Code of Ethics

of the Enagás Group

October 2026

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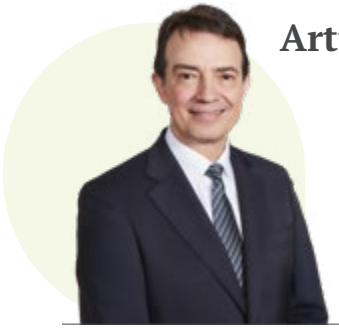
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Letter from the Chief Executive Officer



Arturo Gonzalo
CEO of Enagás

A company's ethics are measured both by the major decisions that shape its direction and by everyday actions. Through the commitment and actions of everyone at Enagás, we build the trust that our stakeholders and society place in our organisation.

This trust has been integral to our culture and values throughout Enagás' history, spanning more than fifty years. The Code of Ethics is a cornerstone of the company's Governance Model. This new edition reflects two key commitments: incorporating best practices and standards of ethics and good governance whilst remaining an organisation that is in step with the times and capable of anticipating future developments.

As such, it is a living document that is fully interwoven with our purpose and strategy, taking a flexible, cross-cutting and humanistic approach to the new demands and realities that are transforming our environment. These range from the growing importance of sustainability to artificial intelligence, for which we have a specific policy aimed at ensuring its safe, reliable and ethical use.

This same approach underpins our new Responsible Communication Policy, which focuses not only on our actions, but also on how we communicate them to society. In an environment characterised by the proliferation of channels and the immediacy of news, we reaffirm our commitment to communicating transparently, accurately, consistently and on the basis of verified information.

The Code of Ethics embodies the high standards of conduct that characterise us, setting out the behaviour expected of everyone at Enagás, regardless of where or in what capacity duties are carried out. Being aware of, understanding and putting the Code of Ethics into practice is a shared responsibility that begins with the Board of Directors and the management team and extends to everyone in the organisation.

It is our responsibility to ensure that it is also known by our stakeholders: contractors, suppliers, collaborators and business partners, etc. We want integrity to extend throughout our entire value chain, to the actions of all the people with whom we interact in our professional activity.

Ethics are not merely an obligation or a commitment; they are a way of understanding who we are and how we wish to contribute to society.

1. Our Code of Ethics

The Enagás Group's Code of Ethics is a fundamental pillar of the Governance Model. It reflects the company's ethical culture and the behaviour expected of its employees, managers, and Board members (hereafter referred to as 'professionals'), as well as of third parties who interact with the Group. The Code helps to project a consistent and responsible image of the organisation.

Compliance with the Code of Ethics is mandatory for all professionals of the companies making up the Enagás Group, irrespective of their geographical location, including companies in which the Group holds an interest and over which it exercises effective control, within the limitations established in the applicable regulations in each jurisdiction. In subsidiaries in which the Enagás Group does not hold effective control, the company shall encourage principles and guidelines that are consistent with those set out in this Code of Ethics.

Compliance with the Code of Ethics is also mandatory - within the respective areas of their dealings with Group companies - for contractors, suppliers, those who work with Enagás or act on its behalf, and its business partners.

The Code of Ethics was adopted in 2008 and has been updated on subsequent occasions: 2012, 2014, 2019 and 2023. This review was approved by the company's board of directors at its meeting on 19 October 2026. This update reflects the Group's commitment to continuously improving its ethical and compliance culture.

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

All Enagás Group professionals must familiarise themselves with the Code of Ethics, understand it, and put it into practice alongside the other regulations implementing it. Enagás professionals must therefore acknowledge their awareness of the Code of Ethics and confirm their compliance with it: (i) when they are hired; (ii) whenever the Code is updated, and (iii) at any other time when required to do so by Enagás.

Enagás has a **Sustainability and Good Governance Policy** setting out its commitments in this area, and a **Compliance Policy** which includes a commitment to develop, through a corporate approach, a Compliance Model tailored to the Group's risks and designed to facilitate its effective implementation.

I. The ethics and compliance model

This Code of Ethics formalises the ethics and compliance system of the Enagás Group, implemented through policies, rules, processes and controls in line with the most stringent international standards and current legislation. Enagás has the necessary organisational structure and resources to ensure the effectiveness of this model and to monitor its implementation. In this regard, following the acceptance of the Code of Ethics by Enagás professionals, all professionals must complete the training programmes provided by the company on this document and the regulations implementing it, taking an active role in their own professional development and undertaking to keep their knowledge of the Code up to date.

The Board of Directors is the body with ultimate responsibility for ensuring Enagás Group's ethical culture and the effectiveness of the ethics and compliance model. The Ethical Compliance Committee, which reports to the Audit and Compliance Committee, is responsible for matters relating to the ethics and compliance model. For its part, the operational responsibilities of the model rest with the Audit and Compliance Committee, which is responsible for overseeing the implementation of the ethics and compliance model and for ensuring that the Ethical Compliance Committee has sufficient resources, autonomy and independence to carry out its duties.

