

# Conflict of Interest Policy

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Board of Directors

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Ensure transparency and fairness in all processes, procedures and decision-making by all Enagás Renewable directors, administrators, managers and employees.

**Changes from the previous version**

N/A

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## 1.Introduction

Enagás Renovable S.A. and the subsidiaries under its control (collectively referred to as "Enagás Renovable" or the "Company") are deeply committed to transparency and fairness in processes, procedures and decision-making.

As a result of this commitment, Enagás Renovable has approved this Conflicts of Interest Policy (hereinafter, the "Policy"), which establishes the scope, responsibilities and process for identifying and preventing or managing actual or potential conflicts of interest within Enagás Renovable.

## 2.Scope

This Policy applies to and must be complied with by all Enagás Renovable directors, administrators, managers and employees (collectively, the "Personnel") regardless of where they are located or where they provide their services.

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.

## 3.Our Policy

### 3.1. Concept

A conflict of interest arises when your personal activities or relationships interfere, or appear to interfere, with your ability to act in the best interests of the Company.

Enagás Renovable Personnel may never use their position within the Company for personal gain or to benefit a member of their family or acquaintance. They must avoid personal transactions with customers and suppliers that may influence or appear to influence their ability to perform their work.

In this sense, the definition of conflict of interest includes an actual conflict of interest (i.e. a conflict of interest that has arisen) and a potential conflict of interest (i.e. a conflict of interest that may arise given the particular facts and circumstances).

In addition, a conflict of interest may exist even in situations that may not give rise to an actual conflict of interest but create the perception of its existence. If you become aware of an actual or potential conflict, you must disclose it immediately by completing the Conflict of Interest Disclosure Form (Annex I) and informing your supervisor and Compliance Officer.

## 3.2. Objectives

The main objectives of this Policy are as follows:

- Provide guidance to Enagás Renovable personnel to recognize and avoid situations that are most likely to cause an actual or potential conflict of interest.
- To guarantee the Independence of judgement and action of the Personnel.
- Avoid any potential conflict or appearance of conflict of interest.

## 3.3. Types of conflicts of interest

Personnel shall identify potential or actual conflicts of interest before or after they arise as part of their daily activity based on fairness, transparency and honesty. To achieve this objective, Enagás Renovable shall ensure that its Personnel are aware of what constitutes a conflict of interest and of the measures required when a potential or actual conflict of interest has been identified.

The following are examples and procedures where conflicts of interest may arise. These include, but are not limited to:

- **Personal or family relationships:** Relatives (e.g. spouse, partner, child, parent, siblings, etc.) or associates (e.g. close friendship, romantic relationship, etc.) working at Enagás Renovable or for one of Enagás Renovable's competitors or at an organisation with which the Company is considering doing business. These types of relationships must not interfere or be perceived as interfering with or influencing the work and decisions of the Personnel.

As detailed below, Personnel must disclose actual, potential or perceived conflicts of interest arising from the existence of personal or family relationships. In addition, Personnel must immediately cease involvement in any decision-making with respect to the person(s) with whom they have a personal/family relationship until their Manager and the Compliance Officer decide on the conflict of interest and how it should be dealt with.

- **External commitments, including employment:** Personnel may not accept external employment with competitors, customers or suppliers of the Company, or provide them with services or products on their own account without having obtained prior approval from Enagás Renovable.

Employment with organisations or individuals that are not competitors, customers or suppliers of Enagás Renovable is acceptable provided that it does not interfere with your responsibilities at Enagás Renovable, and provided that strict confidentiality of Company information is maintained. Similarly, Personnel may provide services to

charitable enterprises that are not directly or indirectly related to the Company and/or teach as a teacher, tutor or lecturer in all types of educational institutions, provided that these activities do not interfere with their work at the Company.

In any case, if you consider that there may be a conflict of interest, real or apparent, between your work at Enagás Renovable and your other employment, you must immediately notify your Manager and the Compliance Officer.

- **Personal financial interests:** This may exist when Personnel, or their family members or associates, have an interest in an organisation with which the Company has, or is considering having, a business relationship, and at the same time are in a position within Enagás Renovable to directly or indirectly influence decisions relating to this business relationship.

