Agreement was 1.66 times the minimum interprofessional wage in Spain, without distinguishing by gender (1.5 times in 2023). In conclusion, all employees receive an adequate salary according to the benchmark index in Spain<sup>77</sup>.

### S1-11

## Social protection

For Enagás, having social security for its employees in case of major life events is beneficial for employees and for the company, as it creates a healthier, fairer and more sustainable working environment.

Therefore, all employees are covered by social security for the following life events through different governmental programmes, sometimes topped up by Enagás:

- **Illness:** employees are entitled to free health care, as well as cash benefits for temporary disability (less than 100% of the regulatory base). In this regard, Enagás provides a temporary disability allowance, which entails the payment of 100% of the fixed gross annual salary in the event of illness, accident or parental leave and childcare.

- **Unemployment benefit** from the moment the professional works for the company: in Spain, the unemployment protection system is designed to help workers who lose their jobs involuntarily providing unemployment benefits as well as other assistance and subsidies.
- **Workplace accidents and acquired disability:** social security is offered through benefits provided by the government in the form of financial, medical and/or rehabilitation coverage. In addition, Enagás provides all its employees with group death and disability insurance. Enagás subsidises 90% of the cost of private medical healthcare insurance for professionals and 100% for their children.
- **Parental leave (maternity/paternity):** With respect to childcare, in addition to the maternity/paternity leave established by law (currently 16 weeks for each parent), professionals of both genders can take fifteen working days of paid leave to care for a child under nine months of age (breastfeeding). Enagás has also extended the period during which a reduction in working hours for childcare purposes can be requested (formerly until the child is 12; now until the child is 14). Enagás also provides a temporary disability allowance, which entails the payment of 100% of the fixed gross annual salary in the event of illness, accident or parental leave and childcare.
- **Retirement:** Upon retirement, employees receive a pension as part of Spain's social security system, which is designed to provide financial support to individuals after the end of their working life. In addition, employees with two years of actual or recognised seniority have a pension plan set up by the company.

<sup>77</sup> At the end of the financial year, there were three employees outside Spain (in Belgium). For reasons of confidentiality and non-materiality, Enagás does not publish the ratio of the average salary to the country's minimum wage.

## S1-12

## Persons with disabilities

The company works towards social and labour inclusion through direct hiring (ten people in the workforce at year-end<sup>78</sup>) and indirect job creation for severely disabled profiles, through collaboration agreements with foundations and special employment centres.

Percentage of employees with disabilities at year-end by gender <sup>(1)</sup>

	2022	2023	2024
Women	0.24%	0.25%	0.49%
Men	0.63%	0.63%	0.84%
<b>TOTAL</b>	<b>0.51%</b>	<b>0.52%</b>	<b>0.73%</b>

(1) For confidentiality reasons, and given the non-materiality of the representation of the gender 'other', in the breakdown by gender, sex information has been used for the calculation. For further details, see disclosure requirement S1-6.

Enagás collects information on employees with disabilities from its human resources management tools based on information provided voluntarily by the professionals themselves.

## S1-13

## Training and skills development metrics

Percentage of employees who have participated in performance appraisals during the year, broken down by gender and professional group <sup>(1)(2)</sup>

		2022	2023	2024
Managers	Women	100%	98%	100%
	Men	100%	100%	100%
Technicians	Women	94%	90%	83%
	Men	70%	70%	69%
Administrative workforce	Women	65%	68%	84%
	Men	78%	55%	100%
Operational workforce	Women	19%	21%	19%
	Men	88%	87%	90%
<b>Total by gender</b>	<b>Women</b>	<b>80%</b>	<b>78%</b>	<b>77%</b>
	<b>Men</b>	<b>80%</b>	<b>79%</b>	<b>80%</b>
<b>TOTAL</b>		<b>79%</b>	<b>79%</b>	<b>79%</b>

(1) For confidentiality reasons, and given the non-materiality of the representation of the gender 'other', in the breakdown by gender, sex information has been used for the calculation. For further details, see disclosure requirement S1-6.

(2) Individual performance assessment. The percentage is calculated by dividing the number of professionals assessed by the number of workforce at year-end. The Chief Executive Officer is not included, as he is not covered by the performance assessment.

Average number of hours of training received by employees during the financial year, broken down by gender and professional group <sup>(1)(2)</sup>

		2022	2023	2024
Managers	Women	91.1	111.3	102.4
	Men	68.3	80.0	77.0
Technicians	Women	50.3	58.2	67.6
	Men	60.4	57.8	53.5
Administrative workforce	Women	22.0	21.8	45.9
	Men	31.8	28.9	42.9
Operational workforce	Women	176.0	109.0	89.9
	Men	42.5	49.2	44.0
<b>Total by gender</b>	<b>Women</b>	<b>57.9</b>	<b>62.7</b>	<b>69.9</b>
	<b>Men</b>	<b>54.0</b>	<b>56.1</b>	<b>51.7</b>
<b>TOTAL</b>		<b>55.1</b>	<b>58.1</b>	<b>57.2</b>

(1) For confidentiality reasons, and given the non-materiality of the representation of the gender 'other', in the breakdown by gender, sex information has been used for the calculation. For further details, see disclosure requirement S1-6.

(2) Calculation of the total number of training hours received during the year in relation to the average number of workforce.

## S1-14

## Health and safety metrics

The Enagás Group's Health and Safety Management System is certified under ISO 45001; it has been subject to internal audits and external certification. It covers 100% of employee and non-employee workers, as well as workers in the value chain who work at the company's facilities and carry out work there.

Number of deaths resulting from workplace injuries and workplace health issues during the fiscal year

	2022	2023	2024
Employees	0	0	0
Non-employee workers	0	0	0
Workers in the value chain working at company facilities	1	0	0

<sup>78</sup> At the end of the 2023 and 2022 financial years, there were seven persons with disabilities.

## Number and rate of recordable workplace accidents

Recordable accident rate: No. of workplace injuries per total number of hours worked and multiplied by 1,000,000

		2022	2023	2024
Employees	Number of recordable accidents	10	11	6
Employees	Recordable accident rate	4.54	4.89	2.75
Non-employee workers	Number of recordable accidents	N.D.	N.D.	0
Non-employee workers	Recordable accident rate	N.D.	N.D.	0
Workers in the value chain working at company facilities	Number of recordable accidents	13	10	5
Workers in the value chain working at company facilities	Recordable accident rate	5.76	6.21	2.72

N.D. Historical information not available.

None of the recordable workplace accidents that occurred in 2024 were considered accidents with major consequences, the main types being falls and blows.

In 2024, the number of hours worked was 2,183,120 hours for employees and 111,577 hours for non-employee workers.

Through its evaluation systems for health and safety-related risks, Enagás has not identified workers at risk of work-related diseases. Enagás has therefore not identified any work-related health problems (cases of occupational illnesses) either for its current or former own workforce or for subcontractors in the last three years.

For own workforce, the number of days lost due to workplace injuries and deaths as a result of workplace accidents, work-related health problems and deaths due to illness was 56 days for employees (134 in 2023) and zero days for non-employee workers.

## S1-15

## Work-life balance metrics

At Enagás, 100% of employees of both genders are entitled to statutory maternity/paternity leave (parental leave) (currently 16 weeks for each parent) and paid leave of fifteen working days to care for a child under nine months of age (breastfeeding).

In addition, 100% of employees are entitled to take carer's leave, such as leave to care for a first- or second-degree relative in the event of serious illness, hospitalisation or surgery (five days' leave).

In relation to maternity leave, in the event that the job poses a risk to the pregnant woman's state, she is entitled to risk leave during pregnancy.

This leave to care for family members is set out in the Enagás Group Collective Bargaining Agreement and in the Workers' Statute.

In line with Spanish law, Enagás offers its employees who have children the opportunity to take cumulative unpaid leave of up to eight weeks (continuous or discontinuous) before the child reaches the age of eight.

Percentage of employees who are entitled to family leave who took it <sup>(1)(2)</sup>

	2024		
	Women	Men	Total
Percentage of employees benefiting from this entitlement who took family leave	27.1%	30.8%	29.7%

(1) For confidentiality reasons, and given the non-materiality of the representation of the gender 'other', in the breakdown by gender, sex information has been used for the calculation. For further details, see disclosure requirement S1-6.

(2) Includes the number of people who have taken family leave during the year, including maternity leave (pregnancy risk leave), paternity leave, parental leave (as defined by ERS S1) and carer's leave, with respect to the total number of workforce entitled to take such leave (100% of workforce).

## S1-16

## Compensation metrics (pay gap and total compensation)

Gender pay gap in average gross remuneration by professional group <sup>(1)(2)</sup>

(Difference between the average hourly pay levels of female and male employees, expressed as a percentage of the average hourly pay level of male employees)

		2022	2023 <sup>(3)</sup>	2024
		(year of settlement of long-term incentive plans) <sup>(3)</sup>		
	Chief Executive Officer <sup>(4)</sup>	N.A.	N.A.	N.A.
Managers	Other members of the Executive Committee	12.6 % <sup>(5)</sup>	7.66%	9.62%
	Other managers	7.24%	-3.17%	2.22%
Technicians		4.57%	5.30%	5.79%
Administrative workforce		-7.09%	-9.95%	-4.87%
Operational workforce		14.38%	21.01%	15.38%
TOTAL		1.88%	1.29%	2.55%

N.A. Not applicable

(1) Given the non-materiality of the representation of the gender 'other', sex information has been used for the calculation. For further details, see disclosure requirement S1-6.

(2) The gap has been calculated using average remuneration, which includes the following: base year salary at December 31, variable remuneration, payments to long-term savings plans and any other item. While allowances and overtime pay were included in 2022 and 2023, these items have been excluded in 2024 in accordance with the interpretation of disclosure requirement S1-16. It has been deemed unnecessary to recalculate 2022 and 2023 for comparison, as the exclusion of these items in 2024 resulted in a remuneration variation of 1% for men and 0.1% for women, without affecting the overall gap for 2024. This takes into consideration all professionals in Spain with a permanent or temporary contract, both full-time and part-time, who have remained in the company throughout the year (94.6% of the workforce). In the case of part-time workforce, the base salary has been extrapolated to a full-time salary for comparability. For 2022, given the appointment of the Chief Executive Officer in February 2022, the Chief Executive Officer's annual base salary was considered together with the actual remuneration received in the year for comparability purposes.

(3) In 2022, the long-term incentive plans (2019-2021) were settled, significantly increasing the remuneration of the company's professionals. The allocation of these incentive plans was structured according to the professional group's degree of contribution to the established targets. In 2023, the partial settlement of the term incentive plans (2019-2021) for senior management was finalised.

(4) There are no women in this professional group.

(5) Unrepresentative data, as there are less than three professionals in this group for one of the genders. Although there were three women on the Executive Committee in 2022, only two were taken into account for the wage gap calculation, as one of them was not with the company for the whole year.

When analysing the pay gap by occupational group, the difference in the 'Other members of the Executive Committee' group (9.62%) is due to differences in management seniority among the members of this group, which leads to differences in other remuneration without an identifiable pay gap in base salary among this occupational group.

The difference in the occupational group 'Other managers' (2.22%) increased due to the lower number of women in managerial and pre-managerial positions.

The difference in salary in the professional group of administrative workforce (-4.87%) is due to the fact that this is a category made up mostly of women (88%), in which some positions have function-related bonuses.

Similarly, the difference in the operational workforce category (15.38%) is explained by a greater presence of men (87.5%) with an average seniority greater than that of women (an average of 15.2 years for men compared to 4.8 years for women). In this regard, Enagás is promoting the incorporation of women in the technical specialist professional group through initiatives such as the search for female profiles in vocational schools.

In 2024, the ratio between the total annual remuneration of the highest paid person (CEO) and the average total annual remuneration of all employees (excluding the highest paid person) was 27.3 times (28.8 times in 2023).

Enagás monitors the gender pay gap to ensure equal pay for men and women.

## S1-17

## Incidents, claims and related serious incidents with human rights

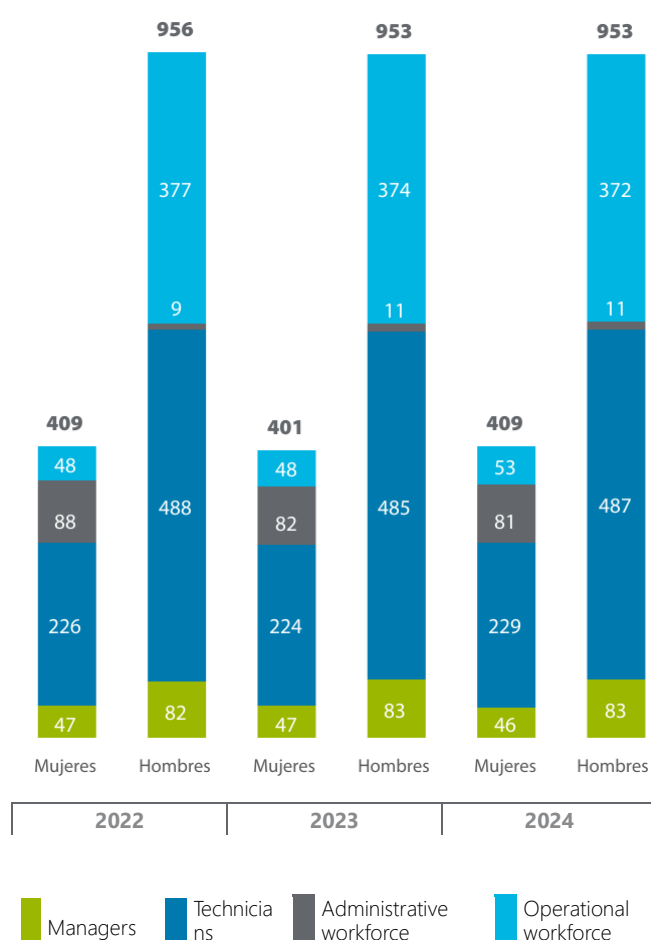
During the financial year, there were no communications received through the Code of Ethics, other company reporting channels, or OECD National Contact Points for Multinational Enterprises. Additionally, no cases of discrimination or serious human rights incidents were identified.

# Non-financial and diversity reporting requirements (Law 11/2018)

## Employment

Total number and distribution of professionals by gender, age, country and professional group

Number of professionals by professional group and gender at year-end



Yearly average of permanent contracts, temporary contracts and part-time contracts by gender, age and professional group

Average annual number of permanent and temporary contracts broken down by gender, both full-time and part-time

	Permanent contract			Temporary contract		
	Full-time	Part-time	Total	Full-time	Part-time	Total
<b>2022</b>						
Women	355	20	375	18	0	18
Men	909	13	922	31	0	31
<b>2023</b>						
Women	360	21	381	20	0	20
Men	917	15	932	22	0	22
<b>2024</b>						
Women	364	21	385	21	0	21
Men	913	15	928	20	0	20

Average annual number of permanent and temporary contracts broken down by age, both full-time and part-time

	Permanent contract			Temporary contract		
	Full-time	Part-time	Total	Full-time	Part-time	Total
<b>2022</b>						
<30 years	65	1	66	31	0	31
30-50 years	787	27	814	18	0	18
>50 years	428	7	435	1	0	1
<b>2023</b>						
<30 years	64	1	65	21	0	21
30-50 years	774	29	803	20	0	20
>50 years	439	6	445	1	0	1
<b>2024</b>						
<30 years	64	1	65	21	0	21
30-50 years	750	29	779	19	0	19
>50 years	463	6	469	1	0	1

## Average annual number of permanent and temporary contracts broken down by professional group, both full-time and part-time

	Permanent contract			Temporary contract		
	Full-time	Part-time	Total	Full-time	Part-time	Total
<b>2022</b>						
Managers	139	3	142	0	0	0
Technicians	689	10	699	13	0	13
Administrative workforce	87	8	95	2	0	2
Operational workforce	349	12	361	34	0	34
<b>2023</b>						
Managers	127	3	130	0	0	0
Technicians	688	14	702	8	0	8
Administrative workforce	87	7	94	1	0	1
Operational workforce	375	12	387	33	0	33
<b>2024</b>						
Managers	127	2	129	0	0	0
Technicians	690	15	705	6	0	6
Administrative workforce	85	6	91	3	0	3
Operational workforce	375	13	388	32	0	32

## Number of dismissals by gender, age and professional group

Enagás has not carried out any restructuring in recent years, nor does it plan to do so. The company ensures the appropriate transmission of expert knowledge through planned and voluntary departures. In 2024, there was one involuntary redundancy from the company (male, between 30 and 50 years old, in the technician professional group)<sup>79</sup>.

## Average remuneration and its evolution by gender, age and professional group or equivalent

## Changes in average remuneration <sup>(1)</sup> by professional group, age and gender

		2022 (year of settlement of long-term incentive plans) <sup>(2)</sup>	2023 <sup>(2)</sup>	2024
<b>Professional group</b>				
Managers	Chief Executive Officer	1,377,688 <sup>(3)</sup>	1,879,700	1848,494 <sup>(4)</sup>
	Other members of the Executive Committee	595,687	641,438	545,579
	Other managers	176,791	161,048	154,972
	Technicians	73,404	70,983	73,347
Administrative workforce		51,109	50,210	51,855
Operational workforce		58,686	57,289	59,682
<b>Age range</b>				
<30 years		55,556	53,320	50,051
30-50 years		83,893	80,975	74,861
>50 years		93,164	91,534	91,398
<b>Gender</b>				
Women		80,573	78,195	78,547
Men		82,116	79,217	80,605

(1) Average remuneration that includes: base year salary at December 31, variable remuneration, payments to long-term savings plans and any other item. While allowances and overtime pay were included in 2022 and 2023, these items have been excluded in 2024 in accordance with the interpretation of disclosure requirement S1-16. It has been deemed unnecessary to recalculate 2022 and 2023 for comparison, as the exclusion of these items in 2024 resulted in a remuneration variation of 1% for men and 0.1% for women.

This takes into consideration all professionals in Spain with a permanent or temporary contract, both full-time and part-time, who have remained in the company throughout the year (94.6% of the workforce). In the case of part-time workforce, the base salary has been extrapolated to a full-time salary for comparability.

(2) In 2022, the long-term incentive plans (2019-2021) were settled, significantly increasing the remuneration of the company's professionals. The allocation of these incentive plans was structured according to the professional group's degree of contribution to the established targets. In 2023, the partial settlement of the term incentive plans (2019-2021) for senior management was finalised.

(3) The appointment of the current CEO took place in February 2022; that year, his annual base salary together with the actual remuneration received in 2022 was considered in the remuneration reported in that fiscal year.

(4) This amount differs from the amount reported in the Annual Report on Directors' Remuneration 2024, as the information reported in this table excludes interim income and remuneration for Board membership (154 thousands of euros for the Chief Executive Officer) and considers the annual base salary for comparison purposes.

<sup>79</sup> In 2023, two involuntary redundancies occurred at the company (two men, one in the technical professional group under 30 years old; the other in the

operator professional group between 30 and 50 years old). In 2022, no involuntary redundancies took place.

Changes in remuneration <sup>(1)</sup> by professional group, age and gender

			2022 (year of settlement of long-term incentive plans) <sup>(2)</sup>	2023 <sup>(2)</sup>	2024
Managers	Chief Executive Officer <sup>(3)</sup>	Women	N.A. <sup>(4)</sup>	N.A. <sup>(4)</sup>	N.A. <sup>(4)</sup>
		Men	1,377,688	1,879,700	1848494 <sup>(5)</sup>
	Other members of the Executive Committee	Women	540,091	609,812	515,111
		Men	617,925	660,413	569,954
	Other managers	Women	168,460	164,276	152,730
		Men	181,614	159,222	156,194
	Technicians	Women	71,043	68,305	70,343
		Men	74,445	72,129	74,667
	Administrative workforce	Women	51,419	50,685	52,161
		Men	48,014	46,097	49,740
Operational workforce		Women	50,599	46,172	51,361
		Men	59,097	58,452	60,695
TOTAL		Women	80,573	78,195	78,547
		Men	82,116	79,217	80,605

N.A. Not applicable

(1) Average remuneration that includes: base year salary at December 31, variable remuneration, payments to long-term savings plans and any other item. While allowances and overtime pay were included in 2022 and 2023, these items have been excluded in 2024 in accordance with the interpretation of disclosure requirement S1-16. It has been deemed unnecessary to recalculate 2022 and 2023 for comparison, as the exclusion of these items in 2024 resulted in a remuneration variation of 1% for men and 0.1% for women.

This takes into consideration all professionals in Spain with a permanent or temporary contract, both full-time and part-time, who have remained in the company throughout the year (94.6% of the workforce). In the case of part-time workforce, the base salary has been extrapolated to a full-time salary for comparability.

(2) In 2022, the long-term incentive plans (2019-2021) were settled, significantly increasing the remuneration of the company's professionals. The allocation of these incentive plans was structured according to the professional group's degree of contribution to the established targets. In 2023, the partial settlement of the term incentive plans (2019-2021) for senior management was finalised.

(3) The appointment of the current CEO took place in February 2022; that year, his annual base salary together with the actual remuneration received in 2022 was considered in the remuneration reported in that fiscal year.

(4) There are no women in this professional group.

(5) This amount differs from the amount reported in the Annual Report on Directors' Remuneration 2024, as the information reported in this table excludes interim income and remuneration for Board membership (154 thousands of euros for the Chief Executive Officer) and considers the annual base salary for comparison purposes.

(6) Non-representative data, as there are less than three professionals in this professional group.

The average remuneration of directors and managers, including variable remuneration, expenses, compensation, payments to long-term savings plans and any other item by gender

The average remuneration of Directors in 2024, broken down by sex, amounted to 448 thousands of euros for men and 168 thousands of euros for women. The difference in remuneration is due to the fact that the Chairman and the CEO are men (excluding the Chairman and the CEO, remuneration averaged 162 thousands of euros for men).

For further information on the remuneration of directors and senior managers, see the requirement 'Average remuneration and its evolution broken down by gender, age and professional group or equal value', note '4.4 Remuneration of the Board of Directors and Senior Management' of the Consolidated Annual Accounts and sections C.1.13 or C1.14 of the Annual Corporate Governance Report<sup>80</sup>.

Implementation of policies related to the disconnecting from work

Enagás has a Protocol on the Right to Digital Switch-Off, which moderates possible effects of permanent connectivity and

promote a positive impact on people's productivity and well-being.

### Organisation of work

#### Number of hours lost to absenteeism

88,410.2 hours of absenteeism in 2024 (94,738.6 in 2023 and 79,761.2 in 2022).

### Health and safety

#### Work-related accidents

The following is a breakdown by gender of lost time injuries in recent years:

#### Breakdown of lost time injuries by gender

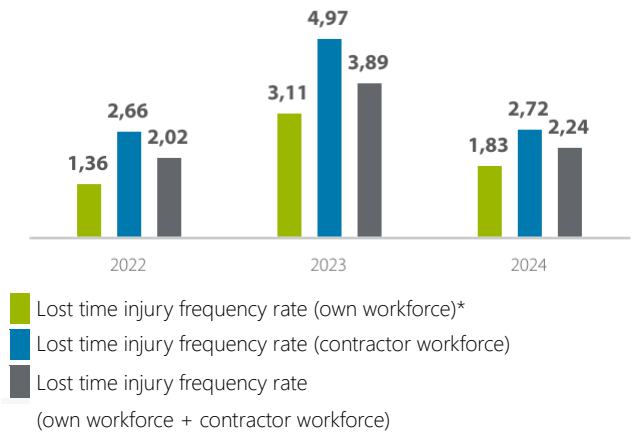
		2022	2023	2024
Lost time injury severity rate (own workforce)	Women	0	1	0
	Men	3	6	4
	TOTAL	3	7	4

<sup>80</sup> This external link refers to unverified information within the framework of the review of the Non-Financial Information and Sustainability Information Statement.

Frequency and severity, by gender

Lost time injury frequency rate

Number of accidents resulting in lost time injuries per million hours worked (number of lost time accidents x 10<sup>6</sup> / number of hours worked)



\* In 2024, the lost time injury frequency rate by gender for own workforce was 2.62 for men (3.79 and 1.94 in 2023 and 2022, respectively) and 0.00 for women (0.00 and 1.62 in 2022 and 2021, respectively).

Lost time injury severity rate

Number of working days lost due to accidents per thousand hours worked (number of working days lost x 10<sup>3</sup> / number of hours worked)



\* In 2024, the lost time injury severity rate by gender among own workforce was 0.04 for men (0.08 and 0.02 in 2023 and 2022, respectively) and 0.00 for women (0.01 and 0.00 in 2023 and 2022, respectively).

Training

Total number of hours of training courses by professional group

Total hours of training courses completed during the financial year by professional group

	2022	2023	2024
Managers	10,788	11,764	11,097
Technicians	40,688	41,197	41,176
Administrative workforce	2,225	2,143	4,276
Operational workforce	20,512	23,605	20,778
TOTAL	74,213	78,709	77,327

# S2. WORKERS IN THE VALUE CHAIN

## Strategy

SBM-2

### Interests and views of stakeholders

After identifying and assessing the impacts, risks, and opportunities within its value chain, Enagás incorporates the interests and expectations of its stakeholders into its business model and strategy. In its materiality analysis (for more details, see the IRO-1 disclosure requirement in chapter 2), the company has considered the views of various stakeholders, including suppliers and affiliates. This feedback has been collected through various formal and informal listening mechanisms during interactions with these stakeholders. Regarding suppliers, feedback has been mainly gathered through direct engagement by the supply chain management team at Enagás, using tools such as the supplier portal, corporate mailboxes, and ESG performance assessments. For affiliates, information has been compiled through working groups, committees, and other collaborative forums.

SBM-3

### Material impacts, risks, and opportunities and their interaction with the strategy and business model

Enagás has conducted an analysis to identify impacts, risks, and opportunities, assessing which are materially significant concerning all workers in the value chain, as detailed in the IRO-1 disclosure requirement in chapter ESRS 2. This analysis takes into account Enagás’ strategy and business model, covering all internal activities and the locations of the company’s infrastructure. It also considers the upstream and downstream phases of the value chain, alongside external developments.

Below is a detailed account of the risks deemed significant as a result of this analysis:

Table of risks and opportunities

Topic	Sub-topic	Risk	Nature
Human rights	Human rights of employees in the value chain	Reputational and financial consequences from human rights violations in the value chain	Risk

Enagás has identified the employees in the value chain who are at the highest risk of human rights violations:

- **Affiliates without operational control:** Enagás holds stakes in affiliates where it does not have operational control at the national, European, or international levels (for more information, see note ‘1.3 Principles of consolidation’ in the

Consolidated Annual Accounts, which lists the companies consolidated by the equity method). The company has conducted a Human Rights due diligence assessment of these affiliates, focusing on aspects particularly relevant to each country where the affiliates operate.

Aligned with the company’s purpose, Enagás is undertaking an asset rotation to concentrate its strategy on Europe, thereby reducing the inherent country risk related to potential human rights violations. For more information on the company’s affiliates, see disclosure requirement [SBM-1](#) within chapter 2.

Enagás therefore considers that the risk to the company is greater for the workers of affiliates present in countries with a high inherent risk of violation of various human rights.

- **Suppliers:** professionals of companies contracted by Enagás. The company considers the risk higher for workers within its facilities and those in countries identified as having an elevated risk of human rights violations.

Enagás has not identified any regions with a significant risk of child, forced, or compulsory labour among workers in the value chain.

The identified risk related to the value chain stems from Enagás’ interactions with other entities within its business model, specifically affiliates and the supply chain. This risk is tied to the potential negative outcomes from human rights violations among workers in this value chain. Consequently, managing this risk is directly connected to due diligence processes and the integration of sustainability criteria, including human rights considerations, into supply chain management models and the governance of investments and affiliates.

# Management of impacts, risks, and opportunities

## S2-1

### Policies related to workers in the value chain

Enagás has made several commitments to ensure the effective management of significant risks associated with workers in the value chain, primarily through its [Code of Ethics](#), which applies to all Enagás Group companies. This code is mandatory for contractors, suppliers, collaborators, and business partners who work with or represent Enagás. In affiliates where Enagás lacks effective control, the company promotes principles and guidelines aligned with its Code of Ethics, in addition to more specific policies. (For more information on the Code of Ethics, refer to disclosure requirement [G1-1](#)).

All Enagás Group suppliers and contractors are bound by the company's Code of Ethics and expressly confirm their commitment to be familiar with it, comply with it and enforce it through acceptance of the general contracting conditions.

- More specifically for suppliers, Enagás has developed the [Ethical Principles and Guidelines for Suppliers of the Enagás Group](#). This document specifies the principles and conduct guidelines for Enagás suppliers and contractors, aligning with the Code of Ethics. It establishes the core values and commitments that suppliers must adhere to and follow.

The document specifies the human rights guidelines that suppliers need to comply with and how Enagás encourages its suppliers and contractors to follow the United Nations International Bill of Human Rights, the OECD Guidelines for Multinational Enterprises, the International Labour Organisation (ILO) Declaration and its core conventions, and the European Convention on Human Rights.