Any non-compliance with the Code and with the regulations that implement it shall be analysed by the Ethical Compliance Committee. When it is found that a person has contravened the Code of Ethics, the Ethical Compliance Committee, in coordination with the People and Transformation Department, will propose the corresponding disciplinary measures based on the internal regulations in force and the applicable labour framework.

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

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

In relations with third parties, Enagás transfers its values and ethical commitments to suppliers, contractors, customers and business partners with whom it collaborates through acceptance of this Code of Ethics. Enagás reserves the right not to work with third parties whose ethical conduct does not align with the company's established standards, and to terminate existing relationships in the event of any such discrepancies being identified.

The company has a model of ethical principles and codes of conduct aimed specifically at its suppliers. Compliance with these principles and guidelines is mandatory for all third parties providing services or supplying goods to the Group. This system is set out in the document 'Ethical Principles and Guidelines of Conduct for Enagás Group Suppliers'.

II. Ethics Channel (whistle-blowing channel)

As part of our duties, we must report to Enagás any reasonable indication of an irregularity, unlawful act or behaviour that is incompatible with the principles and values set out in the Code of Ethics, that comes to our attention. This obligation also applies to any breaches detected involving third parties with whom we have a relationship, such as suppliers, contractors, or business partners.

If we have any doubts about the application or scope of this Code of Ethics and its implementing regulations, or if we wish to raise any concerns, we shall bring them to the organisation's attention.

To facilitate the submission of reports, ensure they are managed efficiently and encourage the organisation to be the first to become aware of any potential irregularities, Enagás makes the Ethics Channel available to all company professionals and third parties with whom it interacts, including suppliers, contractors, business partners and other stakeholders affected by its activities.

The Ethics Channel can be accessed via the following means.

Corporate intranet

Corporate website

By post:
Paseo de los Olmos 19
28005 – Madrid, Spain
(for the attention of the Chair of the Ethical Compliance Committee)

At the request of the whistleblower, made through any of the aforementioned channels, a report may also be made at an in-person meeting within a maximum period of seven days.

The **Ethical Compliance Committee of Enagás** is the autonomous and independent body responsible for processing the communications and enquiries received through the Ethics Channel, and may seek support from any Enagás departments it considers appropriate in each case. If a communication concerns a member of the Ethical Compliance Committee, this person shall not participate in its processing.

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

Reports may be made anonymously and will be treated confidentially, in accordance with the provisions of current data protection legislation, as well as the regulations governing the protection of persons who report regulatory breaches and the fight against corruption. Consequently, the identity of the person making a report will not be disclosed to the person concerned or any third party without their consent. This ensures that the identity of the whistleblower remains confidential. Without prejudice to the foregoing, the data of persons making communications may be disclosed to administrative or judicial authorities to the extent that disclosure is required by such authorities as a result of any proceedings arising from the subject matter of the communication.

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

> The persons concerned by a notification shall be entitled to the presumption of innocence and the right of defence, with the confidentiality of the matter being guaranteed.

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

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

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

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

2. Commitment to our values

All Enagás professionals must set an example of rigour and professionalism. Ethical, responsible and consistent behaviour is essential to the company's corporate culture and its credibility with its stakeholders. We ensure that our example is positive and that we transmit the values of the organisation in our day-to-day work, both among our colleagues and with the third parties with whom we interact in our professional activity.

Before acting, we must reflect on whether or not our behaviours are aligned with the Enagás purpose, the 2030 vision and our values. We are committed to continuously improving our corporate governance model in line with best practices, always bearing in mind our shareholders' interests and the creation of value. Enagás is certified under AENOR's Good Corporate Governance Index 2.0, which reflects best practice in corporate governance and reinforces our commitment to a robust and transparent governance framework.

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 establish ourselves as an operator of future infrastructure dedicated to hydrogen transmission.
- To promote the roll-out of renewable gases across the entire value chain, encouraging innovation and collaboration with third parties, as well as the orderly development of the market.
- This involves developing innovative organisational and technological solutions that will be key in a carbon-neutral context, whilst promoting an internal culture based on ethics, sustainability and continuous improvement.

Purpose

Our purpose is twofold:

- To help ensure the **security of energy supply** - an essential service for the well-being of society - with reliability, efficiency and responsibility.
- To accelerate **decarbonisation**, driving innovation and creating value for our stakeholders, in line with the company's climate and environmental commitments.

Values

INTEGRITY
TRANSPARENCY
SAFETY
SUSTAINABILITY
EFFICIENCY
TEAMWORK
INNOVATION

I. Integrity

Crime prevention

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

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

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

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

Fight against fraud, corruption and bribery

At Enagás, we conduct our business with a commitment to ethics and integrity. In accordance with Directive (EU) 2026/1021 of the European Parliament and of the Council of 29 April 2026 on combating corruption, and other applicable national and international legislation, we expressly reject fraud, corruption and bribery.

Furthermore, and in line with the principle of 'zero tolerance' towards such conduct, we are aware of and respect the Group's policies against fraud, corruption and bribery, and we are categorically opposed to the perpetration of unlawful or irregular acts and are firmly committed to combating and preventing them. In the event of doubt about the applicable regulations, we raise our queries through the Ethics Channel.

