

Best Practice with Public Officials Policy

18 July 2023



Prepared by

[Pending]

Type of document

Policy

Versión

V.01

Date

[18/07/2023]

Approved by

Board of Directors

Target

This Policy and the internal controls set out in this Policy are designed to prevent breaches of applicable law and to ensure that interactions with Public Officials do not create even the appearance of impropriety.

Changes from the previous version

N/A

Content

1. Introduction.....	3
2. Scope.....	3
3. Our Policy	3
3.1. Definitions.....	3
3.2. Principles to be followed in professional interactions with Public Officials.	4
3.3. Good practices for dealing with Public Officials.....	5
4. Ethical Channel	6
4.1. Other communication channels.	6

1.Introducción

Enagás Renovable S.A. and the subsidiaries under its control (collectively referred to as "Enagás Renovable" or the "Company") are committed to the highest international standards, norms and best practices of corporate governance, business ethics and strict compliance with all applicable laws, rules and regulations.

For this reason, the Company has established this Policy on Best Practices with Public Officials (hereinafter also the "Policy") as a guideline for managing our relationships with Public Officials.

2.Scope

This Policy applies to and is binding on all directors, trustees, officers and employees (collectively, "Personnel") and suppliers, customers, agents, brokers, intermediaries, subcontractors or similar parties (collectively, hereinafter, "Third Parties") who interact with Public Officials on behalf of or in the name of the Company.

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.

This Policy and the internal controls set out in this Policy are designed to prevent breaches of applicable law and to ensure that such professional interactions do not create even the appearance of impropriety.

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)*.

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, transportation, 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.

3.2. Principles to be followed in professional interactions with Public Officials

In professional interactions with Public Officials, any conduct that could be construed as an attempt to obtain an undue consideration or advantage must always be avoided. The principles set out herein must be applied whenever Personnel or Third Parties interact with Public Officials on behalf of or for the benefit of Enagás Renovable. These principles include, but are not limited to:

- **Integrity and Honesty:** When interacting professionally with Public Officials on behalf of or for the benefit of Enagás Renovable, Personnel and Third Parties must at all times act with integrity and honesty and in a fair and professional manner, which requires them to always be open, transparent and accurate about the purpose of the interaction and the role of the Company.
- **Rule of Law:** When interacting professionally with Public Officials on behalf of or for the benefit of Enagás Renovable, Personnel and Third Parties must follow the rules set out in the Code of Ethics and Conduct, as well as in the Company's Compliance Policies, to prevent conduct that could subject the Company to corruption and reputational risks.
- **Common sense:** In situations where there is no specific provision in the law or in internal policies, Personnel and Third Parties must always use good judgement and common sense, following the fundamental values and principles of the Enagás Renovable Code of Ethics and Conduct.
- **Transparency:** In formal or informal interactions with Public Officials, if Company Personnel are not in attendance, the Third Party must disclose their identity and their relationship with Enagás Renovable.
- **Undue influence:** Enagás Renovable does not tolerate bribery, kickbacks, facilitation payments or corruption of any kind, directly or through third parties. Personnel must never, directly or indirectly or through Third Parties, give/offer/promise or accept/receive anything of value or other advantage to/from Public Officials (or a third party related to them) especially for the purpose of improperly obtaining information, influencing their decision making or obtaining/maintaining a commercial advantage. For more information, see the Enagás Renovable Anti-Corruption Policy.

- **Documentation:** As part of its internal controls against undue influence, the Personnel shall ensure that all business transactions and financial flows handled by it for the benefit of the Company, if any, with Public Officials are properly documented, recorded and classified. Cash payments are expressly prohibited unless it is the only existing procedure for executing the payment.
- **Conflict of interest:** Conflict of interest is one of the risks involved in interactions and commitments with Public Officials on behalf of or for the benefit of Enagás Renewable. Personnel must know how to recognise, manage and, if possible, avoid such situations, and should they arise. For further information, see the Enagás Renewable Conflicts of Interest Policy.

3.3. Good practices for dealing with Public Officials

In addition to the aforementioned principles governing all interactions of Personnel and Third Parties with Public Officials, Enagás Renewable establishes here the following actions to be taken in all interactions:

- **Agenda:** Personnel and Third Parties shall keep Enagás Renewable informed periodically (quarterly) and/or when specifically requested to do so, in full, of the interactions and communications with Public Officials held at any given time, their purpose, attendees and any other relevant data.
- **Notification:** Personnel and Third Parties shall immediately notify the Compliance Officer of any situation in which a Public Official solicits, or appears to solicit, any personal benefit, such as any offer, promise or demand for any gift or entertainment that could be perceived or considered as improper influence or advantage.

While we expect that any request for improper benefits will be promptly rejected, the Compliance Officer should be informed promptly so that they can assess whether additional steps should be taken to help ensure that there is no appearance of impropriety on the part of the Company. Reporting improper requests also helps the Company to be prepared in case similar requests are made in the future by the official(s) in question, or by other officials in the same jurisdiction.

- **Four-eyes principle:** Enagás Renewable may be liable for the actions of Third Parties acting on its behalf or for its benefit. Therefore, the presence of Company Personnel in the professional interactions of Third Parties with Public Officials is recommended to the extent reasonable. This practice can help the Company to corroborate that the

individual acted properly, given the fact that governmental interactions are always subject to criticism or scrutiny by the public official or other regulators.

4. 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

4.1 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: 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.