

CONSOLIDATED MANAGEMENT REPORT 2024



In the event of any discrepancy between the Spanish version and this translation into English, the Spanish version shall prevail

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LETTER FROM THE CHAIRMAN

ANTONIO LLARDÉN



2024 has been an important year for Enagás:

We tackled significant challenges and laid the groundwork for future growth.

We play a crucial role in ensuring the security of energy supply and the decarbonisation efforts in Spain and across Europe. Our strategic importance in providing energy access to industries and the public became particularly evident following the war in Ukraine, and we have continued to strengthen this role throughout 2024.

At the forefront of security of supply

Once again, we have set a benchmark in energy security, with Spain being among the first EU countries to fully fill its underground storage facilities by August. The Spanish Gas System operated at full capacity with great flexibility, sourcing supplies from 14 different origins during a year in which the demand for

conventional gas – including industries, households, and services – increased for the second year running.

Our role as the Technical Manager of the Gas System underpins this seamless operation, 24/7, every day of the year. In 2025, we will celebrate 25 years since Enagás took on these responsibilities, marking a quarter-century of impeccable service to society.

Strengthening the green and industrial agenda

Now more than ever, decarbonisation is central to the EU's role as a global actor, with energy being the cornerstone of the European project. The new European Commission is acutely aware of these challenges and opportunities and has bolstered its commitment to industrial competitiveness, the green agenda, and the development of a European renewable hydrogen network, with H2med set to be a key hydrogen corridor for Europe.

In 2024, Europe has continued to develop a truly unified energy policy by approving the Hydrogen and Decarbonised Gas Directive. The European Hydrogen Bank, during its first auction, confirmed that the most cost-effective hydrogen will be produced in the Iberian Peninsula.

Decarbonisation – and therefore renewable hydrogen – will be crucial for Europe to enhance its strategic autonomy and industrial competitiveness. The development of a hydrogen market heavily relies on infrastructure. A European market requires a network that connects production centres with demand centres.

A new era of hydrogen infrastructure

Spain's strong gas infrastructure has proven its strategic value, and this will extend to the future renewable hydrogen infrastructure. We are on the brink of a wave of hydrogen investments across Europe aimed at securing decarbonisation and security of supply – an opportunity we are prepared for, as we take decisive steps in 2025.

The H2med corridor, the Spanish Hydrogen Backbone Network, and its two associated storage facilities are European Projects of Common Interest and key components of the future European hydrogen network. This network is crucial for enhancing the competitiveness of European industry and transport. Discussing energy transition also means discussing reindustrialisation.

At Enagás, we take pride in contributing to these significant challenges for both Spain and Europe. By 2040, we aim to become a carbon-neutral company, and this year, we will continue to advance steadily towards this goal. We will also continue to contribute to the well-being and prosperity of Spanish society, that of the countries where we operate, and that of those around us.

We are equipped to meet these challenges thanks to the outstanding work of Enagás' team, to whom I extend my gratitude for their dedication, energy, and hard work. I would also like to acknowledge the dedication and valuable contributions of our Board of Directors. Additionally, I extend my gratitude to our shareholders for their continued trust in us; their support is more crucial than ever in this period of transformation. Please rest assured that as we approach 2025, our primary goal remains to continue creating value for you.

Antonio Llardén

CHAIRMAN

INTERVIEW WITH THE CHIEF EXECUTIVE OFFICER ARTURO GONZALO

‘Green hydrogen presents a significant opportunity for both Spain and Enagás’ growth’



How was 2024 for Enagás?

The year 2024 has been pivotal for Enagás, marking a turning point as we achieved crucial milestones to gear up the company for a new phase of growth centred primarily on hydrogen.

This year, we’ve started our journey as a Hydrogen Transport Network Operator (HTNO). Furthermore, the European Commission has recognised the Spanish hydrogen network and H2med as Projects of Common Interest (PCI), and we have been tasked by the Spanish Government to develop these initiatives. We have also submitted four new segments of the Spanish Hydrogen Backbone Network to the EU’s second PCI call for

proposals, which will connect all the mainland autonomous communities with this network.

‘2024 has been crucial in setting Enagás up for the future. We have enhanced our business profile and significantly lowered our debt levels’

I also want to highlight the success of the H2med Call for Interest, the first of its kind for a pan-European corridor, which has

attracted more than 500 projects. This initiative showcases the collaboration between the governments and operators of Portugal, Spain, France, and Germany. It gives us a clear insight into the European market, positioning Spain as a major hub for green hydrogen, with strong demand coming from Germany and other European nations.

To support this investment in hydrogen infrastructure, which will underpin the company's growth, we have made several important decisions this year: we have adjusted our capital structure with a sustainable dividend policy and sold our stake in Tallgrass Energy, actions that have strengthened the company's balance sheet and risk profile.

The ICSID has also ruled in favour of Enagás regarding our investment in Gasoducto Sur Peruano (GSP). This decision, which ends over seven years of uncertainty, strongly affirms Enagás' competent handling of the situation and largely paves the way for repatriating dividends from our affiliate, Transportadora de Gas del Perú (TGP).

It has been an intense year, during which we have also ensured the seamless operation of the System and reinforced Spain's position as a crucial energy hub for Europe's strategic autonomy.

What are the company's prospects for 2025?

We have made significant progress as the year begins. Europe has taken decisive steps to continue supporting renewable hydrogen as a key element of its green and industrial agenda. In January, the European Commission unveiled its Competitiveness Plan, which highlights the acceleration of investments in hydrogen infrastructure as a top priority.

Both Europe and the Spanish government are united in their support for green hydrogen as a cornerstone of the energy transition. This was evident at the Third Enagás Hydrogen Day, where key figures such as the President of the Government of Spain, Pedro Sánchez; the Executive Vice-President for a Clean, Just and Competitive Transition at the European Commission, Teresa Ribera; and the President of the National Commission on Markets and Competition (CNMC), Cani Fernández, spoke.

At Enagás, we continue to take all necessary steps to ensure that 2025 becomes the year of hydrogen infrastructure. Together with our partners, we have secured all the Connecting Europe Facility (CEF) funding we requested for the studies and engineering of the Spanish Hydrogen Backbone Network and the H2med corridor. We are set to progress according to the planned timeline to establish a hydrogen infrastructure by 2030.

A notable initiative in this schedule is the public participation plan for the Spanish Hydrogen Backbone Network. This will be the largest process of its kind ever undertaken in Spain, running throughout this year and into part of 2026 nationwide.

What are the main features of the 2024 results?

The year 2024 has been crucial for Enagás, marked by two key achievements: an improved business risk profile and a significant reduction in debt levels.

Our net profit, excluding non-recurring impacts, has increased to 310.1 million euros, which is 3.2% higher than in 2023 and exceeds our annual targets. Efficiency in operating expenses,

strong performance from our affiliates, and improved financial results have been crucial in offsetting the annual impact of the regulatory framework.

Including the effects of asset rotation and the accounting loss from the GSP ruling, our net profit stands at -299.3 million euros. This adjustment strengthens our strategic initiatives and solidifies our dividend policy both now and for the future.

Selling our stake in Tallgrass Energy enabled us to cut debt by 943 million euros, which is a 28% reduction compared to 2023. Rating agencies have acknowledged these improvements by upgrading Enagás' credit rating to BBB+ with a stable outlook.

And, as I was saying, the GSP ruling has finally ended years of uncertainty.

In summary, 2024 has been crucial in establishing the groundwork for an Enagás poised for growth driven by hydrogen and new energy carriers, ensuring sustainable returns for our shareholders.



How well has the Strategic Plan been implemented and what does it update entail?

Our plan's implementation since 2022 has surpassed our expectations, prompting us to introduce the 2025-2030 Strategic Update. Our initial focus has been on ensuring the security of supply in Spain and Europe, with our Gas System operating at full capacity. By efficiently managing our infrastructure, we have saved approximately 10 billion euros on the national energy bill due to the price differential with Europe from 2022 to 2024.

Our strategic focus is on Spain and Europe, and progress in asset rotation is crucial to this aim. In 2024, alongside selling Tallgrass Energy, we increased our involvement as an industrial partner and operator of the Stade LNG terminal in Germany.

As part of the second pillar of our Strategic Plan, we have effectively managed operating and financial costs and reduced the impact of inflation through our Efficiency Plan.

This strong foundation allows us to advance the third pillar of our Strategic Plan: contributing to decarbonisation. We have announced 4.035 billion euros in investments, with 3.125 billion earmarked for renewable hydrogen infrastructure.

In addition, the newly formed company, Scale Green Energy, will enable Enagás to spearhead the development of other decarbonisation-related infrastructures and services. This includes sustainable CO₂ management, renewable ammonia, bunkering, small-scale LNG and BioLNG, and renewable hydrogen for mobility.

The company's investments are expected to achieve a compound annual growth rate of 9.5% in EBITDA between 2026 and 2030. This growth is aligned with our strategy of maintaining an attractive and sustainable dividend policy beyond 2026.

In short, this ambitious strategic update, with clear challenges and goals, aims to create value for our shareholders.

'We have introduced a strategic update with clear challenges and objectives that will enhance value for our shareholders'

What is the key to remaining a sustainability leader?

We are deeply committed to sustainability, tackling it as a personal challenge. Addressing climate change is a major societal challenge and is central to Enagás' mission. We aim to become a net zero company by 2040. To achieve this, we are implementing a stringent decarbonisation strategy across both our direct operations and those within our value chain, reporting our progress transparently.

We foster a culture of sustainability that engages everyone within the company. This ethos is reflected in our actions and is why Enagás has been included, for the seventeenth year in a row, in the Dow Jones Best in Class Index (formerly the Dow Jones

Sustainability Index). We continue to hold a leading position and have improved our rating.

What would you highlight from your performance in other ESG areas?

We are advancing across all three ESG dimensions. In particular, our commitment to quality employment is a defining characteristic of Enagás in the social sphere. We are a leader in people management and have been recognised as a Top Employer for fifteen years, as well as achieving the highest level of excellence, A+, as a Family-Friendly Company (efr).

Diversity and inclusion are central to our strategy. According to Equileap's Gender Equality Report & Ranking 2024, Enagás ranks among the top 15 companies globally and second in Spain for gender equality.

Last year, we joined CloisnGap to help close gender gaps and were recognised in the Global Summit of Women report as one of the energy companies with the highest number of female managers and executives worldwide.

In the field of Corporate Governance, we have a robust governance model that adheres to best practices and standards. In 2024, we received the highest rating, G++, from the AENOR Corporate Governance Index 2.0, which we have just renewed in 2025.

'At Enagás, we are committed to fostering a culture of sustainability on a personal level'

Is there anything else you would like to highlight about the company's prospects?

We are at a crucial moment in the company's future and we are addressing this by leveraging innovation, technology, and digitalisation – our key strategic allies in transitioning to a hydrogen economy. In 2024, we established the Hydrogen Technology Observatory to drive innovation, facilitate the exchange of technical knowledge, and accelerate the rollout of this energy carrier. This initiative has already attracted 40 partners from across the value chain.

Our Digital Transformation Plan is helping us advance more swiftly with the 2022-2030 Strategic Plan. We are driving a more digitalized energy model across all areas of our activity, with a prominent role for our Cybersecurity Plan in ensuring the resilience and continuity of our business, and for Artificial Intelligence as a disruptive and transformative element. We believe in a digitalisation approach that puts people at its core, enabling us to become more agile and flexible.

I want to express my gratitude to the outstanding team of professionals at Enagás for their excellent work this year and their continual dedication to realising the company's future plans.

I also extend my thanks to our Board of Directors, stakeholders, and every shareholder for their support and trust. Our main priority is to create sustainable value for you.

INTRODUCTION

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ENAGÁS IN 2024

Sustainable and profitable growth



Total revenues

760.7 M€

EBITDA⁽²⁾

2,404.1 M€

Net debt⁽¹⁾

3,252 M€

Liquidity⁽¹⁾

Rating

BBB+

Standard & Poor's

11.78 €

Share at 31/12/2024

1.00 €

Dividend per share

BBB+

Fitch

(1) Figures from the income statement of the Consolidated Annual Accounts of the Enagás Group for financial year 2024.

(2) Figure reported in the Alternative Performance Measures Report, available at <https://www.enagas.es/en/investor-relations/financial-information/alternative-performance-measures-apm/>.

Important circumstances arising after year-end: see 'Consolidated Annual Accounts', section '4.9 Subsequent events'.

Transformation



1,362

Professionals

30%

Women

40%

Women on the Board of Directors

40%

Women in the Executive Committee

Launch of the **2024-2026 Digital Transformation Plan**

Operational excellence



311.7 TWh

National gas demand

(-4.2% vs. 2023)

+4.2 %

Industrial demand (176.8 TWh)

100 %

availability of facilities and security of supply

1,671 GWh/día

Record daily demand in the last two years

100 %

filling of the underground storage facilities in August, exceeding the filling obligations established according to European and national regulations

14

Countries supplying natural gas

Sustainability



-25%

Reducción de emisiones CO₂e de alcance 1 y 2 vs. 2018

Objetivo Net Zero

by 2040 for scopes 1 and 2, and by 2050 for scope 3

Sustainability indices

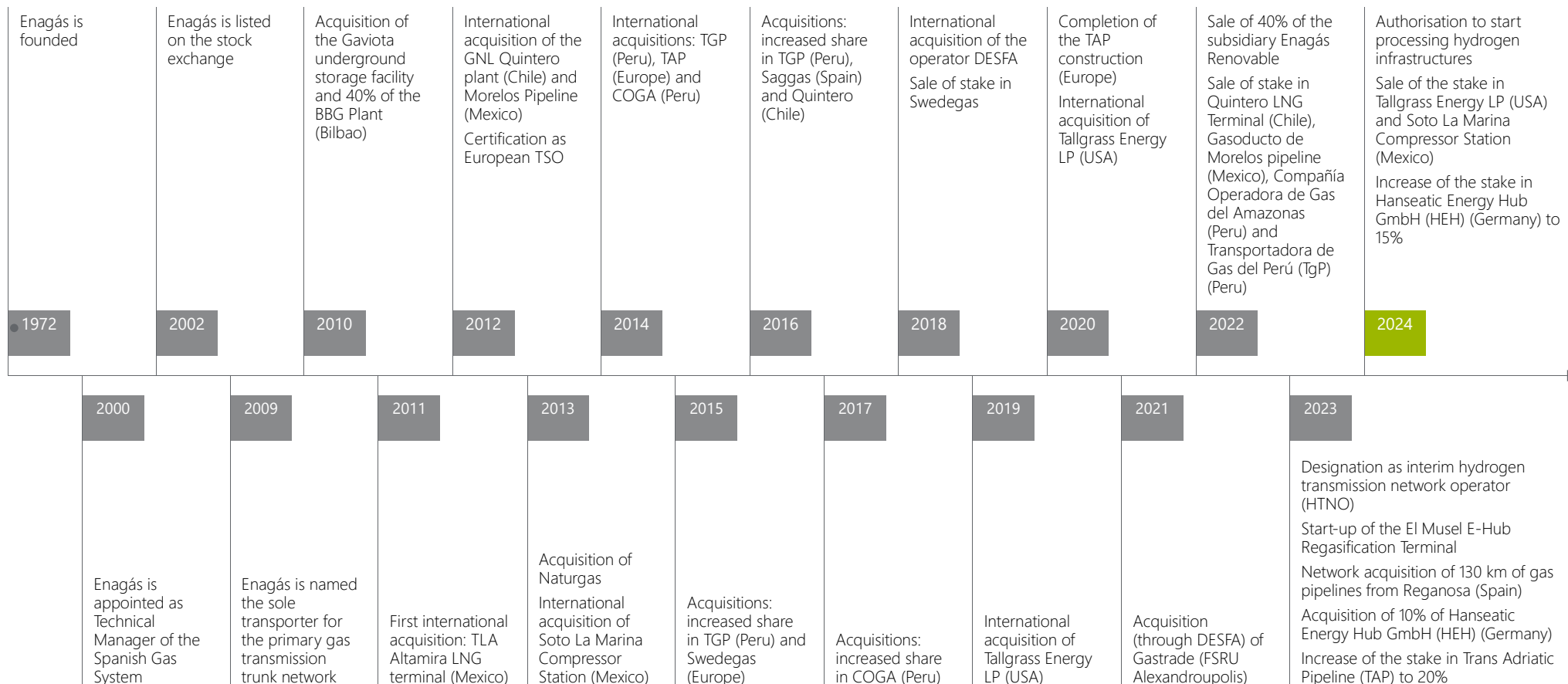
87/100

DJSI Score (Top 5% S&P Global ESG Score 2024)

A list

CDP Climate Change score

MAJOR COMPANY MILESTONES



RISK MANAGEMENT

Enagás Risk Model

Enagás has established a risk control and management model aimed at ensuring the achievement of the objectives of the company in a predictable manner and with a medium-moderate profile for all of its risks. This model is perfect for adapting to the complexity of a globalised competitive environment and a complex economic backdrop.

In its [Risk Control and Management Policy](#), Enagás establishes its commitments to ensure a clear governance structure, a proactive and comprehensive approach to risk control and management, as well as effective information management to identify, assess, manage and communicate risks at the appropriate levels.

This model is based on five aspects:

1. The consideration of a risk taxonomy, which sets out standard typologies of risks according to their nature. The taxonomy comprises the following categories: Strategic and Business, Operational and Technological, Financial and Tax and Credit and Counterparty. In addition, there are other types of risk transversal to the previous ones: Reputational, Compliance and Criminal Liability.

The Enagás Group is also exposed to other cross-domain risks that do not correspond to a single risk category, but rather may be correlated with multiple. These risks are related to the three ESG sustainability pillars: environmental, social and governance.

The taxonomy defined is taken as a reference point for the identification of the risk inventory to which society is exposed. It is dynamic inventory, conditioned by changes in the corporate environment.

It should also be noted that the methodologies used for risk measurement differ depending on each type.

2. The segregation and independence of the functions of risk control and management are articulated at the company in three 'lines of defence':

On the one hand, the business units responsible for the risks take them on when conducting their ordinary business activities, and are therefore responsible for identifying and measuring them.

Moreover, there is a risk control and management area responsible for the following:

- Ensuring that the risk control and management systems function correctly.
- Actively participating in the preparation of risk strategies and the impact definition regarding their management.
- Ensuring that the control and management systems adequately mitigate risks.

Lastly the internal audit function is responsible for monitoring the efficiency of controls in relation to identified risks.

Internal risk control and management framework

	1st line of defence - Business units	2nd line of defence - Risk area	3rd line of defence - Internal audit
Governance		Define the regulatory and governance framework.	
	Identify the risks they assume in their ordinary activity.	Define a taxonomy of risks and advise the business units on identifying risks.	
	Assess and measure risks following the established measurement methodologies, assuming and managing them.	Establish the risk measurement methodologies and the risk consolidation and reporting system.	
Risk profile		Validate the measurements made by the business units.	
	Define risk control and management measures.	Ensure that management controls and measures are aligned with the company's strategy.	Verify and monitor the risk function and established control activities.
	Define actions to correct failure to comply with risk limits.	Provide a global and homogeneous vision of risks, reporting to Senior Management and Governing Bodies.	
Risk appetite		Inform the Governing Bodies of the risk appetite and its associated limit structure.	
		Validate measures and strategies for correcting any non-compliance.	
Coordination with second lines		Ongoing coordination with Insurance, Cybersecurity and Health and Safety areas	

- 3. The existence of a solid risk culture, as well as a governance structure with clear responsibilities in the company's risk control and management process:

Governing Bodies

Board of Directors

The Board of Directors is responsible for approving the Risk Control and Management Policy, setting the acceptable level of risk, and ultimately ensuring the Risk Control and Management Model is in place and functioning.

Other responsibilities with respect to risks are delegated in the Audit and Compliance Committee.

Audit and Compliance Committee

The Audit and Compliance Committee mainly monitors the efficiency of the risk control and management systems and evaluates the risks to the company (identification, measurement and establishment of measures for their management). It also ensures the independence of the function and that it is provided with the necessary workforce and material resources needed for the optimum performance of its duties.

Executive Committee

The Executive Committee establishes the overall strategy for risks and the limits of global risk for the company. It also reviews the level of exposure to risk and the corrective actions, should there be any non-compliance.

- 4. Establishing a risk appetite framework which defines the risk levels considered acceptable and that is in line with established business objectives and the market environment in which the company's activities are carried out.

There is also a scorecard of key risk indicators (KRIs) with their associated limits for the company's main processes and risks. These delimit the risk appetite that the Group wishes to assume in its quest for profitability and value.

Among the established KRIs, we highlight the areas of operational risk, health and safety, financial, sustainability, geopolitical context and compliance.

Similarly, some KRIs (financial, environmental, sustainability) are included as metrics in the company's objectives for long-term incentives.

Finally, it is worth highlighting the establishment of KRIs associated with the main Monitoring KPIs for the 2025-2030 Strategic Update.

- 5. The transparency of information supplied to third parties, to guarantee its reliability and accuracy.

The Model complies with international best practice standards in terms of risk control and management, primarily referring to ISO 31000 Risk Management Standard and 2nd COSO Report¹: ERM (Enterprise Risks Management). It is also fully aligned with the national regulatory framework in this area (requirements of the Spanish Corporate Enterprises Act and the recommendations of the CNMV's Good Governance Code of Listed Companies and Technical Guide 3/2017 on Audit Committees for Public Interest Entities).

This risk model includes a comprehensive analysis and regular monitoring of all risks to which the company is exposed, enabling them to be adequately controlled and managed.

Risk monitoring

Corporate risks are continuously monitored through different channels and a wide variety of reports. Substantial changes in risk are promptly communicated to decision-makers.

At least quarterly, a monitoring report is made to the company's Executive Committee, Audit and Compliance Committee and Board of Directors. The risk identification and assessment process includes the following phases:

¹ Committee of Sponsoring Organizations of the Treadway Commission.

Phase 1

Risk identification

Identification of those risks to which the company is exposed in the ordinary course of business on a continuous and systematic basis.

Risks are classified according to the risk taxonomy set out by the company.

Phase 2

Risk assessment

Qualitative and quantitative assessment of the level of risk for a given time horizon on an annual basis, updated quarterly for the most significant risks.

Use of different methodologies, taking into account the characteristics of each risk and the different scenarios established on the basis of available information.



Phase 3

Risk Control and Mitigation Measures

The required control and management activities are designed for each risk according to the nature of the risk, the operational plans of the business and the established risk management strategy: take on, mitigate or eliminate.

Phase 4

Reporting

Creation of cutbacks at different levels of the organisation: areas, Executive Committee, Audit and Compliance Committee and Board of Directors.

The impact/exposure of risks is assessed in the different dimensions indicated below, including ESG aspects, so that risk levels are determined from the perspective of relative importance, impact on the company's value and impact on the environment (environmental, security, reputational and social):

- Economic: assessment according to impact on company results.
- Health and safety: assessment according to severity of incidents.
- Reputational: assessment according to the impact on stakeholder expectations.
- Security of supply: assessment according to the degree to which the Gas System is affected and the time for which infrastructure is unavailable.
- Environment: assessment depending on the type of environmental impact (biodiversity or emissions). Done according to the level of environmental damage and impact on protected areas, the energy efficiency indicator, and/or the volume of methane emissions.

