



Compliance Policy

This Compliance Policy (hereinafter, the “**Policy**”) includes Enagás' commitments regarding Compliance.

The Company adheres to the spirit and letter of the obligations and regulations of the various legal jurisdictions in which it operates, and to any best practices that it has undertaken voluntarily.

This Policy applies to all directors, managers and employees of all companies making up the Enagás Group, including any affiliates under its effective control, within the limitations established in the applicable regulations. In this case, they are to be informed of this policy.

For those affiliates in which the Enagás Group does not hold effective control, the company will encourage principles, measures of supervision, controls and guidelines that are consistent with those set out in this Policy.

With regard to third parties with whom Enagás maintains a business relationship (regular suppliers or national or international business partners), Enagás will assess the aspects of Compliance, make a copy of this Policy available to them, and encourage principles and guidelines that are consistent with it, except where such third parties provide documentary evidence that they are subject to a Compliance model in alignment with that in existence at Enagás.

Commitments

Enagás establishes the following commitments in relation to Compliance:

- Develop, with a corporate approach, a Compliance Model and a regulatory framework to facilitate the effective implementation of the following commitments. The Company has a Compliance Model, which integrates all the rules, formal procedures and material actions aimed at guaranteeing the Company's conduct in accordance with ethical principles, current legislation and internal regulations, as well as preventing, managing and mitigating the risk of breaches of regulations and ethics that may be committed by directors, professionals or suppliers within the organisation.
- To maintain conduct that respects both the rules and the ethical standards and internal procedures of Enagás.
- To establish a zero-tolerance attitude towards forms of conduct that may infringe existing regulations and established policies and procedures.
- To contribute to the creation of a compliance culture at Enagás through the conduct of its directors and senior management, who lead by example and react promptly and unambiguously to risks or infringements of regulations or ethical standards.
- To promote a culture of integrity and respect for the law and ethical standards that takes into consideration not only the interests of Enagás but also the needs and expectations of its stakeholders.



- To prevent forms of conduct that are counter to those set out in the General Compliance Regulation, with the application of disciplinary or corrective actions or sanctions permitted by current labour laws where required.
- To encourage training in and communication of the Compliance Management Model to people in the company, including its directors, and to the third parties who enter into relations with it, where applicable, so that they can be aware of and understand the regulations and commitments in relation to compliance necessary for their activity.
- To encourage communication of any concern regarding Compliance.
- To revise and continuously update the Compliance Model in order to ensure its coherence with best practices.
- To manage, analyse and respond to the communications and information entered into the Enagás Internal Information System, complying with the deadlines, requirements and guarantees, especially with regard to the protection of informants, provided for in the applicable legal regulations and specific internal regulations.

The Compliance Function: Independence and autonomy

The Company's Compliance Function proactively and autonomously oversees the proper functioning and effectiveness of its Compliance Model and the effectiveness of its controls, without prejudice to the supervisory responsibilities corresponding to other bodies and divisions of the Company.

The Enagás Group's Compliance Function enjoys autonomy and independence, as well as the necessary capacity for initiative and control, and has the appropriate material and human resources to carry out its functions.

The Board of Directors of the Company entrusts the exercise of the Compliance Function to a high-level collegiate body, with autonomous powers of initiative and control, of an executive nature and oriented towards decision-making (the "**Ethical Compliance Committee or ECC**"), which has the Chief Compliance Officer (CCO) as its executive apparatus.

The Chief Compliance Officer, who will be a member of the Ethical Compliance Committee, reports organically to the General Secretariat Office and functionally to the Board of Directors through the Audit and Compliance Committee, to which they communicate and report on their activities, thus becoming a high-level Enagás body.

Suitability of members of the Ethical Compliance Committee.

The Board of Directors shall ensure the suitability of the members of the ECC, which is composed of the Secretary General, the Director of Legal and Compliance, the Director of People and Diversity, the Director of Audit, Control and Risk, the Director General of Communication, Institutional and Investor Relations and the Director General of People and Transformation.



As the members of the ECC do not perform operational or business functions for the Company, they do not have relevant exposure to the organisation's most significant business risks, which favours the suitability and independence of its members.

In short, the Compliance Function performs the work of a second line of defence in Compliance matters, in an objective and independent manner, in relation to the first operational line and also with respect to the risk supervision of a third line of defence (carried out by Internal Audit).

In addition, the following aspects are particularly relevant as a basis for the independence and suitability of the compliance function:

- **Allocation of resources:** The existence of a specific and independent budget allocation for the exercise of the compliance function, as well as the allocation of the personal and material resources necessary for the exercise of its tasks.
- **Appointment and removal:** The appointment of the members of the ECC, as well as the Chief Compliance Officer at corporate level, whose appointments and removals are the responsibility of the Enagás Board of Directors, at the proposal of the Audit and Compliance Committee.
- **Performance assessment:** The effective evaluation of the performance of the Chief Compliance Officer is carried out by the Audit and Compliance Committee
- **Reporting line:** The Chief Compliance Officer, together with their team, reports periodically to the Board of Directors through the Audit and Compliance Committee, to which they report functionally.
- **Management of conflicts:** Members of the ECC shall abstain from voting on resolutions in which they have a direct or indirect conflict of interest or which affect employees of the Company who report directly to the member of the Ethical Compliance Committee.

Management Model

Enagás has established a Compliance Model based on the due-control principle and focusing on adherence to the commitments set out in this policy, which may be summarised as follows:

- Responsibility for Compliance in general is the duty of all members of the Company in their own particular areas, and specifically to representatives of senior management, who are responsible for its adequate management, in such a way that:
 - The Board of Directors, through the Audit and Compliance Committee, is responsible for orientation, supervision and control of Compliance strategy and Policy in the company, and for risks and public information in this regard.
 - The Compliance Function supervises, in its application and implementation, the effective functioning of the Compliance Model and reports to the Audit and Compliance Committee of the Board of Directors, to which it reports functionally. This report is carried out through the Chief Compliance Officer.



- It reflects the commitments taken on by the Company in its regulations, constituted by the policies, regulations, procedures and controls that allow and facilitate their effective implementation.
- The existence of safeguard mechanisms, such as the Compliance Function, whose responsibilities include ensuring awareness, understanding and fulfilment of the commitments made by the organisation that are contained in its policies, regulations and procedures.

The establishment of a procedure for managing notifications and consultations concerning irregularities or instances of non-compliance with the Code of Ethics and the regulations and policies that inspire or implement it and whose responsibilities and operation are described in the Enagás Group Code of Ethics.

The Board of Directors expresses its commitment to ensuring that the Enagás Group's Compliance Function is at all times a benchmark in the application of the best national and international standards. To this end, the Company will efficiently implement those initiatives that result in a continuous improvement of its processes and results.

This policy was approved by the Enagás Board of Directors on 17/07/2017, and the update was approved on 18/12/2023