This document mandates that Enagás' suppliers and contractors must understand and adhere to the principles outlined in the Enagás Human Rights Policy. It also includes commitments to respect human rights, including labour rights, with explicit references to child labour, forced labour, freedom of association, and collective bargaining.

Furthermore, suppliers are expected to comply with applicable internal and external regulations, particularly those related to preventing criminal activities, environmental harm, and violations of personal rights.

- Additionally, Enagás has established a [Human Rights Policy](#) that applies both to its own workforce and to workers within the value chain. This policy, approved by the Board of Directors, explicitly states that in affiliates where the Enagás Group lacks effective control, it will propose to their boards the adoption of principles and guidelines consistent with this Policy. The company also emphasises these principles and commitments with contractors, suppliers, and collaborators, particularly regarding the supply chain.

The commitments in this policy align with relevant internationally recognised instruments, including:

- The United Nations Guiding Principles on Business and Human Rights.
- The United Nations (UN) International Bill of Human Rights and its associated covenants (the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights).
- The OECD Due Diligence Guidance for Responsible Business Conduct.
- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.
- The International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and its core conventions.
- The Universal Declaration of Human Rights.

The Universal Declaration of Human Rights serves as a foundation for this policy, which includes commitments to respecting human rights, particularly labour rights. It explicitly references the right to decent work and opposes forced, compulsory, and child labour, as well as all forms of slavery and human trafficking.

The policy commits to developing and maintaining a due diligence system aimed at anticipating, preventing, mitigating, and/or remedying negative impacts on people (both its own workforce and those in the value chain), the environment, and society. It also sets out the commitment to implement processes for the purpose of prior information, participation, dialogue, consultation and collaboration with stakeholders, in order to guarantee that their needs and expectations are known to the company and, where appropriate, added to its management. For further details on the Human Rights Policy, refer to disclosure requirement [S1-1](#).

In addition, the policy sets out commitments related to managing suppliers and affiliates to ensure human rights are respected throughout the value chain. It aims to:

- Ensure that suppliers, particularly those with workers operating within Enagás' facilities, adhere to the general human rights principles stated in the Enagás Group's Policy and the Ethical Principles and Guidelines for Suppliers of the Enagás Group. This is achieved by requiring formal commitment through the necessary documentation and conducting relevant assessments and audits.
- For affiliates where the company lacks effective control, Enagás has committed to:
  - Promoting adherence to corporate policies aligned with the principles outlined in the Enagás Human Rights Policy and within business agreements, depending on the company's level of influence.

- Transmitting essential management standards that cover necessary areas to ensure respect for human rights.
- Evaluating respect for human rights as a critical element in due diligence processes.

In 2024, the Human Rights Policy was updated to strengthen the company's commitment to developing and maintaining a human rights due diligence system, as outlined in the European Sustainability Reporting Standards developed by EFRAG, the proposed Sustainability Due Diligence Directive, and the OECD Due Diligence Guidance for Responsible Business Conduct.

This policy assigns the Board of Directors the responsibility for guiding, overseeing, and monitoring strategy, policies, risks, objectives, and performance concerning human rights issues. It is also the responsibility of the Sustainability Committee to control and monitor these aspects, reporting to the Sustainability and Appointments Committee, which is established at the Board level. In addition, various departments within the company are tasked with setting up action plans, goals, and monitoring indicators.

The Code of Ethics and all policies are accessible to stakeholders on the company's [corporate website](#), as well as on the corporate Intranet for all employees.

This approach allows the company to make commitments that address risks deemed relatively significant. (For further details, refer to the 'Risk and Opportunity Table' included in disclosure requirement [IRO-1](#)).

In 2024, the company has not identified any cases of human rights violations upstream or downstream in its value chain through the mechanisms available.

## S2-2

### Processes for engaging with value chain workers about impacts

The materiality analysis did not reveal any significant potential or actual negative impacts.

## S2-3

### Processes to remediate negative impacts and channels for value chain workers to raise concerns

The materiality analysis did not reveal any significant potential or actual negative impacts.

## S2-4

### Taking action on material impacts on value chain workers, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

Enagás has established, as set out in the Human Rights Policy, a due diligence system to anticipate, prevent, mitigate and/or remedy negative impacts on workers in the value chain and, consequently, the associated dependencies that give rise to the identified material risk (For more information on the materiality assessment, see disclosure requirement SBM-3). To this end, in general terms:

- It identifies, assesses, and prioritises actual or potential negative impacts on human rights in the value chain.
- It implements actions to avoid, prevent, or mitigate (should they materialise) identified negative impacts, within the company's sphere of influence, evaluating the efficiency of the actions implemented.

Enagás is currently reviewing its Due Diligence processes in relation to third parties, focusing on the protection of Human Rights and the Environment, in line with the European Directive on this issue.

In conjunction with the company's risk assessment processes, Enagás identifies and evaluates the risk level of human rights violations within the value chain. For more information about ESG risks and their integration into the company's global risk model, see the 'Risk Management' chapter of the Consolidated Management Report<sup>81</sup>.

Enagás has not identified any serious human rights issues or cases related to its affiliated companies or supply chain.

### Affiliates without operational control

The actions taken by Enagás to mitigate the negative impact associated with the identified materiality risk are primarily based on the continuous assessment and management of ESG aspects in affiliates without operational control (consolidated by the equity method and managed independently) at various stages of the relationship.

<sup>81</sup> This link refers to unverified information within the framework of the review of the Non-Financial Information and Sustainability Information Statement.

Estándares críticos de gestión












The company has set out critical ESG management standards which include human rights and that Enagás extends to its affiliates according to its level of influence. The company also monitors them by setting out a plan of objectives for each affiliate to be implemented over a five-year horizon.

Critical management standards are transferred through working groups led by the specific managers of each affiliate, involving members of the General Management of Enagás who co-lead matters falling under their remit. These working groups are

instrumental in aligning positions and ensuring the operability of the Board of Directors of the affiliate, where the decisions taken by consensus will be concluded in the groups.

Enagás has an Internal Monitoring Committee, established at the management level, which supervises the critical decisions of affiliates and reports quarterly on key matters to the Enagás Board of Directors.

Below is a summary of the key critical management standards related to human rights:

Critical management standards			
Critical management standards	Areas related to Human Rights	Critical management standards	Areas related to Human Rights
 Financial and operational excellence		 People	<ul style="list-style-type: none"><li>◦ Remuneration policy</li><li>◦ Contractual relations and trade union rights</li><li>◦ Negotiation and representation</li><li>◦ Human Resources Policy</li><li>◦ Human resource development (training and recruitment)</li><li>◦ Workplace climate</li></ul>
 Good Governance		 Health and safety	<ul style="list-style-type: none"><li>◦ Health and safety management system</li><li>◦ Emergency plan</li><li>◦ Health monitoring</li></ul>
 Ethics and compliance	<ul style="list-style-type: none"><li>◦ Code of conduct</li><li>◦ Corporate Defence Programme</li><li>◦ Whistleblowing channel</li></ul>	 Local communities	<ul style="list-style-type: none"><li>◦ Stakeholder management model</li><li>◦ Local development actions</li></ul>
 Supply chain		 Natural capital and biodiversity management	<ul style="list-style-type: none"><li>◦ Environmental management system</li><li>◦ Conducting environmental impact assessments</li></ul>
 Human rights	<ul style="list-style-type: none"><li>◦ Human rights due diligence</li></ul>	 Climate action and energy efficiency	
 Other management standards			

Internal control in affiliates

Enagás, in collaboration with its business partners, conducts internal audits of its affiliates to verify the robustness of internal controls in high-risk processes, which may at times affect the human rights of the employees within these affiliates.

In 2024, Enagás focused on developing the Audit Plan for our affiliates, concentrating specifically on labour, health, and safety issues, as well as local community management processes. This included work related to the supply chain and business continuity at the Trans Adriatic Pipeline (TAP), the Social Management Plan at Transportadora de Gas del Perú (TgP), and reviewing the occupational health process, safety risk management, and resource contracting process at DESFA.

Specific human rights assessment

Enagás conducts an annual review of the human rights risk assessment for affiliates where the company lacks operational control. All the companies have commitments to human rights included in their codes of ethics or specific policies, though in some cases, it is necessary to continue making progress to reinforce these commitments by making them public and providing training to their professionals.

In general, there is also an advanced level of management regarding the handling of communications and complaints. Due to the importance of this area, Enagás is reinforcing the importance of continuing with this type of action.

This assessment examines the potential country-related risks concerning areas such as human rights management, grievances and communication, employee relations and working conditions, public and private security, and community relations. In the last three years, all 100% of the affiliates without operational control have been assessed. In 2024, 22% have been identified as posing a potential human rights risk linked to country-specific risks.

The management capabilities of these affiliates in dealing with such issues are then evaluated, with the conclusion that, generally, management levels are advanced and help mitigate country-specific risks. Nevertheless, mitigation actions have been implemented in all of them with the support, monitoring and assessment of Enagás.

Through these assessments and the establishment of mitigation actions, Enagás works to ensure its affiliates meet their human rights commitments. The company plans to continue these evaluations in the coming years, aligning with the evolution of its due diligence system.

Human rights assessed	Assessment result	Risk Management
<ul style="list-style-type: none"><li>General human rights</li><li>Labour</li><li>Safety</li><li>Environment</li><li>Ethics and integrity</li><li>Basic rights</li><li>Local Communities<sup>(1)</sup></li></ul>	Low risk of violation	<p>In our business agreements we promote compliance with corporate policies (according to the degree of influence). Our management model for affiliate companies is based on the transfer of critical management standards, which include the necessary areas in order to guarantee respect for the following human rights:</p> <ul style="list-style-type: none"><li>People management</li><li>Ethics and compliance</li><li>Health and safety</li><li>Local communities</li><li>Environment</li><li>Supply chain</li></ul>

Likewise, these areas are evaluated as critical aspects in due diligence processes.

(1) Local and indigenous communities and populations have been identified in affiliates without operational control in Peru and Mexico.

Supply chain

Within the framework of managing its supply chain with a focus on risk management for both the business and its stakeholders, Enagás evaluates the inherent human rights risks of its suppliers, considering the country and sector-specific risks.

During the supplier approval process, the company sets requirements to ensure respect for the human rights of supplier companies. These include the acceptance of the Enagás Code of Ethics, an explicit commitment to adhering to the principles of the United Nations Global Compact and the Universal Declaration of Human Rights, and evidence of compliance with labour legislation, among other criteria. Regarding health and safety, Enagás also requires ISO 45001 certification from suppliers in certain product or service categories.

Annually, through assessments conducted during approval (for all suppliers) or contract execution (based on turnover, inherent risk, and criticality), the company evaluates the residual human rights risks associated with its suppliers. For more details on the assessments carried out in 2024, see disclosure requirement [G1-2](#).

If any assessments reveal a high risk to human rights, action plans are developed to mitigate these risks, with ongoing support and monitoring.

In the last three years, 72.2% of suppliers have been assessed, of which 19.9% have been identified as high risk suppliers. All of them have mitigation actions in place. Enagás monitors the extent to which the defined actions have been implemented.

By conducting these assessments and defining mitigation actions, Enagás helps to ensure that its suppliers meet their human rights commitments. The company plans to continue these evaluations in the coming years, aligning with the progression of its due diligence system.

In 2024, the cost of conducting these supplier evaluations, including the expense for the supplier approval platform and external evaluations and audits, amounts to more than 98 thousands of euros (information included in note 2.1 'Operating profit' to the Consolidated Annual Accounts). In 2025, the cost of these assessments is expected to be similar.

Human rights assessed	Assessment result	Risk Management
<ul style="list-style-type: none"><li>• General human rights</li><li>• Labour</li><li>• Safety</li><li>• Ethics and integrity</li></ul>	Low risk of violation	Enagás ensures that its suppliers, and especially those with workers operating within Enagás' facilities, respect these human rights. We demand a commitment from them, we ask them for the necessary documentation and we conduct audits.

In 2024, the company is investing in the development and training of Enagás' small and medium-sized suppliers in human rights, as part of the Global Compact's 'Sustainable Suppliers' training programme. Through this initiative, 77 small and medium-sized Enagás suppliers have received training in human rights management, along with other sustainability-related topics.

As regards health and safety, and in order to guarantee the coordination of business activities and the coordination of health and safety on building projects, the company has the Enagás Contractor Access System (SACE) to manage the safety of its suppliers, contractors and the whole subcontracting chain. This system offers contractors the operating safety procedures applicable to the possible risks involved in the works they perform. It also provides safety training to all its contractors through this platform. This training is complemented to the face-to-face chats at infrastructure facilities where particularly hazardous work may be carried out. In 2024, 5,906 hours of training (5,480 hours in 2023) were delivered through the SACE platform to 2,773 contractors from 556 contractor companies.

Repair procedures and mechanisms

Enagás also has in place procedures for redress should there be non-compliance with any of the previously mentioned human rights, such as:

- Procedure for the management of consultations and reporting regarding irregularities or breaches of the Code of Ethics.
- Self-protection and interior emergency plans, the incident and transmission network emergency response action plan and the procedures regulating it, the accident and incident management procedure and procedure for reporting them to stakeholders (crisis manual, incident reporting, etc.).
- Procedure for compensation and indemnification for gas pipeline routes through private property areas.

Additionally, as mechanisms for redress, Enagás has in place a Whistleblowing Line (accessible to all stakeholders) and an Ethical Compliance Committee. There are also corporate mailboxes available for specific areas.

Enagás is currently reviewing its Due Diligence Processes in relation to third parties, focusing on the protection of Human Rights and the Environment, in line with the European Directive on this issue.

# Metrics and targets

S2-5

## Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

### Affiliates without operational control

Enagás aims<sup>82</sup> to ensure ongoing and proper oversight of human rights management across 100% of its companies through corporate governance bodies by 2024, to minimise the likelihood of risks emerging. This objective has been defined in collaboration with the management bodies of the affiliates to ensure the necessary actions can be implemented effectively. In 2024, Enagás carried out regular oversight of 100% of these affiliates through the established governing bodies. This was especially true for the Hanseatic Energy Hub company, as it was in the process of building its infrastructure.

The achievement of this goal contributes, among other things, to the commitment established in the Human Rights policy to promote compliance with corporate policies, aligned with the principles set out in this policy, in business agreements according to the company's degree of influence.

### Supply chain

Enagás has set various targets for the sustainability management of its suppliers. In 2024, the company plans to conduct at least ten on-site audits focusing on ethical, environmental, and social aspects (including a specific human rights assessment) through an independent third party for key suppliers, considering factors such as criticality, sustainability risks, and turnover<sup>83</sup>. In 2024, Enagás carried out twelve on-site ESG audits by an independent third party, thus meeting that target.

These assessments are a primary tool for the company to identify potential human rights violations (for more information, see disclosure requirement [G1-2](#)).

This goal is aligned with the commitment set out in the Human Rights Policy to ensure that suppliers, especially those with workers operating within Enagás' facilities, respect the human rights reflected in this Policy and the Ethical Principles and Guidelines of the Enagás Group's Code of Ethics for Suppliers, by carrying out relevant assessments and audits.

<sup>82</sup> Given the nature of this target, no specific methodologies have been employed in its definition.

<sup>83</sup> Due to the nature of this target, no specialised methodologies have been used in its definition, nor has it been developed in partnership with suppliers.

# S3. AFFECTED COMMUNITIES

## Strategy

### SBM-2

#### Interests and views of stakeholders

Enagás recognises the importance of the communities potentially impacted by its activities and incorporates their interests and expectations into its business model and strategic planning. To ensure these viewpoints are adequately captured and assessed, Enagás implements various listening mechanisms during the development and operational phases of its assets. One key method is the formal consultation process conducted as part of the environmental assessment during the construction phase (for more details, see disclosure requirement [S3-2](#)).

#### Table of impacts

Topic	Sub-topic	Impact	Nature
Local communities	Rights of local communities and their development	Contribution to the development of the local economy through the creation of direct and indirect employment in the communities where it operates.	Positive - Current
	Rights of local communities and their development	Impact on local communities in terms of safety, health, environmental aspects or other socio-economic factors in the construction phase.	Negative - Potential and linked to individual cases
	Social action	Helping society by promoting social action initiatives and implementing volunteer programmes	Positive - Current

#### Table of risks and opportunities

Topic	Sub-topic	Risk / Opportunity	Nature
Local communities	Rights of local communities and their development	Cost overruns, delays, or even temporary or permanent halts to infrastructure projects due to social protests by affected communities or significant impacts on the environment or society.	Risk

The materiality analysis for identifying impacts, risks, and opportunities concerning affected communities was founded on the Enagás Group's strategy and business model. This is evidenced by the fact that the impacts identified originate from Enagás' own activities, stemming directly from the company's business model.

Within the materiality process, dependencies related to affected communities were examined, including those linked to ongoing activities, new projects, and reputational aspects. Consequently, due to the company's business model, Enagás has identified a significant dependency involving the development of new infrastructure and subsequent operational activities. This has manifested as the risk of 'Cost overruns, delays, or temporary or permanent halts of infrastructure development projects due to social protests from affected communities or significant impacts on the environment or society'. Accurately identifying and managing the opinions and interests of affected communities, and integrating them into the company's business model, is crucial for minimising this risk. This risk, considered material, is

### SBM-3

#### Material impacts, risks, and opportunities and their interaction with the strategy and business model

Enagás has conducted an analysis to determine the impacts, risks, and opportunities, assessing the materiality of these in relation to affected communities, as outlined in disclosure requirement [IRO-1](#). This analysis takes into account Enagás' strategy and business model, covering all internal activities and the locations of the company's infrastructure. It also considers the upstream and downstream phases of the value chain.

The material impacts and risks identified from this analysis are outlined below:

also assessed as part of the company's corporate risks, demonstrating a coherent approach in its evaluation and management.

As detailed in this chapter, the company sets out policies, actions, and objectives to manage these impacts and risks related to the business model and the 2025-2030 Strategic Update, facilitating the inclusion of affected communities into the business framework.

The main groups identified as potentially experiencing negative impacts from the company are those connected to its operations, particularly nearby local communities. When evaluating impacts, risks, and opportunities for these groups, Enagás takes into account the socioeconomic context of potentially affected communities. It recognises that groups in what is referred to as 'hollowed-out Spain' might be more vulnerable due to factors like potential disruptions to their economic activities or limited job diversification.

These groups also experience the positive impact deemed material, as Enagás aims to support the socioeconomic development of the local communities where it builds and operates its infrastructure.

It should be noted that Enagás has not identified any location among its direct operations (operational control) where indigenous populations are present or affected.

# Management of impacts, risks, and opportunities

S3-1

## Policies related to affected communities

Relations with affected communities, specially local communities, are of importance to the company, since our activities impact the areas in which we operate. They encourage competitiveness in the industry, enhance energy security of supply, contribute to decarbonisation and create direct and indirect employment.

When carrying out our activities, we guarantee the safety of infrastructure and minimise impacts on ecosystems and the population.

Enagás sets out its commitments to action for effectively managing impacts, risks, and opportunities related to affected communities in its [Group Code of Ethics](#), as well as in more specific policies approved by the Board of Directors (for further details on the Code of Ethics, refer to disclosure requirement [G1-1](#)).

Through these actions, the company establishes commitments that address the impacts and risks identified as material:

### Link between significant impacts, risks, and opportunities and corporate policies

Topic	Sub-topic	Impact, risk or opportunity	Nature	Policy that covers the impact, risk or opportunity
Local communities	Rights of local communities and their development	Contribution to the development of the local economy through the creation of direct and indirect employment in the communities where it operates.	Impact	Code of Ethics Sustainability and Good Governance Policy Human Rights Policy
		Impact on local communities in terms of safety, health, environmental aspects or other socio-economic factors in the construction phase.	Impact	Code of Ethics Sustainability and Good Governance Policy Human Rights Policy Health and Safety Policy
	Social action	Helping society by promoting social action initiatives and implementing volunteer programmes	Impact	Code of Ethics Sustainability and Good Governance Policy
	Rights of local communities and their development	Cost overruns, delays, or even temporary or permanent halts to infrastructure projects due to social protests by affected communities or significant impacts on the environment or society.	Risk	Code of Ethics Sustainability and Good Governance Policy Human Rights Policy

- [Enagás Group Code of Ethics](#): Among the various commitments laid out in the code, Enagás demonstrates its dedication to the environment by supporting the socio-economic development of local communities where it operates. This is achieved through initiatives that enhance positive impacts and help meet societal needs.

The Ethical Compliance Committee, responsible for overseeing the Code of Ethics, directly reports to the Audit and Compliance Committee of the Board of Directors. For further details on the Code of Ethics, refer to disclosure requirement G1-1).

- [Sustainability and Good Governance Policy](#): This policy emphasises the establishment of mechanisms that enable the company to form commitments with stakeholders, particularly local communities, based on collaboration, timely information exchange, and participation. These efforts contribute to due diligence and enhance the management of real or potential negative impacts arising from the company's development, construction, maintenance, operation, and dismantling of its infrastructure and supply chain. This policy also helps achieve social acceptance, generate positive impacts, and integrate

Enagás within the communities where it operates. Enagás is therefore committed to:

- Identifying the affected communities and stakeholders, including the most vulnerable among them.
- Defining and implementing strategies for consultation and participation with local stakeholders, as well as engaging with relevant parties and/or their legitimate representatives, to ensure their views are considered.
- Establishing publicly available and accessible complaints and grievance mechanisms for all identified local stakeholders.

In 2024, this policy was revised to update its sustainability commitments, aligning them with those in other corporate policies approved later, and with the latest edition of the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (2023).

- [Health and Safety Policy](#): this includes commitments relating to safety (covering individuals, infrastructure, the environment, and road safety), as well as physical and emotional well-being.

Among the commitments related to the identified potential negative impacts are:

- Maintaining a high level of safety in facilities and work, guaranteeing safe conditions in the design, operation and maintenance of facilities, processes and equipment.
- Establishing emergency measures and actions in the event of a crisis situation in the various work centres and work sites to ensure the protection of people, goods and the environment while business activities are being engaged in.

In 2024, this policy was revised following a corporate decision to split the former combined Health and Safety, Environment, and Quality Policy into three distinct policies. This change enables more effective implementation of commitments related to these crucial aspects of the business.

• [Human Rights Policy](#): this outlines Enagás' commitments to ensure due diligence in human rights areas. These commitments align with relevant internationally recognised instruments, including:

- The United Nations Guiding Principles on Business and Human Rights.
- The United Nations (UN) International Bill of Human Rights and its associated covenants (the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights).
- The OECD Due Diligence Guidance for Responsible Business Conduct.
- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.
- The International Labour Organisation (ILO) Declaration.
- The Universal Declaration of Human Rights.

It addresses the respect for human rights concerning society and local communities, which includes:

- Rights of communities and indigenous people: contribute to the socio-economic development of local communities, prioritising those areas where the company operates, through sustainable social action models, paying special attention to the most vulnerable communities such as indigenous or tribal populations<sup>84</sup>.
- Property rights, resettlement and compensation: take into account, criteria aimed at avoiding the occupation of privately owned areas when developing infrastructure construction projects and minimise the potential relocation of local communities, applying procedures for information, consultation and fair compensation that guarantee transparency and equal treatment.

In 2024, this policy was updated to strengthen the company's commitment to developing and maintaining a human rights due diligence system, as outlined in the European Sustainability Reporting Standards developed by EFRAG, the proposed

Sustainability Due Diligence Directive, and the OECD Due Diligence Guidance for Responsible Business Conduct.

These policies commit to developing and maintaining a risk-based due diligence system to anticipate, prevent, mitigate, and/or remedy negative impacts on affected communities. This is accomplished through the regular implementation of actions focused on continuous improvement and cooperation with stakeholders.

The Code of Ethics and all specified policies apply to the entire Enagás Group, covering all activities by its companies across all regions where it operates, and encompass commitments to all affected communities. The policy is communicated to all employees and directors within the Enagás Group, including subsidiaries where it has effective control, respecting legal regulations.

In affiliates where Enagás does not have effective control, the Board of Directors recommends promoting principles and guidelines that are consistent with those outlined in the Code of Ethics and the previously mentioned policies. The company also seeks to encourage, as much as possible, the adoption of the Code of Ethics and related policies by temporary joint ventures, joint ventures, and other comparable associations or entities. The company also emphasises principles and commitments aligned with the Code of Ethics and company policies with contractors, suppliers, and collaborators, particularly regarding the supply chain.

The Code of Ethics and all policies are accessible to stakeholders on the company's [corporate website](#), as well as on the corporate Intranet for all employees.

These policies assign the Board of Directors the responsibility for guiding, overseeing, and monitoring the strategy, policies, risks, objectives, and performance concerning the management of issues related to the subject matter of each policy (human rights and sustainability). It is also the responsibility of the Sustainability Committee to control and monitor these aspects, reporting to the Sustainability and Appointments Committee, which is established at the Board level. In addition, various departments within the company are tasked with setting up action plans, goals, and monitoring indicators.

By doing so, the company makes commitments to address material impacts, risks and opportunities. For further details, refer to the table of impacts and the table of risks and opportunities, both included in the [IRO-1](#) disclosure requirement in this chapter.

Over the past three years, Enagás has not identified any instances of non-compliance with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises. This applies both to its own operations and those within its value chain, with regard to affected communities.

<sup>84</sup> As defined in ILO Convention 169 on indigenous and tribal peoples.

## S3-2

# Processes for engaging with affected communities about impacts

In the early stages of projects involving construction, operation, maintenance, and decommissioning, an analysis is conducted to assess the area's actual and potential social, economic, and environmental impacts. This analysis helps identify affected communities, key associations, and legitimate representatives such as vulnerable groups, NGOs, and local councils. Collaboration with these parties is crucial to involve them in decision-making and to ensure they are properly informed and consulted throughout the process.

From this analysis, stakeholder maps are created for the management of crises and emergencies affecting infrastructure, in which key collectives, communication channels and relevant issues are identified.

## Information and consultation processes

Enagás conducts environmental impact studies (which also assess social aspects) for construction projects and assesses environmental aspects for infrastructure operation and maintenance projects. Environmental impact studies are open to public information and are also subject to processes of consultation in which stakeholders may voice their opinion and even propose modifications. EMAS-certified facilities publish an annual report (Barcelona and Cartagena regasification terminals and Yela and Serrablo underground storage facilities).

In the case of gas pipeline construction projects, the route design already takes into account criteria for minimising the impact on local plant and animal wildlife, as well as other aspects derived from direct collaboration with affected communities (for more information, see disclosure requirement S3-4).

The types and frequency of collaboration will depend on the specific nature of the project and the affected communities involved. Operational responsibility for ensuring proper collaboration and participation of affected communities during the construction phase lies with the Chief Executive Officer of Engineering, Technology and Digitalisation. During the operation and maintenance phase, this responsibility shifts to the Gas Assets General Manager. Both roles are part of the Executive Committee.

As stated, Enagás offers various channels for affected communities and their legitimate representatives to express their needs or concerns. The consultation and listening processes extend to all potentially affected communities, including those identified as particularly vulnerable, such as communities from the 'hollowed-out Spain' phenomenon.

The departments responsible for managing these communication channels will establish mechanisms to honour Enagás' commitment to address all feedback received and to enhance collaboration with affected communities through effective management of these channels.

Communication channels with affected communities

- Contact telephone numbers (switchboard, emergencies, Public Affairs & Investor Relations, etc.)

- Corporate mailboxes (infrastructure, environment, social action, Public Affairs & Investor Relations, etc.)

In matters related to infrastructure safety, Enagás develops internal emergency plans, which include information on stored chemical substances, human and material resources, scenarios, emergency plans, liability, etc. These plans are registered with the local government authorities, which are responsible for communicating them to the community and creating an associated action plan.

## Communication channels with affected communities specific to the infrastructure development, construction and decommissioning phases

In the development, construction, and decommissioning phases of infrastructure projects, Enagás sets up additional communication channels specifically for affected communities and their legitimate representatives, beyond those already mentioned, to ensure their active involvement. Recognising the importance of engaging affected communities during these phases, Enagás assesses the effectiveness and stakeholders' awareness of these channels throughout the process.

Enagás holds information sessions in local areas for the purpose of explaining details of projects that are being executed locally, and safety and environment-related issues, among others.

- Citizen participation days.
- Consultation processes for affected communities (e.g. local authorities).
- Permanent information centres.

## Public participation concept plan

As part of the general procedures outlined, Enagás has prepared and submitted a Public Participation Conceptual Plan to the Ministry for Ecological Transition and the Demographic Challenge. This Plan is for the Inland Hydrogen Infrastructure project in Spain, which is included in the Portugal - Spain - France - Germany Corridor as part of the Western Europe Hydrogen Interconnections (HI West). This initiative is recognised as a Project of Common Interest by the EU. This Public Participation Plan for the connection to Portugal (CelZa Project) and the North-1 project has also been submitted to the Directorate General of Industry, Energy and Mines of the Government of Cantabria.

The Plan aims to ensure transparency and facilitate the involvement of affected communities and their legitimate representatives during the authorisation process and the project's development. In order to increase the participation of these groups in the permit granting process and ensure prior information and dialogue, stakeholders parties affected are extensively informed and consulted at an early stage, when potential concerns of those affected can still be taken into account.