The risk measurement exercise consists of estimating possible prospective business scenarios that could eventually have a negative impact on the company's interests.

The level of risk (Acceptable, Assumable, Significant or Critical) is determined on the basis of the impact/exposure, as indicated above, and the likelihood of the risk events materialising.

The existing model is complemented by specific risk analyses that facilitate decision-making based on risk-profitability criteria for strategic initiatives of the Enagás Group, new products (CO₂, ammonia, etc.), services, businesses, etc. The risk control and

management area performs this analysis independently, transversally (covering all types of risk) and homogeneously (following the same methodologies as for global risk measurement), based on the establishment of specific risk levels for this type of operation, which are aligned with the methodology used for other risks, making it possible to monitor the risks identified throughout the entire life cycle (from the study of the opportunity to management of the activity once it has been integrated into the Company's processes).

In 2024, the Risk Control and Management Model was certified by an independent third party. Its report concluded that the level of maturity and deployment within the organisation and compliance with the aforementioned reference standards are high, highlighting as strong points the risk culture at all levels of the organisation, the robustness and maturity of the model, and the solidity of the quantification models used.

Furthermore, within the framework of ISO 55001 - Asset Management Certification, ISO 14001 - Environmental Management Systems Certification and ISO 37001 - Anti-Bribery Management Systems Certification, regular external audits are carried out on the Risk Control and Management Model, as far as these standards are concerned.

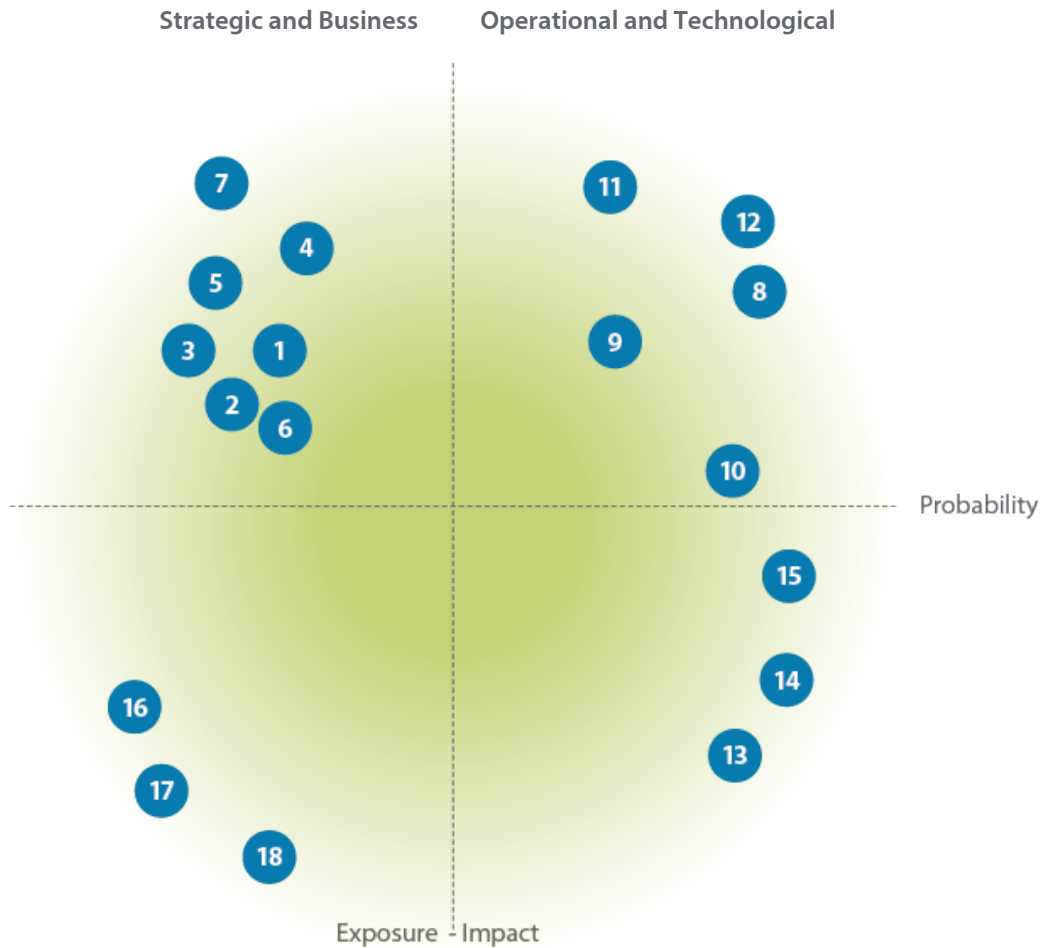
In 2024, Enagás carried out internal communication campaigns and training activities for the Board of Directors and Enagás employees - in relation to the Risk Management Model, methodology and comprehensive security risk in information and communications systems (cybersecurity). This allows us to update knowledge in this area and continue to strengthen the risk culture at all levels of the organisation.

The Enagás risk map is shown below, detailing the risks to which the Enagás Group is exposed, represented in aggregate (in accordance with level 2 of the company's risk taxonomy).

This map includes aggregate Sustainability (ESG) risks, defined as the effects of non-compliance with commitments and targets in the company's material topics. Enagás has identified and assessed these

risks, based on the company's materiality analysis (for more information, see disclosure requirements [SBM-3](#) and [IRO-1](#) in chapter 2 of the Non-Financial and Sustainability Information Statement). The result is risks with ESG factors or impacts for each of the material topics.

Corporate Risk Map



- 1. Technological and regulatory deployment of hydrogen
- 2. Geopolitical risks
- 3. Políticas europeas de países del entorno
- 4. Sustainability (ESG)
- 5. Regulatory and remuneration
- 6. Legal
- 7. Affiliates - International business
- 8. Industrial risks in infrastructure operation
- 9. Information and Communications Systems Security

- 10. Non-availability of gas
- 11. Supply chain
- 12. Unintentional failures or errors in corporate processes
- 13. Worsening of the company's financing conditions
- 14. Financial (interest rate, exchange rate and liquidity)
- 15. Tax risks
- 16. Direct reputational risks
- 17. Compliance risks
- 18. Criminal liability risks

Breakdown of main risks²

Type of risk	Risk description	Level of risk ³	Control and management measures
STRATEGIC AND BUSINESS RISKS			
1. Technological and regulatory deployment of hydrogen	<ul style="list-style-type: none"> Achieving technological deployment is necessary to ensure the viability of renewables as an energy alternative. There is uncertainty as to the regulatory deployment (remuneration, public funds) that conditions the viability of the projects. 	Significant	<ul style="list-style-type: none"> Update to the Policy on the separation of activities. Agreement of the Council of Ministers of July 30, 2024 authorising Enagás Infraestructuras de Hidrógeno as provisional manager of the hydrogen network. Publication of the results of the 2nd hydrogen bank auction in the expected terms. H2Med has established itself as the most mature pan-European H2 corridor in Europe. Recognition as PCIs of the H2med hydrogen corridor and the initial axes of the hydrogen backbone. 100% of the requested aid from CEF funds for PCI studies has been granted. H2med Call for Interest process. Endorses Spain as a H2 production hub in Europe. The third H2 day on January 29, 2025, was received very positively. Early engagement with Spanish regulators, including the CNMC and the Ministry for Ecological Transition and the Demographic Challenge (MITERD). <p>For more information, see disclosure requirement SBM-1 in chapter 2 of the Non-Financial and Sustainability Information Statement.</p>
2. Geopolitical risks	<ul style="list-style-type: none"> Certain geopolitical developments could have a negative impact on the natural gas market and the energy transition and, therefore, on the company's strategic objectives and business development. 	Tolerable	<ul style="list-style-type: none"> Internal monitoring of the main geopolitical hotspots with potential negative consequences for the gas market and the energy transition, and indirectly for Enagás and its 2025-2030 Strategic Update.
3. European policies of neighbouring countries	<ul style="list-style-type: none"> Enagás' strategy, focused on security of supply and decarbonisation, may be affected by dependence on the government policies of neighbouring countries in Europe. 	Tolerable	<ul style="list-style-type: none"> Monitoring of government policies (PNIECs, Energy Policies) and the macroeconomic context in the EU countries of greatest relevance to Enagás (France, Germany, Portugal, etc.). Publication on July 15, 2024, of the hydrogen and decarbonised gas package (Regulation 2014/1789 and Directive 2024/1788). Monitoring of possible delays that could slow down the implementation of BarMar and the hydrogen backbone network.
4. Sustainability (ESG)	<ul style="list-style-type: none"> Effects of non-compliance with commitments and targets on the company's material topics: decarbonisation, environmental impact, human rights, discrimination/diversity/vulnerability, loss of talent/lack of human capital, health and safety, and non-compliance with governance principles. 	Tolerable	<ul style="list-style-type: none"> Health and safety policy, environmental policy, climate action policy and quality and operational excellence policy, the principles of which are embodied in the Enagás Environmental Management System, certified in accordance with ISO 14001 and EMAS. Sustainable Management Plan with lines of action in the field of natural capital and biodiversity management. Presence in the S&P Global's sustainability rankings, the Dow Jones Best in Class Index and other sustainability indices. Compliance, Sustainability and Good Governance policies that establish the general principles governing the company's management in this area, as well as the specific area in the company that manages diversity and inclusion. <p>For more information, see chapters E1, E2, E3, E4 and E5 of the Non-Financial and Sustainability Information Statement.</p>
5. Regulatory and remuneration	<ul style="list-style-type: none"> Admissibility of CapEx investment costs, adjustment of CapEx and OpEx standards for inflation. 	Tolerable	<ul style="list-style-type: none"> Promotion of the use of natural gas and dissemination of analyses of the economic and financial sustainability of the system. Ongoing relationship with regulatory bodies and Public Administrations. Participation in the development of proposals for regulatory development and the consultation phase.

² Riesgo de Crédito y Contraparte: En aplicación de la NIIF9, desde enero de 2018 se realiza una provisión por la pérdida esperada de este tipo de riesgo.

³ En el mapa de riesgos se representa el riesgo residual, es decir, el riesgo considerando la efectividad de las medidas de control y gestión establecidas (transferencia del riesgo a compañías aseguradoras o medidas de mitigación). Nivel de Riesgo: Aceptable / Asumible / Relevante / Crítico.

Type of risk	Risk description	Level of risk ³	Control and management measures
6. Legal risks	<ul style="list-style-type: none"> The company's results may be affected by the outcomes of administrative or legal actions and proceedings in which it is involved, as well as by the uncertainties that arise from differing interpretations of contracts, laws or regulations that the company may have that differ from those of third parties. Effects on Enagás' income statement arising from the resolution of arbitration, legal proceedings, and/or the evolution of its business plans and growth projects. 	Significant	<ul style="list-style-type: none"> Management and follow-up of existing situations in legal proceedings and/or with the relevant administrative authorities. Hiring specialised legal counsel for the process.
7. Affiliates – International business	<ul style="list-style-type: none"> Effects on Enagás' income statement derived from the evolution of its business plans and growth projects. 	Acceptable	<ul style="list-style-type: none"> Follow-up and monitoring of the evolution of the business, the portfolio of opportunities and the project execution at the different companies.
OPERATIONAL AND TECHNOLOGICAL RISKS			
8. Industrial risks in infrastructure operation	<ul style="list-style-type: none"> In the operation of the infrastructure for transmission, regasification terminals and underground storage facilities, accidents, damage or incidents involving loss of value or lost profits may occur. 	Acceptable	<ul style="list-style-type: none"> Emergency, maintenance and continuous improvement plans, the existence of control systems and alarms that guarantee service continuity and quality. Quality, prevention and environmental certifications and redundancy of equipment and systems. Insurance policy contracts. Cybersecurity Measures /Resilience / Physical Security
9. Security of information and communication systems	<ul style="list-style-type: none"> Damage to corporate and industrial systems as a result of attacks by third parties. 	Tolerable	<ul style="list-style-type: none"> Cybersecurity Strategy (2025-2027) Good position in the sector in terms of cyber-attack mitigation and control measures. Cybersecurity and AI Committee, Business Continuity Committee and quarterly report to the Audit and Compliance Committee on the actions taken to mitigate risk in the areas of logic, resilience, and physical security. Definition and update of BIAs (Business Impact Analysis) and BCPs (Business Continuity Plan) to respond to different cyber-attack scenarios. Supply chain assessment (suppliers). Cybersecurity and AI training (Board, Senior Management and other professionals). Conducting cyber-attack simulation tests (Red Team) to test detection and response capabilities. <p>For more information, see the section on 'Information Security' in the Additional Information section of the Non-Financial and Sustainability Information Statement.</p>
10. Gas unavailability	<ul style="list-style-type: none"> Interruption of supply in the Spanish Gas System due to unavailability of gas at the source or due to market tensions irrespective of cause (sabotage, geopolitical decisions). 	Tolerable	<ul style="list-style-type: none"> Preventive action plan for the Spanish Gas System (investments in gas infrastructures, flexibility of entry points, organised market, interruptible contracts, among others). Cybersecurity Measures /Resilience / Physical Security Business Continuity Committee, BIAS and BCP.
11. Supply chain	<ul style="list-style-type: none"> Contractual disputes, poor quality of services or information received, non-compliance with sustainability criteria and delays in administrative decisions. 	Acceptable	<ul style="list-style-type: none"> Processes and regulations and internal procedures for purchasing and supplier approval. Reputational analysis and ESG assessments of suppliers. Close and continued relationship with stakeholders. <p>For more information, see disclosure requirement G1-2 of the Non-Financial and Sustainability Information Statement.</p>
12. Unintentional failures or errors in corporate processes	<ul style="list-style-type: none"> Non-industrial processes (invoicing, formalisation of contracts, legal and/or administrative formalities, etc.). 	Acceptable	<ul style="list-style-type: none"> Processes with specific validation and monitoring controls. External and internal audits. Internal policies, standards, training and procedures. Automation of processes, updating and review of systems.

³ The risk map represents the residual risk, i.e. the risk considering the effectiveness of the established management and control measures (risk transfer to insurance companies or mitigation measures). Level of risk: Acceptable / Tolerable / Significant / Critical.

Type of risk	Risk description	Level of risk ³	Control and management measures
FINANCIAL AND FISCAL RISKS			
13. Worsening of the company's financing conditions	<ul style="list-style-type: none"> The push for sustainable finance by regulators and investors (EU taxonomy, EIB investment policy, European Green Deal, and other similar measures) could affect the company's financing conditions in the medium and long term. 	Acceptable	<ul style="list-style-type: none"> The development of renewable gas projects aligned with the EU Taxonomy and the ESG requirements of regulators and investors will enable sustainable debt issuance and improved financing conditions.
14. Financial risks (interest rate, exchange rate and liquidity)	<ul style="list-style-type: none"> Volatility of interest and exchange rates, as well as movements in other financial variables that could negatively affect the company's liquidity. 	Acceptable	<ul style="list-style-type: none"> Hedging through derivative contracts to establish an optimal debt structure. Natural hedging through financing in the business's functional currency. Taking out credit lines with unconditional availability and temporary financial investments.
15. Tax risks	<ul style="list-style-type: none"> Possible changes to tax legislation that could affect the company's results. Possible differences in interpretation of the tax legislation in force in the countries in which the Group is present that may diverge from the criteria held by Enagás and its tax advisors. Possible defects of form. 	Tolerable	<ul style="list-style-type: none"> Consultancy services provided by tax specialists. Monitoring of Principles of action that govern compliance with tax obligations, avoiding risks and tax inefficiencies.
REPUTATIONAL RISKS			
16. Direct reputational risks	<ul style="list-style-type: none"> Possible deterioration of the perception or image of the Enagás Group from the different stakeholders. 	Tolerable	<ul style="list-style-type: none"> Fluent, direct communication with stakeholders. Permanent monitoring of information published in the media and social networks. Internal communication regulations. <p>For more information, see disclosure requirement SBM-2 in chapter 2 of the Non-Financial and Sustainability Information Statement.</p>
COMPLIANCE RISKS AND MODEL			
17. Compliance risks	<ul style="list-style-type: none"> Non-compliance with external regulations (sanctions), fraud, corruption and anti-trust. 	Tolerable	<ul style="list-style-type: none"> Internal policies and procedures relating to the Code of Ethics, Compliance models, control framework, etc. Dissemination and awareness raising measures Continuous monitoring of new rules/regulations. <p>For more information, see disclosure requirement G1-1 and the 'Regulatory compliance' section in the Additional Information section of the Non-Financial and Sustainability Information Statement.</p>
CRIMINAL LIABILITY RISK			
18. Criminal liability risk	<ul style="list-style-type: none"> Criminal offences included in the Spanish Criminal Code that could result in corporate criminal liability. 	Tolerable	<ul style="list-style-type: none"> Corporate Defence Programme. Internal policies, rules and procedures from different areas of the company. Code of conduct and code of ethics. <p>For more information, see disclosure requirement G1-1 and the 'Regulatory compliance' section in the Additional Information section of the Non-Financial and Sustainability Information Statement.</p>

³ The risk map represents the residual risk, i.e. the risk considering the effectiveness of the established management and control measures (risk transfer to insurance companies or mitigation measures). Level of risk: Acceptable / Tolerable / Significant / Critical.

Emerging risks

Within this process, Enagás also pays special attention to identifying changes in the reference context to capture events or macro-trends originating outside the organisation that could have a significant impact on the business or the sector in the long term, identifying the most significant threats in order to get ahead of them and establish mitigation measures.

Emerging risks have the unique characteristic of not having been addressed in the past. They are risks for which there is a lack of knowledge/preparedness to quantify their potential impact through long-term prospective scenarios. Pro-active management of these risks is essential to avoid potential negative effects and deviations from established objectives, which, if they occur, could be mitigated

through the establishment of prevention and control strategies and measures.

Emerging risks are identified by the business areas (first line of defence) during measurement exercises.

In 2024, there was significant uncertainty driven by rapid changes and the potential for unpredictable events, further intensified by a complex geopolitical landscape and escalating armed conflicts. The Transformation Plan for models and the adoption of new technologies, such as Artificial Intelligence, also brings about new risks.

In addition to those risks that are already included in the company's risk breakdown, as they are already present in the company's day-to-day business (such as risks derived from the macroeconomic and geopolitical context, the transformation plan

and the adoption of new technologies, climate change, exposure to cyber-attacks or artificial intelligence), other risks have been identified that could become relevant in the future:

Risk	Description / Impact	Risk control and management measures
Extreme weather conditions affecting people	<ul style="list-style-type: none"> Intensification of acute weather events urgent in nature (floods, cut-off lows, storms), as well as chronic weather events (drought, increased temperatures) over the long term in areas most exposed to these hazards could have significant impacts for the company. This may affect people's health and also cause difficulties in accessing buildings and communication between locations, and may even prevent access to Enagás' facilities and affect the integrity and operation of infrastructures. 	<ul style="list-style-type: none"> Simulations of operation with partial unavailability of infrastructures. Emergency Action Plans, Crisis Management Standard, NGTS (Exceptional Operating Situation, EOS). Acquisition of new emergency communication systems. Update of physical risk at all facilities during 2024-2025, as well as the need for new implementation measures.
Disinformation or misinformation of the public	<ul style="list-style-type: none"> Providing intentionally manipulated information to serve certain malicious ends. Disinformation is spread in various ways, most notably through digital platforms and social media, through fake profiles, algorithms or Generative Artificial Intelligence tools. Disinformation can be a threat that increases the risk to the overall security of information systems (e.g. cyber-attacks), worsens the company's reputation and/or causes the loss of investor confidence. 	<ul style="list-style-type: none"> Verifying sources, developing critical thinking, contextualising information. Tracking of information published in media and social networks. Awareness-raising and training workshops: organising workshops and training programmes to try to prevent misinformation risks.
Shortage of talent with the technical skills required by the market	<ul style="list-style-type: none"> Due to the ageing of the population, the low birth rate and the changing occupational trends of the new generations entering the labour market, there could be a long-term shortage of skilled labour to develop the hydrogen infrastructure investment plan foreseen in the 2025-2030 Strategic Update. This could lead to delays in project development and increased costs in hiring available personnel. 	<ul style="list-style-type: none"> Training and development programmes. Partnerships with educational institutions and research centres. Internal talent retention and development programmes. Global talent attraction: expanding recruitment strategies to attract talent from different regions and countries. Use of technology for talent management.
Shortage of materials	<ul style="list-style-type: none"> Possible tensions or problems in the supply of critical materials for the construction of infrastructures, given the H₂ infrastructure development plan planned at the European level, and increasing geopolitical tensions. 	<ul style="list-style-type: none"> Better planning and diversification of suppliers. Long-term agreements with strategic suppliers.
Solar storms	<p>In addition to the increased frequency and intensity of certain weather phenomena, which currently already occur, there are new threats such as solar storms that may gain strength in the coming years.</p> <p>These phenomena can cause significant disruptions to power grids, communication systems and/or satellites. A severe storm could overload and damage electrical transformers, as well as affect navigation or communication systems, which are key to the coordination and control of operations at Enagás infrastructures.</p>	<ul style="list-style-type: none"> At the governmental level, work is under way to develop early warnings. Business continuity plans, simulation exercises to increase resilience. Update of physical risk at our facilities during 2024-2025 for all facilities, where this threat is modelled, and adaptation measures will be defined accordingly.

STATEMENT OF CONSOLIDATED NON-FINANCIAL AND SUSTAINABILITY INFORMATION 2024

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GENERAL INFORMATION



2 General information

21

2. INFORMATION

Basis for preparation

BP-1

General basis for preparation of sustainability statements

The Statement of consolidated non-financial and sustainability information forms part of the Consolidated Management Report of Enagás, S.A. (parent company) and its subsidiaries. It includes information relating to the 2024 financial year on a consolidated basis with the same scope of consolidation as the Consolidated Annual Accounts of the Enagás Group (for further information, see Note '1.3. Consolidation principles' in this fiscal year's Consolidated Annual Accounts). Excluded from the scope are Efficiency for LNG applications S.L., Scale Gas Solutions S.L. and Sercomgas Gas Solutions.

The exclusion of these three companies is due to the difficulties in obtaining the necessary data for sustainability reporting, as well as their minimal contribution and impact. These companies account for less than 1% of the Enagás Group's revenues and engage in activities akin to those of other Group companies, such as energy efficiency and LNG bunkering to replace more polluting ship fuels. Their impact on environmental, social, and governance indicators is not significant, as they do not substantially affect the group's overall data. Enagás is undergoing a transformation so that, by 2025, Efficiency for LNG applications S.L. and Scale Gas Solutions S.L. will become part of a new company named Scale Green Energy S.L. This integration will bring their operations into the Enagás Group's management framework, aligning the new company's processes with corporate standards. This will streamline information gathering and ensure management aligns with global criteria. In 2025, efforts will focus on obtaining the necessary information to report on the sustainability aspects of Sercomgas Gas Solutions.

In addition, the Statement of consolidated non-financial and sustainability information also covers the upstream and downstream stages of the Enagás value chain (for more information on the company's value chain, see disclosure requirement [SBM-1](#)). In other words, the value chain has been considered in the assessment of the relative importance of impacts, risks and opportunities, as well as in the establishment of policies and certain actions.

This Statement of consolidated non-financial and sustainability information was prepared by the Board of Directors on February 17, 2025, in accordance with the requirements of:

- Directive 2014/95/EU on non-financial information and diversity, as well as with the associated Spanish legislation (Law 11/2018).
- Regulation (EU) 2020/852 of the European Parliament and of the Council of June 18, 2020 on the establishment of a framework to facilitate sustainable investments and its delegated acts, which establish the obligation to disclose information on how and to what extent the company's activities are associated with economic activities that are considered environmentally sustainable.

See Appendix '[Non-financial and diversity reporting requirements \(Law 11/2018\) and the EU Taxonomy for sustainable activities Regulation](#)'.

Similarly, it follows, as a voluntary reporting framework, the Regulations of Directive (EU) 2022/2464 of the European Parliament and of the Council of December 14, 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting⁴.

BP-2

Disclosures in relation to specific circumstances

Specifically and where applicable, Enagás will respond to the BP-2 Disclosure requirement for information relating to specific circumstances throughout this Statement of consolidated non-financial and sustainability information via explanatory footnotes.

In this report, Enagás outlines the following timeframes, consistent with the applicable ESRS:

- Short term: the one-year reference period used for financial statements.
- Medium term: between 1 and 5 years.
- Long term: more than 5 years.

In 2024, the criteria for the calculation of the following indicators have been modified:

- CapEx numerator for the key results indicators from the Regulation (EU) 2020/852 (Taxonomy Regulation) chapter. This change has been made to ensure consistency in the calculation

⁴ Enagás has not chosen to omit items of specific information on intellectual property, know-how or results of innovation or information on imminent developments or matters under negotiation.

methodology for the key performance indicators of the Taxonomy Regulation and the CapEx indicator in the financial statements. As a result of this change, the information for the previous year has been recalculated. For more information, see the chapter on [Disclosure of information under Article 8 of Regulation \(EU\) 2020/852 \(Taxonomy Regulation\)](#).

- Water collected and water consumed in disclosure requirement E3-4: in 2023, stored water (10,857 m³) was considered as water collected, with 270,508,968 m³ reported as water collected and 101,136 m³ as water consumed. In 2024, these figures have been recalculated, treating the collected water as not affecting the balance. For further details, refer to disclosure requirement E3-4.

The quantitative parameters and monetary amounts provided are primarily based on direct measurements. When estimates or approximations are used, the assumptions or methods are noted alongside the parameter:

- Significant CapEx amounts invested during the reporting period related to gas-related economic activities under Disclosure Requirement E1-1: further information on the estimation methodology in the specified disclosure requirement.
- Scope 1, 2, and 3 emissions in disclosure requirement E1-6: for detailed information on the estimates for different scopes, see the specified disclosure requirement.
- Non-greenhouse gas emissions in disclosure requirement E2-4: further information on the quantification methodology can be found in the specified disclosure requirement.
- Water discharged in disclosure requirement E3-4: additional information on this parameter’s estimation is available in the mentioned disclosure requirement.
- Biodiversity areas reported in disclosure requirement E4-5: information related to these areas is included in requirement E4-5. Enagás uses Cartographic Information Systems to determine the protected areas occupied by its priority infrastructures, while it estimates the altered, revegetated, and restored areas based on the linear kilometres of affected gas pipelines.

Any disclosure requirements that are incorporated by referencing other requirements are detailed in the table titled “Disclosure requirements established in the ESRS covered by the company’s sustainability report under disclosure requirement IRO-2 in this chapter.

It is also worth noting that Enagás has applied the following phased-in provisions in accordance with Appendix C of ESRS 1:

European Sustainability Reporting Standards	Disclosure requirement	Full name of the Disclosure Requirement	Phase-in
2	SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Information prescribed by ESRS 2 SBM-3 paragraph 48(e) (anticipated financial effects)
E1	E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Information prescribed by ESRS E1-9

Governance

GOV-1

The role of administrative, management and supervisory bodies

Board of Directors and Committees

Name of the Director	Position on the Board of Directors	Type of Director	Position on the Audit and Compliance Committee	Position on the Sustainability and Appointments Committee	Position on the Remuneration Committee
Antonio Llardén Carratalá	Chairman	Other External			
Arturo Gonzalo Aizpiri	Chief Executive Officer	Executive			
Ana Palacio Vallelersundi	Independent Leading Director	Independent		Chairwoman	
José Montilla Aguilera	Director	Independent	Chairman		
María Teresa Arcos Sánchez	Director	Independent			Chairwoman
Santiago Ferrer Costa	Director	Proprietary		Member	
SEPI - Sociedad Estatal de Participaciones Industriales (represented by Bartolomé Lora Toro)	Director	Proprietary	Member		
José Blanco López	Director	Independent		Member	
Natalia Fabra Portela	Director	Independent	Member		
Cristóbal José Gallego Castillo	Director	Independent		Member	
Clara Belén García Fernández Muro	Director	Independent			Member
Manuel Gabriel González Ramos	Director	Independent			Member
David Sandalow	Director	Independent		Member	
Patricia Úrbez Sanz	Director	Independent	Member		
María Teresa Costa Campí	Director	Independent		Member	
Diego Trillo Ruiz	General Secretary		Secretary	Secretary	Secretary

Board structure: Independence and diversity

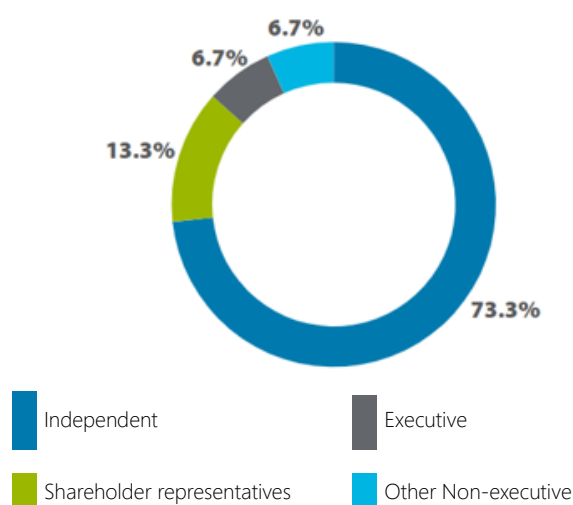
The Rules and Regulations of the Organisation and Functioning of the Board of Directors of Enagás includes conditions which must be met by Board members in order for them to be considered independent. An additional target has been defined to have at least half of the Board consisting of independent directors.

Number of Directors by type

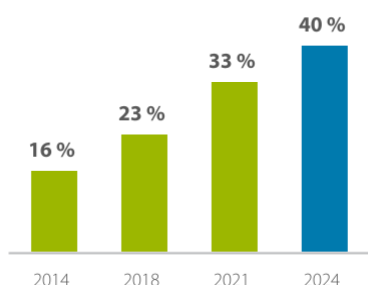
Type of Director	2022	2023	2024
Executive ⁽¹⁾	1	1	1
Non-executive	14	14	14
Independent	10	11	11
Shareholder representatives	2	2	2
Other Non-executive	2	1	1
Total Board members	15	15	15

(1) There are no Directors that represent employees at Enagás.

Board of Directors



Percentage of women on the Board of Directors



Percentage of Board members by age range and gender

	Women	Men	Others	Total
<30 years	0%	0%	0%	0%
30-50 years	16.7%	11.1%	0%	13.3%
>50 years	83.3%	88.9%	0%	86.7%
TOTAL	40.0%	60.0%	0%	100.0%

In 2024, the Enagás Board of Directors has 15 Directors, 73.3% of whom are independent. The average age of the Directors is 60.5 years old and their average tenure is 6.5 years.

The Board Diversity and Director Selection Policy sets out the principles on which the selection processes for members of the Board of Directors are based:

- Principle of diversity in the composition of the Board.
- The principle of non-discrimination and equal treatment, so that the selection procedures for members of the Board of Directors are not subject to implicit bias which could entail any discrimination of any kind, whether due to race, sex, age, disability, etc.
- Compliance with laws in force and with the Enagás corporate governance system; likewise, with the recommendations and principles of good governance adopted by the company.

In 2024, and in line with its commitment to promote gender diversity and the recommendations of the National Securities Market Commission (CNMV), 40% of the Enagás' Board are women, thus meeting the target of having 40% women on the Board by 2024 included in the 2022-2024 Long-Term Incentive Plan.

Knowledge, skills and professional experience of the Board of Directors

	Audit and Compliance Committee						Sustainability and Appointments Committee						Remuneration Committee		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Senior Management	x	x	x	x		x	x	x		x	x	x	x		x
Industry experience	x	x	x		x	x	x		x	x	x	x	x	x	
International experience	x	x	x	x	x	x	x		x	x	x	x	x	x	
Audit and finance	x	x	x	x	x	x	x	x			x	x	x	x	x
Risk management	x	x	x	x		x	x					x	x		
Strategy	x	x	x	x	x	x	x	x		x	x	x	x		x
Institutional experience and public service	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Legal, regulatory and corporate governance	x	x	x		x	x	x	x		x	x	x	x		x
Technology		x	x	x		x		x	x	x		x	x		
Innovation		x	x	x		x				x	x	x	x		
Cybersecurity and the digital transformation		x	x		x	x		x		x			x		
People, culture, talent and human rights management	x	x	x	x	x	x	x	x		x	x	x	x	x	x
Sustainability, climate change and environment	x	x	x		x	x	x	x	x	x	x	x	x	x	x

Assessment of the Board of Directors

Every year, an assessment of the Board is performed with the participation of an independent external expert. This assessment is performed objectively and from a best-practice viewpoint by means of questionnaires completed by all members of the Board. The conclusions of this phase are checked in interviews with the same Directors. The aim is to sustain and bolster the performance of the Board of Directors.

For more details on the results of the assessment carried out during 2024, see the 'Annual Corporate Governance Report'⁵, sections C.1.17 and C.1.18.

Following the evaluation process that has been carried out, it can be concluded that Enagás' governance model is in an optimal situation. Among the board members, there is a general feeling that the composition of the Board of Directors is appropriate, with a wide range of profiles and expertise that contribute to

⁵ This external link refers to information that has not been verified within the review of the Non-Financial Information and Sustainability Information Statement.

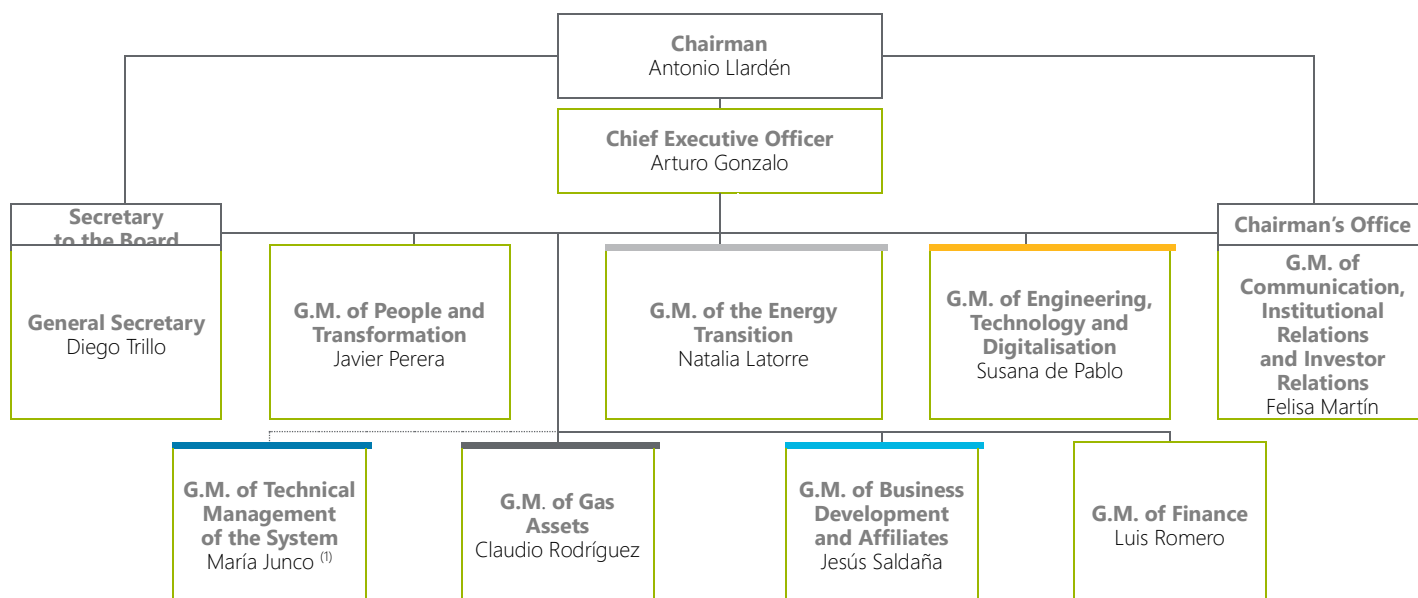
enriching the discussions and to good decision making. Concluding that the members of the Board of Directors have the necessary knowledge, skills and professional experience to

oversee sustainability issues identified as having material impacts, risks and opportunities.

Cross-reference of knowledge and skills with impacts, risks and opportunities

		Sustainability issues with material impacts, risks and opportunities for Enagás												
		Climate action and energy efficiency	Pollution	Water and marine resources management	Biodiversity	Circular economy	People	Human rights	Sustainable value chain	Local communities	Customers	Good Corporate Governance	Ethics and integrity	Operational excellence
Knowledge, skills and professional experience of the Board of Directors	Senior Management						X	X				X	X	
	Industry experience	X									X			X
	International experience						X					X	X	
	Audit and finance												X	X
	Risk management	X	X	X	X	X	X	X	X	X	X	X	X	X
	Strategy	X	X	X	X	X	X	X	X	X	X	X	X	X
	Institutional experience and public service											X	X	
	Legal, regulatory and corporate governance											X	X	
	Technology										X			X
	Innovation										X			X
	Cybersecurity and the digital transformation										X			X
	People, culture, talent and human rights management						X	X	X	X				
	Sustainability, climate change and environment	X	X	X	X	X	X	X	X	X	X	X	X	X

Executive Committee



- Enagás GTS, S.A.U.
- Enagás Transporte, S.A.U.
- Enagás Internacional S.L.U., Enagás Emprende S.L., Enagás Service Solutions S.L.
- Enagás S.A., Enagás Infraestructuras de Hidrógeno S.L.U.
- Enagás S.A., Enagás Transporte S.A.U.
- Members of the Executive Committee

(1) The Technical Management of the System General Manager shall have her participation in the Executive Committee limited, depending on the issues to be discussed.

In line with the company's commitment to gender diversity in management and pre-management positions, Enagás' Executive Committee comprises 40% women.

Percentage of professionals who are members of the Executive Committee by age range and gender

	Women	Men	Others	Total
<30 years	0	0	0	0
30-50 years	4	2	0	6
>50 years	0	4	0	4
TOTAL	4	6	0	10

The members of the company's Executive Committee have extensive experience in the utilities sector and in the geographic locations where Enagás operates. This is largely due to the fact that most of the members have spent a large part of their professional careers within the company, giving them an in-depth knowledge of the sector's characteristics, as well as a cross-cutting and highly specialised vision of the operations and strategies of the business. On the other hand, there are also members of the Executive Committee from other companies in the energy sector, thus bringing a valuable external perspective to decision-making. In addition to their sectoral expertise, the members of the Executive Committee stand out for their specialised knowledge in the field of sustainability. The company has senior managers with extensive experience in environmental, social and governance (ESG) matters. This specialisation ensures that sustainability is central to the company's strategy and management.

Responsibility for Sustainability

The Board of Directors is responsible for guiding, overseeing, and monitoring strategy, policies, risks, objectives, and performance concerning the different sustainability areas. Likewise, through its Sustainability and Appointments Committee, it is responsible for supervising environmental and social practices, as well as stakeholder relations processes, to ensure their alignment with the company's policies and strategy. For more information, see the [Rules and Regulations of the Organisation and Functioning of the Board of Directors of Enagás⁶](#) and the [Regulations of its Committees⁶](#) on the corporate website.

The Sustainability Committee, composed of members of the Executive Committee, reports to this committee and is responsible for reviewing the materiality analysis conducted by the company and approving sustainability actions in line with the impacts, risks and opportunities identified as material by the analysis. It is also responsible for overseeing the setting of targets and progress towards their achievement (delegated by the Sustainability and Appointments Committee). Both bodies meet at least twice a year.

At executive level, the Chief Executive Officer is responsible for managing the company's business, and is responsible for driving

the company forward and the ongoing coordination of its activities.

Reporting to the Chief Executive Officer, the various General Managements are responsible for the identification, assessment and management of material impacts, risks and opportunities, which are generally distributed as follows:

- General Secretariat: the impacts, risks and opportunities related to ethics and integrity and good governance.
- Energy Transition General Management: impacts, risks and opportunities related to the environment (climate action and energy efficiency, pollution, water and marine resource management, biodiversity and circular economy).
- People and Transformation General Management: the impacts, risks and opportunities related to people and human rights of our workforce.
- Engineering, Technology and Digitalisation General Management: impacts, risks and opportunities in the supply chain (part of the value chain).
- Business Development and Affiliates General Management: the impacts, risks and opportunities for affiliates (part of the value chain).
- Technical Management of the System General Management: customer impacts, risks and opportunities
- Infrastructure General Management: the impacts, risks and opportunities for customers and local communities.

GOV-2

Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

Board of Directors and Sustainability and Appointments Committee

On a regular basis, the Board of Directors is provided - directly and/or through the Sustainability and Appointments Committee - with information on issues related to sustainability matters material to the company (in 2024, the Committee met on six occasions). This information includes, but is not limited to, information on policies, actions, benchmarks and targets related to the impacts, risks and opportunities identified as material. This information is provided to all governing body members prior to the meeting for their review. Subsequently, the information is presented by the member of the Executive Committee responsible for the team that manages the sustainability issue in question.

In 2024, the following actions of the Board of Directors relating to sustainability issues were particularly notable:

⁶ This external link refers to information that has not been verified within the review of the Non-Financial Information and Sustainability Information Statement.

- Unanimous approval of the Annual Corporate Governance Report and Consolidated Management Report (Statement of consolidated non-financial and sustainability information).
- Approval of the sustainability materiality analysis (for more information, see disclosure requirement IRO-1) addressing all material impacts, risks and opportunities.
- Approval of the following policies: Cybersecurity and Data Governance Policy, Environmental Policy, Health and Safety Policy, Quality and Operational Excellence Policy, Human Capital Management Policy, Sustainability and Good Governance Policy, Climate Action Policy, Major Accident Policy, Policy for Comprehensive Security in Strategic Infrastructures, Human Rights Policy, Fiscal Policy, Policy for the separation of Enagás Group Activities and Enagás GTS Code of Conduct.

In addition, the Board of Directors and the Sustainability and Appointments Committee have also overseen specific aspects of material impacts, risks and opportunities (for further information, see the [2024 Sustainability and Appointments Committee Activity Report](#)).

Sustainability Committee

In addition, at the executive level, the Sustainability Committee meets at least twice per year (two meetings in 2024). It also discusses information on issues related to sustainability matters of material importance to the company. This information is provided to all members prior to the meeting for their review. Subsequently, the information is presented by the Chair of the Committee, the Energy Transition General Manager, who is responsible for the company's Sustainability team.

The information provided to the Board of Directors, the Sustainability and Appointments Committee and the Sustainability Committee ensures that the management of material impacts, risks and opportunities is integrated into the oversight processes of the 2025-2030 Strategic Update, risk management and new business opportunities.

GOV-3

Integration of sustainability-related performance in incentive schemes

Strategic priorities are established at company level as annual targets linked to the variable remuneration of all Enagás professionals, including the Chief Executive Officer, thus linking remuneration to environmental, social and economic goals. These targets are approved annually by the Board of Directors.

Moreover, Enagás has a Long-Term Incentive Plan (ILP) in place, requiring the fulfilment of objectives aligned with strategic priorities, thus linking remuneration to the commitment to long-term management. These targets are approved on a triennial basis by the Board of Directors and subsequently by the General Shareholders' Meeting.

The annual targets for 2024 and the long-term targets for the 2022-2024 period have been met with a degree of compliance of 84.2% and 87.5%, respectively.

Targets linked to variable remuneration

Strategic priorities	2022–2024 Long-Term Incentive Plan targets (% weighting)	Achievement of ILP 2022–2024 targets (%)	Yearly targets 2024 (% weighting)	Achievement of 2024 targets (%)
Shareholder remuneration	Total shareholder return (25%): <ul style="list-style-type: none"> Relative TSR to a comparison group. Absolute TSR. 	0%	Financial results (25%): <ul style="list-style-type: none"> Net profit at 31.12.2024 aligned with budget. Net profit at 31.12.2024 considering non-recurring impacts. 	50%
Regulated assets	Funds from operations (20%): <ul style="list-style-type: none"> Accumulated results corresponding to the Company's Funds From Operations (FFO) 	125%	Regulated income from eligible CopEx projects and other income (20%): <ul style="list-style-type: none"> Amount of capitalization in eligible CopEx projects associated with their accrued start-up date Expected CopEx revenues. Other expected income. 	93.4%
International growth	Dividends (20%): <ul style="list-style-type: none"> Dividends from international affiliates and other businesses. 	125%	International and diversification (20%): <ul style="list-style-type: none"> Compliance with the subsidiaries' yearly budget. Origination and identification of new opportunities, diversification and asset rotation. Execution of the Innovation and Corporate Entrepreneurship Plan. Future business development. Ongoing legal proceedings. 	91.6%
Sustainability	Decarbonisation, diversity and inclusion (20%) ⁽¹⁾ : <ul style="list-style-type: none"> Decarbonisation: <ul style="list-style-type: none"> Reduction of CO₂ emissions in line with the decarbonisation pathway (emissions 2024 vs. emissions 2021). Investment in renewable gases: Investment and studies associated with the adaptation of infrastructure to transport renewable gases and the development of infrastructure dedicated to the transport and storage of renewable gases. Diversity and inclusion: <ul style="list-style-type: none"> Percentage of women on the Board of Directors. Percentage of women in managerial and pre-managerial positions. Percentage of promotions that are women in managerial and pre-managerial positions. 	106.7%	Sustainability and energy transition (20%): <ul style="list-style-type: none"> Degree of implementation of planned actions and investments. Positioning in the leading global sustainability index (DJSI). Total greenhouse gas emission reductions (Scopes 1 and 2). ⁽¹⁾ Reduction of methane emissions. ⁽¹⁾ 	98.9%
Digitalisation and diversity	Implementation of the Digital Transformation Strategy and improvement of indicators and strengthening the positioning of Enagás' digital assets (15%): <ul style="list-style-type: none"> Development of priority initiatives from the Roadmap for the 2022-2024 Digital Transformation Framework and improvement to the indicators. Development and execution of the company's digital asset strategy for the 2022-2024 period and improvement of indicators. 	125%	Transformation (15%): <ul style="list-style-type: none"> Execution of the 2024 Transformation Plan. Percentage of promotion of the less-represented gender in management positions. Number of persons of the less-represented gender hired as a percentage of total workforce. Completion of the actions set out. Implementation of the Business Continuity Plan for Enagás assets. 	99.3%
Total achievement		87.5 % ⁽²⁾		84.2 %

(1) Sustainability-related performance parameters that are taken into account as performance benchmarks.

In line with the provisions of the ILP Regulation, failure to meet the absolute TSR target does not allow for the recognition of overachievement of the remaining indicators above 100%. As a result, the incentive is limited from 90.1% to 87.5%.

For further information, see details of the 2024 and 2025 annual targets and the 2022-2024 and 2025-2027 Long-Term Incentive Plan targets in the [Annual Directors' Remuneration Report](#)⁷.

⁷ This external link refers to information that has not been verified within the review of the Non-Financial Information and Sustainability Information Statement.

GOV-4

Statement on due diligence

The Enagás Human Rights Policy shows the company's commitment to develop and maintain a due diligence system aimed at anticipating, preventing, mitigating, and/or remedying negative impacts on people (both its own workforce and those in the value chain), the environment, and society. This is achieved by regularly taking the following actions, which are based on a continuous improvement approach and cooperation with stakeholders:

- Establish mechanisms to identify, assess and prioritise actual and/or potential negative impacts on human rights arising from the company's own activities and those of the value chain in all geographical areas where the company is present.
- Implement actions to avoid, prevent, or mitigate identified negative impacts, within the company's sphere of influence, should they materialise. This will prevent associated human rights violation risks.
- Monitor the actions taken to ensure that they have achieved their purpose, thereby assessing the effectiveness of the due diligence system.
- Accountability to stakeholders on the due diligence system through public reporting.

Enagás applies this commitment to a range of relevant sustainability issues:

Due diligence essential elements	Sections of the Statement of consolidated non-financial and sustainability information
<p>Integration of due diligence into governance, strategy and the business model</p>	<p>Chapter 2: GOV-1, GOV-2, GOV-3, GOV-4, SBM-1 and SBM-3. Chapter E1: GOV-3 and SBM-3. Chapter E4: E4-1 and SBM-3. Chapter S1: SBM-3. Chapter S3: SBM-3. Chapter G1: GOV-1. Additional information: Governance and Strategy.</p>
<p>Engaging with affected stakeholders at all key stages of due diligence</p>	<p>Engagement with stakeholders is systematically undertaken when actual or potential negative impacts are identified:</p> <ul style="list-style-type: none"> • Chapter 2: SBM-2. • Chapter S1: SBM-2, S1-2 and S1-3. • Chapter S3: SBM-2, S3-2 and S3-3. • Chapter G1: G1-1. • Additional information: Strategy and management of impacts, risks and opportunities.
<p>Identification and assessment of adverse impacts</p>	<p>Enagás incorporates the phases of identification and assessment of negative impacts arising from the due diligence system into its materiality analysis.</p> <ul style="list-style-type: none"> • Chapter 2: IRO-1. • Chapter E1: IRO-1. • Chapter E2: IRO-1. • Chapter E3: IRO-1. • Chapter E4: IRO-1. • Chapter E5: IRO-1. • Chapter S1: SBM-3. • Chapter S3: SBM-3. • Chapter G1: IRO-1. • Additional information: Management of Impacts, Risks and Opportunities.
<p>Adoption of measures to deal with such adverse impacts</p>	<p>Measures taken and planned to address negative impacts are described in detail in the MDR-A sections:</p> <ul style="list-style-type: none"> • Chapter E1: E1-3. • Chapter E2: E2-2. • Chapter E3: E3-2. • Chapter E4: E4-3. • Chapter E5: E5-2. • Chapter S1: S1-4. • Chapter S3: S3-4. • Chapter G1: G1-1, G1-2, G1-3, G1-5 and G1-6. • Additional information: Management of Impacts, Risks and Opportunities.
<p>Monitoring the effectiveness of these efforts and communication</p>	<p>The effectiveness of the measures taken is monitored as described in the MDR-A and MDR-T sections:</p> <ul style="list-style-type: none"> • Chapter E1: E1-3 and E1-4. • Chapter E2: E2-2 and E2-3. • Chapter E3: E3-2 and E3-3. • Chapter E4: E4-3 and E4-4. • Chapter E5: E5-2 and E5-3. • Chapter S1: S1-4 and S1-5. • Chapter S3: S3-4 and S3-5. • Chapter G1: G1-1, G1-2, G1-3, G1-5 and G1-6. • Additional information: Management of Impacts, Risks and Opportunities.

GOV-5

Risk management and internal controls over sustainability reporting

Starting in 2019, the Enagás Group has implemented an Internal Control System over Sustainability Reporting (ICSSR) that reinforces the transparency and reliability of processes for generating, communicating, preparing and reporting sustainability information in a manner equivalent to the internal control system over financial reporting (see Appendix '[Audit Opinion on Internal Control over Financial Reporting \('ICFR'\)](#)' of the 'Annual Corporate Governance Report')⁸.

The ICSSR has been designed based on the guide published by COSO⁹ in 2018 on 'Enterprise Risk Management' (COSO 2018 ESG), which establishes the guidelines to be applied in enterprise risk management to environmental, social and corporate governance risks, taking into account the following structure:

- Governance and Culture.
- Strategy and Target's Setting.
- Performance.
- Review and Monitoring.
- Information, Communications and Reporting.

Specifically, the following aspects have been taken into account in the risk assessment of the main processes associated with the sustainability disclosure process, as well as the associated sustainability issues and indicators:

- Relative importance based on materiality analysis.
- Assessment of the associated risks, such as integrity risk, existence and occurrence risk, risk of breaching applicable regulations or risk of manipulation of files, programmes and information. It should be noted that the main risks identified are associated with information integrity and information manipulation risks.

Based on this risk assessment, the scope of the ICSSR has been set, ensuring that it covers the company's three areas of sustainability (environmental, social and governance). The outline of the model adopted by the ICSSR is as follows:

- General controls: these are the basis on which the Enagás Group's ICSSR model is based. They represent a cross-cutting control framework established directly by Senior Management, which affects all of the Organisation's processes and employees. This is what COSO calls the 'control environment'.
- Process controls: controls over operational processes that are more specific than general controls. Also referred to as control activities, they are embedded in each of the company's main sub-cycles¹⁰ with a material impact on sustainability reporting, ensuring the reliability and transparency of sustainability reporting by avoiding or mitigating risk. These controls may vary according to their nature (preventive, detective, corrective or directive) and their level of automation (manual, semi-automatic or automatic).

Since its implementation, Enagás carries out a yearly review with a focus on continuous improvement of this internal control system, increasing its scope and improving the traceability of the associated databases. In addition, the ICSSR is externally reviewed annually by EY through an agreed-upon procedures report, which in turn is reviewed by the Audit and Compliance Committee.

In 2024, Enagás considered the result of the materiality analysis when analysing the scope of the ICSSR. This has been formalised in a roadmap of which process controls to include during the year and in the coming years in order to cover the matters that are most material to Enagás.

⁸ This external link refers to information that has not been verified within the review of the Non-Financial Information and Sustainability Information Statement.

⁹ Committee of Sponsoring Organizations of the Treadway Commission.

¹⁰ Series of activities carried out consecutively with one or more persons in charge and with a common goal.

In 2024, the scope of the internal control system over sustainability reporting included the following indicators:

Sustainability issues	General
Indicators	Receipt and external verification of the information points for the preparation of the Statement of consolidated non-financial and sustainability information
	Review of the Statement of consolidated non-financial and sustainability information
	Dual materiality analysis
Climate change	Scopes 1,2 and 3 greenhouse gas emissions (categories 4, 9 and 11 according to GHG Protocol)
	Financial effects of climate change
Climate change / Pollution	Energy consumption
Water and Marine Resources	Water collection, consumption and discharge
Biodiversity and Ecosystems	Biodiversity (area restored/revegetated)
Resource Use and Circular Economy	Volume of waste generated and managed
	Diversity - Gender diversity (workforce, management positions and other professional categories)
Own workforce	Pay gap
	Diversity - Professionals with disabilities
	Accident rate indicators
Workers in the value chain / Business Conduct	Approved suppliers
	Suppliers assessed
Affected communities	Social action contribution amounts
Customers	Customer satisfaction
Business Conduct	Communications received via the whistleblowing line
	The Council's abilities and experience assessment process
Others	Board remuneration
	Executive Committee remuneration
EU Taxonomy	Taxonomic CapEx of activities significantly contributing to climate change mitigation and adaptation objectives (eligible and aligned activity and eligible and non-aligned activity)
	Taxonomic OpEx of activities contributing significantly to climate change mitigation and adaptation objectives (eligible and aligned activity and eligible and non-aligned activity)

Strategy

SBM-1

Strategy, business model and value chain

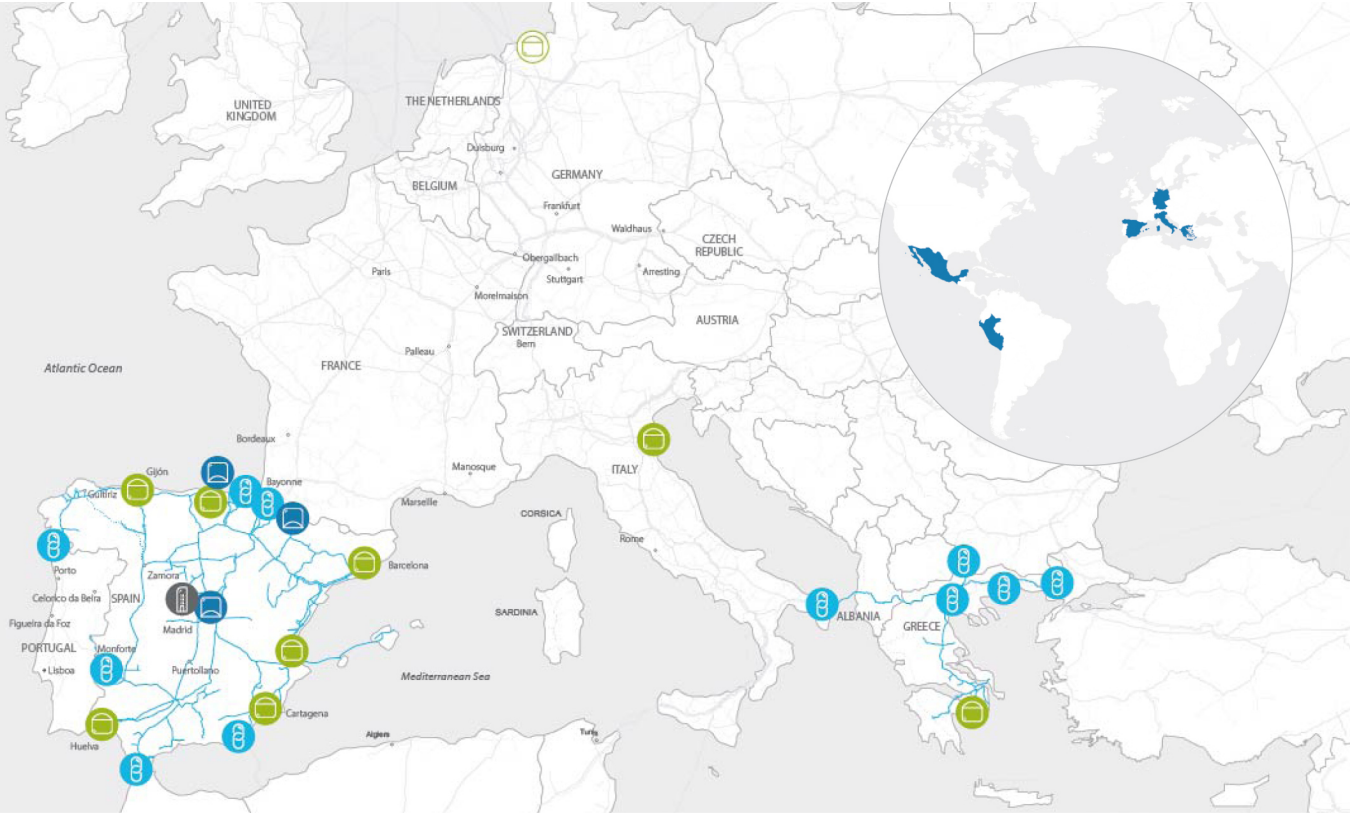
Enagás Risk Model

The countries in which Enagás is present directly and through affiliates are shown below¹¹. The location of infrastructures in Spain and the rest of Europe is also included.

For more details on employees by country at the end of the financial year, refer to disclosure requirement S1-6.

¹¹ See Appendix II. Joint ventures and associates of the Consolidated Annual Accounts to see all Enagás Group affiliates.

Geographies



Spain

~11,000 km of pipeline

6 LNG terminals

- Barcelona LNG terminal
- Huelva LNG terminal
- Cartagena LNG terminal
- El Musel E-Hub LNG terminal (75%) ⁽¹⁾
- Saggas LNG terminal (72.5%) ⁽²⁾
- BBG LNG terminal (50%) ⁽²⁾

3 underground storage facilities

- Gaviota storage facility
- Yela storage facility
- Serrablo storage facility

19 compressor stations

6 international connections

Head office (Madrid)

- Enagás Renovable (60 %) ⁽²⁾



Germany

- Hanseatic Energy Hub (15 %) ⁽²⁾
- Hanseatic Energy Hub Operations GmbH (50.1 %) ⁽²⁾



Italy

- Ravenna *Small Scale* LNG Terminal (19 %) ⁽²⁾



Greece

- DESFA (11.88 %) ⁽²⁾



Greece, Albania and Italy

- Trans Adriatic Pipeline (TAP) (20 %) ⁽²⁾



Mexico ⁽³⁾

- TLA Altamira Pipeline (40 %) ⁽²⁾



Peru

- Transportadora de Gas del Perú (TgP) (28.95 %) ⁽²⁾

- Gas pipeline
- LNG terminal under development
- LNG terminal
- Underground storage
- Estación de compresión
- International connection
- Headquarters

(1) Affiliate without operational control. The percentage shareholding is specified in brackets.
 (2) Affiliate with operational control. The percentage shareholding is specified in brackets.
 (3) Estación de Compresión de Soto la Marina (50%) pendiente cierre de venta.

Transmission System Operator

Enagás, a midstream company with more than 50 years of experience and independent European TSO (Transmission System Operator), is an international reference in the development and maintenance of gas infrastructure and in the operation and management of gas networks. Enagás has been carrying out the majority of its activities in Spain since its founding in 1969. It has built up a meshed network of more than 11,000 km of high-pressure gas pipelines, facilitating access to gas from almost every point on the Iberian Peninsula. Enagás holds stakes in six of the seven regasification terminals in the Iberian Peninsula (three wholly-owned terminals and three part-owned), and has three underground storage facilities. As the main transmission company, Enagás has developed the main infrastructure facilities of the Spanish Gas System, making it a leader in security and diversification of supply.

Commercial services

Enagás works to provide its customers with logistics services in accordance with current regulations. The Third-Party Network Access (ATR) services provided at its facilities are fundamentally classified as:

Individual services:

- Tanker unloading
- Regasification
- LNG storage
- Truck loading
- LNG terminal-to-tanker bunkering
- LNG ship-to-ship transfer
- Ship cooling
- Virtual liquefaction
- Entry to the Virtual Balancing Point
- Departure from the Virtual Balancing Point
- Departure from the Virtual Balancing Point to a consumer
- Natural gas storage in basic underground storage facilities
- Injection
- Extraction

The sale of these services is carried out through a framework access contract and through standard capacity products, i.e. through the signing of annual, quarterly, monthly, daily or intraday contracts.

Bundled services

- Vessel unloading, LNG storage and regasification.
- Vessel unloading, LNG storage, regasification and flow on to the Virtual Balancing Point.
- LNG storage and regasification.
- LNG storage, regasification and flow on to the Virtual Balancing Point.

- Vessel unloading, LNG storage and LNG loading from plant to vessels.
- Underground natural gas storage, injection and extraction.

In turn, Enagás works to provide its customers with services that allow them to connect to the transmission network, which are classified as follows:

- End consumers connection services.
- Transmission network connection services.
- Distribution network connection services.
- Renewable gases connection services.

The decarbonisation targets set by the European Union have accelerated the pace of promotion and development of renewable gases, including biomethane. In this context, Enagás is working to adapt its transmission infrastructure to facilitate the injection of renewable gases into the network and, through the Green Link service, contribute to lay the foundations for the future injection of renewable energies into the system. This service offers the possibility for the different agents of the Gas System to request connection of their biomethane and/or hydrogen production facilities to the transmission network managed by Enagás.

As Enagás' activity is carried out in an environment covered by the regulation, this and its implementation form the basis of our plans moving forward. It should be noted that in recent years, the regulatory pieces necessary to establish the regulatory framework have been published, making it possible to complete the new management and shipping model for the Spanish Gas System.

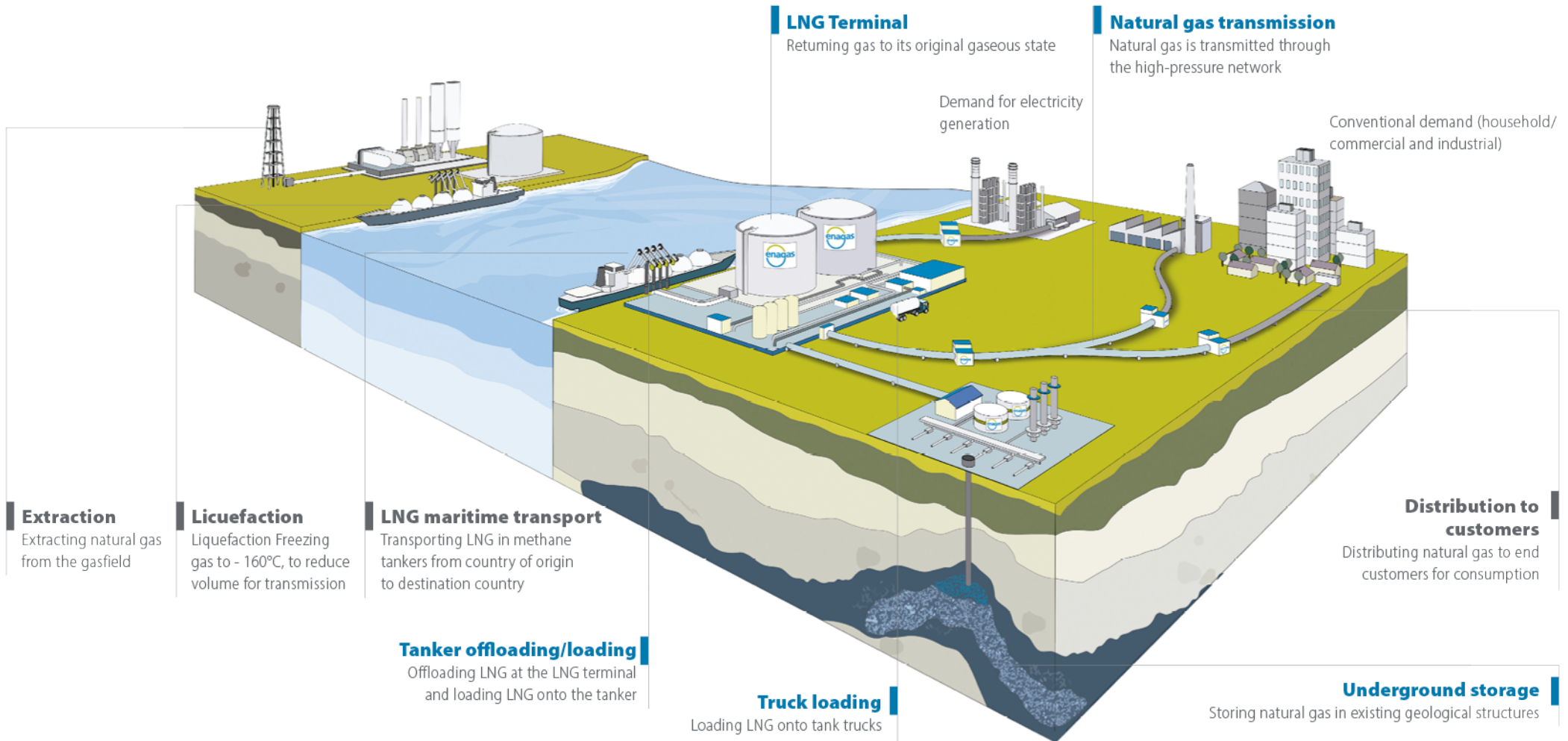
For further information about the company's customers, see the additional section of interest for Enagás titled '[Customers](#)'.

Enagás activities in the natural gas value chain

- Activities carried out by Enagás on the gas value chain.
- Activities carried out

Gas network operation

(Technical Manager of the Spanish Gas System, certified as independent European TSO)



Technical Management of the System

Enagás also works as the Technical Manager of the System from the publication of the Hydrocarbons Law. This means it is responsible for the operation and technical management of the basic network and the secondary transmission network, guaranteeing the continuity and security of the natural gas supply as well as proper coordination between marketers, the operators of access points, storage facilities, and transmission and distribution networks.

The Main Control Centre (MCC), or Dispatching, manages the operation and supervision of Spanish Gas System transmission facilities, in real time, 24 hours a day, 365 days a year. It also issues guidelines for the safe and efficient operation of the system, manages international connections with operators outside Spain, drafts plans to guarantee the security of supply and, if necessary, coordinates and adapts maintenance schedules of the facilities to ensure their operation and availability.

The MCC is also the centre from which Gas System incidents and emergencies are managed. To strengthen security, Enagás also has a Reserve Control Centre and a Last Resort Control Centre, both of which are equipped with equivalent technical resources as the Main Control Centre.

The Technical Manager of the System carries out its duties in coordination with other figures that operate or use the gas system. Its key duties include:

- Guaranteeing the natural gas supply at all times.
- Predicting the use of the System's facilities and the natural gas reserves in accordance with demand forecasts.
- Providing the necessary instructions and orders to ensure that the System and transmission network is functioning correctly.
- Submitting the development of the basic natural gas network and emergency plans that are deemed necessary to the Ministry.
- Carrying out delivery schedules, managing the entry and exit of natural gas into/out of the system.
- Calculating and applying the daily balance that the gas network uses and the network's strategic and operating reserves.
- Coordinating maintenance plans.

These duties are governed by criteria of reliability, safety, transparency, objectivity and independence.

For further information about the company's customers, see the additional section of interest for Enagás titled '[Customers](#)'.

Management of the system of guarantees of origin of renewable gases

In 2023 Enagás GTS, as the responsible entity designated by the Ministry for the Ecological Transition and the Demographic Challenge, launched the System of Guarantees of Origin of gas from renewable sources. In 2024, a system feature was introduced to facilitate the export and import of guarantees of origin with other European countries. This system allows to certificate that the biogas, biomethane and hydrogen produced in Spain is of renewable origin, providing information on how and where it was produced.

Also, and in compliance with regulatory provisions, in 2023 Enagás GTS set up a Committee of Subjects of the Guarantees of Origin System. The aim of this committee is to know and be informed of the functioning and management of the System of Guarantees of Origin, as well as to elaborate and provide a channel for improvement proposals. In 2024, six meetings of this body were held, and more than 100 agents from the renewable gases sector participated.

In 2024, there are 179 agents registered in the Guarantees of Origin System, including producers, suppliers and intermediaries. 53 production facilities have completed their registration with the system, 34 of them definitively (already in operation with access to issue Guarantees of Origin) and 19 provisionally (not yet operational). The production plants include all shipper logistics.

The Guarantees of Origin System issued a total of 496,602 Guarantees of Origin in 2024, of which approximately 35% were for biomethane for injection into the Gas System and 64% were for biogas for self-consumption. A small amount were also issued for off-grid hydrogen and bio-LNG. In terms of redemption, 21,809 Guarantees of Origin were redeemed in 2024 for points of consumption, of which 8,614 Guarantees of Origin were imported for redemption.

Provisional HTNO (Hydrogen Transmission Network Operator)

Additionally, Royal Decree-Law 8/2023 of December 27 establishes that Enagás, as the hydrogen transmission network operator (in accordance with the provisions of Article 63 bis of Law 34/1998 of October 7 on the hydrocarbons sector), may operate as the provisional hydrogen transmission network operator.

Energy infrastructures are a core element in the energy transition towards decarbonisation. In addition, in 2024, the Spanish Government approved the agreement authorising Enagás Infraestructuras de Hidrógeno to provisionally exercise the functions of developing European Projects of Common Interest (PCI) for hydrogen networks.

This new role for Enagás is aligned with the 2025-2030 Strategic Update and its commitment to the energy transition and sustainability, representing the Group's main axis of growth and development.

Revenue breakdown by sector

Breakdown of net turnover by ESRS sector and by fossil fuel sector (thousands of euros)

ESRS Sector ⁽¹⁾	Fossil fuels Sector	2023	2024
Oil and gas - Midstream and Downstream ⁽²⁾	Natural gas	830,411	828,596
Energy production and utilities sector	Natural gas	50,285	45,271
Oil and Gas - Upstream and services	Natural gas	310	3,866
Professional and commercial services sector		38,508	35,459
Capital markets sector		127	29
TOTAL		919,641	913,221

(1) Classification based on the NACE code (Statistical Classification of Economic Activities in the European Community) for companies consolidated through global integration.

(2) Includes natural gas storage and transmission activity.

For further information on the Enagás Group’s net turnover, see ‘[section a\) Revenue in note 2.1 Operating profit](#)’ in the Consolidated Annual Accounts.

Enagás value chain

Understanding the company’s business model and that Enagás does not sell any products but rather services, the company’s value chain is described below:



• Supply chain

In order to work with Enagás, suppliers must undergo a strict approval process. The company currently works with 1,836 approved suppliers (1,706 in 2023), which are classified in families according to the products or services they offer:

- Suppliers of works and services: IT & communication suppliers, engineering, etc. In 2024, 3,052 persons belonging to 494 service providers carried out work at Enagás facilities (in 2023, 2,518 persons belonging to 512 service providers).
- Suppliers of supplies: electrical equipment suppliers, piping manufacturers, rotary machine manufacturers, manufacturers of instrumentation and control devices, among others.

Supply chain cost analysis (thousands of euros)¹²

Indicator	Category of the supplier	Geographical distribution		
		Domestic	International	Total
2024				
Number of orders	Works and services	6,328	225	6,553
	Supplies	10,691	99	10,790
	Total	17,019	324	17,343
Number of suppliers contracted	Works and services	1,390	123	1,513
	Supplies	1,642	46	1,688
	Total	3,032	169	3,201
Amount from orders (million euros)	Works and services	219.0	63.1	282.1
	Supplies	46.0	7.5	53.5
	Total	265.0	70.6	335.6

Approximately 79% of the amount of expenditure in our supply chain is local in nature.

¹² Local purchases are considered to be purchases made domestically in Spain.

• Affiliates

Enagás has a presence in various affiliates that are not financially consolidated and are managed autonomously. This presence is mainly oriented towards Europe and countries that are key to the European continent's security of supply.

The Shareholders' Agreements regulate, among other things, decisions that require joint decision-making by shareholders. Enagás' influence and decision-making is exercised through leadership on Boards of Directors and other governing bodies (e.g. Remuneration Committee, etc.), appointing directors with extensive experience in the sector and the country.

However, Enagás has developed a management model for these companies that seeks to guarantee compliance with the business plans and their long-term sustainability, contributing Enagás' experience, knowledge and best practices as an industrial partner, while at the same time allowing affiliates to contribute to Enagás' growth, ensuring the targets communicated to the market.

Enagás has an internal management team in each affiliate, as well as the support of specific working groups for the corporate and business areas in their areas of expertise. In addition, Enagás guarantees the suitability of the managers of the affiliates for their positions by analysing and evaluating their profiles, as well as by appointing specialised profiles from the company to key positions in the affiliates (seconded personnel).

• Customers

Customers are one of the company's key stakeholders as described in additional information of interest to Enagás on ['Customers'](#).

Enagás' management model and its value chain

Enagás has a twofold purpose: to contribute to ensuring the security of energy supply, an essential service for the well-being of society. By driving innovation and accelerating the decarbonisation process, we create value for our stakeholders (for more information, see disclosure requirement G1-1). To achieve this goal, which is grounded in Enagás' business model and value chain, the company must implement a management system that ensures the availability of essential resources to support its operations.

Enagás manages its human capital to ensure it has the committed and qualified personnel needed for its operations and to implement the 2025-2030 Strategic Update (for more information, see chapter S1). It also implements supply chain management measures to guarantee the quality and availability of key materials and resources in the short, medium, and long term (for more information, see disclosure requirement G1-2).

Enagás' services, by operating and managing key energy supply infrastructures, create significant benefits for stakeholders. These include customers and society, who enjoy a stable and secure supply, and investors, who see predictable returns from the regulated model. Looking ahead, and in line with the 2025-2030 Strategic Update, efforts to decarbonise the energy sector and Enagás' own operations will strengthen these benefits and support the energy transition.

Company strategy

2025-2030 Strategic Update

Strategic priorities

Enagás' strategy has a clear purpose: to contribute to security of supply and decarbonisation, creating value, working towards sustainable and profitable growth in Spain and Europe. It is focused on hydrogen and expanding the business spectrum to the logistics of new molecules related to the energy transition that offer synergies with our work (carbon dioxide and ammonia).

Leading TSO and HTNO in Europe

<p>Decarbonisation</p>	<p>Security of supply</p>	<p>Focus on H₂</p>	<p>Spain and Europe</p>	<p>Creation of value</p>	<p>Sustainable and profitable</p>
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Resilient strategy for long-term sustainable growth in Spain and Europe

Sustainable and profitable growth

- Boosting the development of hydrogen and other molecules related to the energy transition (CO₂ and ammonia).
- Security of supply and decarbonisation.
- Focus on Spain and Europe.
- Innovation, technology and digitalisation to accelerate decarbonisation.
- Relevance of cybersecurity.

Transformation

- Focus on people, processes and new ways of working.
- Digitalisation boost.
- Strategic talent management.
- Diverse and inclusive environment.

Operational excellence

- 100% technical and operational availability of our infrastructures.
- Operational flexibility.
- Efficiency plan to absorb inflation.

ESG

- Fully aligned 2025-2030 Strategic Update and Climate Transition Plan.
- Net Zero commitment.
- Sustainability due diligence /ESG.

The strategic priority is the development of green hydrogen transmission infrastructures in Spain and Europe, both because of the growth this represents for the company in line with its strategic pillars, and because of the economic development and decarbonisation potential it represents on a domestic and European scale. This priority has synergies with Enagás' TSO function for the Spanish Gas System and corresponds to its role as provisional HTNO of the Spanish hydrogen backbone network in a context of positive developments in the European regulatory environment.

In line with Enagás' commitment to decarbonisation, the company has the opportunity to position itself in other midstream businesses associated with other molecules related to the energy transition (CO₂ and NH₃) by participating in projects that meet the following requirements:

- Complement the strategic focus on hydrogen.
- Have an appropriate risk-return ratio.
- Build on our capabilities and assets, without competing with the same, in line with the strategic vision of adapting our regasification terminals to serve as multi-molecule terminals.

Growth drivers

The drivers of company growth are presented below either under a regulated or contractual business model approach, and discipline in required returns, as well as in the capital allocation policy:

Hydrogen infrastructure

- Renewable hydrogen infrastructures (transmission and storage) that facilitate the decarbonisation of the economy, in line with European and domestic energy policy guidelines.

Natural gas and transition infrastructure

- Gas and transition infrastructures for security of supply, decarbonisation, maintenance/life extension, efficiency and safety.

Scale Green Energy

- Creation of a non-regulated operator of energy infrastructures that contribute to decarbonisation and favour the development of logistics chains for the new molecules associated with the energy transition, promoting activities that extend the useful life of our infrastructures.

Innovation, technology and digitalisation, international assets and Enagás Renewable

- Incorporate the technology necessary for the competitive development of new activities in the field of energy transition.
- Transformation and digitalisation of the company to facilitate new ways of working.
- International gas infrastructures (Europe focus).
- Development of renewable gas production projects (hydrogen and biomethane).

Most of the investments included in this strategy have a business model that is currently regulated or will be regulated in the near future, or will have contracts that guarantee a security of returns comparable to that of regulated activity.

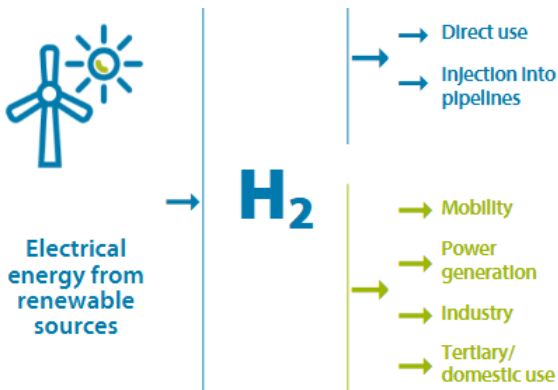
During 2024, the company has accelerated its fulfilment of the 2022-2030 Strategic Plan, reaching milestones that have led to an update in February 2025.

Renewable gases

Security of supply and decarbonisation are the main axes on which the new European energy paradigm is based. These axes reinforce Europe's renewable energy and energy efficiency while allowing new infrastructure developments to be driven forward to integrate EU markets.

Spain occupies a privileged position thanks to its geographical location and its consolidated network of infrastructures and international connections. It is poised to become a leading

country for the production and export of non-electrical renewable energies (hydrogen and biomethane), indispensable energy carriers that contribute to the development of a circular economy and to the energy transition process, as they enable progress towards a carbon-neutral economy.



Renewable hydrogen, which is obtained using renewable electricity, is a key energy carrier for decarbonisation with multiple applications as it can be used in all energy sectors (industry, mobility, domestic-commercial and power generation).

Biogas obtained from waste is a source of renewable energy with a positive impact on employment and the rural economy. After a process of cleaning and CO₂ separation, the biogas transforms into biomethane: a totally renewable gas, of equivalent quality to natural gas, that can be injected into the transmission network.

At Enagás, we want to actively contribute to the energy transition process, promoting the integration of renewable gases in the Spanish and European Gas System.

Scale Green Energy: business development associated with other molecules related to the energy transition

Enagás will contribute to decarbonisation by promoting the development of logistics chains for new molecules associated with the energy transition, such as carbon dioxide (CO₂) and ammonia (NH₃). It will promote activities that create synergies with our infrastructures and also act as a catalyst for the development of end uses of hydrogen, such as mobility.

In order to develop these activities, a non-regulated operator of energy infrastructures, Scale Green Energy, has been created. Through it, positioning investments are envisaged, which will be increased as business dynamics are consolidated. Scale Green Energy integrates Scale Gas' businesses related to LNG / bio-LNG bunkering to decarbonise the maritime sector (extending them to NH₃), as well as small-scale LNG plants, gaseous fuel refuelling stations, and energy efficiency businesses through the use of the industrial cold inherent in LNG (Efficiency for LNG Applications, S.L.), extending its lines of business to CO₂, NH₃ and H₂ for land mobility. In this respect:

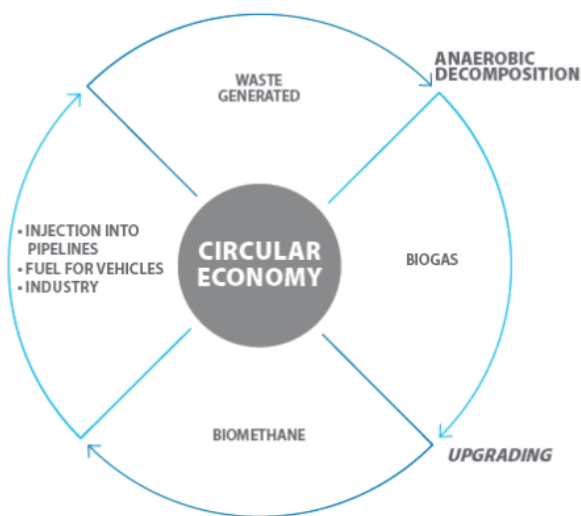
- CO₂: Scale Green Energy will drive the development of a CO₂ logistics chain around emissions concentration areas, especially at industrial facilities close to our LNG terminals and with a focus on the cement industry, for subsequent export to geological storage. This initiative supports the multi-molecule plant vision.
- NH₃: it will drive the development of a green ammonia logistics chain, especially at industrial facilities close to our LNG terminals, with a focus on use as a marine fuel (bunkering) and as a final product. This initiative builds on the capabilities of Scale Gas and also supports the multi-molecule plant vision.
- H₂ for mobility: Scale Green Energy will drive the penetration of green hydrogen in hard-to-electrify land mobility segments through the development of hydrogen supply stations (HRS¹³).

Sustainable mobility

Enagás is committed to decarbonising transport by promoting the use of natural gas and renewable gases in mobility.

Natural gas plays a highly relevant role in ensuring security of supply and competitiveness, while meeting the energy requirements of highly demanding sectors, such as intensive industry or segments that are difficult to electrify, where there are currently no solutions that can meet the requirements of the majority of users. In the field of heavy and maritime transport, natural gas is positioning itself as one of the most sustainable and realistic fuels in the short-term, key to reducing emissions and immediately improving air quality.

The use of natural gas as a fuel for transport would allow for NOx emissions to be reduced by 80-90%, CO₂ emissions to be reduced by 20-30% and SOx emissions and particles by practically 100% compared to traditional fuels. This makes natural gas a sustainable alternative for mobility and heavy, maritime and rail transport.



¹³ Hydrogen Refuelling Station.

Its contribution is particularly important in the case of maritime transport, as it allows vessels to adhere to new environmental regulations set forth by the International Maritime Organisation (IMO) and European Directive 2016/802.

Renewable hydrogen and its derivatives are emerging as a viable, clean, and sustainable alternative to traditional fuels in the transport sector.

Within the terrestrial field, Scale Green Energy will participate in projects for the development of new hydrogen refuelling points in Spain. These would be added to the one already inaugurated in 2021 in Madrid.

SBM-2

Interests and views of stakeholders

Enagás' commitment to stakeholders is reflected in the company's [Sustainability and Good Governance Policy](#), approved by the Board of Directors. Among other commitments, it includes the implementation of mechanisms that allow the company to establish commitments with stakeholders based on collaboration, the timely exchange of information and participation, as well as regular, transparent, timely and reliable reporting to the different interest groups.

This is also a common element in all Enagás corporate policies, which include - among the elements of the management model for fulfilling the commitments we have taken on - the implementation of stakeholder participation, prior information, dialogue, consultation and collaboration processes to ensure that their needs and expectations are understood by the company and, where appropriate, incorporated into its regulations.

Enagás defines its stakeholder map by identifying the different groups that are influenced by and exert influence on the company's activities, based around the company's strategy. Every

year, internal supervisors at Enagás review these groups and their segmentation, type of interaction, the relationship channels with each of them, as well as the frequency of contact, according to the company's strategy and organisational model. This is how the stakeholder relationship model is defined. For more information regarding the channels established with our own workforce, affected communities and customers, see disclosure requirements S1-2, S1-3, S2-2 and S2-3 and the following blocks: 'Processes for engaging with customers about impacts' and 'Processes to remediate negative impacts and channels for customers to raise concerns' of the additional information relevant to Enagás relating to Customers, respectively.

As a result of these interactions with stakeholders, the company analyses the information received and incorporates, depending on relevance, stakeholders' opinions and interests in its management models. Internal managers are responsible for this understanding and related actions, as well as for reporting to the Board of Directors or Executive Committee on the main results and associated measures.

Stakeholders	Relationship channels	
Regulatory bodies (state, local and international)	<ul style="list-style-type: none"> Regular meetings (face-to-face, telephone, e-mail) Public consultations 	<ul style="list-style-type: none"> Electronic headquarters administration Corporate electronic mailbox Industry associations
Investors (investment fund managers, rating agencies, analysts)	<ul style="list-style-type: none"> Regular meetings (face-to-face, telephone, e-mail) Roadshows Shareholder Information Office Electronic mailbox 	<ul style="list-style-type: none"> Free shareholder helpline Direct phone line to the Investor Relations Team Meetings with minor shareholders and analysts
Professionals (our professionals, social organisations)	<ul style="list-style-type: none"> Regular meetings (face-to-face, e-mail) Corporate Intranet Chatbot 	<ul style="list-style-type: none"> Internal communication campaigns Whistleblowing Line Opinion surveys and associated improvement plans
Customers (distributors, shippers, transmission companies, direct consumers in the market)	<ul style="list-style-type: none"> Managers by service Regular meetings (face-to-face, telephone, e-mail) Main Control Centre Spanish Gas System Monitoring Committee Annual Control Centres Conference Technical Management of the System Standards Group 	<ul style="list-style-type: none"> Corporate website: SL-ATR 2.0 portal and SITGAS portal Biomethane connections platform Committee of Subjects of the Guarantees of Origin Commercial Service Portal Customer satisfaction surveys and associated improvement plans Service desk Consultation and Incident Service Portal
Partners (business partners, strategic business partners and company management)	<ul style="list-style-type: none"> Governing bodies (General Shareholders' Meetings, Boards of Directors, Committees, etc.) Coordinators of affiliates 	<ul style="list-style-type: none"> Working groups with management and partners (financial, HR, technical, etc.)
Media (general, economic, specialised in the sector, specialised in sustainability)	<ul style="list-style-type: none"> Regular meetings (face-to-face, telephone, online, e-mail) Corporate website and social media 	<ul style="list-style-type: none"> Media hotline Media mailbox
Suppliers	<ul style="list-style-type: none"> Corporate website: supplier portal Supplier platform Contractor Access System 	<ul style="list-style-type: none"> Supplier mailbox Regular meetings (telephone, e-mail)
Financial institutions	<ul style="list-style-type: none"> Regular meetings (face-to-face, telephone, e-mail) 	
Representatives of local communities, associations and foundations	<ul style="list-style-type: none"> Corporate electronic mailbox. Informative sessions. Consultation processes. 	<ul style="list-style-type: none"> Regular meetings derived from participation in groups and forums (face-to-face, telephone, e-mail)

The consultation of key stakeholders as part of the materiality assessment process (for more information, see disclosure requirement [IRO-1](#)) is an example of the integration of their views into the company's strategy, sustainability strategy and management model. Through these surveys, stakeholders provided their assessment of the relevance of the different sustainability issues, enabling Enagás to integrate this information into its assessment of the impacts, risks and opportunities identified. They were also consulted on Enagás' efforts to transform the company towards new energy carriers such as green hydrogen and its impact on the creation of value for shareholders, information that contributed to the company's 2025-2030 Strategic Update. This information was presented to the Board of Directors within the framework of approving the Materiality Analysis.

As a testament to the importance of stakeholder opinions and their influence on the company's strategy and business model, to gauge the interest of key players in the energy sector regarding the development of essential renewable hydrogen transport infrastructure, Enagás

initiated a new, non-binding, open, transparent, and non-discriminatory Call for Interest (CFI) process in 2024 for the initial routes of the Spanish Hydrogen Backbone Network. The results of this consultation will help to optimise the infrastructure's design and establish operational requirements, thereby modifying the company's strategy. Further consultations are planned to ensure that the views of the main actors in the energy sector are taken into account in the establishment of this infrastructure.

SBM-3

Material impacts, risks, and opportunities and their interaction with the strategy and business model

As a result of the materiality analysis (for more information, see disclosure requirement [IRO-1](#)), and following the application of impact and financial materiality thresholds, Enagás has identified the following impacts, risks and opportunities¹⁴ (IROs) that are material to the company.

¹⁴ The significant risks and opportunities identified by Enagás have not resulted in material adjustments to the current financial statements, nor are they anticipated to in the short term (next financial year).

Identified material impacts, risks and opportunities

The cells with a blue background refer to topics, subtopics, or sub-subtopics that are not applicable to Enagás' business model.

European Sustainability Reporting Standards (ESRS) by theme	Sustainability issues addressed by the ESRS by theme			Main topic: Enagás	Subtopic: Enagás	Description of impact, risk, or opportunity	Impact, risk or opportunity	Location of this impact/risk/opportunity	Current and anticipated effects and responses to these effects	Additional information
	Topic	Sub-topic	Sub-subtopic							
Environment	E1	Climate change	Climate change adaptation		Climate change adaptation	Operational cost overruns due to natural disasters that damage the company's infrastructures or due to the adaptation of the company's infrastructures to the consequences of climate change, as the case may be.	Risk	Own operations	Currently, the main effects include potential increases in operational costs due to the need for repairs to infrastructure damaged by natural disasters, supply chain disruptions, and higher insurance premiums. Looking ahead, beyond these cost increases, there may be a need for significant investments in adapting to extreme weather conditions, complying with stricter regulations, and relocating assets or suppliers. For further details on Enagás' response to this risk, refer to disclosure requirement E1-3.	
			Climate change mitigation		Climate action and energy efficiency	High direct (scope 1) and indirect (scope 3) greenhouse gas emissions due to the company's own operations and those of its value chain.	Negative impact	Suppliers Own operations Customers	This negative impact is currently leading to increased operating costs to achieve the company's decarbonisation goals for its own operations and value chain. This trend is expected to continue in the future. For more details on how Enagás is addressing this risk, refer to disclosure requirements E1-1 and E1-3.	The impact, directly tied to Enagás' business model and its energy consumption, contributes to climate change. This can exacerbate natural disasters, degrade ecosystems, impact human health (particularly in vulnerable communities), and disrupt biodiversity, agriculture, and natural resources. The significance of this issue is increasing in the short, medium, and long term. Therefore, the latest 2025-2030 Strategic Update is regarded as the Climate Change Mitigation Transition Plan, concentrating on decarbonising both the energy sector and Enagás' own operations. For further information, see disclosure requirements SBM-1 and E1-1.
			Climate change adaptation		Climate change mitigation	Reputational deterioration that may negatively impact the valuation of intangibles by stakeholders, due to loss of relevance in sustainability indices for not reaching the expected standard of climate management or due to climate change impacts.	Risk	Suppliers Own operations Customers	The potential effects of this risk, both now and in the future, include damage to our reputation and a loss of trust among investors who prioritise sustainable investment criteria, as well as other key stakeholders. For more details on how Enagás is addressing this risk, refer to disclosure requirements E1-1 and E1-3.	
						Failure to meet the announced carbon neutrality commitments due to the materialisation of the identified transition risk factors, among others	Risk	Suppliers Own operations Customers	This risk could lead to reputational damage, the loss of investors focused on sustainability, or regulatory penalties, all of which could undermine stakeholder trust and company valuation. In the future, the risk may increase due to more stringent regulations and/or shifting stakeholder interests. For more details on how Enagás is addressing this risk, refer to disclosure requirements E1-1 and E1-3.	

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	Topic	Sub-topic	Sub-subtopic							
Environment	E1	Climate change	Climate change mitigation	Climate action and energy efficiency	Climate change mitigation	Worsening financing conditions / attraction of capital flows for the development of activities not aligned with the EU taxonomy of sustainable activities or similar	Risk	Own operations Customers	In the short term, investing in activities that do not align with the environmental goals of the EU Taxonomy Regulation may affect the ability to secure financing on more favourable terms and attract investors focused on sustainability. However, in the long term, and in accordance with the 2025-2030 Strategic Update, this risk is expected to diminish as the business model becomes more aligned with activities that support climate change mitigation. For more details on how Enagás is addressing this risk, refer to disclosure requirements E1-1 and E1-3.	
						The value of the assets is recovered with the current remuneration life; in the long term, there may be possible lower revenues for the company due to lower remuneration associated to the extension of the assets' useful life (Spain business).	Risk	Own operations	The main effect of this risk is the reduced long-term remuneration due to certain natural gas infrastructure assets not having their useful life extended, as they will not support the company in its journey towards carbon neutrality over the long term. For more details on how Enagás is addressing this risk, refer to disclosure requirements E1-1 and E1-3.	
						Hydrogen infrastructure development	Opportunity	Own operations Customers	Green hydrogen is emerging as one of the most promising options for cutting carbon emissions and speeding up the transition to a more sustainable energy system, offering the company an opportunity to align its business model with the energy transition. This energy carrier brings flexibility and resilience to the system, decarbonises the energy mix and enhances security of supply. For more details on how Enagás is addressing this risk, refer to disclosure requirements SBM-1 and E1-1.	
						New logistics services that promote natural gas consumption	Opportunity	Own operations Customers	According to the opportunities presented by Enagás in its new 2025-2030 Strategic Update, it is crucial to develop new logistical services and applications for natural gas in the maritime, rail, road transport, industrial, and residential sectors because of their role in mitigating climate change. For more details on how Enagás is addressing this risk, refer to disclosure requirements SBM-1 and E1-1.	
						Development of infrastructure for CO ₂ transport and storage	Opportunity	Own operations Customers	Further, CO ₂ transmission infrastructures will help mitigate climate change by reducing its effects, as set out in the new 2025-2030 Strategic Update. For more details on how Enagás is addressing this risk, refer to disclosure requirements SBM-1 and E1-1.	

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	Topic	Sub-topic	Sub-subtopic																
Environment	E1	Climate change	Energy	Climate action and energy efficiency	Energy	Contribute to the transition of the energy model towards a more sustainable version by integrating renewable gases.	Positive impact	Suppliers Own operations Customers	The company's latest 2025-2030 Strategic Update supports the energy transition, for instance, by developing hydrogen infrastructure. This new business model will positively impact society and the environment by mitigating climate change and enhancing the security of supply. For more details on Enagás' approach to this impact, refer to disclosure requirements SBM-1 and E1-1.	Over the long term, this potential impact, associated with the business model described in the new 2025-2030 Strategic Update, will benefit society and the environment through improved security of supply, decarbonisation of the energy sector, and a just energy transition.									
			Pollution of air		Pollution of air	The deterioration of air quality due to the emission of pollutants associated with energy consumption in the organisation's operations.	Negative impact	Own operations	Associated with the burning of natural gas in its operations, the current impact affects air quality in the regions where facilities use this fossil fuel. For more information on how Enagás is addressing this impact, see disclosure requirements E2-2.	This has adverse effects on human health, such as an increased rate of respiratory diseases, and on the environment by contributing to air pollution and climate change. This impact is linked to the company's business model, but it is expected to decrease in the long term as the company works to decarbonise its operations.									
	E2	Pollution and contamination	Pollution of water	Pollution	Pollution of water	Pollution of soil	Pollution of soil	Pollution of soil	Pollution of soil	Pollution of soil	Pollution of soil								
			Pollution of soil		Pollution of soil							Pollution of soil	Pollution of soil	Pollution of soil	Pollution of soil	Pollution of soil	Pollution of soil	Pollution of soil	
			Pollution of living organisms and food resources		Pollution of living organisms and food resources							Pollution of living organisms and food resources	Pollution of living organisms and food resources	Pollution of living organisms and food resources	Pollution of living organisms and food resources	Pollution of living organisms and food resources	Pollution of living organisms and food resources	Pollution of living organisms and food resources	Pollution of living organisms and food resources
			Substances of concern		Substances of concern							Substances of concern	Substances of concern	Substances of concern	Substances of concern	Substances of concern	Substances of concern	Substances of concern	Substances of concern
			Substances of very high concern		Substances of very high concern							Substances of very high concern	Substances of very high concern	Substances of very high concern	Substances of very high concern	Substances of very high concern	Substances of very high concern	Substances of very high concern	Substances of very high concern
			Microplastics		Microplastics							Microplastics	Microplastics	Microplastics	Microplastics	Microplastics	Microplastics	Microplastics	Microplastics
	E3	Water and marine resources	Water and marine	Water and marine resources management	Water consumption	Water consumption	Reduction in water resources due to the consumption of water from municipal networks, underground sources, or surface sources.	Negative impact	Own operations	The current effect of this issue is primarily a reduction in water resources in regions where Enagás uses water. For more information on how Enagás is addressing this impact, see disclosure requirements E3-2.	This reduction negatively impacts the environment by decreasing water availability for ecosystems and local communities, especially in the long term in areas of high water consumption, regions experiencing significant water stress, and places facing consumption restrictions due to water scarcity. Enagás does not consume water as part of its production process, only for sanitary use, cleaning, maintenance, and green areas.								
			Marine resources		Water withdrawals							Water withdrawals	Water withdrawals	Water withdrawals	Water withdrawals	Water withdrawals	Water withdrawals	Water withdrawals	
Water discharges			Water discharges		Water discharges							Water discharges	Water discharges	Water discharges	Water discharges	Water discharges	Water discharges		
Water discharges in the oceans			Water discharges in the oceans		Water discharges in the oceans							Water discharges in the oceans	Water discharges in the oceans	Water discharges in the oceans	Water discharges in the oceans	Water discharges in the oceans	Water discharges in the oceans	Water discharges in the oceans	
Extraction and use of marine resources			Extraction and use of marine resources		Extraction and use of marine resources							Extraction and use of marine resources	Extraction and use of marine resources	Extraction and use of marine resources	Extraction and use of marine resources	Extraction and use of marine resources	Extraction and use of marine resources	Extraction and use of marine resources	

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Environment	E4 Biodiversity and ecosystems	Direct impact drivers of biodiversity loss	Climate change							
			Land-use change, fresh water-use change and sea-use change			Impacts affecting the health of terrestrial ecosystems and their natural resources, stemming from maintenance activities on pipeline infrastructure, such as weeding, in both protected areas and other ecologically valuable regions.	Negative impact	Own operations	Enagás' gas pipeline infrastructure currently has a negative impact on biodiversity, disrupting habitats and degrading natural resources, particularly in protected or ecologically sensitive areas. This impact is primarily due to vegetation clearance required for the maintenance and integrity of the infrastructure, which directly ties to the company's business model. In the short term, these activities can lead to a loss of plant cover and the displacement of species; in the long term, there is a risk of cumulative impacts on ecosystems.	This impact is directly connected to the maintenance work on the gas pipelines and, therefore, to Enagás' business model. It negatively affects the environment through vegetation clearance. In the short term, these activities can result in the loss of plant cover and species displacement, while in the long term, there is a risk of cumulative impacts on ecosystems.
			Direct exploitation		Terrestrial and fluvial ecosystems					
			Invasive alien species							
			Pollution							
		Others								
		Impacts on the state of species	Species population size	Biodiversity						
			Species global extinction risk							
			Impacts on the extent and condition of ecosystems	Land degradation		Marine ecosystems				
		Desertification								
Soil sealing										
Impacts and dependencies on ecosystem services										
	Resource inflows, including resource use			Use of auxiliary materials						
		Resource outflows related to products and services	Circular economy							
E5 Circular economy	Waste			Waste management	Generation of hazardous and non-hazardous waste	Negative impact	Own operations	The generation of both hazardous and non-hazardous waste negatively impacts the environment by polluting soil, surface water, and groundwater, and disrupting ecosystems. Poor waste management can also pose risks to human health, such as exposure to toxic substances and the spread of diseases.	The environmental and societal effects of this impact are closely tied to how the waste is managed afterwards, potentially leading to soil and water contamination and affecting workers and local communities. This impact is relevant in the short, medium, and long term. Waste generation is an integral part of Enagás' business model due to its link with company activities.	
								For more information on how Enagás is addressing this impact, see disclosure requirements E5-2.		

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Social	S1	Own Workforce	Working conditions	People	Secure employment	Stable, quality employment	Own operations	<p>The positive impact of maintaining stable, high-quality employment with favourable working conditions strengthens the company's ability to attract and retain talent, which is crucial for the continuity and sustainability of its business model. In today's context, this impact is vital for maintaining productivity and employee engagement. Over the long term, its significance is expected to grow, as the company will require highly skilled workforce to address the challenges posed by the 2025-2030 Strategic Update.</p> <p>For further details on Enagás' approach to this impact, refer to the SMB-3 disclosure requirements in Chapter S1 and S1-4.</p>	<p>This impact directly benefits individuals by ensuring economic stability, improving quality of life, and fostering a safe and supportive working environment, which in turn enhances social welfare in the communities where Enagás operates. It is closely linked to the company's strategy and business model, as providing stable employment with competitive working conditions is key to ensuring the security of supply and the energy transition. This impact is relevant in the short, medium, and long term.</p>							
										Freedom of association, the existence of works councils and the information, consultation and participation rights of workers	Satisfaction and motivation of professionals	Use of programmes and policies to ensure the well-being of professionals in the workplace	Positive impact	Own operations	<p>This impact directly influences the company's professionals by enhancing the satisfaction of professionals and the efficiency of the business model. At present, these initiatives have boosted workforce satisfaction, commitment, and productivity, positively affecting the company's performance.</p> <p>For further details on Enagás' response to this impact, refer to disclosure requirement S1-4.</p>	<p>The positive impact significantly improves professionals' satisfaction and engagement. It positively impacts on their experience and promotes an inclusive and motivating work environment, as shown by regular satisfaction surveys. This impact is directly related to the company's strategy and business model, as the well-being of employees is crucial for operational efficiency and the successful implementation of the new 2025-2030 Strategic Update. The timelines for these issues span the immediate, medium, and long term, considering their ongoing impact on talent retention and development as Enagás faces various challenges.</p>

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Social	S1	Own Workforce	Working conditions	Work-life balance	People	Work-life balance and co-responsibility	Positive impact	Own operations	<p>Establishment of a fair and stable employment framework through collective bargaining to strengthen the employment relationship, raise professional satisfaction, commitment and expertise and contribute to a more productive working environment in a collaborative climate</p>	<p>Establishing a fair and stable labour framework positively impacts professionals and provides a significant opportunity to strengthen employee relations, improve job satisfaction, and create a more collaborative and productive work environment. Currently, this opportunity has helped reduce labour disputes, increase talent retention, and enhance Enagás's operational efficiency. Looking ahead, it will be crucial for addressing the challenges of the energy transition, as having collaborative, committed professionals with the right technical skills is essential for its successful implementation.</p> <p>For further details on how Enagás' is capitalising on this opportunity, refer to disclosure requirement S1-4.</p>			
									<p>Collective bargaining, including rate of workers covered by collective agreements</p>	<p>Collective bargaining</p>	<p>Opportunity</p>	<p>Own operations</p>	<p>Enhancing the balance between different aspects of professionals' lives positively impacts individuals by promoting well-being, reducing stress, and increasing job satisfaction. This effect is closely linked to the company's strategy and business model, as having committed and motivated professionals is crucial for task development and managing the changes associated with the 2025-2030 Strategic Update. This impact is expected to span the short, medium, and long term, reflecting Enagás's commitment to long-term benefits. This commitment also influences its business relationships by encouraging similar practices among its affiliates and suppliers, promoting a positive impact across the entire value chain.</p>
									<p>Improving the balance between the different aspects of professionals' lives thanks to the implementation of a comprehensive plan of measures favouring work-life balance and co-responsibility.</p>	<p>Positive impact</p>	<p>Own operations</p>	<p>By implementing measures to promote work-life balance and shared responsibility, Enagás currently and in the future positively impacts its professionals' satisfaction and well-being. This leads to increased productivity, improved talent retention, and a more inclusive and collaborative work environment. Strategically, the company has recognised that encouraging a balance between personal and professional life is crucial for having a workforce that supports its operational excellence.</p> <p>For further details on Enagás' response to this impact, refer to disclosure requirement S1-4.</p>	
					Health and safety	Health and safety	Positive impact	Own operations	<p>Implementing plans, protocols, training and projects on a culture of occupational health and safety has significantly benefited the company's professionals by enabling them to work safely and healthily. This development has enhanced the integration of health and safety across the value chain, strengthening and positively evolving the company's safety culture. It has helped reduce operational disruptions and ensured compliance with regulatory standards. In the future, this impact will become even more significant as the transition to new energy carriers requires managing new risks associated with new molecules, emerging technologies and innovative processes.</p> <p>For further details on Enagás' response to this impact, refer to disclosure requirement S1-4.</p>	<p>This current positive impact affects Enagás professionals and its value chain by ensuring a safe and healthy working environment, which, among other benefits, reduces the risk of workplace accidents. It enhances the well-being of professionals and strengthens the mutual trust between them and the company. This impact is closely linked to Enagás's business model, as it is a crucial component of its operations and infrastructure. It is evident in the short, medium, and long term, as health and safety are core company values, demonstrating the establishment of a robust and sustainable safety culture over time.</p>			

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European Sustainability Reporting Standards (ESRS) by theme		Sustainability issues addressed by the ESRS by theme										
Topic	Sub-topic	Sub-subtopic	Main topic: Enagás	Subtopic: Enagás	Description of impact, risk, or opportunity	Impact, risk or opportunity	Location of this impact/risk/opportunity	Current and anticipated effects and responses to these effects	Additional information			
Social	S1	Own Workforce	Working conditions	Health and safety	Health and safety	Possibility of harmful work situations for professionals that generate insecurity in the work environment, including situations that negatively affect both mental and physical health.	Negative impact	Own operations	<p>Enagás has identified a potential negative impact related to adverse workplace conditions, accidents and occupational illnesses, which could significantly affect the professionals involved and, indirectly, erode trust in the company.</p> <p>For more information on how Enagás addresses this issue, see disclosure requirements S1-2, S1-3, and S1-4.</p>	<p>If these negative impacts were to occur, they would primarily affect professionals, creating an unsafe working environment and harming their physical and mental well-being. This impact is indirectly connected to the business model and 2025-2030 Strategic Update, given that human capital is a fundamental pillar of development. Enagás must ensure the effective implementation of measures to keep the likelihood of this impact happening low. The company is directly involved in this impact through its activities, as it creates the working environments and conditions within its own operations.</p> <p>This impact is relevant in the short, medium, and long term.</p>		
						People	Economic and reputational consequences resulting from serious incidents involving professionals during operations, such as fatal workplace accidents	Risk	Own operations	<p>If this risk were to materialise, it would have a variety of reputational and economic consequences, significantly impacting the company's business model and decision-making. Currently, such incidents can lead to direct costs, including potential compensation payments. They can also incur indirect costs from operational disruptions, alongside the undeniable effect on the affected professionals and harm to the company's reputation.</p> <p>For further details on Enagás' response to this risk, refer to disclosure requirement S1-4.</p>	<p>Ensuring non-discrimination and equal opportunities, which has a direct positive impact on professionals, by promoting an inclusive work environment where individual differences are respected and valued. This impact is closely linked to the company's business model, as promoting diversity is crucial in the industrial sector for attracting and retaining key talent and enhancing the ability to adapt to the challenges of the new 2025-2030 Strategic Update.</p> <p>The effects of this impact extend over the short, medium, and long term, as inclusive policies offer immediate benefits while also driving a cultural transformation that strengthens the company's resilience and competitiveness over time.</p>	
							Diversity and inclusion	Gender equality and equal pay for work of equal value	Positive impact	Own operations	<p>These initiatives currently and in the future affect the company's professionals by promoting respect for equality and non-discrimination, which, in turn, creates a ripple effect in society. The measures implemented by Enagás have had a positive impact by fostering an inclusive and diverse work environment, which enhances talent attraction and retention, and improves team performance. These are key factors during times of transition, when diverse perspectives are essential for tackling the company's challenges. Across the value chain, these initiatives have also fostered stronger relationships with partners and suppliers, promoting inclusive practices throughout the operations network.</p> <p>For further details on Enagás' response to this impact, refer to disclosure requirement S1-4.</p>	
Diversity	<p>Ensure non-discrimination and equal opportunities, regardless of gender, race, ethnicity or other personal characteristics, through the implementation of policies, strategies and action plans</p>											
		Equal treatment and opportunities for all	Employment and inclusion of persons with disabilities									
			Measures against violence and harassment in the workplace									

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European Sustainability Reporting Standards (ESRS) by theme		Sustainability issues addressed by the ESRS by theme			Main topic: Enagás		Subtopic: Enagás		Description of impact, risk, or opportunity		Impact, risk or opportunity	Location of this impact/risk/opportunity	Current and anticipated effects and responses to these effects	Additional information
Topic	Sub-topic	Sub-subtopic												
Social	S1	Own Workforce	Equal treatment and opportunities for all	People	Awareness and development of in-house talent	Professional development and qualification of workforce through appraisals and development plans, as well as continuous learning and training	Positive impact	Own operations	Optimisation of operational efficiency by promoting professional development and training for internal workforce	Opportunity	Own operations	Various assessments focused on identifying and recognising talent make a positive contribution to implementing development plans and training programmes. These initiatives benefit professionals and present an opportunity for the company, as they help improve technical skills and soft skills, boosting productivity, adaptability, and capability. This, in turn, enhances operational efficiency and aids in achieving strategic goals.	The professional development and training of professionals directly benefits them by enhancing their technical skills, professional capabilities, and growth opportunities. This impact is linked to the company's strategy and business model, as the energy transition requires new specialised knowledge to support the effective implementation of the 2025-2030 Strategic Update.	
												This is crucial in a rapidly changing energy sector, where ongoing training is essential to ensuring the continuation of current activities and the pursuit of activities aligned with the energy transition.	The timeframe for this impact is ongoing and long-term, with benefits starting to emerge in the short term while fostering a sustainable cultural and operational transformation.	
												For further details on Enagás' response to this impact, refer to disclosure requirement S1-4.		
			Other work-related rights		Human rights	Human rights of own workforce			Reputational improvement and improvement of the due diligence management model for the protection of human rights, derived from the company's alignment with international initiatives and principles in defence of human rights (UN, ILO, etc.).	Opportunity	Own operations	A robust human rights due diligence model, which ensures effective management in this area and aligns the company with international initiatives and principles, can enhance its reputation among various stakeholders. This improved reputation helps attract talent, reduces the risks related to non-compliance with human rights regulations, and strengthens the company's sustainability position.	For further details on how Enagás is managing this opportunity, refer to disclosure requirement S1-4.	

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European Sustainability Reporting Standards (ESRS) by theme		Sustainability issues addressed by the ESRS by theme				Impact, risk or opportunity	Location of this impact/risk/opportunity	Current and anticipated effects and responses to these effects	Additional information
Topic	Sub-topic	Sub-subtopic	Main topic: Enagás	Subtopic: Enagás	Description of impact, risk, or opportunity				
Social	S2	Workers in the value chain	Working conditions	Secure employment	Human rights	Human rights of employees in the value chain (supply chain and affiliates)	Reputational and financial consequences from human rights violations in the value chain	Risk	Suppliers Own operations Affiliates Customers
				Working time					
				Adequate wages					
				Social dialogue					
				Freedom of association, the existence of works councils and the information, consultation and participation rights of workers					
				Collective bargaining, including rate of workers covered by collective agreements					
				Work-life balance					
				Health and safety					
				Gender equality and equal pay for work of equal value					
				Training and skills development					
				Equal treatment and opportunities for all					
				Employment and inclusion of persons with disabilities					
				Measures against violence and harassment in the workplace					
				Diversity					
Other work-related rights									
Child labour									
Forced labour									
Adequate housing									
Privacy									

If this risk, linked to the proper implementation of the due diligence system within Enagás's value chain, were to occur, it could undermine the trust of stakeholders, including investors, customers, and regulators. It could also lead to legal penalties, loss of contracts, and harm to the company's reputation. In addition, depending on the scale of the impact, it might cause operational disruptions and affect relationships with suppliers or strategic partners.

Looking ahead, this risk is expected to grow in an environment where regulations on human rights continue to tighten, demanding greater diligence and transparency from companies in their operations and business dealings.

For further details on Enagás' response to this risk, refer to disclosure requirement S2-4.

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European Sustainability Reporting Standards (ESRS) by theme		Sustainability issues addressed by the ESRS by theme			Main topic: Enagás		Subtopic: Enagás	Description of impact, risk, or opportunity	Impact, risk or opportunity	Location of this impact/risk/opportunity	Current and anticipated effects and responses to these effects	Additional information	
Topic	Sub-topic	Sub-subtopic											
Social	S3	Affected communities	Economic, social and cultural rights	Adequate housing	Local communities	Rights of local communities and their development	Cost overruns, delays, or even temporary or permanent halts to infrastructure projects due to social protests by affected communities or significant impacts on the environment or society.	Risk	Suppliers	Own operations	Customers	Stemming from the identified negative impact of this sustainability issue linked to infrastructure development projects, there is a potential risk that significant social and/or environmental impacts, or conflicts with affected groups, could lead to cost overruns, project delays, or temporary or permanent halts, as well as reputational damage for the company. These impacts are directly connected to the business model and 2025-2030 Strategic Update, particularly as new infrastructures for emerging energy carriers are developed.	
			Civil and political rights	Adequate food									Water and sanitation
			Rights of indigenous communities	Free, prior and informed consent								For further details on how Enagás is addressing this risk, refer to disclosure requirements S3-2, S3-3, and S3-4.	
				Self-determination									
				Cultural rights									
							Contribution to the development of the local economy through the creation of direct and indirect employment in the communities where it operates.	Positive impact		Suppliers	Own operations	Customers	The company's contribution to the local economy through the creation of direct and indirect jobs in the communities where it operates has both immediate and long-term positive effects. It fosters the economic development of the regional industry and strengthens relationships with these communities. Job creation enhances the skills and abilities of the local workforce, benefiting both the company and the regional economy. Looking ahead, this impact is anticipated to be crucial in line with the company's transition commitment, as it will lead to the creation of new jobs related to emerging energy sectors, further driving economic growth in these communities. Furthermore, indirect job creation helps establish a resilient business ecosystem that supports the company's long-term operations.
												This positive impact benefits local community members by creating job opportunities, reducing unemployment, and enhancing the quality of life in the areas where the company operates. The impact is both immediate and long-term. In the short term, the company creates direct employment through its operations at its facilities. Over the medium and long term, the impact grows as local supply chains are developed, which strengthens the local economy and encourages suppliers to adopt sustainable practices concerning their own employees.	
												For further details on Enagás' response to this impact, refer to disclosure requirement S3-4.	

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Topic	Sub-topic	Sub-subtopic	Main topic: Enagás	Subtopic: Enagás	Description of impact, risk, or opportunity	Impact, risk or opportunity	Location of this impact/risk/opportunity	Current and anticipated effects and responses to these effects	Additional information	
S3	Affected communities		Local communities	Rights of local communities and their development	Impact on local communities in terms of safety, health, environmental aspects or other socio-economic factors in the construction phase.	Negative impact	Own operations	<p>In connection with the risk outlined for this sustainability issue, there is a potential negative impact during the infrastructure construction phase that directly affects local communities, particularly in health and safety, environmental, and other social areas.</p> <p>This impact is tied to the business model for all construction projects, which is a critical focus area in the long term, as outlined in the 2025-2030 Strategic Update.</p> <p>For further details on Enagás' response to this impact, refer to disclosure requirement S3-4.</p>	The construction of new infrastructure, as planned in the company's 2025-2030 Strategic Update, could negatively affect local communities and the environment. Enagás has implemented various measures to avoid, minimise, mitigate, or compensate for these impacts. The likelihood of this impact occurring is directly related to the company's business model and its new 2025-2030 Strategic Update, aligning with the company's goals of ensuring security of supply and decarbonising its operations and the sector. These impacts are expected to be particularly significant in the medium and long term, coinciding with the construction and commissioning of new infrastructure.	
				Social action	Helping society by promoting social action initiatives and implementing volunteer programmes	Positive impact	Suppliers Own operations Customers	<p>Promoting social action initiatives, sponsorships, and patronage, along with implementing volunteer programmes, has a positive impact on society by reinforcing the company's commitment to sustainable development and the well-being of the communities where it operates. This positive effect, both in the short, medium, and long term, supports the business model and ensures a social contribution aligned with value creation for our stakeholders.</p> <p>For further details on Enagás' response to this impact, refer to disclosure requirement S3-4.</p> <p>For further details on Enagás' response to this impact, refer to disclosure requirement S3-4.</p>	The current positive impact on local communities from the company's social action initiatives enhances the quality of life for various groups through projects across multiple sectors, including socioeconomic development, social welfare, education, art and culture, and humanitarian aid. In addition, some of these initiatives positively affect the environment, particularly those related to reforestation and environmental education. This positive impact is already being realised, and the company aims to sustain it in the medium and long term. To enhance the reach and effectiveness of these initiatives, Enagás often collaborates with associations, NGOs, educational institutions, and local governments.	
S4	Consumers and end-users	Information-related impacts for consumers and/or end-users Personal safety of consumers and/or end-users Social inclusion of consumers and/or end-users		Privacy Freedom of expression Access to (quality) information Health and safety Security of a person Protection of children Non-discrimination Access to products and services Responsible marketing practices						

Social

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European Sustainability Reporting Standards (ESRS) by theme		Sustainability issues addressed by the ESRS by theme								
Topic	Sub-topic	Sub-subtopic	Main topic: Enagás	Subtopic: Enagás	Description of impact, risk, or opportunity	Impact, risk or opportunity	Location of this impact/risk/opportunity	Current and anticipated effects and responses to these effects	Additional information	
G1	Business conduct	Corporate culture								
		Protection of whistle-blowers			Protection of whistle-blowers	Effective management and handling of complaints and issues reported through the whistleblowing channel.	Positive impact	Suppliers Own operations Customers	Effective management and attention to communications received through the Whistleblowing Line reinforce transparency, business ethics, and stakeholder trust, positively influencing Enagás's stakeholders. This approach fosters a culture based on integrity, listening, respect, and zero tolerance for behaviours that do not align with the code of ethics. Looking ahead, this impact is expected to continue bolstering the company's governance, which will be particularly important as it progresses with the 2025-2030 Strategic Update. For further details on Enagás' response to this impact, refer to disclosure requirement G1-1.	This positive influence on employees and other stakeholders contributes to ensuring a safer, more ethical, and transparent work environment, safeguarding the rights of employees, suppliers, and communities affected by the company's activities. Maintaining high standards of governance and regulatory compliance is crucial for the company to ensure its operations run smoothly. The effects of this management approach are anticipated to endure in the short, medium, and long term, as an efficient whistleblowing system not only addresses current issues but also prevents future risks and continually enhances the organisational culture.
		Animal well-being		Ethics and integrity						
		Political participation and lobbying activities			Political engagement and lobbying activities	Actively engage in developing new industry initiatives and staying informed about new trends and regulations by participating in industry associations and initiatives.	Opportunity	Own operations	Active participation in sectoral initiatives and associations enables Enagás to contribute to the improvement and progress of European Union legislative and regulatory frameworks, especially in those developments that have a direct or indirect impact on the transmission and storage business of gas, liquefied natural gas and renewable gases, as well as on the Spanish and European gas industry in general. It also allows the company to lead in sector best practices and anticipate new trends and regulations, enhancing its adaptability in a transforming energy landscape. This opportunity is directly tied to the company's business model and is crucial for the successful implementation of the 2025-2030 Strategic Update. For further details on how Enagás is managing this opportunity, refer to disclosure requirement G1-5.	
	Management of supplier relations, including payment practices		Sustainable value chain	Supply chain management	Reputational damage and sanctions due to poor management of supplier payments	Risk	Suppliers Own operations	Enagás has recognised the risks associated with poor management of its payment processes to suppliers (negative effect on suppliers, reputational damage, sanctions, loss of trust from strategic partners, etc.). Strategically and in decision-making, the company recognises the need to continue ensuring efficient and transparent payment processes to mitigate this risk and strengthen its reputation. For more details on how Enagás is addressing this risk, refer to disclosure requirements G1-2 and G1-6.		

Governance

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Topic	Sub-topic	Sub-subtopic	Main topic: Enagás	Subtopic: Enagás	Description of impact, risk, or opportunity	Impact, risk or opportunity	Location of this impact/risk/opportunity	Current and anticipated effects and responses to these effects	Additional information	
Governance	G1	Business conduct	Management of supplier relations, including payment practices	Sustainable value chain	Supply chain management	Enhancing sustainability performance and culture among suppliers by setting sustainability criteria and focusing on development and training in sustainability.	Positive impact	Suppliers Own operations	Enhancing performance and fostering a sustainability culture among suppliers by setting requirements and offering sustainability training programmes positively impacts the company's value chain. This approach encourages operations with more sustainable partners aligned with Enagás's commitments. Enagás plans to advance its sustainable supply chain management in the coming years to align with new regulatory trends in due diligence and best practices, ensuring that this current positive impact is sustained in the medium and long term. For further details on Enagás' response to this impact, refer to disclosure requirement G1-1.	This current positive impact benefits society by promoting more sustainable companies and supporting workers within these companies through the encouragement of good practices. It also benefits the environment by fostering more responsible environmental practices in the supply chain, such as reducing the carbon footprint. This impact is closely linked to the company's strategy and business model, as ensuring a value chain that aligns with corporate sustainability criteria is crucial for the more efficient and responsible performance of all players in the energy sector. This impact is relevant in the short, medium, and long term.
			Corruption and bribery	Ethics and integrity	Corruption and bribery	Implementation of corporate policies and procedures to prevent and deter corruption and bribery.	Positive impact	Suppliers Own operations Customers	The existence of corporate policies and procedures to prevent and detect corruption and bribery has a direct impact on the company's business model, value chain and strategy, ensuring transparency and compliance in all its operations. These areas are particularly important for maintaining positive impacts in the deployment of the 2025-2030 Strategic Update. For further details on Enagás' response to this impact, refer to disclosure requirement G1-3.	This positive impact has an effect on the company's professionals, as well as on society at large and the value chain, ensuring an ethical and transparent business environment. This impact is directly related to the company's strategy and business model, as zero tolerance for corruption and bribery is basic principle for our work and business relationships in the medium and long term. This impact is relevant in the short, medium, and long term.
			Incidents			Risk associated with fraud or unauthorised activities by employees or external parties acting with malice, excluding damage to assets.	Risk	Suppliers Own operations Customers	The risk associated with fraud or unauthorised activities by professionals or outsiders significantly affects the business model, the value chain, and the company's strategy, as it can pose a significant risk to corporate reputation and lead to financial penalties. This risk is especially critical in the new stage of development of new infrastructures on which Enagás is embarking, in line with the 2025-2030 Strategic Update. For further details on Enagás' response to this impact, refer to disclosure requirement G1-3.	

European Sustainability Reporting Standards (ESRS) by theme		Sustainability issues addressed by the ESRS by theme								
Topic	Sub-topic	Sub-subtopic	Main topic: Enagás	Subtopic: Enagás	Description of impact, risk, or opportunity	Impact, risk or opportunity	Location of this impact/risk/opportunity	Current and anticipated effects and responses to these effects	Additional information	
Entity-specific	Customers	Customer safety	Customers	Transparent communication	Developing and implementing business and commercial transparency strategies	Positive impact	Suppliers Own operations Customers	In its work with customers, Enagás believes that it currently has a positive impact through the development and implementation of business and commercial transparency strategies. This impact, linked to our business model, has a positive effect on customers, helping them as we provide the service, in decision-making and complying with applicable international standards. Enagás works to maintain this impact in the medium and long term, to the benefit of its customers and its relationship with them. For more information on Enagás' response to this impact, see the 'Management of impacts, risks and opportunities' section of the 'Customers' section.	This impact is linked to the promotion of ethical, responsible and transparent business practices, ensuring that customer relations are conducted in an environment of transparency and compliance with enforcement requirements. This generates greater trust among stakeholders, especially customers, and improves customer relations. This impact is considered significant in the short, medium and long term for Enagás.	
				Customer safety	Failing to ensure proper supervision and quality of services	Negative impact	Own operations Customers	Enagás has identified a possible one-off impact stemming from a failure to ensure proper oversight and quality service, with effects on customers and the gas sector. This impact is associated with the company's business model, with the understanding that in the medium and long term, it could be affected by the offer of new services to customers in line with the 2025-2030 Strategic Update. For more information on Enagás' response to this impact, see the 'Management of impacts, risks and opportunities' section of the 'Customers' section.	This impact can significantly affect customers and customer relations. The time horizon of the impact is short to medium term, as any failure in oversight could have immediate consequences for operations and service, putting our relationship with customers at risk in the long term. It may also have an impact on society and/or the environment, if the failure to ensure quality service is associated with operational incidents.	
				Customer safety	Enhancing the quality of services and transparent communication by increasing the ability to react and identify areas for improvement, thanks to customer satisfaction evaluation processes and supervision and assurance systems.	Opportunity	Own operations Customers	Customer relations, in particular customer satisfaction evaluations, can lead to improved service offerings and communication with customers. This opportunity currently strengthens Enagás' business model by improving operational efficiency and building customer trust. For more information on Enagás' management to take advantage of this opportunity, see the 'Management of impacts, risks and opportunities' section of the 'Customers' section.		
				Information Security	Cybersecurity and data privacy	Impacts on stakeholders due to incidents in infrastructure, equipment, and systems caused by operational failures related to cyber-attacks.	Negative impact	Suppliers Own operations Customers	This potential negative impact, linked to the success of cyber-attacks, may affect different stakeholders, compromising the security of supply and the proper provision of services by Enagás. As the company continues to move towards developing new renewable gas infrastructures, this impact becomes more likely, as the digitalisation of operations and the integration of new technologies increase exposure to cyber threats. To lessen the chances and potential impact of such risks, Enagás must continually enhance its cybersecurity measures, adapting to and addressing emerging cyber threats. For more information on Enagás' response to this impact, see the 'Management of impacts, risks and opportunities' section of the 'Information security' section.	Cyber-attacks can lead to operational failures with a significant impact on different stakeholders. Therefore, they can affect the company's business and its value chain. This potential negative impact is significant at present, but further pressure is expected in the medium and long term, and Enagás needs to implement appropriate measures to ensure that this impact does not materialise.

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	Topic	Sub-topic	Sub-subtopic							
Entity-specific				Information Security	Cybersecurity and data privacy	Fines and reputational damage may result from cybersecurity breaches or leaks of sensitive stakeholder data due to inadequate management.	Risk	Suppliers Own operations Customers	Cybersecurity breaches and leaks of sensitive data can have a negative impact associated with significant fines, reputational damage, service or stakeholder impacts. This risk could have a direct impact on the company's business model and value chain. As the company moves forward in the digitalisation process, the risk of cyber-attacks and exposure to vulnerabilities increases. To further mitigate these risks, Enagás should maintain its cybersecurity and privacy management systems to identify and address any potential legal breaches that could result in fines. For more information on Enagás' response to this risk, see the 'Management of impacts, risks and opportunities' section of the 'Information security' section.	
				Regulatory compliance	Regulatory compliance	Criminal liability for offences committed by employees or managers against workers' rights, public health, natural resources and the environment.	Risk	Own operations	Criminal liability for offences committed by employees or managers against workers' rights, public health, natural resources and the environment represents a significant risk for the company, with direct impacts on its business model, value chain, strategy and decision-making. For more information on Enagás' response to this risk, see the 'Management of impacts, risks and opportunities' section of the 'Regulatory compliance' section.	
				Regulatory compliance	Regulatory compliance	Non-compliance with current legislation and internal regulations (gas, environmental, antitrust, labour and safety regulations, accounting and tax rules, Protection of Personal Data Act ('LOPD'), confidentiality, diversity and equality, etc.)	Risk	Suppliers Own operations Customers	Non-compliance with current legislation and internal regulations in key areas represents a significant risk for the company, which may result in financial penalties, reputational damage or financial loss. This risk is particularly key given the challenges the company faces in implementing the actions outlined in the 2025-2030 Strategic Update. For more information on Enagás' response to this risk, see the 'Management of impacts, risks and opportunities' section of the 'Regulatory compliance' section.	

Resilience: crisis management and business continuity

Enagás is moving towards a resilient management model, promoting improvements in different areas such as crisis management and business continuity. This model makes it possible to increase the company's capacity to adapt to a changing environment, reducing the time required to act and recover from the possible appearance of a disruptive situation.

Enagás periodically updates its Crisis Management General Standard, adapting it to new risks, policies and emerging businesses, establishing various action committees to control incidents depending on the degree of severity and consequences of each scenario.

As part of its Global Security Plan, the company organises annual crisis management and business continuity drills, which enable it to train its professionals at both the technical and highest executive level. Likewise, to facilitate its response capacity, Enagás has maps of both corporate and local stakeholders so that, in the event of a hypothetical crisis situation, both the key people and the communication channels are identified, enabling efficient management.

In 2024, we continued to promote business continuity at the Infrastructure General Management and launched an analysis of critical processes at the Technical Management of the System General Management, establishing different actions within the company's Transformation Plan that will enable it to achieve improvements in this area.

Management of impacts, risks, and opportunities

Information on the materiality assessment process

IRO-1

Description of the processes to identify and assess material impacts, risks, and opportunities

Enagás has carried out a materiality assessment in order to identify sustainability issues that are material to the company's value (internal perspective) and to people and the environment (external perspective). All this with a focus on the short, medium and long term, taking into account both own operations and the value chain, and in a manner consistent with the strategy, the risk management models and the analysis of corporate risks of the Company.

This analysis encompasses all activities and infrastructure locations of Enagás Group companies under financial control, including both upstream and downstream stages of the value chain.

The materiality assessment is essential for identifying the main impacts, risks and opportunities faced by the company, thus highlighting the most relevant issues on which Enagás must focus its management and reporting, have action plans in place and set objectives aligned with the continuous improvement approach.

Enagás, through its Sustainability Committee, reviews the materiality analysis and updates the company's material topics prior to their approval by the Board of Directors. Given the relevance of this process, it has been included in the Internal Control System over Sustainability Reporting (for more information, see disclosure requirement [GOV-4](#)).

This assessment is based on the company's previous materiality assessment and will be reviewed annually in case of strategic updates or externalities with significant impact.

Understanding context

For the materiality assessment, an assessment of the company's own operations and value chain was carried out; in essence, Enagás' own practices were assessed. The broader context was also assessed, including the regulatory framework, market and sectoral trends, as well as changes in stakeholder needs, among other matters.

Identification of Impacts, Risks, and Opportunities

The main sustainability topics and sub-topics applicable to Enagás have been identified below, in line with applicable regulations, as well as an initial identification of potential impacts, risks and opportunities material to the same. For this assessment, we have used the context analysis described above, as well as internationally recognised reporting frameworks, ESG analysts and peers. Previous assessments carried out by the company, the company's due diligence system and previous sustainability information reports also served as inputs.

In this phase, the risks and opportunities arising from impacts and dependencies were considered.

These are understood to be:

- **Impact:** the effect the company has or may have on the environment and people, including any effects on their human rights that result from the company's activities or business relationships. Impacts can be actual or potential, negative or positive, short-, medium- or long-term, intended or unintended, and reversible or irreversible. They indicate the company's contribution, negative or positive, to sustainable development.
- **Risk:** Sustainability-related risks that have negative financial effects that significantly affect (or can reasonably be expected to affect) the company's cash flows, access to financing or cost of capital in the short, medium or long term.
- **Opportunity:** Sustainability-related opportunities that have positive financial effects that significantly affect (or can reasonably be expected to affect) the company's cash flows, access to financing or cost of capital in the short, medium or long term.

Subsequently, together with the internal teams responsible for managing the various areas covered, the previously identified potential impacts, risks and opportunities were reviewed. New ones were also identified. These impacts, risks and opportunities have also been assigned to the different stages of the company's value chain.

In addition, the identified risks and opportunities were checked with the company teams responsible for corporate risk management and company strategy, respectively.

Stakeholder surveys

Following the identification of impacts, risks and opportunities, surveys were conducted with key stakeholders to ascertain their opinion on the relevance of the sustainability issues identified by the company. The stakeholders surveyed were customers, investors, regulators, professionals and members of the Sustainability Committee.

The relevance of sustainability issues to peers and sustainability analysts was also assessed on the basis of external information.

The results of these surveys and external assessments helped to establish the degree of significance of sustainability issues in the impacts, risks and opportunities valuation process ('scale' parameter):

- In terms of impact materiality, through the results of the surveys carried out with the different stakeholders, as well as the benchmark set by peers and sustainability analysts.
- In terms of financial materiality, through the results of investor surveys and the benchmark set by sustainability analysts.

Evaluation of Impacts, Risks, and Opportunities

As in the impacts, risks and opportunities identification phase, based on the inputs considered, the impacts, risks and opportunities were assessed on the basis of the following parameters with the internal teams responsible for the management of the different areas:

- Impacts:
 - Nature: indicates whether the impact is positive or negative.
 - In the case of a negative impact, remediability shall be assessed, i.e. the degree of difficulty (economic and temporal) of returning it to its pre-impact state if the impact is negative. This is classified as not remediable, very difficult, difficult, challenging and easy.
 - Status: indicates whether it is a current or potential impact (has not yet materialised).
 - In the case of a potential impact, the probability of occurrence shall be assessed, i.e. the likelihood of the impact materialising. This is classified as high probability (>75% chance of occurrence), medium probability (>50%), low probability (>25%) and very low probability (<25%).
 - Scale: determines the degree of significance of the impact to stakeholders (significance of the associated sustainability issue). Information obtained through stakeholder surveys and the benchmark set by sustainability analysts and peers.
 - Scope: determines the physical space affected by each impact. This is classified as global, medium or limited.
- Risks and opportunities:
 - Degree: Determines the degree of significance of the opportunity or risk to stakeholders (significance of the associated sustainability issue). Information obtained through investor surveys and the sustainability analysts' benchmark.

In addition, the probability and economic valuation in the short (1 year), medium (between 1 and 5 years) and long term (more than 5 years) is determined:

- Probability: how likely it is that the opportunity or risk will materialise. This is classified as high probability (>75% chance of occurrence), medium probability (>50%), low probability (>25%) and very low probability (<25%).
- Economic valuation: effect in case of materialisation based on net profit and FFO. This is classified as high, moderate, medium or low.

In line with the procedure followed to identify risks and opportunities, the assessment of these has been checked with the company teams responsible for corporate risk management and company strategy, respectively. All this is done taking into account the differences between the methodologies applied for the assessment of risks and opportunities in this analysis and in the internal risk management system (for more information, see the 'Risk management' section in the Consolidated Management Report)¹⁵ and the identification of business opportunities, as a consequence of the purposes of the different processes. However, despite the differences between the methodologies used, there is a methodological alignment resulting from the application of consistent assessment criteria. This ensures that, for example, sustainability-related risks considered critical within the internal risk management system also receive a high assessment in the dual materiality assessment.

Results of the materiality assessment

As a result of this analysis of the relevance of various impacts, risks, and opportunities, it is concluded that all sustainability topics established by the ESRS are of relative importance to Enagás, except for "consumers and end-users," as it is not applicable to the company's business model (for more information, see the 'Customers' section in the Additional Information for Enagás) given their material impact, financial materiality, or both. Additionally, Enagás has identified three sustainability topics of relative importance that are of particular interest to Enagás: regulatory compliance, information security, and customers. It is worth noting that the issue of climate action and energy efficiency stands out due to its high rating for both materialities.

Enagás has been working for years on the management and continuous improvement of the sustainability issues identified as priorities, thus endorsing the work carried out by the company in the area of sustainability.

For more information on the impacts, risks and opportunities identified as material, see disclosure requirement [SBM-3](#).

¹⁵ This link refers to unverified information within the framework of the review of the Non-Financial Information and Sustainability Information Statement.

