

Anti-Money Laundering Policy

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Target

Develop control measures at Enagás Renovable to prevent the use of business activities for money laundering and comply with legislation in this area.

Changes from the previous version

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1.Introduction

The integrity and reputation of Enagás Renewable S.A. and the subsidiaries under its control (collectively referred to as "Enagás Renewable" or the "Company") may be compromised if it fails to act with due diligence in identifying transactions and operations with third parties that place Enagás Renewable or any of its subsidiaries in a situation of risk.

In this context, our Code of Ethics and Conduct establishes a series of principles in relation to the prevention of money laundering that must be observed and which give rise to this Anti-Money Laundering Policy (hereinafter, the "Policy"), which includes procedures for reporting, accounting records, internal control, risk analysis, among other measures, designed to identify, evaluate and mitigate the risk associated with this type of practice.

2.Scope

This Policy is mandatory and applies to all directors, administrators, managers and employees (collectively, the "Personnel") and to suppliers, customers, agents, intermediaries, subcontractors or similar (hereinafter, collectively, "Third Parties") of Enagás Renewable regardless of where they are located or where they provide their services.

In situations where Enagás Renewable 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.

Any act or omission that involves breaking the law is expressly and strictly prohibited.

3.Money Laundering and Financing of Terrorism

3.1. What is money laundering?

Money laundering refers to any activity related to the possession or use of funds derived from fraudulent and/or criminal activities. It includes the concealment of the "identity" of such illegally obtained funds in order to make them appear to be of lawful origin.

For the purposes of this document, the following conduct, when committed intentionally or negligently, shall be considered money laundering:

- The conversions or transfer of any type of goods or merchandise, with knowledge that such goods originate from illegal activities and with the aim of concealing such irregular origin or of assisting any person, natural or legal, involved in the commission of illegal activities to avoid legal consequences.
- The concealment of the true nature, source, location, disposition, movement, rights or property derived from criminal activity or from an act of participation in such activity;

- The acquisition, possession or use of any asset with knowledge that such asset is derived from criminal or irregular activities.
- Participation in association to commit or attempt to commit, or to aid, abet, facilitate or counsel in the commission of any of the aforementioned actions.

4. Our Policy

4.1. Principles

The Code of Ethics and Conduct includes a number of principles and rules to be observed by all in relation to the prevention of money laundering.

In this regard, no business or commercial relationship should be entered into in cases where we know or suspect that it is related to funds from activities related to money laundering, either directly or indirectly, or to any other criminal activity or activity contrary to the applicable regulations.

We must ensure that the Company's activities do not contravene anti-money laundering regulations. For this reason, Enagás Renovable must have procedures in place aimed at:

- Minimise the risks associated with inadvertent participation in transactions involving money laundering proceeds;
- Prevent and detect dishonest practices related to money laundering by Enagás Renovable employees and any Third Party acting on behalf of the Company;
- Support Enagás Renovable Personnel in identifying suspicious situations that should be reported.

We must also be alert to any situation that may be suspicions, including:

- Payments made in a currency other than the currency of the invoice.
- Significant payments made in cash or cash equivalents.
- Payments made from or to a bank account other than the usual bank account.
- Requests for overpayment or payment by instalments on several accounts.

Annex I include a list of red flags related to money laundering practices in order to assist in the identification of possible red flags indicating suspicious activity and potential non-compliance. This list should not be understood as an exhaustive list. Personnel are encouraged to raise any issues of concern, even if they are not included in the list.

4.2. Management Commitment (“Tone at the Top”)

The members of the Board of Directors and management of Enagás Renovable are committed to complying with all regulations applicable to the Company. This commitment stems from the Code of Ethics and Conduct approved by the Board of Directors.

4.3. Risk assessment and risk management

Enagás Renovable has implemented policies that enable the identification, measurement and management of all criminal risks that could have an impact on the Company's business.

4.4. Medidas de Mitigación

The Company has put in place the following anti-money laundering mitigation measures:

- **Third-party review due diligence procedures** (“Know Your Client” o “KYC”), where the following elements and requirements are developed:
 - Identification of customers and procedures in place to verify their identity, that their business activity is legitimate and that their sources of funding are legal;
 - Obtaining information about you activity, business, and the nature of the potential business relationship;
 - Supervision and monitoring procedures of the business relationship.

