



Enagás Group Code of Ethics

Index



Message from the Chairman and the CEO

Enagás today is a very different company from the one that was founded in 1972. Throughout our history we have experienced significant changes: from the construction of the main infrastructures of the Spanish Gas System, to the development of new services in line with the energy transition, including an internationalisation process, which has taken us to eight countries.

In all this change, there is an element that has always been present: exemplariness. Ethics are part of the DNA of Enagás. They are implicit in our values, which characterise our daily behaviour.

This Code of Ethics is a reflection of this commitment. This mandatory guide describes the conduct expected of all professionals of the Enagás Group, regardless of the company to which they belong or their place of work. We must all familiarise ourselves with it, understand it and put it into practice, starting with the Board of

Directors and managers, who must lead the actions of professionals by example.

It is also everyone's responsibility to make the Code of Ethics known to our stakeholders: contractors, suppliers, freelancers, partners, etc. It is essential that everyone we deal with acts with integrity, because that must continue to be the hallmark of Enagás both now and in the future.

For all these reasons, today we are presenting you with an updated Code of Ethics. Professionals from different areas have been involved in updating it and have contributed their opinions in surveys and focus groups. We sincerely thank you for your collaboration and encourage everyone to familiarise themselves with the results without forgetting that, in the event of doubt, it is always preferable to consult before acting.

We hope that this Code of Ethics will continue to be a guide for all of us.



Antonio Llardén
Chairman



Marcelino Oreja
Chief Executive Officer

1. Our Code of Ethics

The Code of Ethics reflects **Enagás' ethical culture** and sets out the guidelines that determine the behaviour of its employees, managers and directors (hereinafter referred to as "persons" or "professionals" or "employees") and of third parties that have connections with the group.

Compliance with the Code of Ethics is obligatory for all staff of the companies making up the Enagás Group, including any subsidiaries under its effective control, within the limitations established in the applicable regulations. It is also obligatory in their respective areas of relationship with the company by contractors, suppliers, those collaborating with Enagás or acting in the company's name, and the company's business partners. 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 policy.

The Code of Ethics was approved in 2008 and revised in 2012 and 2014. The current version was approved by the company's Board of Directors at its meeting held on 16 December, 2019.

The **Code will be reviewed** as often as necessary to ensure that its content is aligned with applicable law and best practices, and to guarantee the effectiveness of the ethics and compliance programme.

As Enagás professionals, we must **understand and comply with the Code of Ethics** and the rules that develop it. When required by Enagás, we must accept knowledge of the Code and confirm compliance with it.

I. The ethics and compliance programme

The Code of Ethics formalises Enagás' programme of ethics and compliance and is developed through **policies, standards, processes and controls**. The company has the necessary organisation and resources to ensure that this programme is followed. In this sense, it provides the necessary **information and training** so that Enagás staff understand this Code and the rules that develop it.

The **Board of Directors** is the body with ultimate responsibility for ensuring Enagás' ethical culture

and the effectiveness of the ethics and compliance programme. The **Ethical Compliance Committee**, which reports to the Audit and Compliance Committee, assumes the competences related to the ethics and compliance programme. For its part, the **Audit and Compliance Committee** is responsible for supervising the implementation of the ethics and compliance programme and for ensuring that the Ethical Compliance Committee has sufficient resources, autonomy and independence.



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

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, the Ethical Compliance

Committee, together with the Human & Corporate Resources Department, will propose the corresponding disciplinary measures based on the regulations in force and the applicable labour framework.



In the event that a director commits a breach, it will be managed in accordance with the provisions of the Regulations of the Board of Directors or other applicable rules

In **relations with third parties**, the company transfers its values and ethical commitments to suppliers, contractors and business partners with whom it collaborates through

acceptance of this Code. Enagás reserves the right to collaborate with those third parties whose ethical performance is not consistent with the established standards.



Enagás has a Code of Ethics for Suppliers, which is mandatory for all third parties that are suppliers to Enagás

II. Ethics Channel (whistleblowing line)

In our daily work we must inform the company of any **behaviour contrary to the commitments** set out in the Code of Ethics that we observe. We must also report breaches by third parties with whom we interact, such as suppliers, contractors or business partners.