The plan identifies the main affected communities and their legitimate representatives, including relevant national, regional, and local authorities, landowners, residents near the project site, the general public, and their associations or organisations. It also outlines the minimum measures to be taken for public consultation, detailing communication channels such as public

participation events, a dedicated project website, informational brochures, and telephone and email contacts.

The plan requires an evaluation of the participation process, ensuring transparency of both the process and its outcomes. This will provide information on the results of the collaborations and suggest possible improvements for future phases.

### S3-3

## Processes to remediate negative impacts and channels for affected communities to raise concerns

Enagás offers channels for affected communities and their legitimate representatives to submit complaints or claims about actual or potential negative impacts on any group, society, or the environment. In addition to the channels for collaboration with affected communities indicated in disclosure requirement S3-2, since these channels can also pose negative impacts, the following are identified:

### Communication channels with affected communities

- Whistleblowing Line (for more details on the line, its procedures, the management of communications and the no retaliation policy, see disclosure requirement G1-1):
  - Electronic mailbox: [canal.etico@enagas.es](mailto:canal.etico@enagas.es)
  - Post addressed to the Chairman of the Ethical Compliance Committee, sent to Paseo de los Olmos 19, 28005 - Madrid, Spain
  - Form available on the corporate Intranet and on the [corporate website](#)

The areas responsible for managing the various communication channels will set up mechanisms to ensure Enagás' commitment to addressing all communications received. When necessary, Enagás will analyse and investigate the communications, taking appropriate actions to prevent or reduce identified negative impacts, as far as the company can influence. The company will also assess the effectiveness of these measures after implementation, considering their actual impact on the affected communities.

Enagás evaluates how well these channels are understood and trusted by the groups, as well as their effectiveness, through direct engagement, informal communications, and usage levels.

In keeping with this commitment to addressing grievances, Enagás supports these reporting and resolution channels within its value chain. This is also one of the criteria used to assess the sustainability risk of its suppliers (for more information, see disclosure requirement G1-2).

### S3-4

## Measures taken related to material impacts on affected communities, approaches to mitigating material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions

Through its activities, Enagás impacts the regions where it operates by enhancing industrial competitiveness, strengthening energy security of supply, contributing to decarbonisation, creating both direct and indirect jobs, and paying taxes to local governments. It also benefits society by promoting social initiatives and implementing volunteer programmes. Enagás determines which actions to take regarding the management of significant impacts and risks, guided by principles of continuous improvement, cost-benefit analysis, and learning from past responses to similar situations. For more details, refer to disclosure requirement SBM-3.

Over the past three years, there have been no identified or reported potential human rights violations related to the affected communities.

### Creation of direct and indirect employment

Regarding the management of the positive impact deemed material – 'Contribution to the development of the local economy through the creation of direct and indirect employment in the communities where it operates' – the Enagás Group is active in a large part of Spain, with facilities in over 55 locations. This widespread network of infrastructure leads to the creation of local direct employment across the various regions where it operates, fostering economic growth and strengthening the social fabric. Enagás plans to sustain local employment in these areas in the coming years.

In 2024, 106 new employees were hired (127 in 2023), of which 50.9% were women (46.4% in 2023), of which 50.9% were women (46.4% in 2023) and 79% were filled by external candidates (76% in 2023).

Enagás also contributes to indirect job creation by engaging local suppliers<sup>85</sup>. In 2024, the Enagás Group placed orders with local suppliers amounting to over 264 million euros, representing 79% of the total expenditure in our supply chain (see note '2.3 Trade payables and other accounts payable' in the Consolidated Annual Accounts for details). Enagás also supports a more diversified and resilient local economy by engaging small and medium-sized enterprises<sup>86</sup>, with spending exceeding 94 million euros (for further details on our suppliers, see disclosure requirement [SBM-1](#)). Enagás expects to maintain similar levels of local spending in our supply chain in the coming years.

## Socio-economic impact of renewable hydrogen infrastructures

The construction and future operation of this planned renewable hydrogen infrastructure, aligned with our 2025-2030 Strategic Update, will have a significant positive impact on the Spanish economy and society.

In terms of GDP, the construction and operation of H2med and the Spanish Hydrogen Backbone would generate an impact of up to 4.8 billion euros. Likewise, construction alone would have an impact on employment equivalent to 3.7% of the net jobs expected to be generated by the various measures included in the PNIEC review by 2030.

The backbone will also serve as a pull factor for multiple sectors of the national economy, thanks to the various applications of green hydrogen. The pull factor for the national economy generated by the deployment of green hydrogen production capacities will be very significant, with much of it concentrated in key sectors such as industry and professional, scientific and technical activities.

## Commitments to affected communities

Enagás is committed to addressing the potential Negative impacts on local communities regarding safety, health, environmental aspects, and other socio-economic factors during the construction phase'. It also recognises the risk of 'Cost overruns, delays, or even temporary or permanent halts to infrastructure projects due to social protests by affected communities or significant impacts on the environment or society' identified as material. Enagás upholds its commitment to due diligence for the groups impacted by its activities across all regions where it operates. This commitment involves active listening and collaboration, and when necessary, taking steps for mitigation, remediation, and/or compensation for the negative impacts that have occurred (for more information, see disclosure requirements S3-2 and S3-3).

Enagás conducts environmental impact studies (which also assess social aspects) for construction projects and assesses environmental aspects for infrastructure operation and maintenance projects. As part of these assessments, information and consultation processes are conducted (for more information, see disclosure requirement S3-2) to help identify impacts. In collaboration with the affected communities, the team responsible for the construction project then defines specific actions to prevent, minimise, mitigate, and/or compensate for the identified negative impacts. Throughout the project, this team evaluates the effectiveness of the measures taken. If these measures do not adequately address the negative impact, they will consider implementing new actions, either during or after the project's completion.

One common negative effect on affected communities during construction projects is typically the occupation of privately owned land. In Spain, there is a regulated procedure (Compensation and Indemnity Procedure for Passage through Private Property) that involves public information and consultation with affected organisations. This process ensures transparency in infrastructure projects and guarantees equal treatment under the law.

In 2024, no significant negative impacts on affected communities have been identified in the construction projects undertaken.

## Renewable hydrogen infrastructures

Enagás has been appointed as the provisional HTNO, with Enagás Infraestructuras de Hidrógeno authorised to temporarily carry out the development of European Projects of Common Interest for hydrogen networks. In relation to this new activity, from the earliest stages of project development, Enagás is assessing potential negative impacts to establish mechanisms that minimise the effects on affected communities. In 2024, Initial Project Documents have been prepared for projects scheduled to begin construction in the coming years, evaluating potential impacts on communities and the environment. In 2024, Enagás invested (CapEx) more than 200 thousands of euros in the preparation of these Initial Project Documents for the Hydrogen Backbone Network, Celza and North 1 underground storage facility projects (information included in note 2.4. Property, plant and equipment' in the Consolidated Annual Accounts).

In 2025, as projects progress to more advanced development stages, there will be a deeper examination of the potential impacts on the environment and affected communities. In collaboration with these groups, necessary measures will be determined to prevent these impacts from occurring or, if they do occur, to repair or compensate for the negative effects. To ensure that all these measures effectively mitigate risk, Enagás will continuously monitor their effectiveness and suitability throughout the project's development.

In line with this commitment, in 2025 Enagás will develop a Conceptual Plan for Public Participation for the Projects of Common Interest: '9.1.3. Internal hydrogen infrastructure in Spain', '9.24.1 H<sub>2</sub> storage North-1', and '9.1.2 Hydrogen interconnector Portugal-Spain'. This is aimed at ensuring transparency and public involvement in the authorisation process for these projects (for more information, see disclosure requirement S3-2). Enagás will track progress through continuous self-assessment during the plan's development, allowing for adjustments based on effectiveness to ensure the plan's objectives are met. To develop these Public Participation Concept

<sup>85</sup> Local purchases are considered to be purchases made domestically in Spain.

<sup>86</sup> Companies with less than 250 employees in line with the European Union definition.

Plans, Enagás has allocated (CapEx) more than 200 thousands of euros (information included in note 2.4. Property, plant and equipment’ in the Consolidated Annual Accounts). In 2025, we expect to take the actions outlined in this Plan for the PCI ‘9.1.3. Internal hydrogen infrastructure in Spain’, estimating an investment (CapEx) of approximately 3 million euros

Social action

Enagás has carried out important actions during the year related to the management of the positive material impact ‘Helping society by promoting social action initiatives and implementing volunteer programmes’.

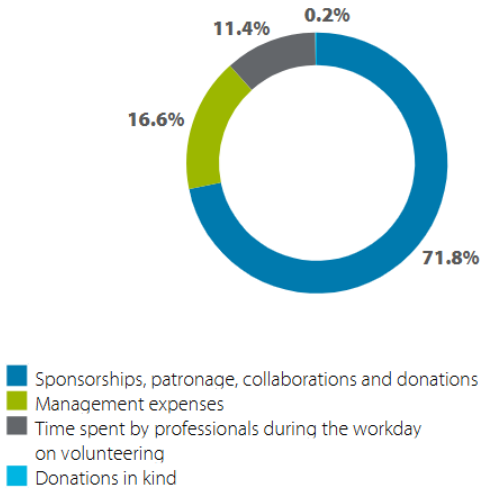
In 2023, the company established Enagás’ Social Action Strategy, which is aligned with the targets set out in the company’s Strategic Plan. The global target of this strategy is to contribute to security of supply and decarbonisation, promoting a just energy transition through socio-economic development projects and initiatives in the country. At Enagás, we maximise the positive social impact of our initiatives through dialogue and collaboration with our stakeholders, whether in the form of volunteering, sponsorship, patronage, partnership or donations.



In 2024, the total amount of this social investment reached 1.7 million euros<sup>87</sup>, distributed as follows:

	2022	2023	2024
Amount allocated for social investment (million euros)	1.94	1.70	1.72

Types of contributions



Company commitment to sustainable development (euros)<sup>(1)</sup>

	2022	2023	2024
Contributions to foundations and non-profit organisations (charitable donations: monetary and in kind <sup>(2)</sup> )	151,031	31,129	32,938
Association and sponsorship actions (sponsorship and patronage activities)	1,450,105	1,217,568	1,203,501

(1) Information included in note ‘2.1 Operating income’ in the Consolidated Annual Accounts.

(2) With regard to donations in kind, Enagás mainly donates computer equipment, mobile phones and discontinued promotional material to associations that use this material solely for charitable purposes.

Sponsorships, patronage, collaborations and donations

Enagás contributes economically with social welfare projects through sponsorship, patronage, collaboration and donation activities.

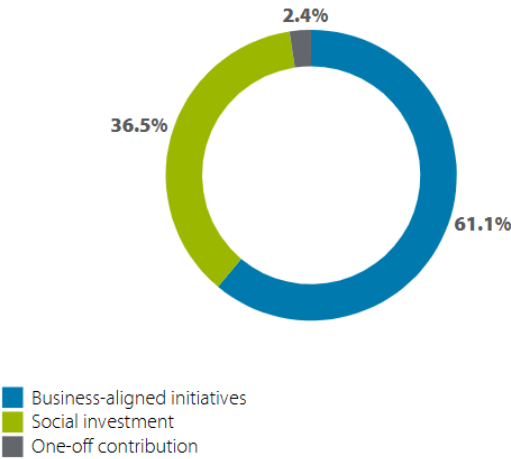
The company’s procedure for managing sponsorships, patronage, collaborations and donations establishes the criteria for the reception, approval and follow-up of financial contribution collaboration requests . In 2024, the procedure was updated to include the Ethical Compliance Committee in assessing actions.

<sup>87</sup> Information included in note ‘2.1 Operating income’ in the Consolidated Annual Accounts.

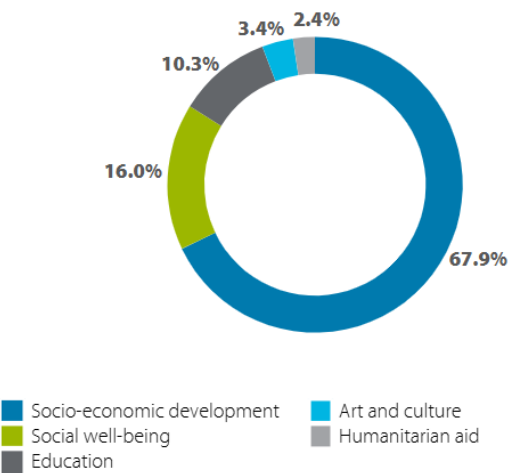
Enagás follows the London Benchmarking Group (LBG) methodology, a global benchmark for the management, measurement and reporting of activities that companies and their professionals carry out for the benefit of society and the environment. A further step in the company's commitment to best practices in social investment.

In 2024, Enagás made monetary contributions totalling more than 1.2 million euros, the same amount as in 2023. This information is included in note '2.1 Operating profit' in the Consolidated Annual Accounts. Contributions were allocated as follows:

Rationale for financial contributions



Areas of action



Here are some examples of these initiatives carried out in 2024:

- Contribution to the socioeconomic development and welfare of the communities where it operates through various projects. For example, Enagás supported ACCEM in Brihuega with 15,000 euros to enhance accessibility for people with dependencies and to promote their personal autonomy in rural areas.
- Support for entrepreneurship and innovation initiatives, such as Innoenergy (20,000 euros), South Summit (5,000 euros) or the Isaac Peral Foundation (3,500 euros); through this, our company supports the advancement of new technologies, promoting job creation, the development of new companies and better competitiveness in key sectors such as energy, technology and innovation.
- Participation in initiatives related to digitalisation, artificial intelligence, and cybersecurity, such as IndesIA (20,000 euros) and the ESYS Foundation (20,000 euros), among others.
- We collaborated with cultural and educational institutions such as the Princess of Girona Foundation (43,000 euros), Carlos III University (27,000 euros), and Lumbier Municipal School of Music (5,000 euros), promoting the educational development of young people and children.
- Promotion of forums and debates on sustainability and green hydrogen to share progress on this crucial carrier for decarbonisation and energy security in Spain and Europe. This year, Enagás earmarked 192,720 euros for these efforts.
- In 2024, Enagás responded to the emergency caused by the cut-off low storm in Valencia by collaborating with the Red Cross, offering its professionals the opportunity to make voluntary contributions to support rescue and recovery efforts. The company matched the amount contributed by employees (29,590 euros).
- Enagás employees can also make various charitable donations promoted by the company. Through the 'Euro Solidario' ('Solidarity Euro') initiative, which allows professionals to make micro-donations from their salaries for social projects, 8,423 euros were donated in 2024 (8,832 euros in 2023) to the Children's Villages and ANAR (Aid to Children and Adolescents at Risk) Foundations. Some of our professionals have also donated the money for the traditional Christmas hampers to the Theodora Foundation, reaching a total of 3,900 euros (2,313 euros in 2023).

In 2025, Enagás will continue committed to maintaining short- and medium-term partnerships and will continue supporting both the organisations it already collaborates with and new initiatives that align with its Social Action Strategy.

Enagás tracks all activities and assesses their impact by requesting project reports and sending measurement forms to associations, institutions, and organisations. This process aims to understand the impact of these initiatives on the affected communities.

Corporate volunteering programme

Enagás professionals participate in the company's Corporate Volunteering programme, giving up their time and bringing their skills and talent. For this purpose, there are two forms of collaboration available to all professionals:

- **On-site corporate volunteering directly managed by Enagás:** activities carried out in collaboration with associations and third-sector organisations, supervised by the company. These on-site corporate volunteering initiatives are carried out during working hours and respond to the needs of the local communities in which Enagás is present.
- **On-site and virtual volunteering platform:** the company connects with volunteering opportunities through different associations and third-sector organisations by means of the corporate volunteering portal.

Among the volunteering initiatives in 2024, notable efforts include:

- development of the second Volunteering Week, a successful initiative in which 218 professionals participated in at least one of the 13 scheduled activities in collaboration with different non-profit organisations.
- Promoting corporate values and culture through initiatives that enhance cohesion and teamwork, focusing on environmental conservation and the social integration of vulnerable groups. These efforts target four different areas of the company.
- Launching a gamification section on the volunteering portal to boost active participation among professionals and enhance their social awareness experience.
- Positively impacting the diversity and inclusion policy through two key initiatives: promoting the social and employment integration of vulnerable women and supporting the social and employment inclusion of individuals with disabilities. Within this framework, Enagás held a number of training workshops to promote employability and social normalisation for women in vulnerable situations due to disability or as victims of gender-based violence. These workshops were carried out in collaboration with the Randstad and the José María de Llanos Foundations.

Indicators of volunteering initiatives

	2022	2023	2024
Number of initiatives	21	32	33
Number of participations (not individual volunteers)	438	605	649
Total number of hours	2,210	3,344	3,407

The company carries out a satisfaction survey of the professionals who participate in social initiatives in order to take maximum care of the volunteer experience, and to find out their satisfaction and assessment of the achievement of the targets of each action. The average result of the surveys carried out by the 2024 initiatives reflects high satisfaction, with a rating of 4.95 out of 5 (4.8 in 2023).

Enagás monitors the activities and assesses their effectiveness by sending questionnaires to associations, institutions, and other relevant parties to gauge the impact of various initiatives on the affected communities.

In 2025, Enagás plans to maintain its volunteer activities in line with those carried out in the previous year.

# Metrics and targets

S3-5

## Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

### Creation of direct and indirect employment

For 2024, Enagás has not set measurable, outcome-oriented targets related to enhancing the positive impact of 'Contribution to the development of the local economy through the creation of direct and indirect employment in the communities where it operates'.

This is because the company already prioritises maintaining stable, quality employment and creating direct jobs, as well as hiring local suppliers and small to medium-sized enterprises to boost indirect employment in the regions where it is active. Enagás believes that indicators for direct local hiring and the generation of indirect employment through local supplier engagement adequately reflect the achievement of these goals.

### Commitments to affected communities

In 2024, construction activities related to new infrastructures have not been significant, presenting only a potential impact and medium- to long-term risk. When construction activities for renewable gas infrastructures reach more advanced stages, Enagás will set specific goals to ensure full compliance with requirements concerning potential effects on local communities during construction projects, thereby also mitigating identified risks.

### Social action

To foster a positive impact beyond its core activities, under the initiative 'Helping society by promoting social action initiatives and implementing volunteer programmes', the company has laid out the following annual objectives in the Enagás 2023-2030 Social Action Strategy. These are applicable to the entire Enagás Group for the 2024 financial year<sup>88</sup>. These goals are aligned with the commitments set out in the Code of Ethics to contribute to the socio-economic development of local communities in the places where it operates through initiatives that boost positive impacts and contribute to meeting the needs of society, and to support the participation of Enagás Group professionals in volunteer activities.

In accordance with the procedure for managing sponsorships, patronage, collaborations, and donations, progress towards these objectives is monitored semi-annually and reported to the Executive Committee.

Through the initiatives we support we seek to contribute to economic and social development with a special focus on security of supply and decarbonisation, both from the point of view of knowledge dissemination and research and implementation of initiatives to contribute to the energy transition. We also support projects in the fields of education, culture, protecting children and young people, and improving the quality of life of vulnerable groups.

The company has set the following measurable goals:

- Allocate at least 0.4% of the Enagás Group's current net profit (1.2 million euros in 2024<sup>89</sup>) to financial social action contributions (sponsorships, donations, collaborations, patronage and volunteer work). In 2024, Enagás met this target with an amount in excess of 1.7 million euros.
- To earmark around 60% of the total amount of financial contributions (740 thousands of euros) to collaborations related to security of supply, decarbonisation and a just energy transition through socio-economic development initiatives. Enagás met this target with 60% of its contributions (743 thousands of euros in 2024) earmarked for the socio-economic development of the region.
- To allocate at least 15% of the financial contributions (185 thousands of euros) for local actions, giving priority to municipalities where Enagás is present with infrastructures or projects, and especially to areas in 'hollowed-out' Spain. In 2024, this target was significantly exceeded, with 26% (329 thousands of euros) of the total allocated to this type of action.
- To use 20% of the total amount of financial contributions (247 thousands of euros) for actions in the areas of education, culture, health and disadvantaged groups to contribute to a just transition and social welfare. In 2024, the target was exceeded by 23% (286 thousands of euros)
- To carry out at least 10 corporate volunteering initiatives per year, aligned with the scenarios envisaged in the Social Action Strategy and Agenda 2030. In 2024, Enagás met this target with 33 initiatives during the year.

These objectives included in the 2023-2030 Enagás Social Action Strategy will also be applicable for the coming years until 2030.

<sup>88</sup>Stakeholders have not been explicitly involved in the definition of targets, monitoring of target results or future learning from target results. Furthermore, no methodologies or meaningful assumptions have been used to establish the targets.

<sup>89</sup>In 2024, given the negative nature of net profit, net profit without the impact of asset rotation was taken as a reference.

# GOVERNANCE INFORMATION



**G1**

Business conduct

191

# G1. BUSINESS CONDUCT

## Governance

### GOV-1

### The role of administrative, management and supervisory bodies

#### Board of Directors

The Enagás Board of Directors is tasked with drafting and approving the Internal Code of Conduct and setting the corporate governance policy for both the Company and the Group. The Board is also responsible for defining the Company's general policies and strategies, proposed by Senior Management, and ensuring their implementation. This includes the sustainability policy concerning environmental and social issues, as well as the risk control and management policy, which must identify at least legal risks and those related to corruption. For more information, please refer to the [Rules and Regulations of the Board of Directors](#)<sup>90</sup> on the corporate website.

In addition, the Board of Directors of Enagás, via the Board's Committees, has been assigned further responsibilities related to business conduct, with particular focus on:

#### Audit and Compliance Committee

Pursuant to the provisions of the [Regulations of the Audit and Compliance Committee](#)<sup>90</sup>, this Committee has the following responsibilities:

- Legal compliance:
  - Receiving and analysing information regarding the Company's tax practices.
- Company risk control and management:
  - Overseeing and assessing the effectiveness of the control and management systems for financial and non-financial risks relating to the Company and its Group, including legal, social, environmental, political, tax and reputational risks or corruption related risks, so that any such risks are adequately mitigated within the framework of the Company's internal policy.
- Corporate governance, internal codes and compliance:
  - Overseeing compliance with corporate governance rules and with the Internal Codes of Conduct, ensuring that the corporate culture is aligned with its purpose and values, and, in particular, with the Internal Code of Conduct in matters relating to the Securities Markets in force at any given time

and with the Regulations of the Audit and Compliance Committee.

- Overseeing a mechanism that allows employees and other persons related to the Company to report potentially significant irregularities, concerning the Company and which may come to light within the Company or its Group. These mechanisms must guarantee confidentiality and, invariably, cover situations where cases may be reported anonymously, respecting the rights of the whistleblower and the accused, providing regular information about how the mechanisms function, being able to propose appropriate actions to improve them and reduce the risk of irregularities in the future.
- Compliance function:
  - Ensuring that the compliance unit performs its mission and duties with regard to regulatory compliance and the prevention and correction of behaviour that is illegal or fraudulent or otherwise breaches the Enagás Group Code of Ethics.

#### Sustainability and Appointments Committee

Pursuant to the provisions of the [Regulations of the Sustainability and Appointments Committee](#)<sup>90</sup>, this Committee has the following responsibilities:

- Company's corporate governance and sustainability:
  - Ensure that sustainability policies addressing environmental and social issues clearly outline principles, commitments, targets, and strategies related to respecting human rights and preventing illegal conduct. Also, ensure the implementation of mechanisms to monitor non-financial risks.

To effectively meet these responsibilities, the Board of Directors includes members with professional experience, expertise, and knowledge in business conduct (for more information, see disclosure requirement GOV-1).

#### Ethical Compliance Committee

The Board of Directors of the company entrusts the exercise of the Compliance Function to the Ethical Compliance Committee, a chartered, high-level body with autonomous initiative and control powers of an executive and decision-oriented nature. This body has a Chief Compliance Officer (CCO) who holds executive powers.

The Board of Directors ensures that the members of the Ethical Compliance Committee, as well as the Head of the Compliance Function and their team, are always suitable for their roles. The Ethical Compliance Committee holds independent powers for both initiative and control, which all Enagás employees must

<sup>90</sup> This external link refers to unverified information within the framework of the review of the Non-Financial Information and Sustainability Information Statement.

respect. The Compliance Function operates separately from the business areas of the Enagás Group. In addition, the members of the Ethical Compliance Committee remain distant from the company's day-to-day operations, meaning they are not exposed to the organisation's key business risks. This separation supports both the suitability and independence of its members.

The Ethical Compliance Committee has the following responsibilities:

- Reporting regularly to the Board of Directors through the Audit and Compliance Committee regarding the effectiveness of the Company's Ethics and Compliance Model and the periodic reviews conducted to assess its performance.
- Overseeing the management procedure for handling notifications and enquiries about irregularities or breaches of the Ethics and Compliance Model, as well as the overall Internal Reporting System. This includes protecting the identity of whistleblowers, maintaining the confidentiality of information, ensuring there is no retaliation, and safeguarding individuals' rights to honour, all while complying with data protection laws.
- Deciding how to handle received communications to coordinate their resolution in line with the established procedure, and track these communications diligently until closure, recording data in the Information Register as detailed in the management procedure for notifications and queries about irregularities or breaches of the Ethics and Compliance Model.
- Preparing the report required under article 63, section 4(d) of the Hydrocarbons Sector Act, with its content and submission requirements set out in the Code of Conduct for the Technical Manager of the Spanish Gas System and the management procedure for notifications and queries regarding irregularities or breaches of the Ethics and Compliance Model. For this report's preparation, the Ethical Compliance Committee may consult the Chief Executive Officer of Enagás GTS.
- Supervising the Corruption Prevention Programme as stipulated by the General Corruption Prevention Regulations.
- Fostering a commitment to ethics and compliance among employees of Enagás, its stakeholders, and other external third parties.

The composition, responsibilities, and operations of the Ethical Compliance Committee are outlined in the Ethical Compliance Committee's Operating Procedure. The current members of the Ethical Compliance Committee are:

- General Secretary<sup>91</sup> (Chairperson).
- Legal and Compliance Manager (Secretary).
- Members:
  - People and Transformation General Manager<sup>91</sup>.
  - Communication, Public Affairs & Investor Relations General Manager<sup>91</sup>.
  - People and Diversity Manager.
  - Audit, Control and Risk Manager.

In carrying out their duties, each member of the Ethical Compliance Committee acts with the diligence and loyalty required by their role.

Members may encounter a conflict of interest if, through the process for handling notifications and queries about irregularities or breaches of the Ethics and Compliance Model, any queries or notifications involve themselves or someone from their unit.

<sup>91</sup> Members of the Executive Committee.

# Management of impacts, risks, and opportunities

## IRO-1

### Description of the processes to identify and assess material impacts, risks, and opportunities

Enagás has conducted a materiality analysis to identify and evaluate significant impacts, risks, and opportunities related to business conduct, as detailed in the IRO-1 disclosure requirement.<sup>92</sup> This analysis encompasses all activities and infrastructure locations of companies under financial control, including both upstream and downstream stages of the value chain.

The material impacts identified from this analysis are outlined below:

Table of impacts

Topic	Sub-topic	Impact	Nature
Ethics and integrity	Corruption and bribery	Implementation of corporate policies and procedures to prevent and deter corruption and bribery.	Positive - Current
	Protection of whistle-blowers	Effective management and handling of complaints and issues reported through the whistleblowing channel.	Positive - Current
Sustainable value chain	Supply chain management	Enhancing sustainability performance and culture among suppliers by setting sustainability criteria and focusing on development and training in sustainability.	Positive - Current

Table of risks and opportunities

Topic	Sub-topic	Risk / Opportunity	Nature
Good Corporate Governance	Management of relationships with suppliers including payment practices	Risk of reputational damage and sanctions due to poor management of supplier payments.	Risk
	Corruption and bribery	Risk associated with fraud or unauthorised activities by employees or external parties acting with malice, excluding damage to assets.	Risk
Ethics and integrity	Political engagement and lobbying activities	Actively engage in developing new industry initiatives and staying informed about new trends and regulations by participating in industry associations and initiatives.	Opportunity

## G1-1

### Corporate culture and business conduct policies

#### Corporate culture

Enagás' corporate culture is defined by several key elements that embody its purpose, vision, and values, alongside the company's policies and strategy. These are regularly reviewed and approved by the Board of Directors.

• Purpose

Our purpose is twofold: to contribute to ensuring the security of energy supply, an essential service for the well-being of society, and driving innovation, accelerating the

- decarbonisation process and thus 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.

<sup>92</sup> The sub-topic of 'Animal Welfare' was not included in the materiality analysis, as it is not relevant to the company's business model.

### • Values:



Efficiency



Transparency



Innovation



Integrity



Sustainability



Safety



Teamwork

Enagás also fosters its corporate culture through leadership, communication, continuous training, and talent development among its professionals. The Enagás Corporate University is instrumental in this effort, offering access to training resources and aiding in the identification and retention of essential knowledge.

With a results-driven approach and a focus on people, the company cultivates a culture marked by its commitment to ethics and compliance, ensuring all actions and decisions meet the highest ethical standards.

Enagás conducts a formal evaluation of its corporate culture every two years through an opinion survey, covering four areas: people, hierarchy and procedures, results orientation, and innovation and adaptability to change. In the most recent assessment in 2024, Enagás improved by three points in the evaluation of its corporate culture compared to the previous one.

## Code of Ethics and policies

The company has a Code of Ethics and related policies that outline commitments addressing the significant impacts, risks, and opportunities identified:

### Link between significant impacts, risks, and opportunities and corporate policies

Topic	Sub-topic	Impact, risk or opportunity	Nature	Policy that covers the impact, risk or opportunity
Ethics and integrity	Corruption and bribery	Implementation of corporate policies and procedures to prevent and deter corruption and bribery.	Impact	Code of Ethics Compliance Policy Anti-fraud, Corruption and Bribery Policy Corporate Defence Policy
	Protection of whistle-blowers	Effective management and handling of complaints and issues reported through the whistleblowing channel.	Impact	Code of Ethics Compliance Policy Anti-fraud, Corruption and Bribery Policy Corporate Defence Policy Internal Reporting System Policy
Sustainable value chain	Supply chain management	Enhancing sustainability performance and culture among suppliers by setting sustainability criteria and focusing on development and training in sustainability.	Impact	Code of Ethics Sustainability and Good Governance Policy Principles and guidelines of conduct applicable to Enagás' suppliers and contractors General contracting conditions
Good Corporate Governance	Management of relationships with suppliers including payment practices	Risk of reputational damage and sanctions due to poor management of supplier payments.	Risk	Code of Ethics Sustainability and Good Governance Policy Principles and guidelines of conduct applicable to Enagás' suppliers and contractors General contracting conditions
Ethics and integrity	Corruption and bribery	Risk associated with fraud or unauthorised activities by employees or external parties acting with malice, excluding damage to assets.	Risk	Code of Ethics Compliance Policy Anti-fraud, Corruption and Bribery Policy Corporate Defence Policy
	Political engagement and lobbying activities	Actively engage in developing new industry initiatives and staying informed about new trends and regulations by participating in industry associations and initiatives.	Opportunity	Code of Ethics Sustainability and Good Governance Policy

Enagás has a corporate Code of Ethics and various policies, applicable to the entirety of the Enagás Group, related to business conduct issues and which encourage professionals to behave in line with its corporate culture. All such policies have been approved by the Board of Directors.

- [Enagás Group's Code of Ethics](#): establishes the conduct that is expected from all the professionals in the company, irrespective of their responsibilities and their geographic or functional location. It is structured in accordance with the company's values and includes Enagás' principles in matters related to each of its values.

Following the 2023 update of the Code of Ethics, all Enagás employees were asked to sign a declaration confirming they have read, understand, and are familiar with the contents of the new Enagás Group Code of Ethics. By the end of 2024, 97.55% of professionals had signed this declaration. In 2025, efforts will be made to increase this percentage to ensure all professionals are covered.

The Enagás Group's Code of Ethics is developed through policies, guidelines, standards and procedures. As for the corporate policy management model, the Board of Directors is responsible for approving said policies, while the organisational units involved in the different matters are responsible for ensuring the implementation of the various commitments and their integration into internal procedures.

The Ethical Compliance Committee, responsible for overseeing the Code of Ethics, directly reports to the Audit and Compliance Committee of the Board of Directors.

The Code of Ethics of the Enagás Group sets out commitments that align with corporate values, including:

- Crime prevention: Enagás stands firmly against committing any criminal offences and is dedicated to mitigating and preventing criminal risks, adhering to a policy of 'zero tolerance' for such acts.
- Anti-fraud, corruption, and bribery: consistent with the 'zero tolerance' approach, the Group is committed to understanding and following its rules against fraud, corruption, and bribery. There is a strong stance against illegal or improper activities, with a clear commitment to their prevention and eradication.
- Supply chain management: the Group is committed to choosing suppliers based on quality, cost, and punctuality, while also encouraging sustainable and local procurement practices to foster local development and economic integration.
- Lobbying: when representing interests to public or private entities, commonly referred to as lobbying, Enagás pledges to adhere to current laws and disclose required information in the European Union Transparency Register.
- [Compliance Policy](#): includes commitments related to compliance, including the following:
  - Develop a Compliance Model and regulatory framework with a corporate focus to effectively implement the commitments listed below. The Company has established a Compliance Model that incorporates all rules, formal procedures, and practical actions designed to ensure it operates according to ethical principles, current laws, and internal regulations. This model also aims to prevent, manage, and reduce the risk of regulatory and ethical breaches by directors, workforce, or suppliers within the organisation (for more information on the Compliance Model, see 'Additional information for Enagás').
  - Uphold conduct that complies with the regulations, and ethical standards and internal procedures of Enagás.
  - Foster a culture of compliance at Enagás by guiding directors and senior managers to lead by example and respond swiftly and decisively to any risks or breaches of rules or ethical standards.
- [Anti-Fraud, Corruption and Bribery Policy](#): this Policy reflects the vehement opposition to the committing of illicit or unlawful acts and its firm will to combat and prevent them, for the purpose of fulfilling its 'zero tolerance' principles. This policy is aligned with the United Nations Convention against Corruption.
- [Corporate Defence Policy](#): this Policy includes commitments on crime prevention that reflect the company's resolute opposition to the commission of any criminal offences and its will to combat such acts, in line with the company's principle of 'zero tolerance' towards the commission of crimes as established on the Company's Code of Ethics.
- [Internal Reporting System Policy](#): This policy adheres to the requirements of Law 2/2023, which governs the protection of individuals who report regulatory breaches and efforts against corruption. It was enacted following the implementation of Directive (EU) 2019/1937 of the European Parliament and the Council, concerning the protection of persons who report infringements of EU law. This Policy forms a central part of the Enagás Internal Reporting System. Alongside the Whistleblowing Line Management Procedure, it aims to equip Enagás with the necessary resources and guiding principles to encourage use of the Line and to protect the rights of all parties involved. This includes ensuring confidentiality, prohibiting retaliation, and upholding the presumption of innocence for those implicated in the reports.
- [Sustainability and Corporate Good Governance Policy](#): this policy outlines the commitments required to ensure due diligence in sustainability and corporate governance. These commitments are designed to create value for shareholders, customers, suppliers, and other stakeholders over the short, medium, and long term, while enhancing the company's control environment, reputation, and credibility with external parties. Key commitments include:
  - Enhancing Enagás' systems for managing and controlling both financial and non-financial risks by adopting responsible practices in crucial areas such as preventing illegal activities, tax compliance, respecting human rights, protecting the environment, and fostering diversity. The aim is to achieve excellence and improve outcomes for stakeholders.
  - Extending the company's sustainability commitments to its supply chain by implementing contracting requirements, evaluation procedures, and other management and control practices that focus on continuous improvement.
  - Adhering to principles of responsible business conduct in dealings with commercial partners like customers and suppliers.

In 2024, this policy was revised to update its sustainability commitments, aligning them with those in other corporate policies approved later, and with the latest edition of the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (2023).

The Code of Ethics and all other policies are applicable and communicated to all employees and directors within the Enagás Group, including those of affiliates over which it has effective control, subject to the constraints of the relevant regulations. Therefore, these policies apply to all activities undertaken by Enagás Group companies across all the regions where they operate.

In affiliates where Enagás does not have effective control, the Board of Directors recommends promoting principles and guidelines that are consistent with those outlined in the Code of Ethics and the previously mentioned policies. The company also seeks to encourage, as much as possible, the adoption of the Code of Ethics and related policies by temporary joint ventures, joint ventures, and other comparable associations or entities. The company also emphasises principles and commitments aligned with the Code of Ethics and company policies with contractors, suppliers, and collaborators, particularly regarding the supply chain.

The Code of Ethics and all policies are accessible to stakeholders on the company's [corporate website](#), as well as on the corporate Intranet for all employees.

While the policies outlined above also apply to suppliers and contractors, they are additionally subject to the [Ethical Principles and Guidelines for Suppliers](#), which are available to all stakeholders on the corporate website. This document specifies the principles and conduct guidelines for Enagás suppliers and contractors, aligning with the company's Code of Ethics. These commitments particularly address:

- Anti-fraud, corruption and bribery.
- Supply chain management.
- Human rights.

In 2024, an irregularity was identified in the purchasing process of a start-up within the Enagás Group. This came to light through a communication from a supplier who had unsuccessfully bid for a contract<sup>93</sup>. Following a thorough analysis, the Ethical Compliance Committee initiated an investigation to gather more information. It was concluded that the start-up's supplier selection process lacked rigour, as the unsuccessful supplier was provided with an inaccurate and incomplete explanation regarding the reason for not being selected, failing to include a detailed and precise technical rationale. In accordance with the above, the Ethical Compliance Committee agreed to adopt the following measures: recommend the implementation of a purchasing process managed by appropriate professionals, specialists in this area of the Enagás Group, following up with the organisation area to promote the implementation of the aforementioned purchasing

process; and inform the governing body of the start-up to take the necessary supervisory measures.

- General terms and conditions for contracting: Enagás has established a set of terms that govern its contracts with suppliers and contractors. These include conditions related to invoicing and payment, quality and environmental standards, sustainability criteria, and measures to prevent corruption, among others. These terms are accessible to all stakeholders on the corporate website, and suppliers and contractors are notified of them when orders are placed.

Whistleblowing Line

Enagás facilitates its employees, as well as its suppliers, contractors and those who collaborate with it or act on its behalf, including business partners, to resolve any doubts or to report any irregularities or breaches through the Whistleblowing Line or any other means the company may set up in the future. The complainant receives updated information of the status of their report at all times. Beyond the previously mentioned Internal Reporting System Policy, the company has implemented a Management Procedure for handling notifications and queries about irregularities or breaches of the Ethics and Compliance Model. This procedure aims to organise the handling of notifications and queries submitted to the Whistleblowing Line and, when necessary, conduct investigations.

Communications to the Line can be made anonymously and are handled confidentially. This means they cannot be disclosed to the person reported or any third party without the informant's consent, ensuring the protection of the whistleblower's identity. Enagás will not tolerate any form of retaliation against individuals who, in good faith, use the Whistleblowing Line to raise concerns or report potential breaches of the Code of Ethics or relevant regulations, nor against those who assist in investigations into alleged misconduct.

Whistleblowing Line contact channels



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



Post addressed to the Chairman of the Ethical Compliance Committee, sent to Paseo de los Olmos 19, 28005 - Madrid, Spain



Form available on the corporate Intranet and on the corporate website

Besides the formal channels mentioned, Enagás employees can always reach out to their immediate supervisor, the person responsible for specific compliance tasks in their area, or directly to the Compliance team ([compliance@enagas.es](mailto:compliance@enagas.es)).

<sup>93</sup> No other breaches of the Code of Ethics have been identified. Specifically, there have been no incidents related to corruption or bribery (for more information, see disclosure requirement G1-4), discrimination or harassment,

privacy of customer or stakeholder information, conflicts of interest, money laundering, insider trading, or other areas.

## Handling notifications and queries

The Ethical Compliance Committee is tasked with managing communications and queries received through the Whistleblowing Line. It may seek assistance from relevant Enagás departments as needed for each situation (for more information, refer to disclosure requirement [GOV-1](#)).

If a communication implicates a member of the Ethical Compliance Committee, that individual will not be involved in the handling process.

The Committee will ensure independence, so that any potential conflicts of interest or personal or professional ties that might compromise the impartiality or credibility of the people handling the communications are effectively negated.

Members of the Ethical Compliance Committee, as part of the company, undergo the same training as all other Enagás employees regarding the Whistleblowing Line (for more details, see the 'Training and communication in ethics and business conduct' section of this disclosure requirement). However, they are briefed first and ahead of time on any legislative changes, as the Committee is responsible for analysing and evaluating the impact of any regulatory updates or modifications in this area. Moreover, any communication or training activity related to the Whistleblowing Line is reviewed and assessed by the Committee members before implementation.

Enagás has an Internal Reporting System Policy, which sets out the principles and commitments in this area in accordance with Law 2/2023, of February 20, regulating the protection of persons who report breaches of regulations and the fight against corruption.

Managing and investigating notifications will follow the guidelines set out in the Procedure for handling notifications and queries concerning irregularities or breaches of the Ethics and Compliance Model. This Procedure details the steps involved in managing the communications received:

- Receipt of report: all reports are received by the Secretary and the Chairman of the Ethical Compliance Committee simultaneously.
- Prior analysis of the report and study of the information provided: the Secretary and Chairman of the Ethical Compliance Committee shall assess whether the report is to be accepted or rejected.
- Deliberation on notification and information to the reporter: the Secretary and Chairman of the Ethics Compliance Committee shall respond to the reporter within the legally established time frame on the decision taken on the report.
- Analysis and assessment of the message: carried out by the Ethical Compliance Committee, together with the Enagás managements or bodies that it considers appropriate in each case. It may be supported by third parties.
- Resolution and notification: The Ethical Compliance Committee will take the relevant decisions regarding the notified case. The Secretary and/or Chairman of the committee will communicate the conclusions to the reporter.

As set out in the procedure, this management will focus on objectivity, independence, and promptness.

Enagás is committed to resolving all reports received. In 2024, as in 2023, the average time for handling notifications submitted to the Whistleblowing Line, from the time the reporter sends the report to the time the reporter is notified of the agreed resolution and the conclusions and actions reached, was less than 50 days.

Any non-compliance with the Code of Ethics 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 People and Transformation General Management, will propose the corresponding disciplinary measures based on the regulations in force and the applicable labour framework.

## Analysis of specific risks in professionals

To tailor its actions to the inherent risks associated with various positions, the company has pinpointed roles that are particularly vulnerable to corruption. This identification, analysis, and assessment of corruption risks take into account areas that face more than a low risk, as specified in the Enagás Corruption Prevention Programme (for more details on the Programme, see disclosure requirement G1-3).

Besides the members of the Board of Directors, certain roles within these areas are deemed 'especially exposed to the risk of corruption' due to the nature of their management duties and/or their capacity to represent the company.

These positions are as follows:

- General Managers of the identified areas
- Managers of the identified areas
- Professionals in these areas not listed above who have the authority to represent the company.

For these roles, the company implements necessary measures to provide adequate protection against potential acts of corruption. These measures focus on enhancing knowledge and training related to commitments in preventing fraud, corruption, and bribery.

## Training and communication in ethics and business conduct

Training is a key pillar of the Compliance Function at Enagás. Each year, the company organises training and awareness activities for all employees, as well as tailored programmes for specific groups where particular compliance-related risks have been identified.

Training begins when employees join Enagás, as the Welcome Plan includes online modules on the Code of Ethics, the Corporate Defence Programme, and the Corruption Prevention Programme, all of which are mandatory for all professionals.

- Code of Ethics: Training on the Code of Ethics aligns with the company's core values:
  - Integrity: focuses on crime prevention; fighting fraud, corruption, and bribery; managing conflicts of interest; separating activities; ensuring free competition; complying with international sanctions regulations; maintaining political neutrality; protecting the company's reputation; and managing the supply chain.
  - Transparency: addresses the reliability of information, communication with shareholders and investors, money laundering prevention, and tax responsibilities.
  - Safety: covers the protection of human rights, health and safety, and respect for individuals.
  - Sustainability: includes topics such as the energy transition, environmental protection, and commitment to the environment.
  - Efficiency: explores the use of company assets, artificial intelligence and other disruptive technologies, and information confidentiality.
  - Teamwork: focuses on collaboration, equal opportunities, work-life balance, and diversity and inclusion.
  - Innovation: emphasises entrepreneurship development.

The training was updated in 2024 with an online module on the Code of Ethics, following its 2023 revision. A total of 99.2% of professionals have completed corporate training on the Code of Ethics, up from 98.2% in 2023. This training seeks to prevent irregularities, including those that are more serious and that could lead to the commission of crimes.

- Corporate Defence Programme: this training has been completed by 98.6% of employees (96.5 % in 2023). The course provides an overview of the framework for corporate criminal liability under Spanish law and Enagás' Corporate Defence Programme. It includes practical scenarios to illustrate the most relevant potential offences related to the company's operations and situations that company professionals might encounter in their work.
- Corruption Prevention Programme (for more information, see disclosure requirement [G1-3](#)).
- Antitrust Programme: starting in 2023 and 2024, Enagás has launched an annual training campaign focused on this model. It targets all professionals involved in market practices subject to competition laws, aiming to prevent actions that violate antitrust regulations. In 2024, the total number of trained professionals amounts to 17 professionals (31 in 2023).

Enagás also regularly carries out awareness campaigns on matters related to ethics and compliance, such as the company's own values and principles of action, management of the acceptance and offering of gifts (in accordance with the provisions of the Procedure for Managing the Offering and Acceptance of Gifts) and Whistleblowing Line contact information and channels of communication. Awareness and information are shared using a variety of internal communication tools and channels, selecting the most effective ones for each situation.

In 2024, a direct message was sent to all professionals about the Whistleblowing Line, detailing how it works and its key features. The communication highlighted the Whistleblowing Line as a platform to support adherence to Enagás' ethical values. All communications and awareness initiatives related to ethics and compliance also remind the workforce of the Whistleblowing Line's availability and functionality.

Additionally, compliance roadshows are organised, where members of the Compliance Function visit various facilities to present and reinforce the Group's Compliance Model, stressing the importance of a strong culture of business ethics and encouraging responsible behaviour across the organisation. The goal is to cultivate a culture of open communication, reinforcing the commitment to the Group's ethical standards and ensuring the organisation remains ethical, transparent, and trustworthy.

## G1-2

# Management of supplier relations

## Our supply chain

In order to manage the supply chain with a risk-based approach, critical suppliers are considered to be those belonging to families of products or services whose failure or malfunction would have a high economic impact, or those that are of high criticality for the business (critical components or services) that have a low number of suppliers (difficulty of substitution). Enagás has 310 approved critical suppliers (265 in 2023), comprising 16.9% of all approved suppliers (15.5% in 2023) and 27.7% of purchases made (26.5% in 2023). We have also identified more than 70 critical indirect suppliers (77 in 2023).

In 2024, work began with 92 new approved suppliers (84 in 2023), of which 100% have undergone an approval process and meet the established social and environmental criteria. Enagás has also discontinued relationships with 104 suppliers (49 in 2023) due to their failure to meet the company's approval criteria, their status as high-risk companies, or having had no commercial dealings with them in recent years. These decisions were not based on social or environmental criteria<sup>94</sup>.

<sup>94</sup> Of the suppliers identified as having significant negative environmental and/or social impacts, no relationships with the same have been terminated as a result of social or environmental criteria.

## Payment policy

As established by the legislation in force in Spain, the payment policy established in Enagás is to pay, in general, sixty days from the date of delivery or provision of the service. No particular payment policy for small and medium enterprises has been defined. For more information on the company's supplier payment policy, see disclosure requirement [G1-6](#).

## Supply chain risk management

Enagás has identified the areas of supply chain management in which there may be risks to the business and to the Company's stakeholders (risks identified in its ESG risk assessment, classified according to Enagás' taxonomy as reputational, strategic and business, criminal liability, compliance and model, and operational and technological. These areas, which cover both economic, ethical, environmental and social aspects, form the basis for the assessments we perform on our suppliers in the different procurement processes. The areas analysed are:

- Product and/or service quality.
- Financial situation, civil liability, economic dependence on Enagás.
- Health and safety.
- Ethics and compliance: criminal risks, ethical compliance, legal compliance, responsible tax practice.
- Human rights: labour rights (diversity, work-life balance, gender equality), respect for the principles of the United Nations Global Compact and the Universal Declaration of Human Rights, human rights compliance in the supply chain (for more information, see disclosure requirement S2).
- Environment: emission intensity, environmental impact (resource consumption, waste generation, noise emissions, gas emissions, etc.), environmental safety (discharges, spills, pollution, etc.).
- Cybersecurity: information security and cybersecurity.

To ensure that sustainability targets are met in supply chain management, procurement management professionals receive regular training in this area.

The Board of Directors, through the Sustainability and Appointments Committee, is the body with the highest level of responsibility for sustainable supply chain management.

### Approval process

Enagás has a supplier management model that takes into account the inherent risks for each supplier according to their nature. Enagás therefore establishes approval requirements depending on the level of risk in the economic, ethical, compliance, social and environmental aspects of the family of products and services to which each supplier belongs.

The requirements established in the supplier approval process are:

#### • For all suppliers:

- Capacity and resources to meet the quality, ethics and compliance, financial, labour, environmental, safety and technical requirements established by Enagás; as well as the long-term maintenance of these requirements within the satisfactory levels defined by Enagás.
- Acceptance of the Enagás Code of Ethics.

The company's Code of Ethics establishes Enagás' ethical culture and is applicable in its corresponding areas of relation with the company, for contractors, suppliers and for those who collaborate with Enagás or act on its behalf. This Code incorporates guidelines for behaviour in the areas of integrity, transparency, safety, respect for people and diversity, and the environment, among others.

All Enagás suppliers and contractors are bound by the Code and expressly confirm their commitment to be familiar with it, comply with it and enforce it through acceptance of the general contracting conditions. For more information, see the [Ethical Principles and Guidelines for Suppliers](#) on the corporate website.

- Respect the principles of the United Nations Global Compact and the Universal Declaration of Human Rights.
- Compliance with the quotas set out in the Spanish Rights of Persons with Disabilities Act<sup>95</sup>.
- Implementation of a Gender Equality Plan<sup>47</sup>.

#### • For suppliers of specific families of products or services:

- Quality, environmental and/or occupational risk prevention certification requirements for suppliers (required from 80.8%, 15.6% and 35.6% of Enagás suppliers, respectively).
- Policies or measures to promote work-life balance of professionals or Family-Friendly Company certificate.

### Supplier assessment

- For approved suppliers: a systematic public information analysis of potential sustainability risks based on the inherent risk level of the country, the sector and other similar companies. This is done by taking into account public financial information and consulting on human rights, ESG, ethics and compliance matters via reputational analysis platforms.
- During the approval process: Enagás evaluates its suppliers in the areas of human rights, ethics, social and environmental matters in line with the company's material topics through a questionnaire and documentary review. In 2024, Enagás updated this questionnaire in order to produce an ESG score that is taken into account during the approval process and in subsequent supplier assessments. The company will also evaluate, through pilot tests, its use in procurement, so that ESG performance will be one of the decision variables when selecting suppliers.

<sup>95</sup> Requisite set for companies with a workforce greater than that indicated by the applicable laws.

- During the execution of the contract: Enagás evaluates its suppliers in the aforementioned areas through
  - different evaluation methodologies, taking into account criteria such as criticality, sustainability risks (environmental, social and governance) and turnover, among others.
  - After the end of the contract: once the main and critical contracts are finalised, a quality assessment of the supplier and the associated contract is carried out.

## Supplier assessments

Methodology and areas of evaluation			Number of suppliers assessed		Definition of high risk	Number of suppliers identified as high risk	
			2023	2024		2023	2024
<b>To identify suppliers</b>	External assessment (by an independent third party)	Predictive sustainability risk assessment	1,321	1,333	Suppliers with a score less than 50/100	62	188
	External assessment (by an independent third party)	Evaluation in the areas of human rights, ethics, social, cybersecurity and environmental matters <sup>(2)</sup> (systematic assessment with documentation review)	N.D. <sup>(4)</sup>	988	Suppliers with a score less than 30/100	N.D. <sup>(4)</sup>	270
<b>During the approval process</b>	Internal assessment	Evaluation on climate action <sup>(1) (2)</sup> (systematic assessment with review of documentation)	191	155	Suppliers that do not measure or report their emissions	69	53
		Documentary and on-site safety audits carried out by company professionals or external consultants on suppliers carrying out work at company facilities <sup>(1)</sup>	102	111	Suppliers with unfavourable audits	19	33
	External assessment (by an independent third party)	Consultation on human rights, ethics and compliance on reputational analysis platforms <sup>(3)</sup>	2,152	2,316	Suppliers involved in legal non-compliance	61	42
		On-site audits on ethical, environmental and social aspects <sup>(1) (2)</sup>	107	135	Suppliers with non-conformities	77	76
		Cybersecurity scoring	995	989	Suppliers with high or very high risk of non-compliance and/or financial losses	374	364
		Financial, reputational, ethical, environmental and social assessment <sup>(2)</sup>	995	991	Suppliers scoring C or lower	296	251
	Internal assessment	Reliability assessment <sup>(1)</sup> (systematic assessment with documentation review)	119	174	Suppliers with a score less than 50/100	5	3

(1) The results of the assessments are considered to have a validity of two years.

(2) For 100% of the assessed suppliers identified as high ESG risk, action plans have been established to mitigate these risks. Guidance for the implementation of these areas is included in these plans.

(3) This assessment also includes non-approved suppliers that are in the process of being approved and suppliers that have been stripped of approval.

(4) In 2024, Enagás updated this questionnaire during its homologation process, modifying the questions and including new ones. It now produces an ESG score that is taken into account during the approval process and in subsequent supplier assessments. For this reason, the previously reported data for 2023 are not comparable with those for this year.

N.D. Not available

The results of these assessments allow monitoring of the degree by which suppliers meet the target scores, audit results and legal compliance established for each assessment area, and to identify suppliers that pose a high risk to sustainability or with significant social or environmental impacts (risks related mainly to the management of its value chain, climate action, health and safety, and waste management).

For 100% of the assessed suppliers identified as having a high sustainability risk, action plans have been established to mitigate these risks, and support and follow-up is provided. Guidance for the implementation of these areas is included in these plans. In case of non-compliance with certain ESG criteria, a period of 12 months is provided to implement corrective actions, after which they lose their approved status until such time as they pass the approval procedure again.

### Supplier training

In order to reinforce the culture of sustainability as a key lever for driving its actions and those of its suppliers, Enagás is committed to the development and training of third parties in sustainability. For this reason, the company has joined the Global Compact's 'Sustainable Supplier' training programme as one of the driving forces.

Through this initiative, some of Enagás' small and medium-sized suppliers - and those of other large companies - have received training in sustainability matters based on the Ten Principles of the UN Global Compact and the SDG. In the campaign launched in 2023 and continued in 2024, 77 small and medium-sized Enagás suppliers have been trained.

#### G1-3

## Prevention and detection of corruption and bribery

Enagás has an [Anti-Fraud, Corruption and Bribery Policy](#) in place which reflects the company's vehement opposition to the committing of illicit or unlawful acts and its firm will to combat and prevent them, for the purpose of fulfilling its zero tolerance principles. It is the Board of Directors that approves the Anti-Fraud, Corruption and Bribery Policy, and therefore 100% of the Board members are informed about the commitments set out in the Policy and the rules and procedures that implement it.

This policy, as well as all other Company's policies, applies to professionals, senior managers and directors of all companies that make up the Enagás Group, including those affiliates over which it holds effective control, within the limits set out under applicable regulations. For those affiliates 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 the policy. All Enagás personnel, partners, and other third parties engaged in business with the company are expected to understand and adhere to this Policy and the relevant anti-corruption laws.

The policy is accessible to stakeholders on the company's [corporate website](#) as well as on the corporate Intranet for all employees.

All Enagás Group activities have been analysed for potential corruption risks and the company has put in place a framework of controls in order to prevent and mitigate them. In particular, the risk of corruption in relations with public officials or other third parties with which Enagás has dealings. In this context, Enagás has established clear guidelines for action: to accurately record all payments to third parties and not to accept or make inappropriate payments, such as facilitation payments, payments in kind or commissions, or advantages or privileges of any kind for unethical purposes. These measures also contribute to the prevention of potentially more serious acts, such as money laundering. Of course, in order to avoid any appearance of money laundering, both the offer and the acceptance of payments in cash or equivalent are expressly prohibited. Enagás pays 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.

Enagás also collaborates with the authorities if they require help to investigate possible cases in the markets in which Enagás operates. It also provides the information they may request in a transparent manner.

The Enagás Corruption Prevention Programme is based on the ISO 37001 standard on anti-bribery management systems, and is laid out in the Enagás Anti-Fraud, Corruption and Bribery Policy, and the internal regulations which implement it.

In 2024, the Company has externally certified its Corruption Prevention Programme based on ISO 37001, the anti-bribery management system standard.

An anti-corruption risk reassessment was also carried out in 2024, reviewing the corruption risk events that may affect the different areas of the company, as well as the controls in place to prevent the materialisation of such risks.

Furthermore, the established anti-corruption principles have been extended to our suppliers by expressly communicating the Anti-Fraud, Anti-Corruption and Anti-Bribery Policy to them.

Enagás provides the Whistleblowing Line to all its employees and third parties it engages with, helping to report any reasonable indications of irregularities, legal violations, or behaviours that conflict with the commitments in the Code of Ethics or the Anti-Fraud, Corruption, and Bribery Policy (for more details on the Whistleblowing Line or the process for managing notifications and queries, see disclosure requirement G1-1).

The Compliance Function submits a quarterly report to the Audit and Compliance Committee on the status, follow-up, and outcomes of notifications received via the Whistleblowing Line, as well as any ongoing investigations.

Training

In recent years, Enagás has introduced an online course focused on the Corruption Prevention Programme.

This one-hour course is part of the mandatory training programme for all new employees. It covers topics such as the Compliance Model, a detailed understanding of corruption and the potential ‘red flags’ to watch for to prevent it, relevant regulations (such as the Spanish Criminal Code, FCPA, UK Bribery Act, and ISO 37001), Enagás’ internal policies, and the professional conduct expected while performing their duties. The course also includes practical examples based on real cases.

In 2024, 97.9% of employees completed this training (93.6% in 2023). Specifically, it was undertaken by 100% of the Executive Committee, 100% of the Ethical Compliance Committee, and 100% of the professionals in roles identified as especially at risk of corruption.

In addition, in 2024, specific training sessions on market abuse, management of insider and confidential information, and corruption prevention were conducted for senior secretarial workforce. These sessions aimed to prevent actions that violate capital market regulations and combat corruption, fraud, and bribery. The training was delivered in person.

In December 2023, specific training on corruption prevention was provided to members of the Audit and Compliance Committee of the Board of Directors, covering 60% of the Board.

Enagás regularly conducts training in this area for the Board to ensure all members are equipped with the necessary knowledge.

The Code of Ethics training received by employees (for more information, see disclosure requirement [G1-1](#)) also includes a section on preventing corruption and bribery, outlining key guidelines for professionals to follow in this area.

# Metrics and targets

G1-4

## Confirmed incidents of corruption or bribery

In the last three years, Enagás has had no confirmed incidents of corruption or bribery, nor has it had any conviction or fine for violating the laws that apply to it in terms of corruption prevention and anti-bribery.

G1-5

## Political influence and lobbying activities

The company is registered in the [European Transparency Register](#) (Name of the organisation: Enagás S.A.; REG Number: 905001612275-82), to which it periodically reports information on its activities and resources in order to contribute to the improvement and progress of European Union legislative and regulatory frameworks, especially in those developments that have a direct or indirect impact on the gas transmission and storage business, liquefied natural gas, renewable gases and the Spanish and European gas industry in general. Enagás has adhered to the Code of Conduct of the European Transparency Register, compliance with which is mandatory in order to be included in the register. It is the responsibility of the Board of Directors to oversee these activities, and at the operational level the responsibility of the Energy Transition General Manager who sits on the company's Executive Committee.

Enagás has five professionals participating part-time in different activities related to the transparency register, including a permanent representative in Brussels. Annual costs in 2024 were between 200 and 300 thousands of euros (in line with 2023), (information included in note 2.1 'Operating profit' to the Consolidated Annual Accounts) distributed as follows: personnel expenses (74%), membership fees (10%), consultancy costs (9%), representation, public relations and travel costs (4%), office and administrative costs (2%) and operating costs (<1%).

Similarly, Enagás is a member of and participates in commercial associations, business associations and groups such as chambers of commerce and think tanks. In 2024, the amount allocated was over 220 thousands of euros, up from 200 thousands of euros in 2023. This information is included in note '2.1 Operating profit' of the Consolidated Annual Accounts.

In relation to lobbying at a European level, the main associations in which Enagás participates and which carry out this activity are:

- GIE (Gas Infrastructure Europe): Gas Infrastructure Europe is a European association of gas infrastructure operators. It advocates for supportive European policy regulations to facilitate the use and deployment of gas infrastructure in Europe, including the transport and management of natural gas, hydrogen, biomethane, and CO<sub>2</sub>. GIE also promotes the development of renewable and low-carbon gases. In 2024, the total contribution amounted to 102,310 euros, with approximately 5,500 euros allocated for lobbying activities.

In 2024, GIE integrated the European Hydrogen Backbone (EHB) initiative. EHB is a consortium of 33 European TSOs working towards establishing a continent-wide hydrogen network.

- Hydrogen Europe: Association representing companies and organisations with an interest in different parts of the hydrogen value chain, dedicated to promoting policies and initiatives at European level for the better development of the hydrogen sector (total contribution of 18,000 euros, of which approximately 4,500 euros are earmarked for lobbying).
- ENTSO-G: European TSO Network that aims to facilitate and enhance cooperation between national gas transmission system operators across Europe, fulfilling the tasks entrusted to them by European regulation, and ensuring the development of a pan-European Gas System aligned with European energy and climate targets. Enagás is obliged to participate in this association in accordance with European Regulation 2024/1789 (637,000 euros total contribution, with approximately 9,800 euros allocated for lobbying activities).

Enagás also contributes actively to other European associations such as EASEE-gas, AIB, GERG, CEOE, the Spanish Chamber of Commerce, AIB and Sedigas, among others. The missions and positions of these associations are consistent with the company's vision and interests. Enagás regularly engages in the activities, working groups, and governing bodies of these associations to maintain this alignment.

The European associations in which Enagás participates work to ensure that the major gas transmission, storage, liquefaction and regasification infrastructures play their part in achieving the European Union's energy and climate objectives. From different perspectives and areas, these associations promote an appropriate regulatory and legislative framework that enables the Europe-wide deployment of renewable and low-emission gases, including hydrogen and biomethane, to achieve cost-efficient decarbonisation and an integrated energy system. Some of these partnerships are also focusing their efforts on the development of CO<sub>2</sub> networks and storage facilities, which will boost the business of CO<sub>2</sub> capture, storage and reuse across the EU.

Regarding financial or in-kind political contributions, the Enagás Group expressly prohibits the funding of political parties, as stated in the Enagás Group's Code of Ethics, in line with current regulations. In the last three years, Enagás did not make political contributions of any kind.

In 2024, four directors were re-elected for another four-year term. Three are independent, while one represents the Sociedad Estatal de Participaciones Industriales, with Mr Bartolomé Lora Toro, the Vice-Chairman of this entity, as its representative on the Enagás Board of Directors. He is the only director currently classified as a 'politically exposed person', under Directive (EU) 2015/849 and Law 10/2010, which aim to prevent money laundering and the financing of terrorism.

G1-6

## Payment practices

In line with Spanish legislation and Enagás' general contract terms (for more details, see disclosure requirement [G1-1](#)), the company's policy is to make payments within sixty days from the delivery date or service provision. Enagás employs reverse factoring, allowing suppliers to receive payment in advance of the invoice due date. A [Supplier Portal](#) is available for suppliers to track invoice status and address any issues that might delay processing and payment. For certain services, the company also makes advance and cash payments. In 2024, 92% of supplier payments were made within the specified timeframes (92% in 2023).

The average payment period to trade creditors for amounts owed to suppliers of goods or services was 20 days<sup>96</sup> (17 days in 2023). This includes items under 'Suppliers', 'Suppliers to group and associated companies', and 'Sundry creditors', calculated according to the average payment period methodology set by the Spanish Accounting and Audit Institute's Resolution of January 29, 2016. For further details on the average payment period, refer to [Note 2.3](#) Trade and other payables in the Enagás Group's Consolidated Annual Accounts.

Enagás has no pending legal actions concerning late payments.

<sup>96</sup> This average period considers all payments made during the year.

# ENAGÁS ADDITIONAL INFORMATION



Regulatory compliance.....	206
Information security.....	208
Customers .....	212
Non-financial and diversity reporting requirements (Law 11/2018) .....	221

# Regulatory compliance

## Governance

The Company's Board of Directors entrusts the exercise of the Compliance Function to the Ethical Compliance Committee (for more information, see disclosure requirement [GOV-1](#) in chapter G1). This body has a Chief Compliance Officer (CCO) who holds executive powers.

The governance processes, controls, and procedures established to oversee and manage information privacy issues are aligned with the '[Governance](#)' disclosure requirements outlined in chapter 2.

## Strategy

The management of the identified risks related to regulatory compliance are key to serve as the basis for a solid and resilient strategy and business model, for more information see the '[Strategy](#)' section of chapter 2.

## Management of impacts, risks, and opportunities

Enagás has conducted an analysis to identify impacts, risks, and opportunities and to assess which of these are material concerning sustainability matters, as outlined in disclosure requirement [IRO-1](#) in chapter 2. This analysis encompasses all activities and infrastructure locations of companies under financial control, including both upstream and downstream stages of the value chain.

The materiality risks identified as a result of the analysis of subtopic 'Regulatory compliance' are detailed below:

Table of Risks

Topic	Sub-topic	Impact / Risk / Opportunity	Nature
Good Corporate Governance	Regulatory compliance	Non-compliance with current legislation and internal regulations (gas, environmental, antitrust, labour and safety regulations, accounting and tax rules, Protection of Personal Data Act ('LOPD'), confidentiality, diversity and equality, etc.)	Risk
		Criminal liability for offences committed by employees or managers against workers' rights, public health, natural resources and the environment.	Risk

## Related policies

The company establishes commitments that cover the risks identified as material through its [Code of Ethics](#) (for more information, see disclosure requirement [G1-1](#)), following policies approved by the Board of Directors.

- [Compliance Policy](#): includes commitments related to compliance, including the following:

- Develop a Compliance Model and regulatory framework with a corporate focus to effectively implement the commitments listed below. The Company has established a Compliance Model that incorporates all rules, formal procedures, and practical actions designed to ensure it operates according to ethical principles, current laws, and internal regulations. This model also aims to prevent, manage, and reduce the risk of regulatory and ethical breaches by directors, workforce, or suppliers within the organisation.
- Uphold conduct that complies with the regulations, and ethical standards and internal procedures of Enagás.
- [Corporate Defence Policy](#): this Policy includes commitments on crime prevention that reflect the company's resolute opposition to the commission of any criminal offences and its will to combat such acts, in line with the company's principle of 'zero tolerance' towards the commission of crimes as established on the Company's Code of Ethics.
- [Antitrust Policy](#): it establishes the bases and mechanisms to promote a culture of business ethics that is conscious and respectful of the principles of free competition, and sets out the essential guidelines for corporate and employee behaviour in this regard.

The Code of Ethics and all these policies are applicable and have been communicated to all employees and directors within the Enagás Group, including those of subsidiaries over which it has effective control, subject to the constraints of the relevant regulations. Therefore, these policies apply to all activities undertaken by Enagás Group companies across all the regions where they operate.

In affiliates where Enagás does not have effective control, the Board of Directors recommends promoting principles and guidelines that are consistent with those outlined in the Code of Ethics and the previously mentioned policies. The company also seeks to encourage the adoption of the Code of Ethics and related policies by temporary joint ventures, joint ventures, and other comparable associations or entities. The company also emphasises principles and commitments aligned with the Code of Ethics and company policies with contractors, suppliers, and collaborators, particularly regarding the supply chain.

The Code of Ethics and policies are accessible to stakeholders on the company's [corporate website](#), as well as on the corporate Intranet for all employees.

These procedures assign the Board of Directors, through the Audit and Compliance Committee, the responsibility for guiding, supervising and controlling strategy, policies, risks and public information regarding related matters covered by said procedures (mainly compliance, crime prevention and antitrust). They also set out the responsibilities of the Compliance Function in relation to the effective operation of the Compliance Model and reporting to the Audit and Compliance Committee of the Board of Directors

## Related actions and resources

Enagás has a Compliance Model that is overseen by a specific functional area, which is supported by synergistic functions and other corporate support areas.

The Compliance Function is in charge of managing the Compliance Model in accordance with the provisions of the Policy and the General Compliance Standard, also identifying those responsible for other synergistic areas or areas that may regulate matters subject to monitoring on its part, in order to coordinate with these managers the prevention, detection and management of any non-compliance risks associated with their activities.

The General Compliance Standard establishes a sanctions procedure to implement the most important aspects of external due diligence at Enagás with regard to the rules on embargoes and sanctions imposed by international bodies that may be imposed on third parties with which Enagás has a relationship.

Within this Compliance Model are:

- Corporate Defence Programme, which acts as the core of the company's criminal compliance, notwithstanding the existence of policies, procedures and controls that illustrate its content and contribute to preventing crimes being committed by any person who is part of Enagás as well as, in their respective areas of relation, by contractors, suppliers, business partners and any third party that collaborates with or acts on their behalf.

The Corporate Defence Programme in Spain also includes the following components: criminal risks; roles and responsibilities aligned with a governance structure as per art. 31 bis 2 1 and 2 of the Criminal Code; and a mapping of criminal risks and activities susceptible to these risks.

- Antitrust Programme, the purpose of which is not only to avoid or reduce any possible administrative sanctions in this issue, but also to promote a corporate culture of ethics and compliance that respects the regulations that defend free competition.

In 2024, a communication campaign was launched in order to strengthen the culture of integrity, ethics, and compliance within Enagás. As part of this campaign, the following stand out:

- The inaugural Enagás Compliance Day aimed at further promoting the corporate ethical culture among its professionals.
- Compliance Roadshows at different company's facilities to present and reinforce the Enagás Group Compliance Model, stressing the importance of a strong culture of business ethics and encouraging responsible behaviour across the organisation. Visits to locations such as the Paterna compressor station, the Valladolid and Cordoba transmission centres, the Huelva LNG regasification terminal, and the Gaviota underground storage facility.
- Appointment of professionals from various General Management Departments as Compliance ambassadors. These ambassadors, working alongside the Ethical Compliance

Committee, have played a crucial role in advancing compliance initiatives across the company with their enthusiasm and dedication.

Regarding the resources available to the Compliance Function, there is an annual Compliance Plan approved by the Audit and Compliance Committee. This plan includes the assignment of an appropriately sized budget, endorsed by the committee.

Looking to the future, a key initiative is updating the internal regulations of the Whistleblowing Line to accommodate the forthcoming appointment of an Independent Authority. The goal is to ensure Enagás' Compliance Model remains current, thereby strengthening controls and preventative measures against actions that violate the company's regulations and ethical standards.

## Metrics and targets

### Related parameters

Enagás continuously tracks the number of breaches of the Code of Ethics, which serves as a key performance indicator for the Compliance Model. The Ethical Compliance Committee is responsible for overseeing this indicator.

Data for calculating this measure is sourced from communications received via the Whistleblowing Line and from any breaches or sanctions under applicable legislation that align with the commitments outlined in the Code of Ethics.

In 2024, a breach was identified concerning an irregularity in the procurement process of a start-up within the Enagás Group (for more information, see disclosure requirement [G1-1](#))<sup>97</sup>.

### Related goals

This year, Enagás has embedded a zero-tolerance policy towards crime, fraud, corruption, and bribery in its Code of Ethics. In line with this commitment, no violations in these areas were found within the Enagás Group during 2024.

Information security

Governance

It is the Board of Directors, through the Audit and Compliance Committee, which has been assigned the responsibility and leadership in the approval of risk management measures and continuous monitoring of the level of cybersecurity. Therefore periodically reports to this Committee on the established cyber risk indicators and other relevant matters. Enagás also has a Cybersecurity and IA Committee chaired by a member of the Executive Committee, which reports quarterly to the Audit and Compliance Committee and the Executive Committee on the actions taken to mitigate risk.

The governance processes, controls, and procedures established to oversee and manage information privacy issues are aligned with the ‘Governance’ disclosure requirements outlined in chapter 2.

Strategy

The management of the negative impact and identified risks related to information security are key to serve as the basis for a solid and resilient strategy and business model. For more information see the ‘Strategy’ section within chapter 2.

Management of impacts, risks and opportunities

Enagás has conducted an analysis to identify impacts, risks, and opportunities and to assess which are material concerning sustainability matters, as outlined in disclosure requirement [IRO-1](#) of chapter 2. This analysis encompasses all activities and infrastructure locations of companies under financial control, including both upstream and downstream stages of the value chain.

The impact and risk identified as material in the analysis of the sub-topic ‘Cybersecurity and data privacy’ are detailed below:

Table of impacts and risks

Topic	Sub-topic	Impact / Risk / Opportunity	Nature
Operational excellence	Cybersecurity and data privacy	Impacts on stakeholders due to incidents in infrastructure, equipment, and systems caused by operational failures related to cyber-attacks.	Negative Impact - Potential and linked to specific cases
		Fines and reputational damage may result from cybersecurity breaches or leaks of sensitive stakeholder data due to inadequate management.	Risk

Related policies

The company establishes commitments to cover the potential negative impact and risk identified as material through the following policies approved by the Board of Directors:

Cybersecurity

- Enagás has a [Cybersecurity and Data Governance Policy](#) approved by the Board of Directors and targeted at efficiently managing the security of information processed by the company’s IT systems, as well as the assets involved in these processes. This policy is implemented at the company through internal procedures and controls.

Key commitments in this policy include:

- All employees must contribute to the effective implementation of cybersecurity. This involves participating in necessary training and awareness programmes, being proactive in preventing cyber-attacks, identifying and reporting any incidents they become aware of, and responding promptly to any cybersecurity breaches.
- Cybersecurity management will rely on the continuous assessment and management of risks, with control measures being defined and adjusted to ensure the risk level remains acceptable or manageable for the company.

In 2024, this policy was updated to include measures stemming from the inclusion of Artificial Intelligence and data governance in the company’s digitalisation processes.

This policy assigns the responsibility and leadership for approving risk management measures and continuously monitoring cybersecurity levels to the Board of Directors, through the Audit and Compliance Committee. This committee is also tasked with ensuring that the necessary resources are available to implement and maintain appropriate security measures, which are regularly reviewed and updated to address evolving threats.

- As enhanced protection for the critical infrastructures operated by Enagás, a [Policy on Comprehensive Security at Strategic Infrastructures](#) has been defined in which the processes of physical and logical security have been combined for compliance with Law 8/2011 governing the Protection of Critical Infrastructure (LPIC) and Royal Decree-Law 12/2018 on the security of network and information systems (NIS). Enagás is working towards the full adoption of the requirements of EU Directive 2022/2555 on measures for a high common level of cybersecurity across the Union, as well as the Good Cybersecurity Governance Code published by the National Securities Market Commission (CNMV).

Key commitments in this policy include:

- Protection of vital services related to gas transmission and technical management, as well as of the Strategic and Critical Infrastructures that support these services and the persons affected by these, protecting their integrity and the availability of the gas supply.

- Strategic management of security pursuant to the corporate Risks Policy, with the capability of integrating the different areas involved and founded on proper management of the security risks related to the Strategic and Critical Infrastructures.

This policy assigns the Board of Directors the responsibility for guiding, overseeing, and monitoring strategy, policies, risks, objectives, and performance concerning the different sustainability areas. Likewise, the Health and Safety, Environment and Quality Integrated Management System Committee is responsible for setting the basic guidelines for the development, control, monitoring and coordination of various actions related to critical infrastructures, as well as for reporting to the Executive Committee

These policies apply and have been communicated to all employees and managers of all companies making up the Enagás Group, including any affiliates effectively controlled by it, within the limitations established in the regulations applicable. Therefore, these policies apply to all activities undertaken by Enagás Group companies across all the regions where they operate.

In affiliates where Enagás does not have effective control, it is recommended that their Boards promote principles aligned with these policies. The company also promotes the application of these policies' principles, wherever possible, to temporary joint ventures, joint ventures, and other similar partnerships or entities. The company also emphasises these principles and commitments with contractors, suppliers, and collaborators, particularly regarding the supply chain.

These policies are accessible to stakeholders on the company's [corporate website](#), as well as on the corporate Intranet for all employees.

## Privacy of Information

- Enagás has an [Internal Reporting System Policy](#), approved by the Board of Directors, which ensures that customer data is used solely for its intended purposes and only with the prior consent of the individuals concerned. This policy complies with the General Data Protection Regulation (GDPR). The Policy forms the core of the Enagás Internal Reporting System (hereinafter, the 'IRS').

Key commitments in this policy include:

- The processing of personal data arising from the application of Law 2/2023 shall be governed by the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 (GDPR), Spanish Organic Law 3/2018 of December 5 on the Protection of Personal Data and guarantee of digital rights (LOPD GDD), Spanish Organic Law 7/2021 of May 26 relating to processing of personal data for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal offences, and Title VI of Law 2/2023.

- Personal data shall not be collected where it is clearly not relevant for the processing of specific information or, if collected by accident, shall be deleted without undue delay.
- The IRS will not collect data allowing the identification of the reporting person, and there are adequate technical and organisational measures in place to ensure the confidentiality of the identity and data relating to the persons concerned and to any third party mentioned in the information provided, particularly the identity of the reporting person in the event that they disclosed their identity.

This policy applies and is communicated to all employees and managers of all companies making up the Enagás Group, including any affiliates effectively controlled by it, within the limitations established in the regulations applicable. Consequently, it covers all activities of Enagás Group companies globally.

In affiliates where Enagás does not have effective control, it is recommended that their Boards promote principles aligned with this policy. The company also promotes the application of the policy's principles, wherever possible, to temporary joint ventures, joint ventures, and other similar partnerships or entities. The company also emphasises these principles and commitments with contractors, suppliers, and collaborators, particularly regarding the supply chain.

The policy is accessible to stakeholders on the company's [corporate website](#), as well as on the corporate Intranet for all employees.

In compliance with its obligations in relation to the supervision and promotion of the IRS, the Enagás governing body appointed in this policy the Ethics Compliance Committee (ECC) as Head of the IRS, which, in turn, appoints the Committee Secretary as the person ultimately responsible for the ordinary management of the IRS and the processing of investigation files.

- In addition, Enagás has a [Privacy Policy](#) which provides information about how Enagás processes the personal data it collects, in compliance with the principle of transparency established by personal data protection regulations. The policy is accessible to stakeholders on the company's corporate website, as well as on the corporate Intranet for all employees.

## Related actions and resources

### Cybersecurity

The Enagás information security management model is applicable to cybersecurity, based on international and national regulations and the continued assessment of cyber risk. This provides, through all means within its reach and in proportion to the threats detected, the resources required so that the organisation has an environment that is aligned with business targets and the cybersecurity targets established.

In 2022, Enagás approved its 2022-2024 Strategic Cybersecurity Plan, which establishes the policies to be followed to help ensure a secure, reliable cyberspace, using a 360° approach throughout the Enagás Group. The Plan included various initiatives, notably a specific training programme on cybersecurity, enhancements to the security infrastructure of the Third Party Network Access Logistics System (SL-ATR), and updates to the access control policy, among others. Enagás has successfully completed its 2022-2024 strategic cybersecurity plan, achieving a high level of project completion with no significant incidents.

The company has developed a new Enagás Group Strategic Cybersecurity Plan for the 2025-2027 period, focusing primarily on the full implementation of EU Directive 2022/2555 on measures for a high common level of cybersecurity across the Union and its legislative developments. The plan also emphasises cyber risk management and the enhancement of cybersecurity resilience and culture. This Plan is designed to allocate resources to maintain the investment ratio throughout this period.

Enagás has a cybersecurity management model with segregation of duties between government and operation, as well as a Strategic Cybersecurity Plan with a three-year scope that is reviewed annually. This plan has been updated in accordance with the requirements of Royal Decree 43/2021; it has designated a Chief Information Security Officer (CISO) with the relevant administrative body.

This Plan is based on the results of the risk analysis and focuses on improving the resilience of Enagás' information systems. It also facilitates secure teleworking without affecting the company's normal operations, discusses the inertia towards digitalisation and the growing migration to cloud solutions.

In 2023, Enagás launched a Cyber Awareness platform to make cybersecurity content even more familiar to our professionals. Awareness-raising through this mandatory training space continued in 2024, training Enagás professionals to protect their digital lives, both professionally and personally. By 2024, cybersecurity training and awareness had been delivered at all levels within the company. This included more than 12,000 individual awareness modules through the Cyber Awareness platform and over 20 in-person sessions with participants such as the Board of Directors and the Executive Committee.

Enagás has a reporting procedure that professionals can follow if they encounter any suspicious situation. Additionally, Enagás carries out periodic phishing simulation exercises to assess its professionals' awareness levels and tailor training measures as needed.

Currently, Enagás is ISO 27001:2013-certified for its logistics and commercial systems, gas pipeline control systems and industrial control systems for each type of infrastructure that it operates. In 2024, Enagás updated its management system to the latest version, ISO 27001:2022, with plans to renew the certification in 2025.

Enagás has implemented procedures to prevent incidents in its technological infrastructure; likewise, it has implemented continuity plans to guarantee the continuity of normal systems operation in the event of changes and incidents and to guarantee rapid recovery. These plans have been tested on an ongoing basis throughout the year.

In 2024, Enagás also took a series of other actions to ensure the soundness of its information security management systems and IT infrastructures, such as the simulation of cyber-attacks and vulnerability analysis by third parties, audits of the control environment of the information systems that support important processes during the audit of the company's accounts, and so on.

Enagás also manages cyber risks in the life cycle of its suppliers on an ongoing basis. This enables it to enhance cybersecurity measures in industrial information systems.

In 2024, Enagás invested 1.8 million euros in cybersecurity for its corporate and industrial information systems (CapEx). This information is included in note '2.4. Property, plant and equipment' in the Consolidated Annual Accounts. In 2025, the necessary resources will be allocated to implement the new Strategic Cybersecurity Plan.

## Privacy of information

Enagás has integrated the principles outlined in its Information Privacy Policy consistently across all areas where information is processed, ensuring compliance with Data Protection standards. Enagás has a Data Protection Delegate registered with the Spanish Data Protection Agency.

In the same year, Enagás conducted an internal audit of its Data Protection Management System, receiving an 'Acceptable' rating.

Additionally, during this financial year, Enagás updated the data protection clauses in its contracts to address the impact of Artificial Intelligence on data processing.

## Metrics and targets

### Related parameters

#### Cybersecurity

Enagás has a Security Operations Centre which serves to detect, analyse, report and resolve actual and potential cybersecurity incidents without interruption, 24/7. As in previous years, Enagás' IT systems were not subjected to any successful attacks in 2024<sup>98</sup>.

This parameter is monitored by the National Cybersecurity Institute (INCIBE) through the leading security incident response

<sup>98</sup> A successful attack is considered to be one that significantly affects all or part of Enagás' information systems for more than 24 hours. Enagás has not based this parameter on significant methodologies or assumptions.

centre for citizens and private law entities in Spain (INCIBE-CERT), as well as by the Cybersecurity Coordination Office (CCO).

Privacy of information

In 2024, Enagás did not receive any complaints from the Spanish Data Protection Agency related to privacy or loss of customers' personal data (nor did it receive any complaints in this area in 2023 and 2022). Enagás has responded properly and in a timely fashion to 100% of the rights complaints received in 2024<sup>99</sup>.

Related goals

Cybersecurity

Enagás has set a target<sup>100</sup> for 2024 to manage and report all cybersecurity incidents reported to the Enagás Group in full compliance with EU Directive 2022/2555 and other relevant legislation, adhering to the timelines and procedures outlined in the national Guide to Cyber Incident Reporting and Management. In 2024, no successful attacks on its information systems were made, thus meeting the target set.

This target displays the company's performance against the commitment set out in the Cybersecurity and Data Governance Policy that all professionals must help to ensure that cybersecurity is properly implemented by being willing to prevent cyber-attacks, identifying and reporting incidents of which they are aware, as well as providing an early response to any cybersecurity breach.

Privacy of information

For 2024, Enagás has also set the following goals for the Enagás Group<sup>101</sup>:

- To respond to all requests to exercise rights within the timeframes and according to the procedures required by current legislation. In 2024, two requests for the exercise of the right to rectify and delete data were received and dealt with in a proper and timely fashion, in accordance with the provisions of Organic Law 3/2018 on the Protection of Personal Data and the guarantee of digital rights, thus fulfilling the established objective.
- To maintain zero complaints from the Spanish Data Protection Agency. In 2024, none were received, thus meeting the established target.

These goals are aligned with the data protection commitments regarding the processing of personal data set out in the Internal Reporting System Policy.

<sup>99</sup>Enagás has not based this parameter on significant methodologies or assumptions. This parameter has only been verified by the verification provider and not validated by any other external body.

<sup>100</sup> No stakeholders were involved in setting this target, nor were any significant methodologies or assumptions used.

<sup>101</sup> No stakeholders were involved in setting these goals, nor were any significant methodologies or assumptions used.

Customers

Enagás’ business model is primarily based on providing services to other companies (Business-to-Business), which means it does not have consumers and end users as defined by EFRAG. For more details, refer to disclosure requirement SBM-3. As a result, Enagás has not identified any impacts, risks, or opportunities related to the sustainability issue of ‘consumers and end users’. However, it has identified such aspects for a sustainability issue specific to its ‘customers’. Nevertheless, due to the synergies between these two stakeholder groups, Enagás has chosen to use the disclosure requirements of the European Sustainability Reporting Standard S4 as the foundation for reporting additional relevant information about customers.

Governance

The governance processes, controls, and procedures established to oversee and manage customer sustainability issues are aligned with the ‘Governance’ disclosure requirements outlined in chapter 2.

Strategy

Interests and views of stakeholders

In its materiality analysis (for more details, see the IRO-1 disclosure requirement within chapter 2), Enagás has considered the views of various stakeholders, including customers, when determining the relative importance of impacts, risks and opportunities related to sustainability issues. This feedback was collected through targeted surveys conducted for this materiality analysis, as well as other mechanisms the company uses to capture customer opinions and interests. For more information, refer to disclosure requirement S1-2.

The analysis identified the significant impacts, risks, and opportunities related to the customer stakeholder group. This has laid the groundwork for setting and pursuing related actions and objectives, using a continuous improvement approach.