Customer due diligence review procedures should be conducted in any situation where a business and/or commercial relationship is initiated with an agent, consultant or partner, whether occasional or not, especially if there are indications of potential money laundering or terrorist financing practices.

We pay particular attention to suspicious payments from third parties, such as payments by bearer cheques, payments in currencies other than those agreed, payments from persons or entities resident in tax havens, payments from entities where it is not possible to identify the parties or the beneficial owners, among others.

The scope of these measures will be determined in consideration of a risk analysis and depending on the customer, the business activity or the transaction to be performed. In

certain cases, more detailed customer review procedures are required. In cases where an alert or suspicious activity is detected, it must be reported in a timely manner and resolved before proceeding with the transaction. This resolution should be properly documented.

- **Requirement to cease operations or transactions:** In cases where it is not possible to perform these customer review procedures, the following measures should be considered:
 - Cancellation of the operation to be carried out;
 - Not to enter into business relationships or occasional transactions with relevant third parties;
 - Termination of any business relationship;
 - Make breakdown or communication with public bodies related to this type of practice;
- **Purchasing Procedure:** This includes all the steps and stages that must be followed to complete any purchase of goods or services at Enagás Renovable. The Protocol regulates, among other issues, how to select suppliers, what authorisations are required in each case, etc.
- **Segregation of duties:** Enagás Renovable has implemented a demanding system of segregation of duties that allows tasks or functions that may be incompatible to be carried out by different people. This model of segregation of duties is implemented in all the Company's relevant systems.
- **Management of Powers of attorney and banking Powers of attorney:** The granting of powers of attorney and banking powers of attorney must be carried out in accordance with the procedures established by the Legal department. In addition, the Legal department annually reviews the powers of attorney in force.
- **Electronic banking:** The use of electronic banking for making payments and/or transfers to mitigate risks associated with fraud and to ensure that payments are properly approved and accounted for.

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 Renovable website.
- E-mail: canaletico@enagasrenovable.es

5.1. Other communication channels

Enagás Renovable 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: eticay compliance@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.

Annex I – Money Laundering Alerts (“Red Flags”)

All Enagás Renewable employees must report any suspicious findings or any of the following "red flags" to the Compliance Officer. This list is not exhaustive, so it is recommended that any additional concerns be raised.

- The proposed Third Party who is reluctant to provide complete information, or provides insufficient, false or suspicious information, or is anxious to avoid reporting or recordkeeping requirements;
- Payments using monetary instruments that appear to have no identifiable link to the third party, or have been identified as money laundering mechanisms;
- Attempts by a proposed third party or business partner to pay cash;
- A Third Party that has a bad business reputation or a reputation for unethical conduct, including reports of suspicious, unethical or illegal conduct about itself, its representatives or its employees;
- Allegations that the third party has made or is likely to make prohibited payments or facilitation payments to officials;
- The Third Party does not have a compliance programme or code of conduct and refuses to adopt one.
- Other Companies have terminated the third party for misconduct;
- Early repayment of a loan in cash or cash equivalents;
- Orders, purchases or payments that are unusual or inconsistent with the third party's trade or business;
- Unusually complex transaction structures, payment patterns that do not reflect a real commercial purpose or unusually favourable terms;
- Unusual transfers of funds to or from countries unrelated to the transaction or illogical to the third party;
- Transactions involving locations identified as tax havens or areas of known terrorist activity, narcotics trafficking or money laundering activities.
- Transactions involving foreign or foreign banks, unlicensed money remitters or currency exchangers or non-bank financial intermediaries;
- Inability or difficulty in verifying an entity's corporate history or an individual's background and experience;
- Hesitation to engage a Third Party because it lacks the personnel, facilities or experience to perform the relevant work.
- The Third Party lacks relevant industrial/technical experience or a "track record" with the product, service, field or industry.
- The third Party's plan for carrying out the work is vague and/or suggests that it is based on contacts or relationships.

- Negative reports in the media or in the local business community regarding the integrity or legitimacy of the third party, such as a reputation for illegal, improper or unethical conduct;
- Structuring transactions to evade record keeping or reporting requirements, such as multiple transactions below reportable threshold amounts.
- Requests to transfer money or return deposits to an unknown or unrecognised third party or account.