Also, if we have **questions about the interpretation** of the Code and the rules that develop it, or we want to express any concerns, we must send them to the company.

For this purpose, Enagás has the **Ethics Channel**, which all of us, Enagás professionals and third parties related to Enagás, can use as follows:



Send a letter to Paseo de los Olmos 19, 28005 - Madrid, Spain (for the attention of the Chairman of the Ethical Compliance Committee)

The **Ethical Compliance Committee** is the body responsible for processing the communications and queries

received through the channel, which may be supported by the Enagás management as it deems appropriate in each case.



Notifications will be managed on the basis of what is established in the Procedure for managing Notifications and Consultations regarding irregularities or breaches of the Code of Ethics

Communications may be anonymous and will be treated confidentially and in accordance with current data protection legislation.

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.

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 or applicable regulations to light, or against those who collaborate in investigations into alleged irregular actions.



How are communications through the Ethics Channel managed?

1 Prior analysis of communication

Supervisors: Secretary and Chairman of the Ethical Compliance Committee. They will assess whether or not the communication is approved or rejected.

2 Analysis and investigation of the communication

Supervisors: Ethical Compliance Committee, together with the directorates or bodies of Enagás that it considers appropriate in each case. It may also be supported by third parties.

3 Resolution and notification

Supervisors: Ethical Compliance Committee: takes the relevant decisions regarding the notified case. Chairman of the committee: communicates the conclusions to the whistleblower.

2. Commitment to our values

All Enagás professionals must set an example of rigour and professionalism. 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 mission, vision and values.

Mission

To develop and manage global gas infrastructure in a secure, efficient and sustainable manner; complying responsibly with prevailing legislation and helping guarantee supply, particularly in our role as the Technical System Manager in Spain; offering our experience, knowledge and best practices to create value for our stakeholders.

Vision

To be a national and international standard bearer in the development and management of gas infrastructures, promoting their use by offering innovative services that contribute to sustainable development.

Values

I. Integrity: *We have integrity*



FIGHT AGAINST FRAUD, CORRUPTION AND BRIBERY

At Enagás, we conduct our activities with ethics and integrity, and **expressly reject fraud, corruption and bribery.**



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.

We know and respect the company's rules against fraud, corruption and bribery. In the event of doubt about the applicable regulations, we raise our queries through the Ethics Channel.

We accurately 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 or privileges of any kind for unethical purposes.



Enagás regularly reviews its accounting and internal control processes to ensure that no undue payments are hidden

How do we act with respect to third parties?

- ✔ We monitor our suppliers, contractors and business partners to ensure that they act ethically and with integrity. In the processes of analysis and selection of third parties, we check their reputation and professional solvency and ensure that their models of ethics and compliance are aligned with those of Enagás.
- ✔ Any suspicious action by a third party with whom we have a relationship, such as suppliers, contractors, business partners, government officials or others, must be reported to the Compliance Department, or reported through the Ethics Channel.
- ✔ The relationship with **public administrations** and their representatives will be the responsibility of the people of the company formally authorised to do so.



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

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

We must not offer or accept, either directly or indirectly, gifts or hospitality from third parties, including public representatives, which go beyond the purely symbolic or which could be interpreted as an attempt to influence our will or to obtain undue advantage.

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



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.



Can we accept or give gifts or hospitality in any situation?

It is possible to do so provided that such gifts or hospitality are of a **symbolic** nature.

As long as all of the following conditions are fulfilled:

- Consistency with our policies and those of the recipient.
- The amount does not exceed that established in the Procedure for Managing the Offering and Acceptance of Gifts.
- They are proportional to the circumstances and social uses. When in doubt, we should reflect on whether we would feel comfortable if such a gift were publicly known.
- They have not been requested.