Enagás implements a specific training plan on corruption prevention for all its professionals, taking into account the risk of corruption arising from the activities carried out by them. Furthermore, Enagás is committed to raising awareness of the prevention of corruption amongst its suppliers, contractors, customers, and business partners.

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

Enagás' Corruption Prevention Model is certified in accordance with the UNE-ISO 37001:2025 standard for anti-bribery management systems.

Enagás has an **Anti-Fraud, Anti-Corruption and Anti-Bribery Policy**, which reflects the commitments of the Group companies in this area.

Some key concepts

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

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

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

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

How do we deal with third parties?

- We ensure that third parties with whom we have dealings, i.e. suppliers, contractors, customers and business partners, act ethically and with integrity. When assessing and selecting third parties or other collaborators, we verify their professional reputation and standing, and ensure that their ethical and compliance standards align with those of Enagás.

- Any suspicious behaviour on the part of third parties with whom we have dealings must be brought to the attention of the Ethical Compliance Committee or reported via the Ethics Channel.

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

If we are faced with a request for, or indication of, a bribe or any other improper payment, we must:

- Reject it immediately and unequivocally.
- Inform any third party involved that they cannot make that payment on behalf of Enagás.
- Report it immediately via the Ethics Channel.
- Keep the relevant documentation and cooperate with the internal investigation.

If there are indications of a criminal offence, action will be taken in accordance with applicable regulations, and the matter will be reported to the relevant authority.

In the exercise of their professional activity and outside the reasonable limits for the normal practice of the business, Enagás professionals are not allowed to engage in any action aimed at obtaining advantages or benefits in the award of a business or contract. This prohibition also extends, but is not limited to, contributions or donations to political parties and governmental or non-governmental organisations, including charities, that have not undergone the authorisation procedures required by Enagás regulations.

What is considered a gift or hospitality?

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

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

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

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

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

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

Management of conflicts of interest

In our work, we always act in the best interests of the Group and avoid situations or decisions where a conflict of interest may exist, acting with full transparency in this area. We are committed to proactively identifying and reporting any potential or actual conflicts of interest that may arise in the course of our duties. Our Board members are subject to the rules on conflicts of interest established in the Regulations on the Organisation and Functioning of the Board of Directors and the applicable regulations.

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

What do we mean by a conflict of interest?

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

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

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

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

- We must abstain from discussions and decision-making that may affect the parties with whom there is a potential conflict.
- We also have a duty to refrain from accessing confidential information.
- We must act with transparency and ensure the proactive disclosure of conflicts of interest.
- We must report any situation that we believe may give rise to a potential or actual conflict of interest to the Legal and Compliance Department, or make use of the Ethics Channel.
- We must cooperate in resolving conflicts of interest.

Separation of activities

At Enagás, we carry out the following activities:

- Technical Management of the Gas System, carried out by Enagás GTS, S.A.U.
- Transport, storage and regasification of natural gas, carried out by Enagás Transporte, S.A.U.
- Development of infrastructure for hydrogen network projects of common European interest, carried out by Enagás Infraestructuras de Hidrógeno, S.L.U.

In each case, compliance with the principles of legal, accounting, functional and decision-making separation is guaranteed, as is the objective, transparent and non-discriminatory treatment of all users and participants in the system.

Enagás applies these principles in accordance with current national and European legislation, as well as the criteria of independence, competitive neutrality, and the prevention of conflicts of interest required for regulated activities and new energy infrastructure.

How do we act?

- Specific mechanisms are in place to ensure the independence of Enagás GTS, S.A.U., Enagás Transporte, S.A.U. and Enagás Infraestructuras de Hidrógeno, S.L.U., thereby preventing any operational, informational or financial interference between the activities carried out by these entities.
- We guarantee that strategic, operational and commercial decisions relating to each activity are made independently and in accordance with applicable legal and regulatory obligations.
- We protect commercially sensitive information by restricting access, applying the principle of functional necessity, ensuring traceability and supervision, and implementing appropriate measures. We prevent its use for the benefit of any gas system participant or other Enagás subsidiary.
- We do not disclose any confidential information to which we have had access in the course of our professional duties, and access to such information is restricted to professionals who require it to carry out their duties.
- We act at all times in strict compliance with the criteria of legal, accounting and functional separation established for this type of activity by the sector regulations in force.
- We avoid cross-subsidisation between regulated, liberalised and emerging activities by applying the regulators' recommendations regarding the provision of intra-group shared services.
- Enagás professionals act objectively and transparently in the performance of their duties and avoid the emergence of possible conflicts of interest between incompatible activities, applying internal regulations in this area.
- We have specific codes and protocols, as well as supervisory bodies, in place to ensure effective compliance with these principles.

In addition, independence is guaranteed and appropriate measures are established to protect the interests and commercially sensitive information of Enagás GTS through the Code of Conduct for the Technical Manager of the System.

