

Anti-Corruption Policy

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Approved by

Board of Directors

Object of the document

Develop the principle of zero tolerance of bribery and corruption, and establish mechanisms for the giving and acceptance of gifts and presents by Enagás Renewable employees.

Changes from the previous version

N/A

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1.Introducción

Enagás Renovable S.A. and the subsidiaries under its control (collectively referred to as "Enagás Renovable" or the "Company") are committed to conducting their business in the most sustainable and successful way for our customers, employees, partners and investors. Success is achieved through the right actions, acting with integrity.

To earn and maintain the trust of all our stakeholders, we must work to a consistently high set of ethical standards in all aspects of our work. We therefore take a zero-tolerance approach to bribery and corruption and are committed to treating our colleagues, customers, partners and investors fairly and with integrity in all business dealings.

Our Code of Conduct encompasses the highest standards of integrity that we are committed to upholding. It is designed to help align our actions and decisions with our core values and compliance standards.

2.Scope

This Anti-Corruption Policy (hereinafter, the "Policy") is mandatory and applies to all directors, administrators, managers and employees (collectively, the "Personnel") of Enagás Renovable.

In situations where Enagás Renovable does not have overall control of subsidiaries, every reasonable effort will be made to encourage them to follow similar principles. We are all expected to know, understand and obey the rules and principles of this Policy.

Enagás Renovable requires full compliance by all its Personnel with this Policy, European Union law, and all applicable anti-corruption laws, including those of each Member State, the Spanish Criminal Code, the *UK Bribery Act* and the *US Foreign Corrupt Practices Act (FCPA)*.

Violations of such laws can result in severe civil and criminal penalties for the Company and its employees. Violations of the Company's policies can have serious employment consequences, including termination of employment.

3.Our Policy

3.1 Definitions

- **"Thing of value"**: includes both financial and non-financial benefits. Things of value include, for example, gifts, meals, entertainment, transport, favours, services, loans, use of property, job offers, political or charitable contributions, etc.
- **Government official**: includes any individual who holds a legislative, administrative or judicial position of any kind, whether appointed or elected, with government at any

level, including national or local government entities; who exercises a public function for a country, territory or agency; or who is an officer or agent of a public international organisation. Government official also includes:

- Any political party official and any candidate for political office;
 - Any executive, officer, agent, or employee of a government-owned or government-controlled business.
- **Facilitation payments:** are payments to government officials to expedite a government action to which a company is entitled and which the officials cannot refuse.

3.2 Anti-bribery regulation

In accordance with anti-corruption regulations and this Policy, **it is strictly prohibited to solicit, demand, accept, obtain or receive "anything of value", directly or indirectly, from public officials or Third Parties** (suppliers, customers, agents, intermediaries, subcontractors or the like) **to obtain or retain business or to secure any business advantage.** Similarly, Personnel may not solicit or accept such payments or valuables.

This Policy prohibits any offer or promise to provide any commercial benefit, even when the payment is ultimately not made. Likewise, Enagás Renovable expressly prohibits facilitation payments.

The risks associated with this Policy may occur in a variety of settings, including, for example:

- To influence the award of a public or private contract;
- To avoid government action (fines, taxes, etc.);
- For confidential information on business opportunities;
- To obtain a permit or licence.

Payments in response to corrupt practice are prohibited. All Personnel must report any situation where they or the Company are required to make such payments. Personnel who are aware that a facilitation payment has been requested or that such a payment has been made must report as set out in this Policy.

3.3 Gifts

In many industries and countries, gifts are common practices used to strengthen business relationships. However, gifts and presents are considered "things of value" and must not be accepted, made, promised, offered or authorised for the purpose of obtaining or retaining business or obtaining an improper private advantage from Third Parties or public officials. These practices are prohibited.

Enagás Renovable Personnel may only accept, deliver, promise, offer or authorise this type of gift if all of the following requirements are met:

- **Government officials:** they can only be offered if they are items with the Company's brand, i.e. "Enagás Renovable", and have a nominal value¹ .
- **Third Parties:** they can only be offered if they are items with the Company's brand, i.e. "Enagás Renovable", and have a nominal value, or if all of the following requirements are met:
 - It is not cash or cash equivalent gifts (e.g. gift cards, shop redemption cards or gambling tokens);
 - It is permitted both by local law and by the policies of the Third Party recipient of the gift;
 - It is presented openly and with full transparency;
 - It is given on behalf of Enagás Renovable, and not on behalf of a private individual;
 - It is correctly recorded in the Company's books and records;
 - It is provided as a token of esteem, courtesy or in exchange for hospitality and in compliance with local custom;
 - In connection with the promotion, demonstration or explanation of products and/or services or in connection with the conduct of legitimate business. It must also be done in good faith and without expectation of any kind of reciprocity;
 - Enagás Renovable must not have any unfinished business that could be affected; and
 - The nominal value of the gift or entertainment is less than 100 euros.

In addition, if any member of the Company Personnel has already provided or received two (2) gifts to a Third Party in the same calendar year, he/she must seek the approval of the Compliance Officer before promising, offering, giving or receiving any additional gifts from the same Third Party. This obligation applies regardless of the economic value of each individual gift.

¹ Gifts of nominal value are items of "small" or "insignificant" monetary value (e.g. branded pens, notebooks, calendars, mugs, small plants, etc.).

The gift giving and gift reporting requirements specified in this Policy apply even if Company Personnel do not seek reimbursement for the expenses (i.e., out-of-pocket expenses for gifts to third parties do not exempt you from having to comply with these requirements).

3.4 Meals, entertainment, travel and accommodation

Common sense and moderation should prevail in invitations or acceptances of invitations to business meals and entertainment, as well as in the payment of travel and accommodation expenses of Third Parties on behalf of the Company. As a general rule, Company Personnel may pay for or accept business meals, entertainment or travel and accommodation to or from any person in a business or business relationship with the Company only if these types of expenses are infrequent, modest and intended to serve legitimate business purposes.

Meals, entertainment, travel and accommodation should never be offered or accepted as a means of influencing anyone's business decision. Each of these **should only be offered or accepted if it is appropriate, reasonable for promotional purposes, offered or accepted in the normal course of an existing business relationship, and if the main subject of discussion or purpose is the business itself**. The appropriateness of a particular type of food, entertainment, travel and accommodation depends on both the reasonableness of the expense and the type of activity involved. This is determined by whether the expenditure is sensible and proportionate to the nature of the person involved. Adult entertainment is strictly prohibited.

Enagás Renovable Personnel shall be governed by the rules set out below:

- **Government Officials:** No expenses for meals, entertainment, travel and accommodation may be incurred for public officials who have the power to decide or influence the Company's business activities without the prior approval of the Compliance Officer.
- **Third Parties:** Meals, entertainment, travel and accommodation expenses may not be incurred for Third Parties who have the power to decide or influence the Company's business activities without the prior approval of the Compliance Officer, unless the following conditions are met:
 - The expenditures are bona fide and related to a legitimate business purpose, and the events involved are attended by appropriate representatives of the Company.
 - It is permitted both by local law and by the policies of the Third Party recipient of the gift;
 - Spouses and other family members should not be included in any case.

- These expenses have, per person and type of expense (and total value per type of expense) a value of less than €100.

En For all meals, entertainment, travel and accommodation, the claim for reimbursement must identify the total number of attendees and their names, as well as the employer and charges (to the extent possible).

All expense reimbursements must be supported by receipts, and expenses and approvals must be accurately and completely recorded in the Company's records. In all cases, Company Personnel must ensure that the recording of the expense associated with meals, accommodation, travel or entertainment clearly reflects the true purpose of the expense.

The meal, entertainment, travel and accommodation provision and reporting requirements specified in this Policy apply even if Company Personnel do not seek reimbursement for the expenses (i.e., out-of-pocket payment of these expenses does not exempt you from having to comply with these requirements). The Company will pay directly to the service provider for meals, entertainment, travel and accommodation.

To request approval, the Company's Personnel must send the request to the Compliance Officer via the following e-mail address: compliance@enagasrenovable.es.

In addition, if Company Personnel have already incurred two (2) instances of meals, entertainment, travel or accommodation to a Third Party within the same calendar year, Company Personnel shall inform the Compliance Officer before promising, offering or providing any additional meals, entertainment, travel or accommodation to the same Third Party. This obligation applies regardless of the financial value of each individual meal, entertainment, travel or accommodation.

Meals, entertainment and travel provided in business relationships where Company Personnel are not present shall be considered absolutely exceptional gifts, and as such shall be expressly approved in advance by the Compliance Officer, and shall be subject to the rules and requirements for gifts specified in this Policy.

In case of doubt about any of the requirements described above, Company Personnel should consult the Compliance Officer at the following e-mail address: compliance@enagasrenovable.es.

3.5 Register

The Enagás Renovable Compliance Officer shall keep a record of all gifts and cases of meals, entertainment, travel and accommodation that have been accepted/received and offered/given by Company Personnel from/to any third party, and which have required the Compliance Officer's authorisation.

Company Personnel will ensure that all expenditures made by the Company are properly reflected in the Company's books and records, even in cases where no authorisation is required. The Company will conduct periodic audits of its books and records to monitor compliance with this Policy.

4.Registration and Internal Controls

This Policy requires that all expenses incurred by the Company be accurately reflected in its financial records, in compliance with all applicable accounting and financial reporting standards, principles, laws and practices, and that all payments made with Company funds, or on behalf of the Company, be properly authorised. Company Personnel must be thorough in preparing all reports and records required by management. In particular, Company Personnel must ensure that no payments are made for any purpose other than as fully and accurately described in the Company's books and records.

Company Personnel must make every effort to ensure that all transactions, dispositions and payments involving Company funds or assets are properly and accurately recorded in the Company's financial records. No undisclosed or unrecorded accounts shall be established for any purpose. False or artificial entries must not be made in the Company's books and records for any reason.

Finally, personal funds must not be used to achieve what is otherwise prohibited by this Policy. The Compliance Officer is primarily responsible for the oversight and implementation of this Policy.

The Company will conduct periodic audits of its books and records to monitor compliance with this Policy.

5.Ethical Channel

Enagás Renovable has set up an Ethical Channel, available in all its corporate languages (English and Spanish), on its Intranet and website, so that all Personnel and Third Parties can access it and report any actual or suspected unlawful or unethical behaviour, as well as breaches of the Code, Compliance Policies, laws or any other internal regulations or specific Company policy.

All Enagás Renovable personnel are obliged to immediately report any known or suspected unethical conduct or breaches of the Code, Compliance Policies or regulations applicable to the Company. Failure to comply with this reporting obligation could result in disciplinary action or sanctions by the Company.

The ways to access the Ethical Channel are as follows:

- From the Enagás Renewable website
- E-mail: canaletico@enagasrenovable.es

5.1. Other communication channels

Enagás Renewable has made several communication channels available to receive any queries, concerns or complaints from personnel:

- **Compliance Officer:** If you have any doubts about any policy, procedure or their application, you can contact the Compliance Officer directly. To get in touch, you can use the following e-mail address: eticaycompliance@enagasrenovable.es
- **Line manager:** You can always go to your line manager with any questions or concerns. Personnel may feel more comfortable communicating their concerns informally and have the option to discuss their concerns with the person they report to.