If we are in doubt as to whether a gift or hospitality that has been offered or that we intend to offer is appropriate, or goes beyond the symbolic, we must consult with the Compliance Department or through the Ethics Channel



Remember to record gifts accepted or given on the basis of the provisions of the Enagás Procedure for Managing the Offering and Acceptance of Gifts

MANAGEMENT OF CONFLICTS OF INTEREST

In our work, we always act in the **best interest of the company** and avoid situations or decisions where a conflict of interest may exist. **Our directors** are

subject to the rules on conflicts of interest established in the Regulations of the Board of Directors and the applicable regulations.



Remember that there are rules and procedures at Enagás regarding incompatibilities and the performance of other professional activities



What do we mean by a conflict of interest?

Conflicts of interest exist when a decision that we take or must take in the course of our work may be of benefit to us, directly or indirectly, or to a person with whom we have a family, emotional or business relationship.

Pay special attention to:

- Situations involving friends and family.
- Business opportunities arising in the course of your work.
- Other professional activities outside your activity at Enagás.



This is how we deal with a possible conflict of interest



We must report any situation that we believe may involve a potential conflict of interest to the Compliance Department or through the Ethics Channel



It is very important to refrain from intervening in or influencing any decision that may affect the parties with whom the potential conflict exists

In the area of **Technical Management of the Gas System (GTS)**, we strictly comply with the guidelines contained in the GTS Code of Conduct without exception.

How do we act with respect to third parties?

- ✔ We avoid conflicts of interest in relationships with suppliers, contractors, business partners and customers.

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.

How do we act with respect to third parties?

- ✔ 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.

POLITICAL NEUTRALITY

Enagás is a neutral organisation in its relations with governments, public authorities, institutions and political parties. We do not finance, directly or indirectly, political parties or their representatives or candidates.

How do we act with respect to third parties?

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



Enagás recognises the right of its employees to participate in political activities, provided, that such activities do not interfere with their professional performance, do not give rise to a conflict of interest and are conducted in a personal capacity

PROTECTION OF THE COMPANY'S REPUTATION

Enagás employees protect the company's 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 networks**, we act with prudence and common sense and avoid behaviour that could be a risk to Enagás' reputation.

With respect to **public and media contributions**, whenever we participate as employees or as a result of

the work we do at Enagás, we will have the authorisation of the Corporate Communication and Public Affairs Office and will comply with the guidelines established by the company.

How do we act with respect to third parties?

- ✔ We ensure that the third parties with whom we interact make appropriate use of Enagás' image and reputation.



This is how we make use of social networks

- ✔ Our participation in social networks should always be on a personal basis and never on behalf of Enagás.
- ✔ We must not disclose internal company information.
- ✔ We must avoid intervening in discussions involving conflict, especially if they deal with any Enagás-related issues.
- ✔ In the case of communications about Enagás, we will only disseminate content previously published by the company's official accounts.

II. Transparency: *We are transparent*



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 a deception.

We convey information truthfully and completely.

We do not knowingly provide incorrect, inaccurate or imprecise information that may mislead the person

receiving it. We do not conceal information for the purpose of evading compliance with Enagás' obligations and commitments to third parties.

Nor do we use misleading or false information for the purpose of obtaining grants, relief or other aid or advantages, or conceal information of interest to the company for our own benefit.



With regard to the recording, collation and review of financial and non-financial information, we ensure its reliability and rigour, and apply the accounting policies, control systems and supervisory mechanisms defined by Enagás

How do we act with respect to third parties?

- ✔ In our relations with suppliers, contractors and business partners we act in a transparent, documented and impartial manner and follow the procedures established by the group.
- ✔ We maintain a transparent and ongoing dialogue with shareholders, investors and financial analysts.
- ✔ We act transparently with our customers. Under no circumstances will we provide customers with misleading or ambiguous information with the intention of obtaining a financial benefit.

PREVENTION OF MONEY LAUNDERING

Enagás' professionals **reject all forms of money laundering** 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.



This is how we act when dealing with a possible suspicion of money laundering



We must report any suspicious actions to the Compliance Department or use the Ethics Channel

How do we act with respect to third parties?