In this regard, Personnel may not have a financial interest in any entity (i.e. including competitors, customers or suppliers) with which the Company has or is considering having a business relationship, nor may they lend money to or borrow money from, act as guarantor, co-signer or surety in any similar capacity for any current or potential competitor, customer or supplier of Enagás Renovable.

Therefore, Personnel must avoid having a financial interest or any investment that may affect, or appear to affect, their decision-making on behalf of Enagás Renovable, and if it exists they must disclose it and obtain approval in accordance with the following section of this Policy.

- **Business opportunities:** The appropriation or diversion to others of any profit opportunity in relation to a transaction in which it is known, or can reasonably be foreseen, that Enagás Renovable is, or would be, interested is prohibited. Such opportunities include, but are not limited to, the acquisition of real or personal property or the design or development of new products or new ideas.

## 4.Procedure

### 4.1 Step 1: Outreach

Personnel must disclose actual, potential or perceived conflicts of interest arising from the existence of any other situation that may have a similar impact on Enagás Renovable. Failure to comply with this Policy and the procedure contained herein may constitute misconduct or serious misconduct that may result in disciplinary action, up to and including dismissal. Personnel may be required by the company to submit an annual declaration confirming the existence or non-existence of any potential or actual conflict of interest.

In this regard, disclosure must be made in writing using the Conflict of Interest Disclosure Form (attached as Annex I) and include sufficient information to determine whether a conflict

of interest exists and to enable an appropriate resolution. Enagás Renewable shall therefore ensure that no undue advantage or disadvantage arises as a result of the existence of a conflict of interest.

Personnel must disclose this information to their Manager (or to the Enagás Renewable contact person in the case of non-employee Personnel) and to the Compliance Officer whenever the person identifies an actual, potential or perceived conflict of interest. In addition, in the case of an employee, they must immediately cease their involvement in any decision-making in relation to the identified conflict of interest.

## 4.2. Step 2: Approval and resolution

Upon disclosure of the conflict of interest to the relevant Manager and the Compliance Officer, the Compliance Officer is responsible for determining whether a conflict of interest exists and proposing a resolution including the measures to be implemented, considering the Manager's recommendation to address the conflict of interest. The Compliance Officer shall document in writing the decision taken in relation to the disclosed conflict of interest and the measures to be implemented.

In this regard, measures to manage conflicts of interest may include, but are not limited to, the following

- Record the details of the conflict of interest and take no further action if the conflict of interest does not exist.
- Approve in writing the Personnel's continued participation in the matter.
- Decide that the disclosed conflict of interest is minimal and could therefore be mitigated by effective monitoring.
- Determine that company personnel should waive the interest or reassignment of duties, responsibilities and/or role of Enagás Renewable Personnel that could create such risk.
- Restrict the Personnel concerned from accessing specific sensitive information or participating in certain procedures related to the disclosed conflict of interest.
- Conduct training on this Policy and the Enagás Renewable Code of Ethics and Conduct.
- Implement additional measures in processes and procedures to ensure the impartiality of Personnel in the performance of their duties.

In this regard, the Managers of the affected Personnel must supervise the outcome and the measures, if any, of the Compliance Officer's resolution to ensure that the decision and the measures adopted are adequate to avoid or mitigate any conflict of interest in Enagás Renewable.

## 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](mailto: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: [eticaycompliance@enagasrenovable.es](mailto: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.



Annex I: Conflict of Interest Disclosure Form

I. Employee Information		
Name:	Department:	Date of communication:
Contact details: <ul style="list-style-type: none"> <li>• Country:</li> <li>• Address:</li> <li>• Telephone:</li> <li>• Email:</li> </ul>		
II. Conflict of interest information		
Type of Conflict of Interest: <ol style="list-style-type: none"> <li>1. Personal or family relationships:</li> <li>2. External commitments, including employment:</li> <li>3. Personal financial interests:</li> <li>4. Business opportunities:</li> <li>5. Others:</li> </ol>		
III. Additional Information		
Please include below any other information on the reported conflict of interest:		

IV. Signatures and Approval			
<b>Personnel</b>	Name:		
	Department:		
	Date:		
<b>Manager</b>			
	1. Name:		2. Name:
	Position:		Position:
	Date:		Date:
<b>Compliance Officer / Compliance Committee</b>			
	Name:	Name:	Name:
	Position:	Position:	Position:
	Date:	Date:	Date: