



Antitrust Policy

This Policy establishes the bases and mechanisms for the promotion of a culture of business ethics that is aware and respectful of the principles of free competition, and sets out the essential lines of behaviour of the company and its professionals.

This Policy applies to all employees, managers and directors of all companies making up the Enagás Group, including any affiliates under its effective control, within the limitations established in the applicable regulations. All of them are obliged to know and respect the basic principles of the rules governing free competition, as well as this Policy and the tools made available to them by the company. Violations of this Policy will be assessed in accordance with the Company's disciplinary regime.

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 this Policy.

This Policy is fully applicable to all the company's activities and decision-making levels, and no exceptions can be identified that do not comply with these principles. This is without prejudice to the fact that its application must necessarily be adjusted to the circumstances of each case.

As part of this commitment to free competition, with regard to third parties with which Enagás maintains business relations (regular suppliers or business partners, whether national or international), Enagás will promote principles and guidelines that are consistent with the same.

Commitments

Enagás establishes the following antitrust commitments:

- Compliance with applicable national and international regulations in the performance of our professional activity, avoiding any behaviour that could be considered an abuse or restriction of competition.
- Provide its professionals with the appropriate tools so that they can carry out their activities avoiding situations of exposure to anti-competitive risks and take up the necessary measures to minimise the degree of exposure to potentially conflictive situations.

- Provide the Compliance Function with sufficient resources to ensure the effectiveness of this Policy.
- Design and implement regular training programmes to equip employees with the necessary knowledge and sensitivity to the proper management of competition risks. The training programme will be assessable, so that assimilation of the concepts can be verified.
- Include in the hiring policies of employees and suppliers their degree of sensitivity and knowledge of antitrust matters, in accordance with the law.
- Encourage the use of existing participation and consultation processes at Enagás for any ethical or legal issues related to the application of antitrust regulations.
- Promote the use of the company's whistleblower channels for reporting potential violations.
- Regularly evaluate the commercial activity of the company's different activities.
- Cooperation with the antitrust authority is considered an essential pillar of this Policy. Accordingly, upon detection of signs of an infringement, Enagás will not only put an immediate end to the possible infringement, but, if the requirements for this are met, it will in any case assess the appropriateness of reporting the situation to the authorities within the framework of the so-called leniency programme.

Management System

Enagás has established an antitrust programme based on the due-control principle and which focuses on satisfying the commitments set out in this Policy, which may be summarised in the following elements and which are implemented through the internal antitrust regulations:

- Responsibility in the area of antitrust is the duty of all members of the Company in their own particular areas, and specifically to representatives of senior management, who are responsible for its adequate management, in such a way that:
- The Board of Directors, through the Audit and Compliance Committee, is responsible for orientation, supervision and control of Antitrust strategy and policy in the Company, and for risks and public information in this regard.
- The Compliance Function reports to the Audit and Compliance Committee on antitrust matters, to which it reports functionally.
- It reflects the commitments taken on by Enagás in its regulations, constituted by the policies, regulations, procedures and controls that allow and facilitate their effective implementation.
- The existence of safeguard mechanisms, such as the Compliance Department, whose responsibilities include ensuring awareness, understanding and fulfilment of the commitments made by the

organisation that are contained in its policies, regulations and procedures.

- Establishment of a procedure for managing notifications and consultations concerning irregularities or instances of non-compliance with both the Code of Ethics and the regulations and policies that inspire or implement it, and the documents that make up the Antitrust programme.

This policy was approved by the Enagás Board of Directors, on 22 March 2021