Material impacts, risks, and opportunities and their interaction with the strategy and business model

Enagás’ customers affected by its value chain and operations include those who receive logistical services or are involved in operations within the gas system<sup>102</sup>.

- As a Transmission System Operator (TSO) Enagás’ customers include transmission companies, shippers, distributors, and direct market consumers (those connecting directly to its facilities), to whom it provides logistical services for the transport and/or storage of Liquefied Natural Gas (LNG) or natural gas at its facilities.
- In its role as a Technical Manager of the System (GTS), Enagás’ customers include the transmission companies, shippers, distributors, and direct market consumers who take part in capacity allocation processes or hold an active access contract within one of the gas system facilities, or maintain an

authorised and valid balancing portfolio in one of the system’s balancing areas.

- Network operators: gas system parties authorised to manage any transmission, liquefaction, LNG regasification, storage or distribution facility, in accordance with Law 34/1998 of October 7 on the hydrocarbons sector.
- Shipper: a company that accesses third-party facilities to acquire natural gas or LNG for resale to end consumers, other shippers, or for international transit.
- Direct market consumers: companies that access third-party facilities to acquire natural gas or LNG for its own use.

For more information on Enagás’ value chain and the logistics services offered, see [disclosure requirement SBM-1](#) within chapter 2.

Management of impacts, risks, and opportunities

Enagás has conducted an analysis to identify impacts, risks, and opportunities, assessing which are materially significant concerning all its customers, as detailed in the IRO-1 disclosure requirement in chapter 2. This analysis encompasses all activities and infrastructure locations of companies under financial control, including both upstream and downstream stages of the value chain.

From this analysis, the following material impacts have been identified, which support and contribute to adapting the business model and may affect all customers:

Table of impacts

Topic	Sub-topic	Impact	Nature
Customers	Customer safety	Failing to ensure proper supervision and quality of services	Negative - Potential. This is linked to individual cases and could affect all customers.
	Transparent communication	Developing and implementing business and commercial transparency strategies	Positive - Current and consistent (affects all customers)

<sup>102</sup> Enagás has not identified any particularly vulnerable or marginalised groups among its customers, in accordance with the impacts, risks, and opportunities identified as material during the year. Additionally, it has not identified any

customers who require precise and accessible information related to the services to avoid potentially harmful use.

Regarding the material risks and opportunities related to customer impacts and dependencies, Enagás has not identified any significant risks. However, it has identified a significant opportunity:

Table of risks and opportunities

Topic	Sub-topic	Risk / Opportunity	Nature
Customers	Customer safety	Enhancing the quality of services and transparent communication by increasing the ability to react and identify areas for improvement, thanks to customer satisfaction evaluation processes and supervision and assurance systems.	Opportunity

Related policies

Enagás has policies in place to manage the material impacts and opportunities of its services on customers. All these policies have been approved by the Board of Directors and align with the recommendations in the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

Through these policies, the company establishes commitments to address the impacts and opportunities identified as material.

Link between significant impacts, risks, and opportunities and corporate policies

Topic	Sub-topic	Impact, risk or opportunity	Nature	Policy that covers the impact, risk or opportunity
Customers	Customer safety	Failing to ensure proper supervision and quality of services	Impact	Quality and Operational Excellence Policy
				Code of Conduct of the Technical Manager of the Spanish Gas System
	Transparent communication	Developing and implementing business and commercial transparency strategies	Impact	Code of Ethics
				Quality and Operational Excellence Policy
Customers	Customer safety	Enhancing the quality of services and transparent communication by increasing the ability to react and identify areas for improvement, thanks to customer satisfaction evaluation processes and supervision and assurance systems.	Opportunity	Sustainability and Good Governance Policy
				Human Rights Policy
	Customer safety	Enhancing the quality of services and transparent communication by increasing the ability to react and identify areas for improvement, thanks to customer satisfaction evaluation processes and supervision and assurance systems.	Opportunity	Code of Conduct of the Technical Manager of the Spanish Gas System
				Code of Ethics

- [Enagás Code of Ethics](#): Among others, this code outlines Enagás' commitment to transparency and reliability of information. It encourages professionals to act clearly and transparently, ensuring none of their actions can be seen as misleading. Enagás professionals 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. Employees must not conceal information to avoid fulfilling Enagás' obligations to third parties, nor use deceptive or falsified information to obtain subsidies, tax breaks, or other benefits. Additionally, they must not withhold information that could be of interest to the organisation for personal gain.  
  
The Ethical Compliance Committee, responsible for overseeing the Code of Ethics, directly reports to the Audit and Compliance Committee of the Board of Directors. For further details on the Code of Ethics, refer to disclosure requirement G1-1).
- [Quality and Operational Excellence Policy](#): approved by the Board of Directors, this policy outlines key commitments towards promoting efficient management, continuous improvement, and innovation, with a particular focus on meeting stakeholder needs. It also addresses the Quality

Management System and Operational Excellence. These commitments include those related to quality of services and transparent communication, identified as key issues for Enagás, with the following highlights:

- Improving both internal and external customer satisfaction by meeting or exceeding their expectations.
- Ensuring the transparency of information given to stakeholders by applying internal processes, controls, and protocols that ensure its reliability and rigour.
- Promoting continuous improvement by adopting principles from internationally recognised models and implementing best practices to boost competitiveness and create value for all stakeholders.
- Conducting regular internal and external audits to assess the proper functioning of implementation plans, determine compliance levels, and recommend corrective actions, thereby fostering continuous improvement.
- Implementing processes for the purposes of prior information, participation, dialogue, consultation and collaboration with stakeholders, in order to guarantee that

their needs and expectations are known to the company and, where appropriate, added to its management.

In 2024, this policy was revised following a corporate decision to split the current the Health and Safety, Environment, and Quality Policy into three distinct policies. This change enables more effective implementation of commitments related to these crucial aspects of the business.

• [Sustainability and Good Governance Policy](#): this policy, approved by the Board of Directors, outlines the commitments required to ensure due diligence in sustainability and corporate governance. These commitments are designed to create value for shareholders, customers, suppliers, and other stakeholders over the short, medium, and long term, while enhancing the company's control environment, reputation, and credibility with external parties. These commitments include one related to quality of services and transparent communication:

- Adhering to principles of responsible business conduct in dealings with commercial partners like customers and suppliers.

In 2024, this policy was revised to update its sustainability commitments, aligning them with those in other corporate policies approved later, and with the latest edition of the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (2023).

- [Human Rights Policy](#): this policy, approved by the Board of Directors, outlines Enagás' commitments to ensuring due diligence in human rights matters and aligns with relevant internationally recognised instruments.
  - The United Nations Guiding Principles on Business and Human Rights.
  - United Nations International Charter of Human Rights.
  - The OECD Due Diligence Guidance for Responsible Business Conduct.
  - The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.
  - The International Labour Organisation (ILO) Declaration.
  - The Universal Declaration of Human Rights.

The policy specifically addresses respecting human rights concerning customers, particularly regarding the right to privacy of information. It ensures the handling of personal information of employees, customers, and suppliers with the utmost respect for privacy and in full legal compliance.

The policy also commits to developing and maintaining a due diligence system aimed at anticipating, preventing, mitigating, and/or remedying negative impacts on people (both its own workforce and those in the value chain), the environment, society, and customers.

It also sets out the commitment to implement processes for the purpose of prior information, participation, dialogue, consultation and collaboration with stakeholders (including customers), in order to guarantee that their needs and expectations are known to the company and, where appropriate, added to its management.

In 2024, this policy was updated to strengthen the company's commitment to developing and maintaining a human rights due diligence system, as outlined in the European Sustainability Reporting Standards developed by EFRAG, the proposed Sustainability Due Diligence Directive, and the OECD Due Diligence Guidance for Responsible Business Conduct.

- [Code of Conduct of the Technical Manager of the Spanish Gas System](#): the purpose of this Code of Conduct is to guarantee that the functions of the Technical Manager of the System are carried out independently from the other activities of the Group, in compliance with the legally established criteria in the Hydrocarbons Sector Law 34/1998 of October 7.

This update to the Code of Conduct was approved by the Board of Directors in 2024, taking into account best practices in ethics and compliance, and the Cybersecurity and Artificial Intelligence policies approved by the Enagás Group.

These policies and the company Code of Ethics are all applicable and communicated to all employees and directors within the Enagás Group, including those of subsidiaries over which it has effective control, subject to the constraints of the relevant regulations. Therefore, these policies apply to all activities undertaken by Enagás Group companies across all the regions where they operate. In affiliates where Enagás does not have effective control, it is recommended that their Boards promote principles aligned with the aforementioned policies. The company also promotes the application of the policies' principles, wherever possible, to temporary joint ventures, joint ventures, and other similar partnerships or entities. The company also emphasises these principles and commitments with contractors, suppliers, and collaborators, particularly regarding the supply chain.

The Code of Conduct for the Technical Manager of the Spanish Gas System applies to members of the Board of Directors, the Executive Committee, and workforce at Enagás GTS, S.A.U., as well as to any other personnel from the Enagás Group providing corporate services to Enagás GTS, S.A.U.

All policies are accessible to stakeholders through the company's corporate website, as well as on the corporate Intranet for all employees.

This policy assigns the Board of Directors the responsibility for guiding, overseeing, and monitoring strategy, policies, risks, objectives, and performance concerning the subject matter of each policy (human rights, sustainability and quality). When it comes to human rights and sustainability matters, it is also the responsibility of the Sustainability Committee to control and monitor these aspects, reporting to the Sustainability and Appointments Committee, which is established at the Board level. On the other hand, in the area of Quality, the Health and Safety, Environment, and Quality Integrated Management System Committee is tasked with setting the basic guidelines for developing and monitoring the integrated management system. It is also responsible for coordinating relevant actions and reporting to the Executive Committee. In addition, various departments within the company are tasked with setting up action plans, goals, and monitoring indicators.

Over the past three years, Enagás has not identified any instances of non-compliance involving its customers with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises.

### Processes for engaging with customers about impacts

Enagás aims to meet customer needs<sup>103</sup> with transparency, non-discrimination, and efficiency, always maintaining a commitment to quality and excellence in services provided. To enhance collaboration and communication, Enagás offers its customers various channels for quick and easy access to the company, allowing them to communicate their needs and expectations in any area of their relationship with the company. The main channels are:

- **Customer Service Manager (CSM):** Both the TSO<sup>104</sup> and the GTS operate independent platforms to manage customer relations and to centralise the management, monitoring, and traceability of incidents within business systems and processes, as well as to handle enquiries about these systems or their operations. For more information on incidents, see the section on [‘Processes to remediate negative impacts and channels for customers to raise concerns’](#).

The CSM is an innovative digital tool for customers. Through this platform, they can register all queries or requests about the provided services, information systems, or any other aspect of their relationship with the company. The process starts when customers submit a query on the platform, which is then assigned a criticality level. The TSO and GTS areas responsible for the tool review this criticality and assign the appropriate business area to manage and follow up on the query. Once resolved, customers are informed of the outcome, and the query is closed.

This tool enhances query management by offering:

- **Autonomy in management:** Customers can perform certain actions on their queries without relying on Enagás, streamlining the process and giving them more control over their requests.
- **Transparency in the process:** Each case is monitored in detail, providing customers with up-to-date visibility of its status and next steps. This ensures clear and constant communication, as well as traceability throughout the process.

- **Immediate access:** from any device – be it a computer, tablet, or mobile – allowing customers to interact with Enagás whenever and wherever suits them best.
- **Improved efficiency:** the centralisation of services through the portal and digitalisation speeds up responses and improves efficiency in meeting customer needs.

This tool enables Enagás to monitor the number of queries received, helping us assess its effectiveness and functionality. Enagás also gauges customer knowledge and satisfaction with the tool through an annual satisfaction survey. Insights from both analyses help us develop action plans and improvements when necessary.

- **Regular meetings are held with customers,** to discuss their market position and review their activities. These meetings cover any issues that could be in customers’ interests and are also used to present new options and new business opportunities for them to consider.
- **Telephone support and corporate mailboxes.**
- **Enagás corporate website:** The Enagás corporate website provides up-to-date information essential for managing the Spanish Gas System and facilitating interaction among various customers, including shippers, transporters, distributors, and direct market customers. It also includes information about infrastructures, the services offered and how to contract these. There are specific sections for both [TSO](#) and [GTS](#), as well as corporate information about the company. The GTS’s [Energy Data](#) section centralises access to all public information about the system, making it easier to access and download published data.
- **Customer satisfaction surveys and associated improvement plans** Enagás conducts annual satisfaction surveys through both TSO and GTS to systematically assess customer satisfaction, aiming to enhance understanding of their needs and expectations. Customers are asked to rate the service attributes and commercial processes. In the case of the GTS, the survey must follow the guidelines of the National Commission on Markets and Competition (CNMC) established in the Incentives Circular (Circular 6/2021, June 30). The remuneration received by the Technical System Manager is linked to the participation rate and the satisfaction valuation obtained from customers in the survey.

Recognising the importance of communication channels for customers to raise concerns and needs, Enagás uses these surveys to assess the level of awareness and trust in these channels for further analysis.

<sup>103</sup> Enagás has not identified any particularly vulnerable or marginalised groups among its customers, in accordance with the impacts, risks, and opportunities identified as material during the year.

<sup>104</sup> Developed and set to be launched by the end of 2024.

The results from the 2024 Customer Satisfaction Survey were as follows:

## Results of customer satisfaction surveys

			2023		2024		
Services		Customer	Number of responses out of the total	Assessment of services rendered (out of 10)	Number of responses out of the total	Assessment of services rendered (out of 10)	
Business operation	Enagás as transmission company	Capacity management and viability analysis, infrastructure operation and programming, etc.	Shippers	23 / 54	8.7	26 / 67	9.2
			System operators (transmission and distribution companies)	2 / 8	9.9	3 / 8	9.1
	Enagás as Technical Manager of the System	Programming, operations, distribution and balances, etc.	Shippers	68 / 173	8.9	54 / 194	8.6
			System operators	10 / 16	8.8	18 / 18	8.7

Once the survey responses are received, they are analysed by the relevant departments, and the identified improvements are incorporated into the Annual Action Plan (for more information, see the section on [Adoption of measures related to material impacts on customers, strategies to mitigate significant risks, and capitalise on opportunities concerning customers, as well as the effectiveness of these actions](#)).

- SL-ATR (Third-party access Logistics System): a real-time, reliable communication tool facilitates seamless interaction between the various entities within the Gas System. This tool supports the entire commercial cycle management of natural gas, including capacity requests, contracts, guarantees, authorisations, scheduling and nominations, measurements, allocations, balancing, settlement of imbalances at the Virtual Balancing Point, and billing support.
- Gas System Monitoring Committee (CSSG): body whose purpose is to monitor the operation of the system, coordination between different parties that act in the system, the presentation of information on operational plans of temporal scope (winter periods) and any other topic of interest for the monitoring of the system.
- Technical Management of the Gas System Regulations Working Group: Gas System Monitoring Committee working group for updating, reviewing and amending gas system technical management regulations and protocols. For the purpose of updating, reviewing and amending the regulations and technical management protocols of the gas system, the Technical Manager of the System will coordinate a specific working group within the Gas System Monitoring Committee.
- Workshops: meetings with various stakeholders in the system, such as marketers, transporters, and distributors, to update them on new functionalities being introduced into the information systems. These workshops are designed to be informative, presenting new developments and addressing any related queries.

- Various publications and regular reports: Gas System report, Gas Statistical Bulletin, and other reports covering demand, operations and maintenance, markets and balances, gas quality, and capacities.
- Roadshows and external site visits: part of the commercial service, featuring technical visits to facilities where the operational excellence of these sites is showcased. These visits offer a detailed insight into site management, the complexity of processes undertaken, and the outstanding maintenance management of equipment. They emphasise the technical quality of the company's facilities, ensuring safety and reliability in delivering contracted services, and play a crucial role in the country's security of supply. This initiative not only strengthens the trust of Enagás' customers but also enables the exchange of technical knowledge and suggestions for day-to-day improvements.

Enagás has two Customer Service<sup>105</sup> procedures, both as TSO and GTS, which outline the processes for managing customer relationships, including communication channels, tools used, involved departments, satisfaction evaluation, and incident or query management.

Enagás collaborates with its customers throughout all service phases, from identifying new services that meet customer needs to development, implementation, and service improvement. To ensure effective collaboration, Enagás tailors the frequency and type of interaction to suit the specifics of each service and its stage.

Under the company's management systems, with a commitment to continuous improvement, Enagás analyses customer expectations, needs, and complaints arising from these interactions. This ensures that necessary actions are taken to resolve issues and improve the system. Enagás assesses the effectiveness of these interactions through informal customer communications and satisfaction survey results (for more

<sup>105</sup> As a TSO, Enagás has a specific customer service procedure, while as a GTS, it has procedures for customer satisfaction and process monitoring, incident and intervention management, and query handling.

information, see the section on [‘Processes to remediate negative impacts and channels for customers to raise concerns’](#)).

It is important to highlight that the responsibility for ensuring effective collaboration, and therefore the proper involvement of Enagás customers as TSO and GTS, rests with Executive Committee members. They are responsible for the areas that manage Enagás’ functions as TSO and GTS (Gas Assets General Manager and Technical Management of the System General Manager, respectively).

These mechanisms form the foundation for understanding the needs, expectations, and perspectives of customers. This understanding is crucial in collaborating with them to manage material impacts related to service quality and ensuring adequate business and commercial transparency (for more information on identified material impacts, see disclosure requirement SBM-3 in this chapter).

### Processes to remediate negative impacts and channels for customers to raise concerns

Customers of both Enagás TSO and Enagás GTS have access to specific communication channels to express any complaints or report negative impacts. These channels are managed according to principles of accessibility, listening, collaboration, transparency, and non-retaliation.

- Customer Service Manager (CSM): both TSO<sup>106</sup> and GTS operate independent platforms to manage customer relationships, ensuring effective management, monitoring, and traceability of incidents within business systems and processes, as well as handling queries about these systems and their operation (for more information on incidents, refer to the section on [‘Processes for engaging with customers about impacts’](#)).

The CSM is an innovative digital tool designed for customers to log any incidents related to the services provided, information systems, or other aspects of their relationship with the company. The process starts with customers reporting the incident on the platform and assigning a criticality level. Then, the TSO and GTS teams responsible for managing the tool review the criticality and assign the incident to the appropriate business area for management and follow-up. Once the issue is resolved, customers are informed of the outcome, and the incident is closed.

This tool enhances the management of incidents by allowing:

- Autonomy in management: customers to take certain actions regarding their incidents independently of Enagás, which speeds up the process and gives them more control over their requests.
- Transparency in the process: detailed, up-to-date tracking of each case, giving customers insight into the status and next steps, ensuring clear, consistent communication and full traceability of the process.

- Immediate access: from any device – be it a computer, tablet, or mobile – allowing customers to interact with Enagás whenever and wherever suits them best.
- Improved efficiency: the centralisation of services through the portal and digitalisation speeds up responses and improves efficiency in meeting customer needs.

The tool also enables Enagás to monitor the number of incidents received, allowing for segmentation and data analysis to measure the resolution rate of complaints and the time taken to address them. This analysis shows its effectiveness and functionality. Enagás also gauges customer knowledge and satisfaction with the tool through an annual satisfaction survey. Insights from both analyses help us develop action plans and improvements when necessary. Enagás monitors these discrepancies through the CSM tool.

If customers disagree with the response to their incident and all other customer service channels (e.g. meetings) have been exhausted, they can file a dispute with the relevant regulatory body, as per current legislation. The regulatory body is responsible for resolving the claim after reviewing the submitted information and consulting with the parties involved.

- Regular meetings are held with customers, to discuss their market position and review their activities. These meetings cover any issues that could be in customers’ interests and are also used to present new options and new business opportunities for them to consider.
- Telephone support and corporate mailboxes.
- Reviews and Complaints Module in SL-ATR: Enagás GTS has a specialised tool for managing complaints on the SL-ATR Platform, which is also employed by the TSO to fulfil its regulatory obligations.
- Whistleblowing Line (for more information on the line, management process, and anti-retaliation policy, see disclosure requirement G1-1).
  - Electronic mailbox: [canal.etico@enagas.es](mailto:canal.etico@enagas.es).
  - Post addressed to the Chairman of the Ethical Compliance Committee, sent to Paseo de los Olmos 19, 28005 - Madrid, Spain.
  - Form available on the corporate intranet and on the corporate website.

Enagás evaluates how well its customers understand and trust these channels and procedures through informal communications and satisfaction survey results (for more information, see the section on [‘Processes for engaging with customers about impacts’](#)).

<sup>106</sup> Developed and set to be launched by the end of 2024.

In keeping with this commitment to addressing grievances, Enagás supports these reporting and resolution channels within its value chain. This is also one of the criteria used to assess the sustainability risk of its suppliers (for more information, see disclosure requirement G1-2).

### Measures related to material impacts on customers, approaches to managing material risks and opportunities related to customers, and the effectiveness of such actions

Enagás' primary goal is to meet its customers' needs through a commitment to quality, service excellence, and transparent operations. To achieve this, the company undertakes various initiatives designed to enhance positive impacts and reduce negative ones for its customers by mitigating risks and seizing opportunities for improvement<sup>107</sup>.

In determining appropriate actions for managing significant impacts and opportunities, the company considers:

- both general and specific strategies to address significant negative impacts,
- initiatives directed at generating significant positive impacts,
- progress made during the year in these efforts, and
- objectives for continuous improvement.

Enagás also employs analysis, control, and communication mechanisms to ensure its activities do not lead to significant negative impacts on customers.

#### Quality

To address the potential negative impact of failing to ensure proper supervision and service quality, Enagás has developed a Quality Management and Operational Excellence framework. This framework is certified to international standards, specifically ISO 9001 - Quality Management, and aims to ensure efficient management, continuous improvement, and innovation, with a strong focus on meeting the needs of various stakeholders. To promote a culture of excellence and professional involvement through teamwork, internal communication, knowledge management, talent development, equal opportunity, and the recognition of achievements in a constant search for excellence.

The Quality system is part of the Integrated Management System for Health & Safety, Environment, and Quality, providing a unified approach to managing these critical areas for the company. Management conducts internal and external audits and reviews within this system to ensure ongoing service improvement and to assess the effectiveness of the actions taken under the management system.

Enagás, is also recognised with the ISO 55001 asset management certification. This accreditation represents recognition under an international standard for the company's infrastructure asset management model in accordance with the practices identified during the audit process. Among the most significant aspects of

the standard are a holistic vision of the asset's life cycle, consolidated management of operational risk, alignment of the model with the 2025-2030 Asset Management Strategic Update and the use of technical methodologies to support decision-making. All this is within a framework that guarantees total asset cost and the availability and quality of customer service.

In 2024, Enagás allocated more than 27 thousands of euros to quality management and asset management systems relating to internal and external audits (OpEx) (information included in note 2.1 'Operating profit' to the Consolidated Annual Accounts).

In relation to the materialisation of the identified potential negative impact, Enagás resolved 98.4% of the 123 formal complaints it received from customers in 2024 (177 in 2023). These complaints were received in connection with Enagás' activity as Technical Manager of the System. Their quantity falls within normal bounds given its processes and nature, as well as the regulatory changes of the last few years.

#### Pipeline integrity

Enagás conducts inspections and maintenance to ensure the integrity and proper condition of its gas infrastructure, thereby minimising the risk of compromising service quality in its role as TSO. The company sets out integrity plans each year based on the risk involved in the activities to be carried out in the gas pipelines. These activities include:

- Pipeline inspections:
  - Internal inspections with smart tools to find potential anomalies
  - Indirect external inspections to locate defects in the anti-corrosive coating
  - External indirect inspections on undersea pipelines (undersea inspections) to detect suspended areas, possible damage and harmful objects next to pipelines, as well as to assess the condition of the cathodic protection system
- During 2024, more than 11.2% of Enagás' gas pipeline network was inspected internally by means of the three types of inspections described above (11.0% in 2023).
- Excavations (test pits) for the direct evaluation of anomalies identified through inspections (internal and/or external indirect).
- Complementary safety activities to detect incidents within the gas pipeline right-of-way (observation by car, observation by foot, aerial observation and leak detection).

<sup>107</sup> For more information on the absence of identified human rights issues or severe cases related to customers, refer to the 'Related Policies' section concerning Customer sustainability.

- In 2024, more than 86,000 kilometres of gas pipelines were inspected and monitored (more than 82,000 kilometres in 2023).

As a consequence of a cut-off low weather event in Valencia, which caused very heavy rainfall, the Paterna and Agullent gas pipelines were suspended for a stretch of approximately 40 and 60 metres, respectively. Enagás carried out various analyses to rule out damage to welds and plastic deformations, among other issues, carrying out the necessary measures to mitigate the stress on the pipelines.

In 2024 Enagás has allocated more than 6.3 million euros (OpEx) to these activities (see note '2.1 Operating profit' of the Consolidated Annual Accounts for details). In 2025, expenditure is expected to be approximately 2.7 million euros. This change is mainly explained by the three-yearly periodicity of the underwater inspections of the Strait of Gibraltar and Balearic Islands gas pipelines and an increase in the cost of monitoring due to the implementation of a strategy based on increasing the number of kilometres monitored by 56% and reducing the monitoring cost per kilometre.

### Transparency

To enhance the positive impact of its business and commercial transparency strategies, Enagás maintains effective communication channels with its customers to ensure collaboration, dialogue, and transparency. For more details, refer to the sections on '[Processes for engaging with customers about impacts](#)' and '[Processes to remediate negative impacts and channels for customers to raise concerns](#)'.

Moreover, the distinct role of Enagás GTS, which operates entirely independently from other Enagás functions, has prompted it to adopt commitments that ensure high standards of transparency, coherence, reliability, and accessibility in publishing and disseminating information. The [GTS Good Practice Guide](#) contains these commitments, which include the creation of a Transparency Committee. This Committee consists of industry representatives and is responsible for ensuring adherence to the guide, suggesting possible improvements, and reviewing requests from agents regarding new publications or changes to existing ones. Requests for further publications and amendments to current publications should be submitted to Enagás GTS for evaluation using a form.

To facilitate access to published information, and in line with the Good Practice Guide, GTS has developed [Energy Data](#), a section on the corporate website and an app that centralises access to the System's public information. Customers can view both physical and commercial data about the gas system, along with various publications and regular reports such as the Annual Report of the Gas System, the Statistical Gas Bulletin, and other documents on demand, operations and maintenance, markets and balances, gas quality, and capacities. This section, in continuous development, aims to improve the usability of the published data, allow the information to be accessed and downloaded and enable automatic query functionalities.

Through a dedicated section on the corporate website, [Enagás TSO](#) provides customers with information about infrastructure, the services offered and how to access them, as well as essential details for interacting with various agents. Customers can check the available capacities in each infrastructure, access key information about different services, use the connection request platform for injecting renewable gases, and find forms for requesting traditional natural gas connections. Additionally, the results of the customer satisfaction survey and the Improvement Plan are available, and a Commercial Service Portal has been developed<sup>108</sup>.

Enagás regularly assesses the effectiveness of its actions aimed at developing and implementing business and commercial transparency strategies, in its roles as both TSO and GTS. This assessment is mainly based on the information gathered from the sections on '[Processes for engaging with customers about impacts](#)' and '[Processes to remediate negative impacts and channels for customers to raise concerns](#)', along with other transparency requirements.

In 2024, 50 thousands of euros were invested (CapEx) in the project to develop the Commercial Service Manager portal (CSM Portal) for Enagás in its activity as TSO (information included in note 2.4. Property, plant and equipment' in the Consolidated Annual Accounts).

### Action plans

Aligned with the identified material opportunities and potential negative impacts, Enagás drafts annual action plans that incorporate the improvement and remediation actions identified through the collaboration and remediation mechanisms related to customers. For more details, see the sections on '[Processes for engaging with customers about impacts](#)' and '[Processes to remediate negative impacts and channels for customers to raise concerns](#)'. Each area responsible for these actions regularly monitors their effectiveness and compliance. These action plans are shared with all interested parties via the [corporate website](#).

As an example, some of the actions included in these plans in 2024 were:

- Enagás as TSO:
  - Development of a customer service portal to manage and follow up with questions, queries and incidents.
  - Review, update and publication of the criteria for the vetting service at Enagás Transporte terminals, a process that ensures that ships unloading at Enagás plants are suitable for operation.
  - Promotion of the adaptations needed to bring regulations into line with the current needs of the sector, proposing, among others, mechanisms to facilitate the bunkering service that take into account the particular needs of this sector, as well as changes to the management of the flexibilities of ship operations in accordance with customer needs and interests.

<sup>108</sup> Pending launch.

- Plan to promote the use of bundled notes in invoice payment, identifying the best way to coordinate the process between customers and Enagás Transporte. In this way, we can improve the follow-up on collections and reduce the number of incidents in the payment process.
- Enagás, as GTS, has identified as an area for improvement the modernisation in the coming years of the Logistics System for Third Party Access to the Grid (SL-ATR), an initiative considered critical and therefore included in the company's 2024-2026 Transformation Plan. This initiative is made up of the following projects: obsolescence improvement, user experience, cloud and containerisation and a new governance model. Customers will be kept informed of the progress of this initiative via the following forums: Spanish Gas System Monitoring Committee, Technical Management of the Gas System Regulations Working Group and specific workshops.

