



# Sustainability and Good Governance Policy

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This policy includes the commitments necessary to guarantee due diligence in Sustainability and Corporate Governance that enable the generation of value in the short, medium and long term for shareholders, customers, suppliers and other stakeholders, strengthening the company's control environment and its reputation and credibility before third parties. The commitments of this policy also 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 establishes the following general commitments in relation to sustainability:

- To strengthen Enagás' financial and non-financial risk management and control systems through responsible practices in key areas such as the

prevention of illegal conduct, tax, respect for human rights, the environment and diversity, among others. All of this with the aim of advancing towards excellence and improving stakeholder outcomes.

- To develop and maintain a risk-based due diligence system to anticipate, prevent, mitigate and/or remediate negative impacts on people, the environment and/or society.
- To implement mechanisms that enable the company to engage with stakeholders, especially local communities, based on collaboration, timely information sharing and participation. All this will contribute to due diligence, and therefore to properly manage the actual and/or potential negative impacts generated by the company in the development, construction, maintenance, operation and/or decommissioning of its infrastructure and supply chain. It will also contribute to facilitating social acceptance, the generation of positive impact and the integration of Enagás in the communities where it operates. Enagás therefore undertakes to:
  - Identify affected communities and stakeholders, including the most vulnerable stakeholders.
  - Define and implement strategies for consultation and participation with local stakeholders, as well as engagement with relevant stakeholders and/or their legitimate representatives, in order to ensure that their views are taken into consideration.
  - Establish publicly available and accessible complaints and/or grievance mechanisms for all identified local stakeholders.
- To inform the different stakeholders on a regular, transparent, timely and reliable basis about the main sustainability elements relevant to the company, the objectives set and the results achieved, through responsible communication practices that avoid manipulation of information and protect integrity and honour.
- To extend the company's sustainability commitments to its supply chain through the implementation of sourcing requirements, assessment and other management and control practices based on continuous improvement.
- To regularly update this policy to ensure that it reflects national and international best practices and recommendations, in keeping with the recommendations of the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and those of the International Corporate Governance Network.

Also, and in addition to the commitments established in the company's Code of Ethics and in the various corporate policies, Enagás establishes the following commitments in corporate governance, environmental and social matters:

## **Corporate Governance:**

- To maximise, on a sustained basis, the value of the company, in a considering shareholders' interests and the principles and values included in the Enagás Group's Code of Ethics.
- To promote compliance, improvement and ongoing review of the company's governance standards.
- To communicate to shareholders and other interested parties all information that may reasonably be of interest to them in relation to the company, financial and sustainability information under the principles of transparency and truthfulness of information.
- To promote and facilitate the participation of shareholders by ensuring equal treatment and protecting the exercise of their rights.
- To ensure the proper conduct, professionalism and diligence of the members of the Board of Directors and the management team, as well as compliance with internal and external regulations on market abuse, in particular the Internal Code of Conduct for Securities Markets.
- To comply with national and international corporate governance recommendations and best practices, in particular those relating to: presence of independent directors, promotion of diversity, selection, training and evaluation of directors, independence of the auditor, remuneration of Board members, etc.
- To ensure transparency and integrity with regard to the representation of interests vis-à-vis public or private entities, an activity commonly known as lobbying.

## **Environment:**

- To contribute to the mitigation of climate change by promoting the decarbonisation of its own operations and the value chain, highlighting the promotion of the development of renewable gases (green hydrogen and biomethane), as well as encouraging the creation, development and adaptation of networks to transport them.
- To prevent, minimise and mitigate the negative environmental impacts of our activities in terms of air, water and soil pollution, water use and consumption, use of resources and circular economy and impact on biodiversity.

## **Social:**

- To demand respect for and compliance with the Code of Ethics by employees, and by those who interact with the company in their respective areas of relations.
- To respect the human rights of employees, as well as those of society, customers, local communities and workers in the value chain, affected by both its own activities and those of the value chain, and implement the necessary mechanisms to ensure due diligence.
- To have a talent management model that supports the company's strategic challenges throughout the Human Capital Management process and places the employee at the centre. This model will be based on talent, diversity and inclusion, new ways of working and digitalisation, among others.
- To prevent and mitigate occupational risks by promoting the occupational health and safety of professionals as well as the supply chain.
- To develop a culture of innovation and corporate entrepreneurship to drive decarbonisation through technology, digitalisation and innovation.
- To contribute to the security of supply and decarbonisation, promoting a just energy transition through projects and socio-economic development initiatives in the region.
- To apply principles of responsible business conduct towards business partners, such as customers, suppliers, etc.

## **Management Model**

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 the different areas of sustainability.
- The responsibility of the Sustainability Committee to control and monitor sustainability issues, reporting in turn to the Sustainability and Appointments Committee, constituted at the 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, 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 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 professionals 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**