



Ethical principles and guidelines for suppliers of the Enagás Group

The Code of Ethics reflects **Enagás' ethical culture** and is to be applied by the company's contractors and suppliers in their areas of relationship with the company and by those collaborating with Enagás and acting on its behalf.

In this regard, as reflected in the Enagás Group Code of Ethics, the company sets out the principles and guidelines of conduct for its suppliers and contractors that are described below.

All Enagás' suppliers and contractors shall be in possession of the Code of Ethics and explicitly confirm their commitment to becoming familiar with it and complying and enforcing compliance with it through the acceptance of the contractor general conditions.

1. Commitment to Enagás' values

The following describes the corporate values of Enagás and the guidelines of conduct expected of Enagás' suppliers and contractors:

I. Integrity



FIGHT AGAINST FRAUD, CORRUPTION AND BRIBERY

In their relationship with the company, Enagás' suppliers and contractors understand and respect the express prohibition of Enagás' employees on:

- **Accepting and/or making improper payments**, such as facilitation payments, payments in-kind or commissions, or advantages or privileges of any kind for unethical purposes.
- **Offering and/or acceptance**, either directly or indirectly, of gifts or hospitality from third parties, including public representatives, which go beyond the purely symbolic or which may be interpreted as an attempt to influence our will or obtain undue advantage.
- **Acceptance of cash** or equivalent gifts, such as gift cards, regardless of the amount.

MANAGEMENT OF CONFLICTS OF INTEREST

In their relationship with the company, Enagás' suppliers and contractors must avoid situations or decision-making processes involving 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 direct or indirect benefit to the supplier, contractor or any of their employees, or to a person with whom they have a family, emotional or business relationship.

FREE COMPETITION

Enagás' suppliers and contractors respect free competition and comply with applicable national and international regulations in the course of their professional activity by avoiding any behaviour that may be considered an abuse or restriction of competition.

PROTECTION OF THE COMPANY'S REPUTATION

Suppliers and contractors working in Enagás' name must 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.

ESTABLISHING CLEAR THIRD-PARTY RELATIONSHIPS

Enagás' suppliers and contractors who provide the company with products or services procured from third parties shall ensure that this activity complies with the conduct principles and guidelines set out by Enagás in its Code of Ethics as regards their relationship with third parties.

II. Transparency



TRANSPARENCY AND RELIABILITY OF INFORMATION

Enagás' suppliers and contractors must act in a clear and transparent manner and must ensure that none of their actions may be interpreted as a deception.

Enagás' suppliers and contractors must **provide true and complete information** and must not deliberately provide Enagás with incorrect or inaccurate information or with information that is imprecise and likely to mislead the person receiving it. They must not conceal information in order to avoid fulfilling their obligations and commitments to Enagás or other third parties, nor must they conceal information of interest to Enagás for their own benefit.

PREVENTION OF MONEY LAUNDERING

Enagás' suppliers and contractors **reject all forms of money laundering** and pay special attention to situations where the unlawful origin of funds or payments is suspected.

FISCAL RESPONSIBILITY

Enagás' suppliers and contractors shall avoid tax evasion or obtainment of unjustified tax advantages at all times.

III. Security



RESPECT FOR PEOPLE

Enagás is committed to protecting human and labour rights. Enagás' suppliers and contractors must be aware of and comply with the principles set out in Enagás' Human Rights Policy.



Enagás promotes compliance among its suppliers and contractors 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

Enagás' suppliers and contractors do not tolerate child labour or forced labour, and must ensure respect for freedom of association and collective bargaining in the workplace. They also expressly reject abuse of authority and harassment in all its forms, as well as any conduct that may create an intimidating, offensive or hostile working environment.

HEALTH AND SAFETY PROTECTION

Enagás' suppliers and contractors understand Enagás health and safety requirements and act in accordance with the applicable regulations, thus complying with Enagás' health and safety policies. They ensure that they protect their own safety and the safety of those around them and that they are alert to potential situations that may endanger people's safety.



Enagás has policies and procedures to protect health and safety at work and promotes the development of preventive measures that our suppliers must put into practice when carrying out their activities at or for Enagás

Enagás' suppliers and contractors make use of the resources that the company makes available to them so that they can carry out their activities safely.

IV. Sustainability



ENVIRONMENTAL PROTECTION

The environmental performance of Enagás' suppliers and contractors is in line with the commitments set out in the company's policy. In this regard, should environmental damage occur, they must promptly make the company aware of it. Enagás' suppliers and contractors are committed to preserving natural capital by minimising the environmental impact of the activities they carry out at Enagás' facilities, by taking account of matters such as energy efficiency and the reduction of emissions into the atmosphere, the protection of biodiversity or the efficient use of resources, among others.



Enagás has environmental commitments in its Safety and Health, Environment and Quality Policy, which all its suppliers must be aware of and respect

V. Efficiency



USE OF COMPANY ASSETS

Enagás' suppliers and contractors use resources that the company makes available to them responsibly, limiting their use to professional activities, always according to established standards.

INFORMATION CONFIDENTIALITY

The information handled by suppliers and contractors in the course of their professional activity for the company must be considered confidential and treated as such except when its disclosure is expressly authorised.



Regarding the handling of confidential information, they:

- ✓ Do not disclose company information to the outside world unless authorised to do so.
- ✓ Do not use it for their own benefit or that of third parties.
- ✓ Do not share information to which they have accessed in the performance of their activities and that may be considered sensitive.
- ✓ The confidentiality obligation will remain in place indefinitely, even after the contractual 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

Suppliers and contractors with access to **inside information** must make responsible and professional use of it, and must preserve its confidentiality. They must also comply with prevailing legislation on **data protection** and adequately protect the personal information to which they have access.

VI. Teamwork



COLLABORATION AND TEAMWORK

The company's suppliers and contractors must treat third parties with whom they interact in the exercise of their professional activity for Enagás in a respectful and professional manner.

EQUAL OPPORTUNITIES

Enagás' suppliers and contractors 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.

VII. Innovation



PROMOTION OF INNOVATION AND ENTREPRENEURSHIP

Enagás has a positive attitude towards new projects and is open to new business initiatives that may flourish in its relationship with suppliers and contractors in the area of its professional relationship.

2. Ethics Channel (whistleblowing line)

In their daily work, suppliers and contractors must inform the company of any **behaviour contrary to the commitments** set out in the Code of Ethics that is observed.

Also, if any supplier or contractor has **questions about the interpretation** of the Code and its implementing rules, or if they want to express any concerns, they must send them to the company.

For this purpose, Enagás has the **Ethics Channel (whistleblowing line)**, which suppliers and contractors may 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 in charge of processing the communications and queries received through the channel.



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.

Any enquiry or notification must be accompanied by all the necessary information and there must be active cooperation 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.

3. Enagás' main regulations

Enagás has a series of policies and guidelines that develop the subjects set out in Enagás' Code of Ethics and in this extract. These documents can be consulted on the company's website via the following link: