



Human Rights Policy

This policy covers the commitments made by Enagás in matters of human rights. In its Code of Ethics and the corporate policies which it comprises, Enagás develops these commitments, in line with, among others:

- International Charter of Human Rights of the United Nations (UN).
- The International Labour Organization (ILO) Declaration as well as the fundamental conventions (freedom of association and freedom to join a union, and the effective recognition of the right to collective bargaining; the elimination of all forms of forced or compulsory labour; the effective abolition of child labour; and the elimination of discrimination in respect of employment and occupation) and the conventions relating to indigenous and tribal peoples.
- OECD Guidelines for Multinational Enterprises.
- The European Convention on Human Rights.

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 to all employees, managers and directors of all companies making up the Enagás Group, under the terms set out in the applicable regulations. At those investee companies 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.

Commitments

Enagás is committed to ensuring respect for the following human rights relating to labour practices, society and local communities.

Labour practices:

- Right to decent work and rejection of forced, compulsory and child labour: To offer stable and quality employment.
- Right to rest and free time and the right to family life: To create a flexible working environment, adapted to the needs of each employee, which favours the balance of personal and professional life.
- Right to freedom of association: To recognise the right of professionals to promote and defend their economic and social interests without this being the basis for discrimination, and any agreement or decision by the company contrary to this principle is deemed null and void.
- Right to collective bargaining: To engage in collective bargaining and consult regularly with workers' legal representatives.
- Right to workplace non-discrimination and diversity: To guarantee equal opportunities and diversity, eliminating the elements of discrimination in any field of work (remuneration, selection, recruitment, personal progress, career promotions and performance evaluation) and for any circumstance (gender, disability, age, race, sexual orientation, religious beliefs, political opinions, etc.), promoting initiatives and actions to guarantee this commitment and reject and prevent all forms of abuse, harassment, threats or intimidation in the workplace.
- The right to fair and favourable remuneration and the right to equal pay: To provide a decent salary by establishing a performance-linked remuneration system based on the contribution of professionals to the creation of value and the achievement of the company's strategic objectives and challenges.
- Right to a safe working environment, right to life, liberty and security of the person: To endorse the Voluntary Principles on Security and Human Rights and ensure that the best occupational health and safety conditions are respected in the workplace.
- Right to freedom of opinion, expression and information: To provide professionals with clear and transparent internal communication channels that allow them to communicate with management, guaranteeing freedom of opinion and expression.

Society and local communities:

- Rights of indigenous communities and populations: To contribute to the socio-economic development of local communities, giving priority to those areas in which the company operates, through sustainable social action models, paying special attention to the most vulnerable

communities such as indigenous or tribal populations¹.

- Right to dispose of natural resources, land rights: To manage natural capital and control and minimise the environmental impact of activities.
- Property rights, resettlement and compensation: To take into account, in the development of infrastructure construction projects, criteria aimed at avoiding the occupation of privately owned areas and minimising possible relocations of local communities by applying information, consultation and fair compensation procedures that guarantee transparency and equal treatment.
- Prevention of abuse by security forces and prevention of cruel, inhuman or degrading treatment: Guarantee that the private security bodies that protect Enagás' professionals and properties act in accordance with prevailing national legislation and regulations and international law.
- Right to privacy of information: To treat the personal information of professionals, customers and suppliers with the maximum guarantees of respect for privacy and legal compliance.

In addition, and in order to guarantee respect for human rights in the supply chain, Enagás establishes the following commitments:

- To ensure that suppliers, and especially those with workers operating within Enagás facilities, respect human rights by requesting a commitment, necessary documentation and conducting audits.

In addition, Enagás establishes the following human rights commitments in those companies in which the company has no effective control:

- To encourage compliance with the corporate policies in business agreements (according to the level of influence).
- To transfer critical management standards that include the areas necessary to guarantee respect for human rights.
- To evaluate respect for human rights in due diligence processes as a critical aspect.

Management system

Enagás follows the roadmap set by the United Nations through the Sustainable Development Goals to ensure compliance with human rights that apply to the context and activities of the company. To this end, Enagás has established a management system based on the due-control principle and focusing on adherence to the commitments set out in this policy, which may be summarised

¹ As defined in ILO Convention 169 concerning Indigenous and Tribal Populations.

as follows:

- The responsibility of the Board of Directors in terms of the orientation, supervision and control of strategy, policies, risks, objectives and results in matters concerning human rights.
- The responsibility of the Sustainability Committee to control and monitor human rights, reporting in turn to the Appointments, Remuneration and CSR Committee, set up at Board level.
- Assignment of responsibility for establishing courses of action, objectives and follow-up indicators to various company departments.
- Reflection of the company's commitments in its regulations, constituted by the Enagás Group Code of Ethics, and the policies, processes and controls for their effective implementation.
- Compliance with applicable internal and external regulations both by the company's staff and, where applicable, by third parties that have dealings with the company.
- Training and information to ensure that company employees are aware of and comprehend the regulations and commitments to enable them to carry out their tasks.
- The existence of safeguard mechanisms 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 transparency of information supplied to third parties, to guarantee its reliability and accuracy.
- The implementation of processes for the purposes of participation and consultation with stakeholders, in order to guarantee that their needs and expectations are known to the company and, where appropriate, added to its regulations.
- The existence of mechanisms for redress in the event of non-compliance with any of the human rights included in this policy, such as the ethics channel (accessible to all stakeholders) and the Ethical Compliance Committee.

**This policy was approved by the Enagás Board of Directors, on
21/10/2019**