- ✔ 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

We transparently report the company's tax contributions and do not make use of structures whose purpose is to conceal information from the tax authorities. We at all times avoid evading payments and obtaining undue benefits for the company.

Public grants, subsidies and other public funds

obtained by Enagás are used exclusively for the purpose for which they were granted. Regarding tax assessments, we carry them out in accordance with the tax regulations in force.

We collaborate with the tax administrations and transparently provide the information they may request.



Enagás assumes as its own the commitments contained in the codes of good practice defined by the tax authorities

LOBBYING

Regarding lobbying activities, we comply with current legislation by reflecting all Enagás initiatives in the European Union's Transparency Register.

Enagás cooperates with authorities, regulators and public administrations in a fully transparent manner.

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



What do we mean by lobbying?

Participation, either directly or indirectly through third parties, in discussions or informative actions in support of a cause before the authorities.

Through its lobbying activities, Enagás contributes its experience, knowledge and resources to the decision-making processes and development of public policies that might apply to them.

III. Security: *We care about people and safety*



RESPECT FOR PEOPLE

We are committed to the protection of human and labour rights. We are aware of and comply with the principles set out in the organisation's Human Rights Policy.

We do not tolerate child labour or forced labour and we

ensure respect for freedom of association and collective bargaining in the workplace.

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



Enagás promotes compliance with the United Nations International Charter of Human Rights, the OECD Guidelines for Multinational Enterprises, the International Labour Organisation (ILO) Declaration and its fundamental conventions and the European Convention on Human Rights



What do we mean by harassment?

Any verbal or physical behaviour that violates the dignity of a person, and in particular when it creates an intimidating, offensive, degrading or vulnerable environment.

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

How do we act with respect to third parties?

- ✔ We promote the protection of human and labour rights in relations with third parties and with all those affected by Enagás' activity.
- ✔ We ensure that our suppliers, contractors and business partners comply with the United Nations International Charter of Human Rights and with the labour rights set out in the

conventions of the International Labour Organisation (ILO).

- ✔ If we detect that our suppliers, contractors and business partners do not respect human and labour rights, or observe any harassment or abusive behaviour by any of their employees, we report this to Enagás through the Ethics Channel.

HEALTH AND SAFETY PROTECTION

In our day-to-day work, we comply with Enagás' health and safety policies to ensure that we protect our own safety and the safety of those around us, and we are alert to potential situations that could endanger people's safety.

Enagás' professionals take advantage of the resources that the company makes available to us so that we can carry out our activities safely.



Enagás has policies and procedures to protect health and safety at work and promotes the development of preventive measures



This is how we act in a situation that puts health and safety at risk



We must report situations that could endanger people's safety as soon as possible, together with any damage to protective equipment

How do we act with respect to third parties?

✔ We help our suppliers, contractors and business partners to understand our health and safety requirements and to act in accordance with the

applicable regulations. Under no circumstances do we establish working conditions that could put health and safety at risk.

IV. Sustainability: *We promote sustainable development*



ENVIRONMENTAL PROTECTION

We are committed to preserving natural capital by minimising the environmental impact of our activities. To this end, we develop initiatives aimed at climate action through energy efficiency and the reduction of atmospheric emissions, to promote the transition to a circular economy, to the protection of biodiversity and to efficiency in the use of resources, among others.

Should environmental damage occur, we report it to the company promptly and we shall ensure that Enagás protocols are quickly activated for its immediate correction. Any work involving building, demolition, remodelling and restoration, among others, shall only take place once the corresponding permits and authorisations have been obtained.



Enagás has internal environmental regulations consisting of policies, procedures and controls that all professionals must be aware of

How do we act with respect to third parties?

- ✔ We promote the adoption of environmentally-friendly guidelines among our suppliers, contractors and partner companies and ensure that their environmental performance is in line with the commitments set out in our policy.
- ✔ We deal diligently with any environmental queries or complaints from the communities that live near Enagás' facilities and we inform the company as soon as possible through the established channels.

