



# Climate Action Policy

---

This policy includes the necessary commitments to guarantee due diligence on climate action, aimed at driving decarbonisation and thus contributing to the energy transition process. The commitments of this policy also contribute to the achievement of the Sustainable Development Goals.

Enagás adheres to the spirit and letter of the obligations and regulations of the various legal jurisdictions in which it operates, and to any others it has undertaken voluntarily.

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. In the case of affiliates not effectively controlled by the Enagás Group, principles and directives that are consistent with those established in this policy will be proposed in their Board meetings.

In addition, the Company will also encourage the application of the principles of this Policy in respect to joint ventures and other equivalent associations or entities to the extent possible. When working with contractors, suppliers, and other entities collaborating with Enagás or acting on its behalf, Enagás will promote principles and commitments consistent with this policy, placing special emphasis on the supply chain.

## Commitments

Enagás establishes the following commitments in relation to mitigation and adaptation to climate change:

- Driving 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 at national level and internationally.
- Integrating the physical and transition risks arising from climate change, as well as the opportunities, in the short, medium and long term, into the business strategy by building in appropriate assessment, management and mitigation mechanisms that take into account adaptation and resilience criteria.
- Defining a decarbonisation pathway towards carbon neutrality in 2040, including emission reduction targets (scopes 1, 2 and 3) aligned with the 1.5°C scenario to be included in the short- and long-term variable remuneration incentive programmes of all employees in the company to whom such a remuneration scheme applies.
- Achieving carbon neutrality by 2040 by applying the greenhouse gas mitigation hierarchy:
  - Prioritising energy savings and efficiency measures, as well as emission reduction measures with the greater 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.
- Ensuring transparency in the information provided to stakeholders by applying internal processes, controls and protocols that guarantee their reliability and rigour.
- Providing training and information to ensure that the Company's employees and third parties it interacts with are aware of and understand the obligations contained in this policy.
- Regularly updating this policy to ensure that it reflects international recommendations and best practises by aligning it with the recommendations of the Task Force on Climate Related Disclosures and other standards and reference reporting frameworks.
- 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.

## Management Model

Enagás has a climate action management model aimed at fulfilling the commitments described in this policy, which can be summarised as follows:

- The responsibility for climate action lies with each component of the organisation at its specific level of action, in particular with Management representatives and the members of the hierarchy who are responsible for proper management, i.e.:
  - Through the Sustainability and Appointments Committee, the Board of Directors is responsible for overseeing climate action performance.
  - The Sustainability and Appointments Committee, through the Sustainability Committee, is responsible for approving targets and action lines and monitoring climate performance.
  - The Audit and Compliance Committee oversees the effectiveness of the risk control and management systems and assesses the potential impact of climate change.
  - The Executive Committee oversees and implements the overall risk management strategy agreed by the Board of Directors, the global limits for the company and 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, which is responsible for Sustainability and Climate Action, Strategy and national and international Regulation, areas that provide input for the definition of the decarbonisation strategy, as well as the identification of the opportunities and risks derived from climate change.
  - The Safety, Health, the Environment and Quality Committee regularly assesses and manages climate change issues related to business processes, impact assessment studies and environmental assessment.
- Reflection of the company's commitments in its regulations, constituted by the Enagás Group Code of Ethics, as well as in its policies and processes that allow and facilitate their effective implementation.
- The existence of regulatory compliance mechanisms and bodies such as the Ethical Compliance Committee, which reports to the Board's Audit and Compliance Committee and, among other tasks, is responsible for ensuring that the company's commitments set out in its code of ethics and policies are known, understood and adhered to.
- The existence of a whistleblowing channel (ethics channel), accessible both to professionals and to third parties with whom Enagás has professional relations (suppliers, contractors, customers, partners, local communities, associations, etc.) and the establishment of a procedure for managing notifications and queries regarding irregularities or breaches of the Code of Ethics and the rules and policies that inspire or develop it, the operating

principles of which are described in the Enagás Code of Ethics and in the Internal Reporting System Policy.

**This policy was approved by the Enagás Board of Directors on  
20/05/2024**