Furthermore, Enagás has an *Action protocol to guarantee the independence of the activity of developing hydrogen and other renewable gas transport infrastructures with respect to Enagás Renovable, S.A.*

Enagás also complies with the independence requirements arising from its status as an independent gas transmission system operator (Enagás Transporte, S.A.U. as TSO); and those arising from the status of Enagás Infraestructuras de Hidrógeno, S.L.U. as provisional HTNO, authorised by the Council of Ministers' agreement of 30 July 2024 and published by means of the Resolution of 14 August 2024 of the Secretary of State for Energy. This authorisation is for the provisional exercise of functions relating to the development of Projects of Common European Interest in Hydrogen Networks, in accordance with the ninth additional provision of Royal Decree-Law 8/2023 of 27 December. Enagás also complies with any other requirements laid down in the applicable regulations or in the recommendations of the regulatory authorities.

In the field of Technical Management of the Gas System, we strictly comply, without exception, with the guidelines set out in the Code of Conduct for the Technical Manager of the Spanish Gas System.

Free competition

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

Enagás has the appropriate tools to help professionals avoid anticompetitive risks, comply with regulatory and statutory requirements and meet the highest compliance standards, taking as a reference, among other things, the *CNMC Guide to Competition Compliance Programmes*, updated in 2026. It also encourages the use of its participation and consultation procedures for any ethical or legal questions concerning the application of competition law.

Enagás has a **Policy of Separation of Activities** to promote the principles and commitments in this area.

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

How do we deal with third parties?

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

Sanctions

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

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

We comply with the economic sanctions regulations and programmes imposed by the EU and the UN Security Council, as well as those administered by the US Department of the Treasury's Office of Foreign Assets Control (OFAC), and with similar economic sanctions, anti-terrorism laws, anti-money-laundering laws and anti-boycott laws. These sanctions programmes may be comprehensive or targeted and may apply to countries and to people suspected of involvement in terrorism, drug trafficking, the proliferation of weapons of mass destruction and other security threats.

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

What are the most prominent types of sanctions for companies?

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

Political neutrality

Enagás is neutral in its relations with governments, public authorities, institutions and political parties. We do not directly or indirectly fund political parties, federations or coalitions, their public representatives or candidates, or make contributions that could be perceived as an attempt to exert undue political influence.

Enagás recognises and respects the right of its professionals to participate in political activities, provided they are carried out strictly in a personal capacity outside of working hours and do not utilise the company's resources, assets or premises. Such activities must also not give rise to any actual or apparent conflicts of interest.

Any links, membership or collaboration between professionals and political parties or other public bodies must clearly demonstrate their personal nature, whilst avoiding any explicit or implicit association with Enagás or the Group's companies at all times.

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How do we deal with third parties?

- The responsibility for Enagás' dealings with public authorities and their representatives lies with company professionals who have been formally identified and authorised for this purpose. These dealings must always be conducted in accordance with the principles of professionalism, transparency, respect for institutions and regulatory compliance.
- Employees must not exert any pressure, whether direct or indirect, on other employees, associates or third parties, in order to influence their support for, or rejection of, political options, parties or candidates. They must also not use their professional position within the company to promote political initiatives.

Protection of the company's reputation

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

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

In our dealings with the media, and whenever we participate in our capacity as professionals or as a result of our work at Enagás, we will do so with the authorisation and under the coordination of the General Communication, Institutional and Investor Relations Department, and we will comply with the guidelines established by the organisation.

This is how we make use of social media

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

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

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

Supply chain management

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

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

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

How do we deal with third parties?

- Enagás promotes environmental, social and ethical commitments and principles among its suppliers, striving to improve their sustainability performance. Enagás has a model of binding ethical principles and codes of conduct specifically aimed at its suppliers. In addition, sustainability, quality and cybersecurity requirements are established in the approval process for suppliers depending on the inherent risk of the product and service families in which the approved supplier is involved.

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

- Suppliers undertake to respect the Universal Declaration of Human Rights.

II. Transparency

Transparency and reliability of information

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

We convey information in a truthful, complete and comprehensible manner. We do not deliberately provide incorrect, inaccurate, biased or confusing information that could mislead the recipient. We do not withhold any relevant information that might distort the true and fair view of the organisation or a proper understanding of its activities, position or results.

Similarly, we do not withhold information to evade our obligations and commitments to third parties, nor do we use misleading or falsified information to obtain grants, tax relief, or other forms of aid or benefits. We also do not seek to unduly influence the perceptions of stakeholders.

Control mechanisms for the aforementioned include the Internal Control over Financial Reporting System (ICFR) and the Internal Control over Non-Financial Reporting System (ICNFR), with Enagás' professionals providing the necessary collaboration to ensure that the control system is continually updated. Regarding the preparation, recording and review of financial and non-financial information, we ensure its reliability and accuracy. We apply accounting policies in accordance with current regulations and the control systems and supervisory mechanisms defined by Enagás. We also adhere to the principles of clarity, consistency, traceability and verifiability. Our aim is to present a true and fair view of the organisation using robust and secure information systems.

Make sure you:

- Maintain accurate and complete records of transactions to ensure the information provided is correct.
- Use communications correctly and clearly, particularly if the records may become public documents.
- Never destroy documents that may be relevant to an investigation or audit, or in anticipation of one. If you have any doubts about whether a record should be destroyed, consult the Legal and Compliance Department.
- Use information tools that have been validated in accordance with corporate policy.

Watch out for:

- Accounting entries that do not reflect the true nature of the transaction.
- Unrecorded transactions, particularly those relating to undisclosed assets or liabilities.

Commitment to responsible reporting

At Enagás, we are firmly committed to the responsible management of information as an essential part of our culture of transparency and the trust our stakeholders place in us. We actively recognise and manage reputational risks associated with disinformation, promoting responsible use of information and compliance with the requirements set out in our policies and Code of Ethics.

This commitment is reflected in our Responsible Communication Policy, which sets out criteria and guidelines for managing information across all channels and with all stakeholders.

All Enagás professionals ensure the information we publish is accurate, rigorous, comprehensive, high-quality, consistent, and properly validated. We provide our stakeholders with a corrections channel through which they can make enquiries or report any inaccuracies, and we act promptly to clarify or rectify these through the appropriate channels.

Enagás has a **Responsible Communication Policy**, which sets out the principles, criteria and guidelines that must govern all communication carried out by Enagás and the Group's companies. This ensures a common framework that reinforces integrity, transparency, and the quality of disseminated content.

Communications with shareholders and investors

With the aim of maintaining the trust of its shareholders and investors, Enagás will provide its stakeholders with truthful, objective, appropriate and reliable information on the organisation's performance, on an equal footing, thereby facilitating decision-making for all its shareholders.

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

Likewise, Enagás undertakes to develop the necessary bases for the participation of its shareholders in the decisions that fall within their competence.

Relations with business partners

In relations with third parties, Enagás communicates its values and ethical commitments to suppliers, contractors, customers and business partners with whom it collaborates through acceptance of this Code of Ethics.

In the case of business partners, this commitment is formalised contractually by either adhering to the Enagás Code of Ethics or applying their own code of ethics, provided it sets out equivalent ethical commitments and principles to those of Enagás.

Where appropriate, Enagás will promote anti-corruption training for business partners acting on its behalf or for its benefit, if the applicable third-party risk assessment process indicates a certain level of bribery risk. The content, scope and means of providing this information or training will be determined based on factors such as the nature of the relationship, the activities carried out, and the level of exposure to the risk identified in Enagás' third-party risk analysis process.

Enagás reserves the right not to collaborate with third parties whose ethical conduct is not consistent with the standards established by the company, and to terminate existing relationships where breaches in this area are detected..

Enagás has a **Policy on Communication of Information, Contacts and Engagement with Shareholders, Institutional Investors, Asset Managers, Proxy Advisors and other stakeholders**, which sets out the principles and channels for communication.

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

Prevention of money laundering and the financing of terrorism

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

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

What is money laundering?

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

How do we deal with third parties?

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

Fiscal responsibility

Enagás manages its tax affairs in accordance with the principles of integrity, prudence and transparency. It complies with applicable tax legislation in all jurisdictions in which it operates.

The company promotes responsible tax management by implementing effective control and monitoring systems to ensure compliance with tax obligations and prevent tax risks.

The company also maintains a cooperative relationship with the tax authorities based on transparency and collaboration, and fully embraces the commitments set out in the Code of Good Practice defined by the Tax Authority.

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

Lobbying

When representing interests before public or private entities (commonly known as lobbying), we comply with current legislation and publish the information required in the EU Transparency Register. Enagás also adheres to that Register's code of conduct and complies with its principles and rules, including those on clearly identifying the interests represented and ensuring that the information provided is accurate.

Enagás cooperates with legislators, regulatory bodies, public authorities and other organisations with complete transparency, avoiding any action that could be interpreted as inappropriate, non-transparent or disproportionate influence, and in accordance with the principles set out in this Code of Ethics and the Code of Conduct of the European Union Transparency Register.

Relations with public authorities and their representatives are the responsibility of formally identified company professionals who are authorised for this purpose; lobbying activities on behalf of Enagás are not permitted without the relevant express prior authorisation.

How is interest management carried out with public and private entities?

Interaction - whether direct or indirect, including that carried out through duly identified third parties - with relevant authorities or bodies to promote a specific cause takes place, amongst other channels and formats, through debates or information sessions, public consultations or participation in specialist forums.

Through these activities, Enagás contributes its experience, technical expertise and sectoral insight to public policy decision-making processes, and contributes to legislative and regulatory developments that may be relevant to it, always from an institutional, transparent and well-documented position, aligned with the public interest.

Professionals must refrain from communicating, even informally, with public authorities or decision-makers on behalf of the company where such interactions could be regarded as unauthorised lobbying or as being subject to registration or reporting obligations.

III. Safety

Human rights - Respect for persons

We are committed to protecting human and labour rights as a fundamental principle that underpins all our actions and relationships.

We promote compliance with the International Bill of Human Rights, the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, the International Labour Organisation (ILO) Declaration and its core conventions, the European Convention on Human Rights and the United Nations Guiding Principles on Business and Human Rights. We do this by integrating these frameworks into our corporate culture, decision-making processes and business activities.

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

We do not tolerate child or forced labour, and we ensure respect for freedom of association and collective bargaining, equal opportunities and non-discrimination in the workplace, and respect for the dignity of all those who have dealings with Enagás.

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

Human rights are addressed using a continuous improvement approach aligned with our Sustainable Management System. In this regard, Enagás has a comprehensive due diligence system in place to identify, prevent and mitigate risks of and impacts from human rights violations, in both its own operations and throughout its value chain, including new operations.

What do we mean by harassment?

Any verbal or physical behaviour that undermines a person's dignity, particularly where it creates an intimidating, offensive, degrading or an environment in which the person is left defenceless.

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

Enagás implements the necessary measures to ensure that the working conditions of its professionals (working hours, paid holidays, a decent wage, physical working conditions, other benefits, etc.) are adequate, safeguarding their health and promoting their wellbeing and work-life balance.

Health and safety protection

At Enagás, health and safety are fundamental, non-negotiable values. They are essential for protecting people and facilities, ensuring the continuity of our operations, and enabling us to contribute responsibly to our local community.

We have developed a management model based on anticipation, identification, continuous improvement and risk control. This model is fully integrated into all business activities and decisions, in accordance with current regulations and our corporate policies. This commitment extends to our professionals, partner organisations, suppliers, and anyone else who may be affected by our activities.

Our commitment includes:

- Ensuring safe, healthy and sustainable working environments, promoting physical and emotional well-being.
- Integrating health and safety into all processes, including new projects and operational or organisational changes, with the aim of preventing and reducing accidents and work-related illnesses, whilst ensuring safe change management.
- Providing the necessary training and resources to ensure that activities are carried out safely.
- Fostering a culture of safety based on leadership, shared responsibility and mutual care.
- Making sure that suppliers and partners comply with our standards.
- Strengthening the organisation's resilience so that it can anticipate, respond to and adapt to future risks and challenges.

All professionals working at Enagás or in connection with its activities:

- Integrate health and safety into their day-to-day work and decision-making.
- Be familiar with, comply with and apply the established procedures.
- Carry out the tasks for which they have been trained, whilst actively participating in the relevant training activities.
- Identify and report immediately any risk, incident or unsafe condition.
- Use protective equipment correctly and comply with safety procedures, and stop work in the event of uncontrolled risks.
- Ensure their own safety and that of others, whilst helping to foster an environment of trust, dialogue and continuous improvement.

Enagás promotes a working environment based on responsibility and compliance.

In this context, the following are considered incompatible with our commitment:

- Concealing or failing to report incidents or unsafe conditions.
- Tampering with or disabling protective equipment or systems.
- Deliberately failing to comply with safety rules or procedures.
- Falsifying health and safety information.
- Failure to undertake the training required to carry out activities in safe and healthy conditions.
- Working in conditions that endanger one's own safety or that of others.

Enagás promotes a preventive culture based on anticipation, training, continuous learning and change management to establish a robust, resilient safety model capable of responding to an increasingly demanding environment. This commitment is implemented in accordance with Enagás' Health and Safety Policy and its Policy on Comprehensive Security at Strategic Infrastructures.

Enagás has **Policies on Health and Safety, the Environment, and Quality and Operational Excellence;** and a **Policy on Comprehensive Security at Strategic Infrastructures**, which set out the principles and requirements in health and safety matters.

IV. Sustainability

Energy transition

In accordance with our purpose, we are committed to ensuring that our actions contribute to guaranteeing the energy supply of the regions in which we are present. Furthermore, in line with the company's strategy, we are adapting and transforming our business to align with the decarbonisation of the energy sector.

In this context, we are driving forward the decarbonisation of our operations and reinforcing our commitment to carbon neutrality. Our goal is to become a Net Zero company, in line with the targets set by Enagás.

We act in accordance with these objectives by incorporating decarbonisation criteria throughout the life cycle of our infrastructure. We use energy efficiently, promote emissions reductions and support the development of low-carbon energy solutions as the energy system evolves.

Environmental protection

We are committed to preserving natural capital and exercising due diligence to prevent, minimise and, where necessary, mitigate the environmental impact of our activities, integrating these principles into decision-making. We take action to protect the environment and address climate change, including through energy efficiency, emissions reductions, the transition to a circular economy, responsible waste management, the protection of nature and biodiversity, pollution prevention and efficient resource use.

Enagás identifies, assesses and manages significant environmental and climate-related impacts, risks and opportunities arising from its activities. We prioritise a proactive approach in this regard and implement measures to prevent, mitigate and control these impacts. Should any environmental issues arise, we promptly bring them to the company's attention and activate the relevant action protocols to rectify the situation, without concealing or tolerating behaviour that could have a negative impact.

Enagás identifies, assesses and manages significant environmental and climate-related impacts, risks and opportunities arising from its activities. We take a proactive approach and implement measures to prevent, mitigate and control these impacts.

