



Human Rights Policy

This policy includes Enagás' commitments necessary to ensure human rights due diligence. Said commitments are set out in the Enagás Code of Ethics and the corporate policies that comprise it, in line with, among others, the following:

- UN Guiding Principles on Business and Human Rights.
- International Bill of Human Rights of the United Nations.
- OECD Due Diligence Guidance for Responsible Business Conduct.
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.
- The Declaration of the International Labour Organisation (ILO) as well as the core agreements (freedom of association 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 concerning indigenous and tribal peoples.
- The Universal Declaration of Human Rights.

The commitments in this policy 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 is committed to ensuring respect for the following human rights relating to labour practices, society, customers and local communities.

Labour practices:

- Right to decent work and rejection of forced, compulsory and child labour, as well as all forms of slavery and human trafficking: To offer stable and quality employment by rejecting exploitation of any kind.
- Right to rest and leisure and the right to family life: To create a flexible working environment, adapted to the needs of each employee, which favours the reconciliation of personal and professional life, as well as promoting physical and emotional well-being.
- Right to freedom of association: To recognise the right of employees to belong to trade unions in order 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, inclusion and diversity, eliminating elements of discrimination based on gender, disability, age, race, culture, sexual thought and orientation, religious beliefs, etc., promoting initiatives and actions to guarantee this commitment and rejecting and preventing all forms of abuse, harassment, threats or intimidation in the workplace.
- Right to fair and favourable remuneration and right to equal pay: To provide a living wage for all professionals and an equitable salary between men and women, guaranteeing non-discrimination, through a remuneration system linked to the attraction, development and retention of talent and based on the contribution of professionals to the creation of value and the achievement of the company's strategic targets and challenges.
- Right to a safe working environment, right to life, liberty and security of the person: To adopt 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, customers and local communities:

- Rights of indigenous communities and populations: To contribute to the socio-economic development of local communities, giving priority to those areas where the company operates, through sustainable social action models, paying special attention to the most vulnerable communities such as indigenous or tribal populations¹.
- Right to a healthy environment, natural resources and land rights: To manage natural capital and control and minimise negative environmental impacts of activities and the value chain.
- 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 relocation 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: To ensure that the private security forces that protect Enagás' professionals and property act in accordance with national legislation and regulations in force and international law.
- Right to privacy of information: To treat the personal information of employees, 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 the human rights reflected in this Policy and the Ethical Principles and Guidelines of the Ethical Code of Conduct for Enagás Group Suppliers, by requesting a commitment through the formalisation of the necessary documentation and the completion of relevant assessments and audits.

Enagás also establishes the following **human rights commitments in those companies in which the company has an interest but not effective control**:

- To promote compliance with corporate policies, aligned with the principles set out in this policy, in business agreements according to the company's degree of influence.

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

- To transfer critical management standards that include the areas necessary to ensure respect for human rights.
- To assess respect for human rights in due diligence processes as a critical aspect.

Management Model

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

- The responsibility of the Board of Directors for the direction, supervision and control of strategy, policies, risks, objectives and results in matters related to human rights.
- The responsibility of the Sustainability Committee to control and monitor human rights, reporting in turn to the Sustainability and Appointments Committee, constituted at Board level.
- Assignment of responsibility for establishing courses of action, objectives and follow-up indicators to various company departments.
- The development and maintenance of a due diligence system to anticipate, prevent, mitigate and/or remedy negative impacts on people (own employees and those in the value chain), the environment or society. This is achieved through the regular implementation of the following actions based on a continuous improvement approach and cooperation with stakeholders:
 - Establishing mechanisms to identify, assess and prioritise actual and/or potential negative impacts on human rights arising from the company's own activities and those of the value chain in all geographical areas where the company is present.
 - Implementing actions to avoid, prevent or mitigate (should they materialise) the identified negative impacts, within the company's capacity to influence. This will prevent the associated risks of human rights violations.
 - Monitoring the actions implemented to ensure that they have achieved their purpose, thereby assessing the effectiveness of the due diligence system.
 - Being accountable to stakeholders on the due diligence system through public reporting.
- 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.

- Compliance with the internal and external regulations applicable by company employees and, where applicable, by any third parties related to them.
- Training, awareness-raising and information aimed at ensuring that company employees know and understand the regulations and commitments to enable them to carry out their tasks while ensuring compliance with this Policy.
- 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.
- Transparency of information supplied both internally and to third parties, to guarantee its reliability and accuracy.
- The implementation of processes for the purpose of prior information, participation, dialogue, consultation and collaboration with stakeholders, in order to guarantee that their needs and expectations are known to the company and, where appropriate, added to its management.
- The existence of a whistleblowing channel (ethics channel), accessible both to employees 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