



Corporate Defence Policy

This policy includes commitments on crime prevention that reflect the company's firm opposition to the perpetration of any criminal offences and its willingness to combat such acts, in line with the company's principle of "zero tolerance" towards the perpetration of crimes established in the Company's Code of Ethics.

For the implementation of this Policy, the Company has established a model of organisation and management of criminal risks (hereinafter referred to as the Corporate Defence Programme) that will serve as a means of preventing the commission of crimes at Enagás. It is also intended to prove that the Company exercises the supervision, monitoring and control functions required under Spanish criminal law to prevent it from being held criminally liable.

In addition, this policy reinforces the commitment, already reflected in the "Anti-Fraud, Corruption and Bribery Policy", to work against fraud and corruption in all its manifestations, including those which, due to their seriousness, may be considered criminal.

This policy applies to all employees, managers and directors of all companies making up the Enagás Group in Spain, including any affiliates under its effective control, within the limitations established in the applicable regulations. In the case of affiliates not effectively controlled by the Enagás Group, the company will undertake principles and directives that are consistent with those established in this policy.

Group companies located in jurisdictions other than Spain may approve their own corporate defence policies or programmes applicable to such companies in order to comply with the requirements applicable to them under local regulations on the criminal liability of legal entities. Such policies or programmes will in all cases be in accordance with the principles contained in this Corporate Defence Policy.

It is expected that all Personnel, Enagás Partners and other third parties with whom the company has business relationships understand and comply with the provisions set out in this Policy.

Commitments

Enagás establishes the following corporate defence commitments:

- Not to tolerate under any circumstances the perpetration of crimes by the company's professionals or by third parties acting on its behalf.
- The Company shall Support all efforts to prevent and detect the perpetration of crimes in all their manifestations and will seek to eradicate them in all areas of the Group's activities in which its directors, executive officers and employees are involved and in all its relations with third parties.
- To generate an environment of transparency, integrating the different processes established for crime prevention and maintaining appropriate communication channels to encourage the reporting of possible irregularities, including the Enagás Whistleblowing Channel, or any other means that the company may establish in the future.
- To urge all Enagás professionals, as well as suppliers, contractors, and those who collaborate with it or act on its behalf, including its business partners, to raise any issues or suspicions of criminal activity as soon as possible, through the channels established for this purpose.
- Not to retaliate in any way against a professional who, acting in good faith, reports or communicates an activity that could be considered criminal. Likewise, there will be no reprisals against a professional who refuses to take action that could be considered susceptible to being considered as criminal offences.
- To regularly review the content of the Corporate Defence Policy and the Corporate Defence Programme, ensuring that they reflect the requirements of the applicable criminal regulations, recommendations and best practices in force at any given time.
- To investigate any report of an alleged criminal act or fraudulent or irregular act, regardless of the amount involved, as soon as possible, guaranteeing the confidentiality of the complainant and the rights of the persons under investigation. Likewise, the Company will provide any assistance and cooperation that may be required by judicial and administrative bodies or national or international institutions and organisations for the investigation of allegedly criminal, fraudulent or irregular acts that may have been perpetrated by its professionals.
- To establish elements of internal control, including financial and accounting, sustainability and corporate governance, to prevent and, where appropriate, detect and eradicate possible criminal practices.
- To implement adequate dissemination and training programmes for the Group's professionals on the duties imposed by the applicable legislation with sufficient frequency to ensure that their knowledge of criminal matters is updated.

- To impose disciplinary sanctions for conduct contrary to the provisions of the Corporate Defence Programme and those that contribute to preventing or hindering the discovery of possible criminal acts, in accordance with the disciplinary measures established by the Company, and always in accordance with prevailing legislation.

Management system

Enagás has implemented the Corporate Defence Programme through a formal framework consisting of regulations, activities, processes and internal controls that have been continuously applied in the organisation, allowing us to identify, assess, mitigate and prevent (or at least significantly reduce the risk of committing) crimes, with the ultimate goal that the legal entity as well as its employees, managers and directors are not declared criminally liable under Spanish criminal law.

This Programme complies with the legal requirements established by:

- Identification and evaluation of the different criminal risks to which the company is exposed.
- Identification of the surveillance and control measures in place in the Company that have the potential to prevent the perpetration of crimes.
- Identification of the governance and control bodies that assume the supervision, monitoring and control of the Corporate Defence Programme.
 - The Enagás Board of Directors is ultimately responsible for adopting and effectively executing the Corporate Defence Programme.
 - The Audit and Compliance Committee, as the Criminal Prevention Body for the purposes of Article 31 bis 2.2 of the Spanish Criminal Code, is responsible for the management of criminal risks and for training and communication in criminal matters.
 - The Compliance Department will ensure the validity of the Corporate Defence Programme and its elements, its adaptation to the Law and the updating of documentation.
- The identification and development of the other measures required by the Criminal Code that are part of the Corporate Defence Programme and are reflected in the commitments assumed by the Company in this Policy.

This policy was approved by the Enagás Board of Directors,
on 21/03/2022