Enagás carries out these actions as part of its usual dynamic of continuous improvement, and does not allocate significant specific funds to do so.

## Metrics and targets

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Enagás has set goals for measuring customer satisfaction through surveys conducted by the TSO and GTS (for more information, refer to the section on '[Processes for engaging with customers about impacts](#)'). These goals are linked to the identified material impacts and opportunities, as the surveys assess service quality, transparency, and continuous improvement.

Moreover, these targets align with the commitment outlined in the Quality and Operational Excellence Policy to 'Improve internal and external customer satisfaction in a way that meets or exceeds their expectations'.

- For the TSO, an annual overall satisfaction target has been set, with a critical threshold of 7.7 out of 10 on the satisfaction scale and a separate target of 8.5 out of 10 for the 2024 survey in the shippers' domain. These targets are determined based on historical survey results and reviewed annually. This target was met in 2024, achieving a satisfaction level of 9.2 out of 10 for shippers and 9.1 out of 10 for system operators (transmission and distribution companies). For more information on the results of satisfaction surveys<sup>109</sup>, see section '[Processes for engaging with customers on impacts](#)'.
- For the GTS, the survey must adhere to the guidelines set by the National Markets and Competition Commission (CNMC) in Circular 6/2021, dated June 30, which outlines the GTS's incentives that impact its remuneration. This Circular specifies a set of performance indicators related to their operational functions, including a 'Performance indicator concerning the quality of support to system agents', evaluated via the survey. A minimum participation rate of 30% of active users is required, and the GTS's remuneration is linked to the survey results. Due to these specific circumstances, no measurable targets are set for customer satisfaction, although there is a commitment to continuous improvement in this area. Enagás, in its capacity as GTS, continuously tracks policies and actions to ensure their effectiveness, aiming to enhance customer satisfaction.

These results are published on the [corporate website](#), providing customers with access to the survey data and related action plans.

<sup>109</sup> The methodology used for satisfaction surveys involves calculating the average of all customer responses for the respective campaign to gauge the level of customer satisfaction.

# Non-financial and diversity reporting requirements (Law 11/2018)

## Tax information

### Public subsidies received

In 2024, 604 thousands of euros of public subsidies corresponding to gas infrastructure investments were received, 1,592 thousands of euros in 2023 and 156 thousands of euros in 2022 (in all three years, 100% were received in Spain).

### Profits obtained by country

In 2024, -299.3 million euros net profit, which includes the result of investments accounted for using the equity method, which is recorded net of tax effect. The breakdown of net profit per country is as follows: Spain -78 million euros; Germany -2.5 million euros; Greece 11.1 million euros; Mexico 10 million euros; Peru 56.2 million euros; Switzerland 63.4 million euros; USA: -359.5 million euros.

In 2023, 342.5 million euros net profit, which includes the result of investments accounted for using the equity method, which is recorded net of tax effect. The breakdown of net profit per country is as follows: Spain at 250.4 million euros; Peru at 60.3 million euros; Switzerland at 53.6 million euros; Greece at 17.8 million euros; Germany at -0.6 million euros; Chile at -0.9 million euros; Mexico at -18.6 million euros; and the USA at -19.6 million euros.

Finally, in 2022, 375.8 million euros net profit, which includes the result of investments accounted for using the equity method, which is recorded net of tax effect. The breakdown of net profit per country is as follows: Chile at 200.2 million euros; Spain at 190.0 million euros; Peru at 56.2 million euros; Switzerland at 46.9 million euros; Mexico at 9.6 million euros; Greece at 8.1 million euros; the United Kingdom at -0.1 million euros; and the USA at -135.1 million euros.

### Tax paid on profits

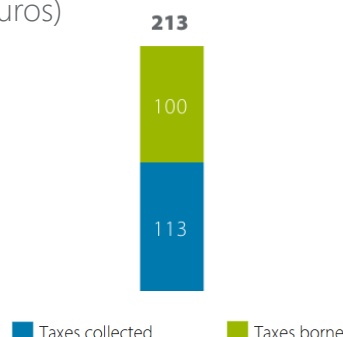
#### Total tax contribution

The total tax contribution made by Enagás in 2024 amounted to 213 million euros (361 million euros in 2023), of which 47% corresponded to input taxes<sup>110</sup> (100 million euros) and 53% to taxes collected<sup>111</sup> (113 million euros) (in 2023, 248 and 113 million euros, respectively). Of the taxes paid, 93 million euros relate to Spain<sup>112</sup>.

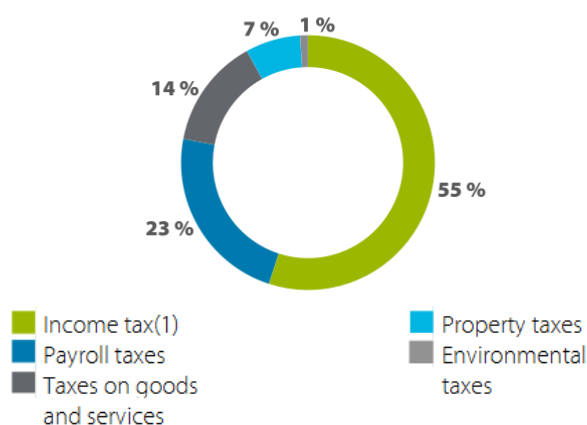
The total tax contribution is calculated using the cash method and taking into account the globally integrated entities and joint

operations (see the '[Consolidation principles, a\) Consolidation methods](#)' section of the Consolidated Annual Accounts).

Total tax contribution of the Enagás Group (million euros)

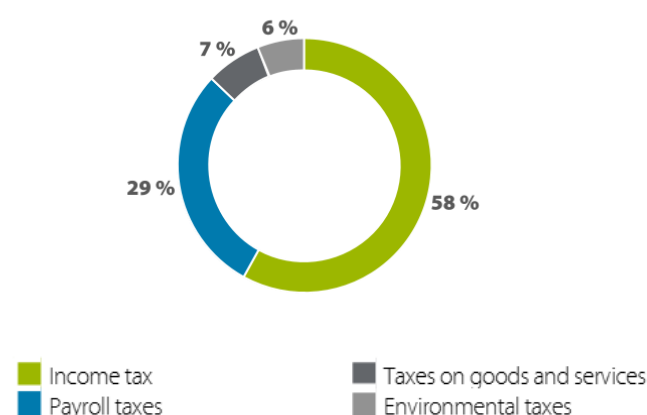


### Taxes borne



(1) Including the following items: Corporate income tax, Tax on Economic Activities and movable capital income retentions.

### Taxes collected



<sup>110</sup> Input taxes are those taxes that the company has paid to Public Administrations of the different states in which it operates. These taxes are those that have entailed an effective cost for Enagás, such as corporate income tax and environmental taxes.

<sup>111</sup> Taxes collected are those that have been paid on behalf of other taxpayers as a result of Enagás' economic activity, without entailing a cost to the Company other than its management.

<sup>112</sup> The additional contribution of national and international affiliates accounted for using the equity method was 109 million euros, of which input tax was 86 million euros and tax collected was 23 million euros.

### Country-by-country contribution

Below is a breakdown of the Enagás Group's tax contribution country by country in 2024, including the tax jurisdictions of Spain, Mexico, Peru, Chile and the United States, companies that are fully consolidated (see the '[Consolidation principles, a\) Consolidation methods](#)' section of the Consolidated Annual Accounts).

### Tax contribution by country in 2024 (euros)

Jurisdiction	Average number of employees <sup>(3)</sup>	Foreign intercompany income	Domestic third-party income	Foreign third-party income									Profit before corporate income tax <sup>(2)</sup>	Corporate Income Tax paid and withholding tax paid (cash basis)	Corporate income tax accrued in the current year <sup>(1)(2)</sup>	Tangible assets other than cash and cash-equivalent instruments
				Germany	Belgium	France	Gibraltar	Greece	Italy	Morocco	United Kingdom	Switzerland				
Spain	1,390	0	906,126,295	3,333,287	185,361	64,521	360,537	218,128	42,072	2,130,758	324,129	248,553	-172,076,095	44,000,725	-16,433,290	3,841,491,495
Mexico	0	0	0	0	0	0	0	0	0	0	0	0	-36,347	0	0	0
Peru	0	184,391	0	0	0	0	0	0	0	0	0	0	-96,266	4,143	-46,744	0
United States	0	0	0	0	0	0	0	0	0	0	0	0	60,561,631	5,794,750	2,537,727	0
Chile	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

(1) In Spain, the difference between the effective rate vs. the nominal rate is mainly due to the limitation of the dividends and capital gains exemption for the transfer of shareholdings to 95%. In the other jurisdictions (Mexico, Chile, Peru and United States), this difference is mainly due to i) their status as holding companies, with exempt income (dividends); ii) companies with an immaterial level of income; and iii) consolidation adjustments. Taxation in these jurisdictions is carried out through equity-accounted affiliates, the details of which are not included in this scope.

(2) The profit before tax and the accrued corporate income tax cannot be compared to previous years due to exceptional operations in 2024 (such as the sale of TGE and the GSP award).

(3) In line with the disclosure requirement BP-1 within chapter 2 on the scope of financial and non-financial information, the financial information of this company is included.

# APPENDICES



Non-financial and diversity reporting requirements (Law 11/2018) and the EU taxonomy for sustainable activities Regulation.....	224
External verification report.....	230

# NON-FINANCIAL AND DIVERSITY REPORTING REQUIREMENTS (LAW 11/2018) AND THE EU TAXONOMY FOR SUSTAINABLE ACTIVITIES REGULATION

The following are the requirements established by Law 11/2018 and the EU Taxonomy Regulation that are responded to in the Statement of consolidated non-financial and sustainability information and in the Annual Corporate Governance Report included in the Consolidated Management Report:

Requirements of Law 11/2018 and Taxonomy Regulation of the European Union	Reporting framework		Page number
	European Sustainability Reporting Standards	Others	
General information			
Description of the business model: business environment, its organisation and structure	(ESRS 2) SBM-1		31-40
The markets in which it operates	(ESRS 2) SBM-1		31-40
Its goals and strategies	(ESRS 2) GOV-3, SBM-1, MDR-T		27-28, 31-40, 99-101, 113, 118, 128, 131, 157-159, 178, 189, 207, 211, 220
The main factors and trends that may affect its future evolution	(ESRS 2) SBM-2, SBM-3		40-57
Reporting framework used	(ESRS 2) BP-1		21
Materiality analysis	(ESRS 2) SBM-2, SBM-3, IRO-1, IRO-2		40-66
Information on environmental issuesissues			
Management approach: Description of the Group's policies with respect to environmental and social issues	E1-2, E1-3, E2-1, E2-2, E3-1, E3-2, E4-2, E4-3, E5-1, E5-2		93-98, 111-112, 116-117, 125-127, 129-130
Detailed general information			
Detailed information on the current and foreseeable effects of the company's activities on the environment and, as the case may be, on health and safety	(ESRS 2) SBM-3, IRO-1. SBM-3 in E1, IRO-1 in E1, E1-1, IRO-1in E2, IRO-1 in E3, SBM-3 in E4, IRO-1 in E4, IRO-1 inl E5		41-59, 90-93, 111, 116, 120-125, 129
Environmental assessment or certification procedures	E1-3, E2-2, E3-2, E4-2, E5-2	ISO:14001 Standard, EMAS Regulation	94-98, 112, 117, 125, 130
Resources dedicated to the prevention of environmental risks	E1-3, E1-9, E2-5, E3-5, E4-6, E5-6		94-98, 108-110, 114, 119, 128, 133
Application of the precautionary principle	(ESRS 2) SBM-3. E1-9, E2-5, E3-5, E4-6, E5-6		41-57, 108-110, 114, 119, 128, 133
The amount of provisions and guarantees for environmental risks	E1-9, E2-6, E3-5, E4-6, E5-6		108-110, 114, 119, 128, 133-134

Requirements of Law 11/2018 and Taxonomy Regulation of the European Union	Reporting framework		Page number
	European Sustainability Reporting Standards	Others	
Pollution			
Measures to prevent, reduce or rectify carbon emissions that seriously harm the environment; taking into account any activity-specific form of air pollution	E2-2		112
Including noise and light pollution	Not applicable	Internal reporting framework: qualitative information	115
Circular economy and waste prevention and management			
Circular economy and waste prevention and management	E5-5		131-133
Measures of prevention, recycling, reuse and other forms of recovery and elimination of waste	E5-2, E5-5		130-133
Actions to combat food waste	E5-2		130, 134
Sustainable use of resources			
Sustainable use of resources: water consumption and supply according to local restrictions	E3-2, E3-4		118-119
Consumption of raw materials and the measures adopted to improve efficiency in their use	E5-2, E5-4		130-134
Direct and indirect consumption of energy	E1-5		101-102
Measures taken to improve energy efficiency	E1-3		93-98
Use of renewable energy	E1-5		101-102
Climate change			
Climate change: the important elements of greenhouse gas emissions generated as the result of the company's activities, including the use of the goods and services produced	E1-6		102-107
The measures adopted in order to adapt to the consequences of climate change	E1-1, SBM-3 in E1, E1-3		89-91, 94-98
The voluntarily established long and short-term emission reduction targets to reduce greenhouse gas emissions and the measures implemented for this purpose	E1-1, E1-4		89-90, 99-101
Biodiversity protection			
Biodiversity protection: measures taken to preserve or restore biodiversity	E4-1, E4-3, E4-5		120, 126-128
Impacts caused by activities or operations in protected areas	SBM-3 in E4, IRO-1 in E4, E4-3, E4-5		120-128
Information on social and personnel-related issues			
Management approach: Description of the Group's policies with respect to social and personnel-related issues	S1-1, S1-2		139-142, 145-156
Employment			
Total number and distribution of professionals by gender, age, country and professional group	S1-6, S1-9 * The distribution by occupational classification is not included in the ESRS.	GRI 405-1	159-164, 168

Requirements of Law 11/2018 and Taxonomy Regulation of the European Union	Reporting framework		Page number
	European Sustainability Reporting Standards	Others	
Total number and distribution of work contract modalities, yearly average of permanent contracts, temporary contracts and part-time contracts by gender, age and professional group	Not applicable	GRI 2-7	168-169
Number of dismissals by gender, age and professional group	Not applicable	GRI 2-7	169
Average remuneration and its evolution by gender, age and professional group or equivalent	Not applicable	GRI 405-2	169-170
Gender pay gap, remuneration for work of equal value or average for the company	S1-16		167
The average remuneration of directors and managers, including variable remuneration, expenses, compensation, payments to long-term savings plans and any other item by gender	Not applicable	GRI 2-19, GRI 2-20, GRI 405-2	170
Implementation of policies related to the disconnecting from work	S1-1		139-142, 170
Employees with disabilities	S1-12		165
<b>Organisation of work</b>			
Organisation of work hours	S1-1, S1-8, S1-11, S1-15		139-142, 162, 164, 166
Number of hours lost to absenteeism	Not applicable	Internal reporting framework: Number of hours of absenteeism including common sickness and occupational accident hours	170
Measures aimed at providing work-life balance and promoting their shared use by both parents	S1-4, S1-15		145-156, 166
<b>Health and safety</b>			
Health and safety conditions in the workplace	S1-1, S1-4, S1-14		139-142, 145-156, 165-166
Work-related accidents, frequency and severity and occupational illnesses, by gender	S1-14 *The frequency and severity rate, and the breakdown of accidents by gender is not included in the ESRs.	GRI 403-9	165-166, 170-171
<b>Social relations</b>			
Organisation of social dialogue, including procedures for notifying and consulting employees and negotiating with them	S1-2, S1-3		142-144
Percentage of employees covered by collective bargaining agreements by country	S1-8		162-163
Results of collective bargaining agreements, particularly in relation to occupational health and safety	S1-8, S1-14		162-163, 165-166
Mechanisms and procedures that the company has in place to promote the involvement of workers in the management of the company, in terms of information, consultation and participation	S1-2, S1-3		142-144
<b>Training</b>			
Training policies implemented	S1-1, S1-4		139-142, 145-156

Requirements of Law 11/2018 and Taxonomy Regulation of the European Union	Reporting framework		Page number
	European Sustainability Reporting Standards	Others	
Total number of hours of training courses by professional group	Not applicable	GRI 404-1	171
<b>Universal accessibility</b>			
Universal accessibility for persons with disabilities	S1-1, S1-4		139-142, 145-156
<b>Equality</b>			
Measures adopted to promote equal treatment and opportunities for men and women	S1-2, S1-3, S1-4		142-156
Equality plans, measures adopted to promote employment and protocol against sexual harassment and harassment on the grounds of sex	S1-1, S1-4		139-142, 145-156
Integration and universal accessibility for persons with disabilities	S1-1, S1-4		139-142, 145-156
Policy against any type of discrimination and, where appropriate, for managing diversity	S1-1, S1-4		139-142, 145-156
<b>Information on respect for human rights</b>			
Management approach: Description of the Group's policies with respect to human rights	S1-1, S2-1, S3-1		139-142, 173-174, 181-182
Information on respect for human rights	(ESRS 2) GOV-4. S1-1, S1-4, S1-17, S2-1, S2-4, S3-1, S3-4.		29, 139-142, 145-156, 169, 173-177, 181-182, 184-188
Application of due diligence procedures in relation to human rights and prevention of the risks of violation of human rights and, where appropriate, measures to mitigate, manage and rectify any possible abuses committed	(NEIS 2) GOV-4. S1-1, S1-2, S1-3, S1-4, S2-1, S2-2, S2-3, S2-4, S3-1, S3-2, S3-3, S3-4.		29, 139-142-156, 173-177, 181-188
Formal complaints for cases of violation of human rights	S1-17, S2-1, S3-4		169, 173-174, 184-188
Promotion of and compliance with the provisions of the fundamental conventions of the International Labour Organisation in relation to respect for freedom of association and the right to collective bargaining	S1-8		162
Elimination of discrimination in employment and occupation	S1-1, S2-1, S3-1		139-142, 173-177, 181-182
The elimination of forced or compulsory labour	S1-1, S2-1, S3-1		139-142, 173-177, 181-182
The effective elimination of child labour	S1-1, S2-1, S3-1		139-142, 173-177, 181-182
<b>Fight against corruption and bribery</b>			
Management approach: description and results of the policies related to these issues as well as the main risks related to these issues linked to the group's activities	G1-1, G1-3		193-198, 201-202
<b>Information relating to the fight against corruption and bribery</b>			
Measures adopted to prevent corruption and bribery	G1-1, G1-3		193-198, 201-202
Measures to combat money laundering	G1-1, G1-3		193-198, 201-202
Contributions to foundations and not-for-profit organisations	S3-4		184-188

Requirements of Law 11/2018 and Taxonomy Regulation of the European Union	Reporting framework		Page number
	European Sustainability Reporting Standards	Others	
Information about the company			
Management approach: description and results of the policies related to these issues as well as the main risks related to these issues linked to the group's activities	S3-1, S3-4		181-182, 184-188
The company's commitment to sustainable development			
The impact of the company's activity on employment and local development	S3-1, S3-2, S3-3, S3-4, S3-5		181-189
The impact of the company's activity on local communities and on the region	S3-1, S3-2, S3-3, S3-4 S3-5		181-189
Relations with key figures of local communities and modalities of dialogue with them	S3-1, S3-2, S3-3, S3-4, S3-5		181-189
Association and sponsorship actions	S3-4		184-188
Subcontracting and suppliers			
Inclusion in the procurement policies regarding social issues, gender equality and environment	S2-1, S2-4, G1-2		173-177, 198-201
Consideration in supplier and subcontractor relations of their social and environmental responsibilities	S2-1, S2-4, G1-2		173-177, 198-201
Systems for supervision and auditing and their results	G1-2		198-201
Consumers			
Measures for the health and safety of consumers	Not applicable	GRI 403-7	213-220
Complaint systems, complaints received and their resolution	Not applicable	GRI 2-6, GRI 418-1	217-220
Tax information			
Profits obtained by country	Not applicable	GRI 207-4	221
Tax paid on profits	Not applicable	GRI 207-4	221-222
Public subsidies received	Not applicable	GRI 201-4	221
Regulation (EU) 2020/852 - Taxonomy			
Qualitative information			
Accounting policy		Regulation (UE) 2020/852, Regulation (UE) 2021/2178	72-80
Assessment of compliance with Regulation (EU) 2020/852		Regulation (UE) 2020/852, Regulation (UE) 2021/2178	72-80
Background information		Regulation (UE) 2020/852, Regulation (UE) 2021/2178	72-80

Requirements of Law 11/2018 and Taxonomy Regulation of the European Union	Reporting framework		Page number
	European Sustainability Reporting Standards	Others	
Quantitative information			
Eligibility and alignment of turnover		Regulation (UE) 2020/852, Regulation (UE) 2021/2178, Regulation (UE) 2021/2139, Regulation (UE) 2023/2486	81-82
Eligibility and alignment of CapEx		Regulation (UE) 2020/852, Regulation (UE) 2021/2178, Regulation (UE) 2021/2139, Regulation (UE) 2023/2486	83-84
Eligibility and alignment of OpEx		Regulation (UE) 2020/852, Regulation (UE) 2021/2178, Regulation (UE) 2021/2139, Regulation (UE) 2023/2486	85-86

# EXTERNAL VERIFICATION REPORT

**Independent Limited Assurance Report on  
the Consolidated Non-Financial Information Statement and  
Sustainability Information for the year ended  
December 31, 2024**

**ENAGÁS, S.A. AND SUBSIDIARIES**

## **INDEPENDENT LIMITED ASSURANCE REPORT ON THE CONSOLIDATED NON-FINANCIAL INFORMATION STATEMENT AND SUSTAINABILITY INFORMATION**

To the shareholders of  
ENAGÁS, S.A.

---

### **Conclusion of limited assurance**

In accordance with article 49 of the Commercial Code, we have conducted a limited assurance engagement on the Consolidated Non-Financial Information Statement ("NFIS") and sustainability information for the year ended December 31, 2024 of ENAGÁS, S.A. (the "Entity") and subsidiaries (the "Group"), which is part of the Group's consolidated management report.

The content of the NFIS contains information in addition to that required by prevailing company law in respect of non-financial information, specifically the sustainability information prepared by the Group for the year ended December 31, 2024 (the "sustainability information") in accordance with Directive (EU) 2022/2464 of the European Parliament and of the Council, as regards corporate sustainability reporting (the "CSRD"). The sustainability information was also subject to limited assurance.

Based on the procedures applied and the evidence obtained, no matter has come to our attention that would cause us to believe that:

- a) The Group's NFIS for the year ended December 31, 2024 has not been prepared, in all material respects, in accordance with the contents required by prevailing company law and the criteria selected in European Sustainability Reporting Standards ("ESRS"), as well as other criteria described above, as explained for each matter in the Appendices of the table "NON-FINANCIAL AND DIVERSITY REPORTING REQUIREMENTS (LAW 11/2018) AND THE EU TAXONOMY FOR SUSTAINABLE ACTIVITIES REGULATION" of the NFIS.
- b) The sustainability information, taken as a whole, has not been prepared, in all material respects, in accordance with the sustainability reporting framework applied by the Group and identified in the in the General Information chapter, section BP-1 (General Basis for the preparation of the Statement of consolidated non-financial and sustainability information)., including:
  - That the description of the process for identifying the sustainability information to be disclosed included in the General Information chapter, section SBM-3 (Impacts, Risks, and Relevant Opportunities and their interaction with the strategy and business model) is consistent with the process implemented and that it enables the identification of the material information to be disclosed in accordance with the requirements of ESRS.
  - Compliance with ESRS.

- Compliance with the disclosure requirements included in subsection DISCLOSURE OF INFORMATION UNDER ARTICLE 8 OF REGULATION (EU) 2020/852 (TAXONOMY REGULATION) on the environmental information section in the sustainability information with Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council on the establishment of a framework to facilitate sustainable investment.

---

## **Basis of conclusion**

We have performed our limited assurance engagement in accordance with generally accepted professional standards applicable in Spain and specifically with the guidelines contained in the Guidelines 47 (revised) and 56 issued by the Spanish Institute of Chartered Auditors on non-financial information assurance engagements and considering the contents of the note issued by the Spanish Accounting and Auditing Institute (ICAC) on December 18, 2024 (the "generally accepted professional standards").

The procedures in a limited assurance engagement are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in limited assurance engagement is lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under those regulations are further described in the *Practitioner's responsibilities* of our report.

We have complied with the independence and other ethics requirements laid down in the International Code of Ethics for Professional Accountants (including international standards on independence) of the International Ethics Standards Board for Accountants (IESBA), which is based on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behavior.

Our firm applies the International Standard on Quality Management (ISQM) 1, which requires the firm to design, implement, and monitor a system of quality management that includes policies and procedures covering compliance with its ethics requirements, professional rules and applicable legal and regulatory requirements.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our conclusion.

---

## **Directors' responsibilities**

The preparation of the NFIS in the Group's consolidated management report is the responsibility of the directors of ENAGÁS, S.A. The NFIS has been prepared in accordance with the content required by prevailing company law and in conformity with the selected ESRS criteria, as well as other criteria described for each matter in the Appendices of the table "NON-FINANCIAL AND DIVERSITY REPORTING REQUIREMENTS (LAW 11/2018) AND THE EU TAXONOMY FOR SUSTAINABLE ACTIVITIES REGULATION" of the NFIS.

This responsibility also includes the design, implementation, and maintenance of such internal control as considered necessary to ensure that the NFS is free of material misstatement, due to fraud or error.

The directors of ENAGÁS, S.A. are also responsible for defining, implementing, adapting, and maintaining the management systems from which the necessary information for preparing the NFS is obtained.

In relation to the sustainability disclosures, the entity's directors are responsible for developing and implementing a process for identifying the disclosures to be included in the sustainability information in accordance with the CSRD, the ESRS and Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council, of 18 June 2020, and for disclosing information about this process in the sustainability information in the General Information chapter, section SBM-3 (Impacts, Risks, and Relevant Opportunities and their interaction with the strategy and business model). This responsibility includes:

- Understanding the context in which the Group carries out its activities and business relationships, as well as its stakeholders, in relation to the Group's impact on people and the environment.
- Identifying the actual and potential impacts (both negative and positive), as well as risks and opportunities that could affect, or could reasonably be expected to affect, the Group's financial position, financial performance, cash flows, access to financing, or cost of capital in the short, medium or long term.
- Assessing the materiality of the identified impacts, risks and opportunities.
- Making assumptions and estimates that are reasonable under the circumstances.

The directors are also responsible for the preparation of the sustainability information, which includes the information identified by the process, in accordance with the sustainability reporting framework used, including compliance with the CSRD, the ESRS, and the disclosure requirements, included in subsection DISCLOSURE OF INFORMATION UNDER ARTICLE 8 OF REGULATION (EU) 2020/852 (TAXONOMY REGULATION) on the environmental information section in the sustainability information with Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council on the establishment of a framework to facilitate sustainable investment.

This responsibility includes:

- Designing, implementing and maintaining such internal control as the directors consider relevant to enable the preparation the sustainability information that is free from material misstatement, whether due to fraud or error.
- Selecting and applying appropriate methods for the presentation of sustainability information and the basis of assumptions and estimates that are reasonable, considering the circumstances, about specific disclosures.

---

### **Inherent limitations in the preparation of the information**

In accordance with ESRS, the entity's directors are required to prepare forward-looking information on the basis of assumptions and hypothetical assumptions, which must be included in the sustainability information, about potential future events and possible future actions, if any, that the Group could take. Actual results may differ significantly from estimated results, as the reference is to the future and future events frequently do not occur as expected.

In determining the disclosures in the sustainability information, the entity's directors interpret legal and other terms that are not clearly defined and that may be interpreted differently by others, including the legal conformity of such interpretations, which, accordingly, are subject to uncertainty.

---

### **Practitioner's responsibilities**

Our objectives are to plan and perform the assurance engagement to obtain limited assurance about whether the NFIS and sustainability information are free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusions. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of this information.

As part of a limited assurance engagement, we exercise professional judgment and maintain professional skepticism throughout the engagement. We also:

- ▶ Design and perform procedures to assess whether the process for identifying the disclosures to be included in the NFIS and sustainability information is consistent with the description of the process followed by the Group and enables, where appropriate, the identification of the material information to be disclosed as required in the ESRS.
- ▶ Perform risk procedures, including obtaining an understanding of internal control relevant to the engagement, to identify disclosures where material misstatements are likely to arise, whether due to fraud or error, but not for the purpose of providing a conclusion on the effectiveness of the Group's internal control.
- ▶ Design and perform procedures responsive to disclosures in the NFIS and sustainability information where material misstatements are likely to arise. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

---

### **Summary from the work performed**

A limited assurance engagement involves performing procedures to obtain evidence as a basis for our conclusions. The nature, timing and extent of procedures selected depend on professional judgment, including the identification of disclosures where material misstatements are likely to arise, whether due to fraud or error, in the NFIS and sustainability information.

Our work consisted of making inquiries of management and of the Group's various business units and components that participated in the preparation of the NFIS and sustainability information, reviewing the processes used for compiling and validating the information presented in the NFIS and sustainability information, and applying certain analytical procedures and sample review tests as described below:

For assurance of the NFIS:

- ▶ Holding meetings with Group personnel to obtain an understanding of the business model, the policies and management approaches applied, and the main risks related to these matters and to gather the information needed to perform the independent assurance work.

- ▶ Analyzing the scope, relevance and completeness of the content of the 2024 NFIS based on the materiality assessment performed by the Group and described in the General Information chapter, section SBM-3 (Impacts, Risks, and Relevant Opportunities and their interaction with the strategy and business model) of the NFIS, considering the content required in prevailing company law.
- ▶ Analyzing the processes used to compile and validate the data presented in the 2024 NFS.
- ▶ Reviewing the disclosures relating to the risks, policies and management approaches applied with respect to the material matters presented in the 2024 NFIS.
- ▶ Checking, through sample testing, the information underlying the content of the 2024 NFS and whether it has been adequately compiled based on data provided by information sources.

For assurance of the sustainability information:

- ▶ Making inquiries of Group personnel:
  - To understand the business model, the policies and management approaches applied and the main risks related to these matters and to gather the information needed to perform the independent assurance work.
  - To know the source of the information used by management (e.g., interaction with stakeholders, business plans and documents on strategy) and review the Group's internal documentation on its process.
- ▶ Obtaining, through inquiries of Group personnel, insight into the entity's processes for gathering, validation, and presenting relevant information for the preparation of its sustainability information.
- ▶ Assessing whether the evidence obtained in our procedures on the process implemented by the Group for determining the disclosures to be included in the sustainability information is consistent with the description of the process included in that information, as well as assessing whether that process implemented by the Group enables identification of the material information to be disclosed in accordance with the requirements of the ESRS.
- ▶ Assessing whether all the information identified in the process implemented by the Group for determining the disclosures to be included in the sustainability information is effectively included.
- ▶ Evaluating whether the structure and presentation of the sustainability information is consistent with ESRS and the rest of the sustainability reporting framework applied by the Group.
- ▶ Performing inquiries of relevant personnel and analytical procedures on the disclosures in the sustainability information, considering those where material misstatements are likely to arise, whether due to fraud or error.
- ▶ Performing, as appropriate, substantive procedures through sampling of selected disclosures in the sustainability information, considering those where material misstatements are likely to arise, whether due to fraud or error.

- ▶ Obtaining, as appropriate, reports issued by accredited independent third parties accompanying the consolidated management report in response to the requirements of European regulations and, in relation to such information and in accordance with generally accepted professional standards, verification, exclusively, of the accreditation of the practitioner and that the scope of the report issued corresponds to that required by European regulations.
- ▶ Obtaining, as appropriate, the documents containing the information incorporated by reference, the reports issued by auditors or practitioners on such documents and, in accordance with generally accepted professional standards, verification, exclusively, that in the document to which the information incorporated by reference refers, the requirements described in ESRS for the incorporation by reference of information in the sustainability information are met.
- ▶ Obtaining a representation letter from the directors and management regarding the NFIS and sustainability information.

---

### Other information

The persons in charge of the entity's governance are responsible for other information. Other information comprises the consolidated financial statements and the rest of the information included in the consolidated management report, but does not include either the auditors' report on the consolidated financial statements or the assurance reports issued by accredited independent third parties required by European Union law on specific disclosures contained in the sustainability information and attached to the consolidated management report.

Our assurance report does not cover other information and we do not express any form of assurance conclusion on it.

Our responsibility in connection with our engagement to assure the sustainability information is to read the other information identified and consider whether it is materially inconsistent with the sustainability information or the knowledge we have obtained during the assurance engagement that could indicate material misstatements in the sustainability information.

ERNST & YOUNG, S.L.



José Agustín Rico-Horcajo

February 17, 2025

# APPENDICES

# 2024

Annual Corporate Governance Report	238
Annual Corporate Governance Report	239
TCFD content index	240
TCFD content index	241
Contact	243

# ANNUAL CORPORATE GOVERNANCE REPORT

The 2024 Annual Corporate Governance Report forms part of this Consolidated Management Report. Both documents are available on the [corporate website](#) or on the [CNMV website](#).

# ANNUAL REPORT ON DIRECTORS' REMUNERATION

The Annual Report on Directors' Remuneration for fiscal year 2024 forms part of this Consolidated Management Report. Both documents are available on the [corporate website](#) or on the [CNMV website](#).

# TCFD CONTENT INDEX

## Task Force on Climate-related Disclosures (TCFD) recommendations

Areas	Recommendations	Page numbers, URL and/or direct response
<b>Governance</b>	Describe the board's oversight of climate-related risks and opportunities.	88 See disclosure requirement GOV-3 within chapter E1 on Climate Change, which details the oversight functions of the Board of Directors.
	Describe management's role in assessing and managing climate-related risks and opportunities.	92-93 See disclosure requirement IRO-1 within chapter E1 on Climate Change on Description of the processes to identify and assess material impacts, risks, and opportunities related to climate
<b>Strategy</b>	Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term.	90-91 See disclosure requirement SBM-3 within chapter E1 on Climate Change on Material impacts, risks, and opportunities and their interaction with the strategy and business model
	Describe the impact of climate related risks and opportunities on the organisation's businesses, strategy, and financial planning.	90-91 See disclosure requirement SBM-3 within chapter E1 on Climate Change on Material impacts, risks, and opportunities and their interaction with the strategy and business model
	Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	90-91 See disclosure requirement SBM-3 within chapter E1 on Climate Change on Material impacts, risks, and opportunities and their interaction with the strategy and business model
<b>Risk management</b>	Describe the organisation's processes for identifying and assessing climate-related risks.	90-93 See disclosure requirement IRO-1 within chapter E1 on Climate Change on Description of the processes to identify and assess material impacts, risks, and opportunities related to climate. See disclosure requirement SBM-3 within chapter E1 on Climate Change on Material impacts, risks, and opportunities and their interaction with the strategy and business model, and Business Model of chapter E1 on Climate Change
	Describe the organisation's processes for managing climate-related risks.	94-98, 108-109 See disclosure requirement E1-9 on Anticipated financial effects from material physical and transition risks and potential climate-related opportunities. See disclosure requirement E1-3 on Actions and resources in relation to climate change policies
	Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organisation's overall risk management.	92-93 See disclosure requirement IRO-1 on Description of the processes to identify and assess material impacts, risks, and opportunities related to climate. See disclosure requirement SBM-3 within chapter E1 on Climate Change on Material impacts, risks, and opportunities and their interaction with the strategy and business model.
	Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process.	99-101 See disclosure requirement E1-4 on Targets related to climate change mitigation and adaptation
<b>Metrics and targets</b>	Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	92-93, 102-107 See disclosure requirement E1-6 on Gross Scopes 1, 2, 3 and Total GHG emissions. See disclosure requirement IRO-1 within chapter E1 on Climate Change on Description of the processes to identify and assess material impacts, risks, and opportunities related to climate.
	Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets.	101-102 See disclosure requirement E1-5 on Energy consumption and mix

# TNFD CONTENT INDEX

## Task Force on Nature-related Disclosures (TNFD) recommendations

Areas	Recommendations	Page numbers, URL and/or direct response
Governance	Describe the board's oversight of nature-related dependencies, impacts, risks and opportunities.	23-27, 30-31, 125
		See disclosure requirement GOV-1 within chapter 2 General disclosures on The role of administrative, management and supervisory bodies.
		See disclosure requirement GOV-2 within chapter 2 General disclosures on Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies
		See disclosure requirement GOV-5 within chapter 2 General disclosures on Risk management and internal controls over sustainability reporting
	Describe the management's role in assessing and managing dependencies, impacts, risks and opportunities	See disclosure requirement E4-2 on Policies related to biodiversity and ecosystems
		23-27, 125
		See disclosure requirement GOV-1 within chapter 2 General disclosures on The role of administrative, management and supervisory bodies.
Governance	Describe the management's role in assessing and managing dependencies, impacts, risks and opportunities	See disclosure requirement GOV-2 within chapter 2 General disclosures on Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies
		See disclosure requirement E4-2 on Policies related to biodiversity and ecosystems
		41-57, 125-127, 181-182, 184-188
	Describe the organisation's human rights policies engagement and activities, and oversight by the board and management, with respect to Indigenous Peoples, Local Communities, affected and other stakeholders, in the organisation's assessment of and response to, nature-related dependencies, impacts, risks and opportunities.	See disclosure requirement SBM-3 within chapter 2 General disclosures on Climate Change on Material impacts, risks, and opportunities and their interaction with the strategy and business model
		See disclosure requirement E4-2 on Policies related to biodiversity and ecosystems
		See disclosure requirement E4-3 on Actions and resources related to biodiversity and ecosystems
		See disclosure requirement S3-1 on Policies related to biodiversity and ecosystems
Governance	Describe the organisation's human rights policies engagement and activities, and oversight by the board and management, with respect to Indigenous Peoples, Local Communities, affected and other stakeholders, in the organisation's assessment of and response to, nature-related dependencies, impacts, risks and opportunities.	See disclosure requirement S3-4 on Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions

Areas	Recommendations	Page numbers, URL and/or direct response
Strategy	Describe the nature-related dependencies, impacts, risks and opportunities related to nature that the organisation has identified in the short, medium and long term.	120-125 See disclosure requirement SBM-3 within chapter E4 on Biodiversity and Ecosystems on Material impacts, risks, and opportunities and their interaction with the strategy and business model. See disclosure requirement IRO-1 on chapter E4 on Biodiversity and Ecosystems on Description of the processes to identify and assess material impacts, risks, and opportunities related to biodiversity and ecosystems.
	Describe the effect nature-related dependencies, impacts, risks and opportunities have had on the organisation's business model, value chain, strategy and financial planning, as well as any transition plans or analysis in place.	120-123, 125-128See disclosure requirement SBM-3 within chapter E4 on Biodiversity and Ecosystems on Material impacts, risks, and opportunities and their interaction with the strategy and business model. See disclosure requirement E4-1 on Transition plan and consideration of biodiversity and ecosystems in strategy and business model See disclosure requirement E4-2 on Policies related to biodiversity and ecosystems See disclosure requirement E4-3 on Actions and resources related to biodiversity and ecosystems See disclosure requirement E4-4 on Targets related to biodiversity and ecosystems See disclosure requirement E4-6 on Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities
	Describe the resilience of the organisation's strategy to nature-related risks and opportunities, taking into account different scenarios.	41-57, 120 See disclosure requirement SBM-3 within chapter 2 General disclosures on Climate Change on Material impacts, risks, and opportunities and their interaction with the strategy and business model See disclosure requirement E4-1 on Transition plan and consideration of biodiversity and ecosystems in strategy and business model
	Disclose the locations of assets and/or activities in the organisation's direct operations and, where possible, upstream and downstream value chain(s) that meet the criteria for priority locations.	41-57, 120-123 See disclosure requirement SBM-3 within chapter E4 on Biodiversity and Ecosystems on Material impacts, risks, and opportunities and their interaction with the strategy and business model. See disclosure requirement IRO-1 in chapter E4 on Biodiversity and Ecosystems on Description of the processes to identify and assess material impacts, risks, and opportunities related to biodiversity and ecosystems.
	Describe the organisation's processes for identifying, assessing and prioritising nature-related dependencies, impacts, risks and opportunities in its direct operations and in its upstream and downstream value chain.	123-125 See disclosure requirement IRO-1 within chapter E4 on Biodiversity and Ecosystems on Description of the processes to identify and assess material impacts, risks, and opportunities related to biodiversity and ecosystems. See disclosure requirement E4-2 on Policies related to biodiversity and ecosystems
Risk management	Describe the organisation's processes for managing nature-related dependencies, impacts, risks and opportunities. Describe how processes for identifying, assessing, prioritising and monitoring nature-related risks are integrated into and inform the organisation's overall risk management processes.	
Metrics and targets	Disclose the metrics used by the organisation to assess and manage material nature-related risks and opportunities in line with its strategy and risk management process.	128 See disclosure requirement E4-6 on Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities
	Disclose the metrics used by the organisation to assess and manage dependencies and impacts on nature	128
	Describe the targets and goals used by the organisation to manage nature-related dependencies, impacts, risks and opportunities and its performance against these.	See disclosure requirement E4-5 on Impact metrics related to biodiversity and ecosystems change See disclosure requirement E4-4 on Targets related to biodiversity and ecosystems

# CONTACT

Please address any comments, requests for clarification or suggestions in connection with this report to:

## Enagás, S.A.

Paseo de los Olmos, 19 28005 Madrid

## Investor Relations Department

Tel.: 91 709 93 30 / 900 100 399

E-mail: [accionistas@enagas.es](mailto:accionistas@enagas.es)

## Sustainability and Climate Action Department

Tel.: 91 709 92 62

E-mail: [accionistas@enagas.es](mailto:accionistas@enagas.es)

# APMs

The financial information disclosed by Enagás contains figures and measures prepared in line with applicable accounting legislation, in addition to a series of measures prepared in accordance with the reporting standards established and developed internally, known as Alternative Performance Measures (APMs).

These APMs are considered to be adjusted figures with respect to those presented in accordance with International Financial Reporting Standards adopted by the European Union (IFRS-EU), which is the accounting framework applicable to the Enagás Group's consolidated financial statements, and the reader should therefore consider them as supplementary information, not replacements.

APMs are important for users of financial information because they are the measures used by Enagás' Management to assess the Group's financial performance, cash flows or financial position for making operational or strategic decisions. These APMs are consistent with the main indicators used by the investment and analyst community in capital markets.

In this regard, and in accordance with the provisions of the Guideline issued by the European Securities and Markets Authority (ESMA), in force since July 3, 2016 on the transparency of Alternative Performance Measures, Enagás provides the following information relating to those APMs included in the management information for Q4 2024 that it considers significant. Furthermore, in order to comply with ESMA guidelines on direct reference to previously published documents detailing APMs for previous periods, we include a link in which this information can be found: <https://www.enagas.es/en/investor-relations/financial-information/alternative-performance-measures-aptm/>

## 1. Alternative Performance Measures relating to the Income Statement

### EBITDA

**EBITDA** (Earnings Before Interest, Tax, Depreciation and Amortization) is an indicator that measures the company's operating income before interest, taxes, impairments and amortisation. By stripping out financial and tax figures and accounting costs that do not involve cash outflows, it is used by management to assess results over time, allowing comparisons with other companies in the sector

EBITDA is calculated as operating income plus depreciation and amortisation, impairment losses, if any, and other items that do not represent cash inflows or outflows in Enagás' operations (such as capital gains or losses on divestments, provisions, etc.). The reconciliation based on the Operating Income shown in the Consolidated Financial Statements as at December 31, 2024 is shown below:

	Q4 2024
Operating revenue	913.2
Results from Affiliates	185.8 <sup>(*)</sup>
Operating Expenses	-338.4
<b>EBITDA</b>	<b>760.7</b>

(\*) For management purposes, 'Results from affiliates' presented as part of the operating income, in the amount of 185.8 million euros, does not include the impact of the amortisation of the PPAs, for the sum of 39.4 million euros, which is considered to be a higher amortisation expense and is therefore excluded from EBITDA. Considering the two items together, the amount would be 146.5 million euros.

### Adjusted EBITDA

**Adjusted EBITDA** is an indicator that measures the company's margin of operating income before the deduction of interest, taxes, impairment, depreciation and amortisation, and includes both dividends received as well as interest on subordinated debt from associates that are included in the financial statements of the Enagás Group using the equity method.

Management uses this measurement to calculate the leverage ratios described in the section 'Alternative Performance Measures relating to the Balance Sheet and leverage ratios' so they can be compared with the figures of other companies in the sector. Below is the reconciliation of the Adjusted EBITDA of Q4 2024, which is subsequently used in the leverage ratios:

	Q4 2024
EBITDA	760.7
Dividends (*)	161.0
Results from Affiliates (**)	-185.8
<b>EBITDA AJUSTADO</b>	<b>735.9</b>

(\*) These are essentially dividends received from companies accounted for using the equity method. Additionally, it includes dividends from subordinated debt collected from companies accounted for using the equity method.

(\*\*) Since dividends received from affiliates are indicated here, the results of these companies must be excluded, but are instead included in EBITDA, as explained in the previous section.

## EBIT

**EBIT** ('Earnings Before Interest and Taxes') is an indicator that measures a company's operating income before the deduction of interest and taxes. Similar to the previous indicator, the company's Management uses this figure to assess the company's earnings over time and compare them with the figures of other companies in its sector.

EBIT is calculated the same way as EBITDA, deducting depreciation and amortisation, impairment, if any, as well as other items that do not involve cash inflows or outflows in Enagás operations (such as capital gains or losses on disposals, provisions, etc.).

EBIT for Q4 2024 amounted to 428.7 million euros. This figure matches the Operating Income for that period.

## Pro forma net profit

Since the Group announced its strategic plan, various operations have taken place as part of the asset rotation plan that make the comparability of the net profit between years not straightforward.

In this context, the **Pro forma net profit**, an indicator that measures net profit without including the non-recurring impacts derived from

significant operations, has been included, thus facilitating the comparability of this magnitude between different financial years. This is done on the basis of the net profit and eliminates the non-recurring impacts on the income statement arising from these transactions.

M€	2023 recurrent	Non-recurrent impact	2023	2024 recurrent	Non-recurrent impact	2024	Var 2024/2023 recurrent	Var 2024/2023
Regulated income	896.6	-	896.6	892.5		892.5	-4.2	-4.2
Other income	23.0	-	23.0	20.7		20.7	-2.3	-2.3
<b>Operated income</b>	<b>919.6</b>	<b>-</b>	<b>919.6</b>	<b>913.2</b>		<b>913.2</b>	<b>-6.4</b>	<b>-6.4</b>
Personnel expenses	-137.1	-	-137.1	-142.7		-142.7	-5.6	-5.6
Other operated expenses	-201.8	-	-201.8	-195.7		-195.7	6.1	6.1
<b>Operating expenses</b>	<b>-338.8</b>	<b>-</b>	<b>-338.8</b>	<b>-338.4</b>		<b>-338.4</b>	<b>0.5</b>	<b>0.5</b>
<b>Results from affiliates</b>	<b>175.0</b>	<b>24.4</b>	<b>199.5</b>	<b>185.8</b>		<b>185.8</b>	<b>-13.6</b>	<b>-13.6</b>
<b>EBITDA</b>	<b>755.8</b>	<b>24.4</b>	<b>780.3</b>	<b>760.7</b>	<b>-</b>	<b>760.7</b>	<b>-19.6</b>	<b>-19.6</b>
<b>Amortisation</b>	<b>-308.6</b>	<b>-14.8</b>	<b>-323.4</b>	<b>331.9</b>	<b>-</b>	<b>-331.9</b>	<b>-8.6</b>	<b>-8.6</b>
Depreciation and amortisation	-271.2	-	-271.2	-292.6		-292.6	-21.4	-21.4
PPA	-37.4	-14.8	-52.1	-39.4		-39.4	12.8	12.8
<b>EBIT</b>	<b>447.2</b>	<b>9.7</b>	<b>456.9</b>	<b>428.7</b>	<b>-</b>	<b>428.7</b>	<b>-28.1</b>	<b>-28.1</b>
<b>Financial result</b>	<b>-82.5</b>	<b>46.7</b>	<b>-35.8</b>	<b>-58.9</b>	<b>-682.50</b>	<b>-741.4</b>	<b>23.6</b>	<b>-705.6</b>
<b>Corporate income tax</b>	<b>-73.6</b>	<b>-4.5</b>	<b>-78.1</b>	<b>59.2</b>	<b>73.1</b>	<b>13.9</b>	<b>14.4</b>	<b>92.0</b>
<b>Income attributable to minority interests</b>	<b>-0.5</b>	<b>-</b>	<b>-0.5</b>	<b>-0.6</b>	<b>-</b>	<b>-0.6</b>	<b>-0.1</b>	<b>-0.1</b>
<b>BDI</b>	<b>290.7</b>	<b>51.9</b>	<b>342.5</b>	<b>310.1</b>	<b>-609.40</b>	<b>-299.3</b>	<b>9.7</b>	<b>-641.8</b>

(\*) In the Consolidated Financial Statements, these transactions relating to both to the sale of Tallgrass Energy, as well as the impairment due to the GSP award, had an impact on the financial result of -682.5 million euros and 73.1 million euros on the "Corporate Income tax" line, totalling an effect on the net result of -609.4 million euros at December 31, 2024.

## 2. Alternative Performance Measures related to the Balance Sheet and leverage ratios

### Net Debt

**Net financial debt** or **net debt** is the main indicator used by Management to measure the level of the Group's debt. It consists of gross debt less cash.

To calculate gross debt, the Balance Sheet headings 'Debts with credit institutions' and 'Debentures and other marketable securities' measured at amortised cost and in relation to 'Other financial liabilities' are added, including only the sum resulting from the application of IFRS16, as well as the various loans from organisations that are not credit institutions.

The cash amount is taken from the consolidated balance sheet heading 'Cash and cash equivalents'.

The reconciliation between the APM and the figures corresponding to the consolidated balance sheet for the period ending 31 December 2024 are shown below (in millions of euros):

	Q4 2024
Cash and cash equivalents	1,295.7
Bank loans	-341.8
Bonds and other marketable securities	-2,971.9
Other financial liabilities (*)	-386.0
<b>Net debt</b>	<b>-3,347.4</b>

(\*) The amount included in this heading relating to the recognition of the financial liability due to the application of IFRS16 amounts to 385.1 million euros. Additionally, the debt granted by organisations that are not credit institutions amounts to 0.9 million euros.

## Ratios linked to Net Debt

Management uses two ratios to analyse leverage and the Group's capacity to meet its financial obligations over time, comparing these with other companies in the sector.

The leverage ratio is calculated as Net Debt/Adjusted EBITDA, calculated as shown below:

	Q4 2024
Net debt	2,404.1
Adjusted EBITDA	735.9
<b>Net debt / Adjusted EBITDA</b>	<b>3.3x</b>

The ratio that compares cash flow generation capacity to net debt is calculated as FFO over the last twelve months (LTM)/net debt, as follows:

	Q4 2024
Adjusted FFO	688.8
Net debt	2,404.1
<b>FFO/Net Debt</b>	<b>28.7%</b>

## Financial cost of gross debt

The **gross financial cost** is the measure of the effective interest rate of the financial debt. This indicator is used by management to assess its evolution over time, the impact of interest rates and its position in relation to the market.

The gross financial cost is determined by dividing the gross financial expense by the average gross debt multiplied by the number of effective days in the year (360 days) divided by the natural days in the year (366 days), where gross financial expense corresponds to interest on loans and related coverage (Debt-related interest from the Consolidated Income Statement). Further, average gross debt is calculated as the daily average of nominal amounts of gross financial debt.

The reconciliation between the APM and the quantities observable in the Consolidated Income Statement at December 31, 2024 (in millions of euros) is shown below:

	Q4 2024
Gross financial expense (*)	106.2
Average gross debt	4,072.9
<b>Gross financial cost</b>	<b>2.6%</b>

(\*) The amount included under this heading corresponds to the interest associated with the debt.

## 3. Alternative Performance Measures relating to Cash Flow and Investments

### Funds from Operations (FFO)

The **FFO** is the main cash flow generation indicator analysed by Enagás Management since it jointly measures cash generation in the regulated and non-regulated domestic business and in the international business in the form of dividends from affiliates or interest charged on subordinated debt extended to these companies, after deducting both the payment of taxes and interest relating to the Group's financial debt.

It is calculated as:

**FFO = EBITDA** excluding profit (loss) from affiliates +/- taxes received/paid +/- interest received/paid + dividends received from affiliates + interest on subordinated debt charged to affiliates.

The reconciliation between this APM and the figures seen in the Consolidated Financial Statements for the period ending 31 December 2024 is shown below:

	Q4 2024
Operating income	428.7
Depreciation and amortisation (*) (***)	331.9
<b>EBITDA</b>	<b>760.7</b>
Taxes received/(paid) (****)	-46.2
Interest received/paid (**)	-13.5
Dividends (**)	161.0
Other adjustments	12.6
Results from Affiliates (*)	-185.8
<b>FFO</b>	<b>688.8</b>

(\*) For management purposes, in addition to the provision for impairment of assets, 'Depreciation and amortisation' also includes the impact of the amortisation of the PPA, which was 39.4 million euros as of 31 December 2024.

(\*\*) Interest on subordinated debt charged to affiliates is included under 'Dividends' for management purposes.

(\*\*\*) Includes impairment on disposal of fixed assets recorded in the year.

### Operating cash flow (OCF)

**Operating Cash Flow** measures the company's capacity to generate operating cash flow after changes in working capital. The calculation is based on FFO and includes changes in working capital.

The OCF amounted to 615 million euros in Q4 FY 2024. The reconciliation between this APM and the figures seen in the consolidated financial statements for the period ending 31 December 2024 is shown below (in millions of euros):

	Q4 2024
<b>FFO</b>	<b>688.8</b>
Change in working capital	-73.7
<b>OPERATING CASH FLOW (OCF)</b>	<b>615.0</b>

## Free cash flow (FCF)

**Free cash flow** measures cash generation from operating and investment activities and is considered by Enagás to be a key APM since it is the indicator used to assess the funds available to pay dividends to shareholders and to service debt.

The reported **FCF** for Q4 2024 stood at 1.386 billion euros. The reconciliation between this APM and the figures seen in the consolidated financial statements for the period ending 31 December 2024 is shown below (in millions of euros):

	Q4 2024
<b>OPERATING CASH FLOW (OCF)</b>	<b>615.0</b>
Payments for investments	-140.0
Proceeds from divestments	911.0
<b>Free Cash Flow (FCF)</b>	<b>1,386.0</b>

## Discretionary cash flow (DCF)

**Discretionary cash flow** is an APM used by Management to manage existing funding needs. It is defined as Free Cash Flow (FCF) less dividends paid to shareholders and certain exchange rate differences related to net debt.

The reported DCF for Q4 2024 stood at 1,040.9 million euros. The reconciliation between this APM and the figures seen in the consolidated financial statements for the period ending 31 December 2024 is shown below (in millions of euros):

	Q4 2024
<b>Free Cash Flow (FCF)</b>	<b>1,386.0</b>
Dividends paid	-378.9
Effect of changes in exchange rates	33.8
<b>Discretionary Cash Flow (DCF)</b>	<b>1,040.9</b>

## Available funds/liquidity

This indicator is used by Management to measure the group's financial capacity to meet any short-term liquidity needs.

It corresponds to the 'Cash and cash equivalents' figure plus the total of undrawn credit lines.

The reconciliation between the APM and the figures corresponding to the consolidated balance sheet for the period ending December 31, 2024 are shown below:

	Q4 2024
Cash and cash equivalents	1,295.7
Other available funds	1,956.8
<b>Total available funds</b>	<b>3,252.4</b>

Pursuant to Article 253 of the Corporate Enterprises Act and Article 37 of the Commercial Code, and remaining applicable standards, on February 17, 2025, the Board of Directors of Enagás, S.A. authorised the Consolidated Management Report which, in accordance with the provisions of Law 11/2018 of December 28 on non-financial information and diversity, includes the Statement of consolidated non-financial (and sustainability) information for the year ended December 31, 2024, consisting of the accompanying documents preceding this document.

#### DECLARATION OF RESPONSIBILITY:

For the purposes of Article 99.2 of Royal Decree 6/2023, of March 17, the directors state that, to the best of their knowledge, the Consolidated Management Report includes a true and fair analysis of the performance and results of the businesses and the situation of the Company, together with the description of the main risks and uncertainties faced, and includes the Statement of consolidated non-financial information (and sustainability) information in accordance with the provisions of Law 11/2018, of December 28, on non-financial information and diversity. They additionally state that, to the best of their knowledge, the directors not signing below did not express dissent with respect to the Consolidated Management Report.

**Chairman:**  
Mr Antonio Lladén Carratalá

**Chief Executive Officer:**  
Mr Arturo Gonzalo Aizpiri

**Directors:**  
Sociedad Estatal de Participaciones Industriales-SEPI  
(Represented by Mr Bartolomé Lora Toro)

Mr José Montilla Aguilera

Ms Ana Palacio Vallelersundi

Ms María Teresa Arcos Sánchez

Ms Eva Patricia Úrbez Sanz

Ms Natalia Fabra Portela

Mr Santiago Ferrer Costa

Ms Clara Belén García Fernández Muro

Mr David Sandalow

Mr José Blanco López

Ms María Teresa Costa Campí

Mr Manuel Gabriel González Ramos

Mr Cristóbal José Gallego Castillo

DILIGENCE to record that, in accordance with the call of the Board of Directors, having been held at the registered office, allowing the directors to participate telematically, the Consolidated Management Report has been drawn up with the agreement of all

members of the Board of Directors, which is certified by the Secretary to the Board with his signature below, and with the signatures of those Directors who have physically participated in the Board of Directors.

*Electronic signature of the Secretary to the Board*

**Secretary to the Board of Directors:**

Mr Diego Trillo Ruiz