COMMITMENT TO THE ENVIRONMENT

Enagás contributes to the socio-economic development of local communities in the environments in which it operates through initiatives that foster positive impact and help meet the needs of society.

by the company. We have the relevant authorisations, we perform them under objective criteria and in a transparent manner, and we accurately reflect them in the company's books and records.

For **sponsorships, patronages, donations and collaborations** we follow the principles established



Enagás encourages all company employees to participate in volunteer initiatives

How do we act with respect to third parties?

- ✔ Our relationship with local communities is based on trust, mutual respect and dialogue.
- ✔ If a third party asks Enagás to collaborate in a cause through sponsorship, patronage or donations, we will inform the Corporate Communication and Public Affairs Office.

V. Efficiency: *We are efficient*



USE OF COMPANY ASSETS

We use the company'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 permits or rights to the material used.

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



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



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 the company's computer systems.
- ✔ We must have the company's authorisation for the installation or use of programmes on Enagás' equipment, as well as for access to third-party equipment.
- ✔ We cannot download, view or distribute material that is illegal, that infringes people's rights or may be offensive.
- ✔ At the end of the professional relationship with Enagás, we will return the goods that the company has provided us with in the condition in which they were delivered.

How do we act with respect to third parties?

- ✔ If we make assets owned by Enagás available to our suppliers, contractors 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, such as customers, suppliers or business partners, potential job applicants or any third party with whom we have a relationship in the course of our business.



What do we mean by information confidentiality?

Confidential information is considered, among others, to be information related to business or strategic plans, possible mergers or acquisitions, financial or commercial information, information about employees and third parties, or any non-public information.



This is how we handle confidential information

- ✔ We do not disclose company information to the outside world 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 information that we have had access to in the performance of our responsibilities and that may be considered sensitive with our colleagues.
- ✔ We only share information that is strictly necessary to perform our functions.
- ✔ Remember that the confidentiality obligation will remain in place even after the labour relationship with Enagás has concluded.



Authorisations to use information must respond to specific requests, must be concrete and specific, and must have a specific time frame

Staff with access to **insider information** must make responsible and professional use of it, preserving its confidentiality.



What is considered to be insider 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.



Remember that Enagás has a Code of Conduct in Matters Relating to Securities Markets, which regulates compliance with legislation on market abuse, insider trading and other securities market-related issues

We will comply with current **data protection** legislation at all times. In our daily work, we must adequately protect the personal information to which we have access.



What do we mean by personal information?

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 apply the principle of data minimisation and we only access the necessary personal information.
 - ✔ If we need to send sensitive information, we must encrypt it and send the password through a means other than the file.
 - ✔ We never share our passwords.
 - ✔ We do not leave our devices or documents unattended.
 - ✔ When we do not need certain information, we destroy it safely.
-

VI. Teamwork: *We work in teams*



COLLABORATION AND TEAMWORK

At Enagás we treat our colleagues, managers and subordinates with respect and professionalism.

We promote a favourable working environment based on dialogue and transparency, we work as a team and we do our best to contribute to the achievement of the

company's objectives.

Professionals with responsibilities within Enagás drive change, develop the capabilities and potential of our teams, and show a receptive attitude.



Enagás promotes working environments based on trust, collaboration and teamwork

How do we act with respect to third parties?

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

EQUAL OPPORTUNITIES

We respect our colleagues and all those with whom we have a relationship in our activity. We do not discriminate against people on the basis of gender, nationality,

race, disability, sexual orientation, age, religious belief, political opinion, or any other personal, family, economic or social circumstance that may cause discrimination.



Enagás is developing measures to promote the work-life balance of its employees

The processes of **selection, recruitment, performance evaluation and promotion** of professionals will always be based on merit and on objective and transparent criteria

related to their abilities and the added value they bring to their work. Under no circumstances are actions that show favouritism tolerable.

How do we act with respect to third parties?

- ✔ If we observe any discriminatory conduct by employees of any supplier, contractor or business partner, we make it known to 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.



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 employees 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.