The Enagás Group is committed to ensuring compliance with applicable environmental legislation and the voluntary commitments undertaken in this area by applying the best environmental practices in the sector wherever possible and promoting continuous improvement in environmental performance.

In line with its commitment to minimising its environmental impact, Enagás sets environmental neutrality targets for its most significant aspects and allocates the necessary human, material and financial resources to ensure these are met.

Enagás has internal environmental regulations comprising policies, procedures and controls with which all professionals members must familiarise themselves and comply. These include the Environmental Policy and the Climate Action Policy. We must act in accordance with these principles when carrying out our activities and using the facilities and resources made available to us.

Enagás has a **Climate Action Policy**, which includes commitments in this area aimed at moving towards decarbonisation and thus contributing to the energy transition process. It also has an **Environmental Policy** which sets out the Group's commitments regarding environmental protection.

How do we deal with third parties?

- We promote the adoption of environmentally responsible practices throughout our value chain and ensure its performance aligns with the Group's environmental and climate commitments.
- We diligently deal with any possible environmental queries or complaints from communities neighbouring Enagás facilities or other affected third parties, and bring them to the attention of the organisation as soon as possible through the established channels so that they can be analysed and, if necessary, resolved.

Environmental commitment

Enagás contributes to the socio-economic development of local communities in the areas where it operates through initiatives that promote a positive impact and help to meet the needs of society, based on an approach centred on creating shared value and respect for human rights. We contribute to the development of a more prosperous and sustainable environment by ensuring that our activities are properly integrated into the local area and by promoting the creation of local jobs.

Our relationship with local communities is based on trust, mutual respect, ongoing dialogue and an understanding of the areas in which we operate. We promote channels of dialogue through which communities and other stakeholders can raise concerns, expectations and complaints relating to our activities and projects.

Enagás demonstrates this commitment through responsible collaboration with public, private and third-sector organisations, including NGOs. We also support the community through sponsorship, patronage and donations, always in line with the Group's values, and in accordance with ethical standards, due diligence and transparency.

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

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

How do we deal with third parties?

- If a third party requests Enagás' collaboration with a cause through sponsorship, patronage or donations, we inform the General Communication, Institutional and Investor Relations Department, the area responsible for the coordination and management of these initiatives.

V. Efficiency

Use of company assets

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

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

Furthermore, in accordance with current legislation on industrial and intellectual property and trade secrets, any developments, inventions, technical improvements, software and other creations produced by Enagás' professionals in the course of their duties or using the company's resources are assets owned by Enagás.

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

We are committed to keeping our information systems secure, preventing and responding to threats. We tailor our security measures to meet the needs of each business area, ensuring that information is always kept confidential, complete and accessible. If security is threatened, we act immediately to resolve the problem.

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

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

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

This is how we use Enagás' technological equipment

- We will not use the organisation's equipment for illegal purposes or for any other activity that could damage Enagás' reputation or affect the operation of its computer systems.
- We must have Enagás' authorisation for the installation or use of systems on the organisation's equipment, as well as for access to third-party equipment with our corporate user account.
- We cannot download, view or distribute material that is illegal, that infringes people's rights or may be offensive.
- Upon termination of our professional relationship with Enagás, we will return any goods provided to us by the company in good condition.
- The use of personal devices for work purposes is not permitted. Should this occur, the Engineering, Technology and Digitalisation Department must be notified in order to implement the necessary cybersecurity measures.

How do we deal with third parties?

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

Information confidentiality

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

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

Any reasonable indication of leakage of confidential or inside information shall be reported by those who become aware of it to their immediate superior and to the Legal and Compliance Department.

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

Enagás has an **Internal Code of Conduct** in matters relating to securities markets, which regulates compliance with legislation on market abuse, the use of inside information and other securities market-related issues.

What is considered to be inside information?

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

This is how we manage confidential information

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

We shall comply at all times with current data protection legislation and shall also ensure that any personal information to which we have access is adequately protected.

What do we understand by information of a personal nature?

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

This is how we protect personal data

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

Use of artificial intelligence and other disruptive technologies

At Enagás we promote the digitalisation and efficiency of processes.

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

We do not use disruptive technologies on corporate devices without prior approval from Enagás, and only use them to achieve Enagás' objectives whilst respecting people's rights and complying with Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024, which lays down harmonised rules on artificial intelligence, as well as all other applicable legislation. In the event of detecting possible malicious use, we will inform our managers.

We do not enter confidential information into AI tools or external platforms that have not been expressly authorised by Enagás. Before using any generative AI tool for work, we ensure that its use is compatible with our confidentiality obligations and the protection of the company's intangible assets.

Enagás has an **Artificial Intelligence Policy**, setting out the guiding principles, commitments, and management model applicable to the professional design, development, and use of AI tools.

Enagás is firmly committed to promoting ethics in AI development, ensuring that its application is fair and that its outputs are free from discriminatory bias. In this regard, we take into account UNESCO's Recommendation on the Ethics of Artificial Intelligence, published in November 2021 and adopted by all 193 Member States, including Spain.