VII. Innovation: We are committed to innovation



PROMOTION OF INNOVATION AND ENTREPRENEURSHIP

At Enagás, we are aware that we work in a changing market and environment, so all of our professionals maintain a proactive attitude, promote innovation and change, and act receptively and collaboratively when addressing new ideas.

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 ground-breaking technologies aligned with the improved efficiency, competitiveness and sustainability of the energy sector.



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

Using the means that Enagás makes available to us, we collaborate in the development of initiatives that contribute to improving our products, services, processes and working methods. We share those ideas that we consider to be transformative with the company.

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

3. Additional information: *Who to contact*

If we need more information about the matters outlined in the Code of Ethics, if we have any questions or are unsure about the best way to proceed, the following contacts are available. However, remember that the Enagás Ethics Channel is available to us at all times.

ISSUE	WHO TO ADDRESS
Our Code of Ethics	Compliance / compliance@enagas.es
Integrity	
Fight against fraud, corruption and bribery	Compliance / compliance@enagas.es
Gifts, presents, and hospitality	Compliance / compliance@enagas.es
Management of conflicts of interest	Compliance / compliance@enagas.es
Free competition	Legal Services and Regulation
Political neutrality	Corporate Communication and Public Affairs
Protection of the company's reputation	Corporate Communication and Public Affairs
Transparency	
Transparency and reliability of information	Budget Control and Business Analysis / Accounting (for financial issues) Sustainability and Risks (for extra financial issues)
Insider trading	Compliance / compliance@enagas.es
Prevention of money laundering	Legal Services and Regulation Compliance / compliance@enagas.es
Fiscal responsibility	Tax matters
Lobbying	Corporate Communication and Public Affairs
Relations with shareholders and investors	Investor Relations
Relationship with suppliers and other third parties	Procurement Compliance / compliance@enagas.es

ISSUE	WHO TO ADDRESS
Safety	
Respect for people	People and Wellness
Respect for Human Rights	Sustainability and Risks
Health and Safety protection	Health and Safety
Sustainability	
Environmental protection	Sustainability and Risks
Commitment to the environment	Sustainability and Risks (for community relations issues) Corporate Communication and Public Affairs (for issues relating to donations, sponsorships and patronage)
Efficiency	
Cybersecurity and IT assets	Information systems
Gas assets	Asset Management
Information confidentiality	Legal Services and Regulation
Data protection	Information systems
Teamwork	
Collaboration and teamwork	People and Wellness
Equal opportunities	People and Wellness
Innovation	
Innovation and entrepreneurship	Enagás Entrepreneurship Innovation and New Energies

4. Enagás' main rules

Enagás has a series of policies that develop the subjects outlined in this Code:

- ✔ **Compliance policy**
- ✔ **Anti-fraud, corruption and bribery policy**
- ✔ **Sustainability and good governance policy**
- ✔ **Health and Safety, environment and quality policy**
- ✔ **Human capital management policy**
- ✔ **Fiscal policy**
- ✔ **Cybersecurity policy**
- ✔ **Human Rights policy**
- ✔ **Policy on communication and contact with shareholders, institutional investors and proxy advisors**



We also have procedures, protocols and guidelines that provide more detailed information on these matters:

- ✔ Corporate biodiversity guidelines
- ✔ Corporate guidelines concerning diversity and equal opportunities
- ✔ Corporate road safety guidelines
- ✔ Sustainable mobility guidelines
- ✔ Major accidents prevention guidelines
- ✔ Social Action Strategy
- ✔ GTS Code of Conduct
- ✔ Operating procedure of the Ethical Compliance Committee
- ✔ Procedure for handling notifications and irregularities concerning the Code of Ethics
- ✔ Procedure for managing sponsorships, patronage and donations
- ✔ Procedure for managing the offering and acceptance of gifts
- ✔ Protocol for the prevention of harassment
- ✔ Equality plan
- ✔ Enagás Gender Violence Measures
- ✔ Reconciliation measures
- ✔ Decalogue of inclusive language



good new energy



Enagás
Group
**Code of
Ethics**