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

VI. Teamwork

Collaboration and teamwork

At Enagás, we foster an environment of trust, mutual respect and collaboration.

As a cross-functional team, we share knowledge, skills and resources to achieve the organisation's common objectives.

We value diversity of experience, perspective and ideas as a source of enrichment, improvement and innovation, and encourage open and constructive dialogue.

We promote active collaboration between individuals and organisational units to maximise collective impact and value creation.

Team leaders foster participatory, inclusive environments geared towards developing individual and collective skills.

Success at Enagás is a shared achievement based on everyone's contribution, commitment and responsibility within the organisation.

How do we deal with third parties?

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

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

Career development and equal opportunities

At Enagás, equal opportunities and talent development are fundamental principles of our organisation.

We do not tolerate any form of discrimination on the grounds of gender, nationality, race, disability, sexual orientation, gender identity, age, religious beliefs, political opinions or any other personal, family, economic or social circumstance.

Our selection, recruitment, performance appraisal, promotion and remuneration processes are based on transparent, objective criteria that take into account merit, skills and professional contribution.

We promote equal opportunities through an equity-based approach, working to identify and remove any barriers that may limit access to, or development of, talent, or hinder career progression.

We promote the professional and personal development of our professionals as a key factor in the organisation's sustainability and success. This is a shared responsibility between the organisation and each individual, with each person playing an active part in their own development by keeping their skills up to date and contributing to the achievement of our common objectives.

We promote internal mobility and the acquisition of diverse experiences to develop solid career paths, thereby enhancing employability and creating value over time.

People in leadership roles must actively ensure that decisions are fair, objective and free from bias, support their teams' development and foster inclusive and equitable workplaces. Enagás also continually improves its professional development practices to ensure a respectful, diverse, inclusive workplace that supports people's growth.

Training

At Enagás, we promote a culture of continuous learning focused on our people's professional development and on strengthening the capabilities that help achieve the organisation's objectives. Through the Enagás Corporate University, we provide training plans to keep professionals knowledge and skills up to date; active participation by individuals in their own development is essential.

Work-life balance

Enagás is fully committed to promoting policies and measures that facilitate shared responsibility and work-life balance, fostering a genuine balance between its professionals' work and personal lives. Our organisation is committed to an inclusive and flexible working environment, enabling everyone to develop their career without compromising their personal wellbeing.

At Enagás, we promote the adoption of flexible and collaborative ways of working, prioritising value creation and providing our professionals with tools that foster agility, cross-functional collaboration and innovation.

We have hybrid working models in place that enable a healthy work-life balance, whilst increasing productivity and optimising the use of technology.

Furthermore, Enagás professionals will adhere to the Corporate Guidelines on the Right to Digital Disconnection. This will ensure that rest and leisure time is respected, thereby contributing to a healthy and balanced working environment.

Diversity and inclusion

This is how we promote diversity and inclusion

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

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

How do we deal with third parties?

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

VII. Innovation

Promotion of innovation and entrepreneurship

At Enagás, we recognise that we operate in a changing market and environment. Therefore, all Enagás Group professionals take a proactive approach, promote innovation and change, and respond to new ideas with openness and a collaborative attitude.

We support and promote innovative projects that, in accordance with the company's strategy, allow us to generate value and diversify our business, as well as to position ourselves in disruptive technologies aligned with improving the efficiency, competitiveness and sustainability of the energy sector and supporting its decarbonisation through the incorporation of renewable gases.

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

Ethics must be central to every stage of the innovation process, from the conception of an idea to its implementation and scaling up. At Enagás, we promote responsible innovation by balancing progress and value creation with consideration of the ethical and social impacts that may arise along the way.

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

Innovations developed within Enagás stem from coordinated work by teams, departments and business units, using company resources as part of its strategic initiatives. To ensure these contributions are properly channelled, we must report to Enagás any invention, development, technical improvement or creation arising from our professional activities, using the designated innovation channel and following the Innovation Communication Protocol.

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

Policies

- Major Accident Policy
- Climate Action Policy
- Quality and Operational Excellence Policy
- Cybersecurity and Data Governance Policy
- Policy on Communication of Information, Contacts and Engagement with Shareholders, Institutional Investors, Asset Managers, Proxy Advisors and other stakeholders of Enagás, S.A.
- Responsible Communication Policy
- Conflicts of Interest Policy
- Business Continuity Policy
- Anti-Fraud, Anti-Corruption and Anti-Bribery Policy
- Risk Control and Management Policy
- Compliance Policy
- Antitrust and Competition Policy
- Human Rights Policy
- Diversity and Inclusion Policy
- Fiscal policy
- Policy on Comprehensive Security at Strategic Infrastructures
- Human Capital Management Policy
- Sustainable Management Policy of the General Meeting of Shareholders
- Innovation Policy
- Artificial Intelligence Policy
- Environmental Policy
- Crime Prevention Policy
- Health and Safety Policy
- Enagás Group's Separation of Activity Policy
- Internal Information System Policy
- Sustainability and Good Governance Policy

View our policies **here**

Code of Ethics

of the Enagás Group