IRO-2

Disclosure requirements in ESRS covered by the undertaking's Statement of consolidated non-financial and sustainability information

The disclosure requirements that are fulfilled in the current Statement of consolidated non-financial and sustainability information are listed below, after the application of impact and financial materiality thresholds in the double materiality analysis:

European Sustainability Reporting Standards (ESRS)	Area	Section	Disclosure requirement	Page number
GENERAL INFORMATION				
2	General disclosures	Basis for preparation	BP-1: General basis for preparation of sustainability statements	21
			BP-2: Disclosures in relation to specific circumstances	21-22
		Governance	GOV-1: The role of administrative, management and supervisory bodies	23-26
			GOV-2: Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	26-27
			GOV-3: Integration of sustainability-related performance in incentive schemes	27-28
			GOV-4: Statement on due diligence	29
			GOV-5: Risk management and internal controls over sustainability reporting	30-31
		Strategy	SBM-1: Strategy, business model and value chain	31-40
			SBM-2: Interests and views of stakeholders	40-41
			SBM-3: Material impacts, risks, and opportunities and their interaction with the strategy and business model	41-57
		Management of impacts, risks and opportunities	IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities	58-59
IRO-2: Disclosure requirements in ESRS covered by the undertaking's sustainability statement	60-66			

European Sustainability Reporting Standards (ESRS)	Area	Section	Disclosure requirement	Page number
ENVIRONMENTAL INFORMATION				
Disclosure of information under Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)				
E1	Climate change	Governance	Related to ESRS 2 GOV-3: Integration of sustainability-related performance in incentive schemes	88
		Strategy	E1-1: Transition plan for climate change mitigation	89-90
			Related to ESRS 2 SBM-3: Material impacts, risks, and opportunities and their interaction with the strategy and business model	90-91
		Management of impacts, risks and opportunities	Related to ESRS 2 IRO-1: Description of the processes to identify and assess material impacts, risks, and opportunities related to climate	92-93
			E1-2: Policies related to climate change mitigation and adaptation	93-94
			E1-3: Actions and resources in relation to climate change policies	94-98
		Metrics and targets	E1-4: Targets related to climate change mitigation and adaptation	99-101
			E1-5: Energy consumption and mix	101-102
			E1-6: Gross Scopes 1, 2, 3 and Total GHG emissions	102-107
			E1-7: GHG removals and GHG mitigation projects financed through carbon credits	107-108
E1-8: Internal carbon pricing	108			
E2	Pollution	Management of impacts, risks and opportunities	Related to ESRS 2 IRO-1: Description of the processes to identify and assess material impacts, risks, and opportunities related to pollution	111
			E2-1: Policies related to pollution	111-112
			E2-2: Actions and resources related to pollution	112
		Metrics and targets	E2-3: Targets related to pollution	113
			E2-4: Pollution of air, water and soil	113
			E2-5: Substances of concern and substances of very high concern	113
			E2-6: Anticipated financial effects from pollution-related impacts, risks and opportunities	114
E3	Water and Marine Resources	Management of impacts, risks and opportunities	Related to ESRS 2 IRO-1: Description of the processes to identify and assess material impacts, risks, and opportunities related to water and marine resources.	116
			E3-1: Policies related to water and marine resources	116-117
			E3-2: Actions and resources related to water and marine resources	117
		Metrics and targets	E3-3: Targets related to water and marine resources	118
			E3-4: Water consumption	118-119
			E3-5: Anticipated financial effects from water and marine resources-related impacts, risks and opportunities	119

European Sustainability Reporting Standards (ESRS)	Area	Section	Disclosure requirement	Page number		
E4	Biodiversity and Ecosystems	Strategy	E4-1: Transition plan and consideration of biodiversity and ecosystems in strategy and business model	120		
			Related to ESRS 2 SBM-3: Material impacts, risks, and opportunities and their interaction with the strategy and business model	120-123		
		Management of impacts, risks and opportunities	Related to ESRS 2 IRO-1: Description of the processes to identify and assess material impacts, risks, and opportunities related to biodiversity and ecosystems	123-125		
			E4-2: Policies related to biodiversity and ecosystems	125		
			E4-3: Actions and resources related to biodiversity and ecosystems	126-127		
			E4-4: Targets related to biodiversity and ecosystems	128		
		Metrics and targets	E4-5: Impact metrics related to biodiversity and ecosystems change	128		
			E4-6: Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities	128		
		E5	Resource Use and Circular Economy	Management of impacts, risks and opportunities	Related to ESRS 2 IRO-1: Description of the processes to identify and assess material impacts, risks, and opportunities related to resource use and the circular economy	129
					E5-1: Policies related to resource use and circular economy	129-130
E5-2: Actions and resources related to resource use and circular economy	130					
Metrics and targets	E5-3: Targets related to resource use and circular economy			131		
	E5-4: Resource inflows			131		
	E5-5: Resource outflows			131-133		
	E5-6: Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities			133		

European Sustainability Reporting Standards (ESRS)	Area	Section	Disclosure requirement	Page number	
SOCIAL INFORMATION					
S1	Own workforce	Strategy	Related to ESRS 2 SBM-2: Interests and views of stakeholders	136	
			Related to ESRS 2 SBM-3: Material impacts, risks, and opportunities and their interaction with the strategy and business model	136 - 138	
		Management of impacts, risks and opportunities	S1-1: Policies related to own workforce	139 - 142	
			S1-2: Processes for engaging with own workers and workers' representatives about impacts	142 - 143	
			S1-3: Processes to remediate negative impacts and channels for own workers to raise concerns	143 - 144	
			S1-4: Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	145 - 156	
			S1-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	157 - 159	
			S1-6: Characteristics of the undertaking's employees	159 - 162	
			S1-7: Characteristics of non-employee workers in the undertaking's own workforce	162	
			S1-8: Collective bargaining coverage and social dialogue	162 - 163	
			S1-9: Diversity metrics	163 - 164	
			Metrics and targets	S1-10: Adequate wages	164
				S1-11: Social protection	164
				S1-12: Persons with disabilities	165
				S1-13: Training and skills development metrics	165
				S1-14: Health and safety metrics	165 - 166
				S1-15: Work-life balance metrics	166
S1-16: Compensation metrics (pay gap and total compensation)	167				
S1-17: Incidents, complaints and severe human rights impacts	167 - 171				

European Sustainability Reporting Standards (ESRS)	Area	Section	Disclosure requirement	Page number
S2	Workers in the value chain	Strategy	Related to ESRS 2 SBM-2: Interests and views of stakeholders	172
			Related to ESRS 2 SBM-3: Material impacts, risks, and opportunities and their interaction with the strategy and business model	172
		Management of impacts, risks and opportunities	S2-1: Policies related to value chain workers	173 - 174
			S2-2: Processes for engaging with value chain workers about impacts	174
			S2-3: Processes to remediate negative impacts and channels for value chain workers to raise concerns	174
			S2-4: Taking action on material impacts on value chain workers, and approaches to mitigating material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	174 - 177
		Metrics and targets	S2-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	178
S3	Affected communities	Strategy	Related to ESRS 2 SBM-2: Interests and views of stakeholders	179
			Related to ESRS 2 SBM-3: Material impacts, risks, and opportunities and their interaction with the strategy and business model	179 - 180
		Management of impacts, risks and opportunities	S3-1: Policies related to affected communities	181 - 182
			S3-2: Processes for engaging with affected communities about impacts	183-184
			S3-3: Processes to remediate negative impacts and channels for affected communities to raise concerns	184
			S3-4: Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	184-188
		Metrics and targets	S3-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	189
GOVERNANCE INFORMATION				
G1	Business Conduct	Governance	Related to ESRS 2 GOV-1: The role of administrative, management and supervisory bodies	191 - 192
		Management of impacts, risks and opportunities	Related to ESRS 2 IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities	193
			G1-1: Corporate culture and business conduct policies	193 - 198
			G1-2: Management of relationships with suppliers	198 - 201
			G1-3: Prevention and detection of corruption and bribery	201 - 202
		Metrics and targets	G1-4: Confirmed incidents of corruption or bribery	203
			G1-5: Political influence and lobbying activities	203 - 204
G1-6: Payment practices	204			

European Sustainability Reporting Standards (ESRS)	Area	Section	Disclosure requirement	Page number
ENAGÁS ADDITIONAL INFORMATION				
Regulatory compliance		Governance		206 Cross-reference to disclosure requirements GOV-1, GOV-2, GOV-3, GOV-4, and GOV-5 in chapter 2
				206 Cross-reference to disclosure requirements SBM-1, SBM-2, and SBM-3 in chapter 2
			Management of impacts, risks and opportunities	206 - 207
			Metrics and targets	207
Information security		Governance		208 Cross-reference to disclosure requirements GOV-1, GOV-2, GOV-3, GOV-4, and GOV-5 in chapter 2
				208 Cross-reference to disclosure requirements SBM-1, SBM-2, and SBM-3 in chapter 2
			Management of impacts, risks and opportunities	208 - 210
			Metrics and targets	210 - 211

European Sustainability Reporting Standards (ESRS)	Area	Section	Disclosure requirement	Page number
		Governance		212
		Strategy	Related to ESRS 2 SBM-2: Interests and views of stakeholders	212
			Related to ESRS 2 SBM-3: Material impacts, risks, and opportunities and their interaction with the strategy and business model	212-213
Customers			Policies related to consumers and end-users	213 - 215
		Management of impacts, risks and opportunities	Processes for engaging with consumers and end-users about impacts	215 - 217
			Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	217 - 218
			Measures related to material impacts on consumers and end-users, and approaches to mitigate material risks and opportunities related to consumers and end-users, and the effectiveness of such actions	218 - 220
		Metrics and targets	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	220
REFERENCE TO OTHER APPLICABLE EU LEGISLATION				
E1-1			Transition plan to achieve climate neutrality by 2050, paragraph 14: Regulation (EU) 2021/1119, Article 2(1)	89-90
E1-7			GHG removals and carbon credits, paragraph 56: Regulation (EU) 2021/1119, Article 2(1)	107-108

Non-financial and diversity reporting requirements (Law 11/2018)

Description of the business model: main factors and trends likely to affect its future evolution

Business context

In 2024, the average price of natural gas on the European spot market was around 40 euros/MWh, marking a 15% decrease from the average price in 2023. This continues the trend of price reductions since Russia's invasion of Ukraine and the energy crisis in 2022.

However, despite these lower prices, the markets remain tense and volatile, affected by ongoing conflicts in the Middle East and the war in Ukraine, as well as uncertainty linked to elections in over 100 countries worldwide. Significant elections included those for the European Parliament, which suggest the continuation of the European Green Deal and decarbonisation policies. Additionally, Trump's victory in the US presidential election was notable, as it prioritises the production and export of natural gas in the country and lifts sanctions on liquefied natural gas (LNG) projects imposed by the Biden Administration, thereby enhancing the US' role in the global gas market.

The structure of natural gas supplies in the European Union in 2024 saw total imports of Russian gas exceed 50 bcm (19% of total imports). This marks a 67% reduction compared to 2021, before the war began, but a slight increase compared to 2023.

Security of supply in the European Union has been largely underpinned by LNG, which constituted over 40% of total natural gas supplies in 2024. Regasification plants, with 35 bcm of new capacity being built in Europe and 250 bcm globally, will increasingly ensure security of supply.

The Spanish Gas System has continued to be a key player in ensuring Europe's security of supply, delivering a total of 34.5 TWh of natural gas via its international interconnections and by reloading LNG carriers. Spain also boasts one of the most diversified supply sources in the world, having received gas from 14 different countries in 2024, positioning it as a strategic LNG entry point into Europe.

Spanish terminals more than doubled their LNG bunkering operations in 2024, reaching 3.8 TWh compared to 1.5 TWh in 2023, thus advancing the decarbonisation of the maritime sector.

In Spain, demand for natural gas fell by 4% compared to 2023. This decline was mainly due to reduced gas usage for electricity generation, thanks to increased hydropower and renewable energy production. Conversely, industrial gas demand showed a recovery, with an increase of over 4%, primarily in the refining sector.

The year 2024 was also notable for the release of the final 2030 National Integrated Energy and Climate Plans (PNIECs) in most EU Member States. These plans emphasised the crucial role of green hydrogen as a decarbonisation driver. Specifically, 17 Member States set targets for electrolysis capacity totalling 52 GW, with 60% (31.5 GW) focused in the H2Med corridor countries: Spain, Portugal, France, and Germany.

Nationally, Spain's final National Integrated Energy and Climate Plan (PNIEC) increases the target for installed electrolysis capacity to 12 GW by 2030, up from 11 GW in the draft version. It maintains the goal of replacing 74% of current grey hydrogen consumption in industry and introduces a new target for the contribution of renewable fuels of non-biological origin (RNFB0) in the transport sector, set at 3.56% by 2030.

In addition, the Spanish PNIEC includes measure 4.12, which focuses on promoting the development of the Iberian H2Med hydrogen corridor. This initiative, supported by the governments of Spain, Portugal, and France, aims to establish Spain as the world's leading renewable hydrogen hub. It will achieve this by developing the initial segments of the national backbone network, linking green hydrogen production centres with domestic consumers and the two international connections to France and Portugal.

Furthermore, on April 8, 2024, the Official Journal of the European Union published the first list of Projects of Common Interest (PCI) and Projects of Mutual Interest (PMI), which features the H2Med project and the Spanish Hydrogen Backbone Network. This marks a significant advancement in the promotion of these projects.

Within this fundamental role for renewable hydrogen in the decarbonisation of the global and European energy system, very significant progress was made in 2024 that constitute a boost for hydrogen development and consolidate Spain's role as a key player.

Global milestones

Between November 11 and 24, 2024 the 29th Conference of the Parties to the United Nations Framework Convention (COP29) was held in Baku. Key outcomes included:

- New finance agreements, setting a collective quantified goal for climate finance (NCQG) of 300 billion dollars per year until 2035, which is triple the current target.
- The conference also established rules for the international trading of carbon credits under United Nations oversight (voluntary market), along with a mechanism for exchanging carbon credits between countries. Projects from the Clean Development Mechanism (CDM) can join this framework.

- Enagás participated in a declaration on hydrogen through UNIDO (United Nations Industrial Development Organization) and UNECE (United Nations Economic Commission for Europe). This declaration aims to promote the integration of green hydrogen and its derivatives into national energy plans and to enhance demand, particularly in end-use sectors that present decarbonisation challenges.
- A call to action was issued by 50 companies in the maritime transport value chain to promote green hydrogen. They committed to investing in zero-emission fuel infrastructure and using at least 5%-10% of energy from zero or near-zero emission sources by 2030.

European milestones

- April 8: the first list of Projects of Common Interest (PCI) and Projects of Mutual Interest (PMI) was published in the Official Journal of the European Union (OJEU). This list includes the H2Med project and the Spanish Hydrogen Backbone Network, marking a significant advance in promoting these projects.
- April 11: CINEA opened the call for applications under the CEF-E Programme to fund PCI/PMI projects.
- April 30: the results of the first European Hydrogen Bank auction were announced, in which Spain secured three of the seven winning projects: Catalina, HYSENCIA and El Alamillo H2.
- July 15: the OJEU published the hydrogen and decarbonised gas package alongside the regulation to reduce methane emissions in the energy sector.
- September 18: the European Commission opened the window for submitting candidate projects for the second PCI/PMI list.
- October 22: the German regulator, BNetzA, approved the final plan for Germany's hydrogen network up to 2032. This plan includes a ~9,000 km hydrogen network by 2032, with 56% of it being reconverted. The investment amounted to approximately 19 billion euros, which covers new hydrogen pipelines and collaborating companies, as well as the reconversion of gas pipelines. This network is connected to H2Med via France through Hy-Fen, GRTGaz.
- December 3: the call for the second European Hydrogen Bank auction opened, running until February 20, 2025.

Milestones in Spain

- January 11: the Spanish Parliament ratified the appointment of Enagás as the Provisional Hydrogen Transmission Network Operator (HTNO).
- April 9: the Hydrogen Technology Observatory was established.
- April 29: Enagás submitted its Hydrogen Backbone Network proposal to the Ministry for Ecological Transition and the Demographic Challenge (MITECO).
- July 30: the Council of Ministers authorised Enagás to develop the PCIs.

- September 5: the Ministry for Ecological Transition and the Demographic Challenge began the national transposition of the hydrogen and decarbonised gas package.
- September 24: the Council of Ministers approved the update to the National Energy and Climate Plan (2023-30).
- November 7: a non-binding Call for Interest for the H2Med project was launched. This aims to identify the potential needs and projects of producers, consumers, and traders of renewable hydrogen along the corridor, which is crucial for speeding up the creation of a competitive hydrogen market in Europe.
- December 16: Mibgas launched its renewable hydrogen price index.
- January 30, 2025: publication of the resolution of the CEF-E funding call, with Enagás receiving the full amount requested for studies on the H2med corridor and the initial sections of the Spanish Hydrogen Backbone Network.

Regulatory vision to 2030

In Spain, the 2021-2026 regulatory framework is stable and transparent, and establishes a period of six-years without intermediate revision. This framework supports climate and energy targets by establishing incentives to keep the Gas system infrastructure available, and to fulfil the role assigned by the Spanish National Integrated Energy and Climate Plan for natural gas and renewable gases in the energy transition process. This shows that the use of existing gas infrastructure is essential if advances are to be made in energy transition at the lowest cost.

In 2024, very significant regulatory actions were taken to accelerate the energy transition and highlight the key role of Enagás' infrastructures for Europe's energy security, which will serve to maintain regulatory stability and anticipate the new energy model.

Enagás Transporte was appointed as the provisional hydrogen transmission network operator (HTNO). Royal Decree-Law 8/2023, of December 27, adopting measures to address the economic and social consequences of the conflicts in Ukraine and the Middle East, as well as to alleviate the effects of the drought, making it possible for the natural gas transmission network managers (Enagás Transporte, S.A.U. is the only company currently certified as a Transmission Network Manager in Spain) to exercise development functions of the hydrogen backbone network manager on a provisional basis until the final designation occurs.

Pursuant to Royal Decree-Law 8/2023, on April 29, Enagás submitted a non-binding proposal for the development of the hydrogen backbone infrastructure, projected over the next ten years.

Also in April, the Official Journal of the EU (OJEU) published the list of Projects of Common Interest (PCI) and Projects of Mutual Interest (PMI), which, for the first time, included projects aimed at developing a trans-European hydrogen infrastructure. This list featured the H2 Portugal-Spain-France-Germany corridor (H2med) and the Spanish Hydrogen Backbone Network,

alongside two H₂ storage projects. In the same month, CINEA opened the call for applications under the CEF-E Programme to fund PCI/PMI projects. The first list of Projects of Common Interest (PCI) and Projects of Mutual Interest (PMI) was published in the Official Journal of the European Union, under Delegated Regulation (EU) 2024/1041 of the Commission, dated November 28, 2023. This list includes the following hydrogen infrastructure projects, promoted by Enagás Infraestructuras de Hidrógeno, S.L.U.:

- Portugal-Spain hydrogen interconnector¹⁶.
- Internal hydrogen infrastructure in Spain.
- Spain-France hydrogen interconnector [currently known as 'BarMar']¹⁶.
- Hydrogen storage facilities in Spain include: 9.24.1 'H₂ storage North-1' and 9.24.2 'H₂ storage North-2'.
- The transposition of the Gas&H₂ Package (new Low Hydrocarbons Law, will replace the current Law 34/1998, of October 7, on the hydrocarbons sector) was commenced.

By the end of April, the outcome of the first European Hydrogen Bank auction and the announcement of a second auction represented a significant step towards establishing a European hydrogen market. Out of the seven selected renewable hydrogen production projects, three were located in Spain, with the Catalina project, which involves Enagás Renovable, being particularly noteworthy.

In June, Enagás, GRTgaz, and Teréga, in collaboration with OGE, signed an agreement to jointly develop BarMar, a crucial infrastructure for transporting hydrogen between the Iberian Peninsula and France.

In July, the hydrogen and decarbonised gas package was published in the OJEU. This package includes a Regulation and a Directive that set the framework for integrating these gases into the EU energy system, supporting decarbonisation and ensuring security of supply. This European package establishes the groundwork for creating a hydrogen system across Europe and developing a model for third-party access to hydrogen networks, with a two-year timeframe to incorporate these measures into the national legal framework. The Ministry for Ecological Transition and the Demographic Challenge has already begun this process by launching a preliminary public consultation in September 2024 to gather input from various stakeholders.

On August 14, 2024, the Spanish Secretary of State for Energy issued a Resolution that published the Council of Ministers' Agreement from July 30, 2024. This agreement authorises Enagás Infraestructuras de Hidrógeno, S.L.U., to provisionally carry out the development of Projects of Common European Interest in Hydrogen Networks. Developing these PCI infrastructure projects includes applying for authorisation, constructing, commissioning, operating, monitoring, and maintaining hydrogen pipelines and underground storage facilities.

On September 24, Royal Decree 986/2024 was published, approving the updated National Integrated Energy and Climate Plan 2023-2030 (PNIEC). This plan incorporates the EU's heightened climate ambitions, supports the ecological transition outlined in the Recovery, Transformation, and Resilience Plan (PRTR), and includes other national advancements, as well as geopolitical changes stemming from the war in Ukraine (REPowerEU). The PNIEC update lays a stronger focus on renewable hydrogen and its network infrastructures to achieve these goals.

- Increase installed electrolyser capacity to 12 GW by 2030.
- Replace 74% of the current grey hydrogen usage in industry and contribute 3.56% of renewable fuels of non-biological origin (RFNBO) in the transport sector.
- Support the development of the Iberian H₂med hydrogen corridor, backed by the governments of Spain, Portugal, France, and Germany, which includes a new measure (Measure 4.12).

H₂med is envisaged as the first major green corridor connecting the Iberian Peninsula with the rest of Europe. Set to be operational by 2030, it is expected to transport 2 million tonnes of green hydrogen per year from Spain, accounting for 10% of the EU's total consumption. By 2050, it is estimated that renewable hydrogen will make up 20% of all energy in Europe. The backbone network aims to link green hydrogen production centres on the Iberian Peninsula with domestic hydrogen demand, prioritising national coverage. H₂med includes two cross-border infrastructures: one connecting Celorico da Beira (Portugal) to Zamora, known as CelZa, and another undersea link between Barcelona and Marseille (France), called BarMar.

These projects have been designated as projects of common interest for the European internal market (PCI) in the first list published under Delegated Regulation (EU) 2024/1041, as they are seen as crucial for enhancing and enabling international infrastructure.

In November, the H₂med Call for Interest was launched, with the results to be published in February 2025. During the same month, submissions for candidate projects for the second PCI/PMI list opened.

Meanwhile, on September 24, the Council of Ministers approved the Draft Bill to re-establish the National Energy Committee (CNE), which was sent to the Congress of Deputies to continue its legislative process as a Bill. The aim of re-establishing the CNE is to enhance the regulator's institutional capacity at a critical time for the energy transition. This move addresses the increasing demand for specialisation and efficiency due to the new energy and regulatory landscape. It also supports decarbonisation and the creation of new markets, such as hydrogen, thereby boosting economic competitiveness. This enhancement of the regulator's role is crucial for the development of hydrogen. As a result, the draft bill assigns it significant responsibilities, such as developing the remuneration and tariff frameworks.

¹⁶ Enagás acts as the promoter of this project in consortium with other European TSOs.

In 2024, the procedures to establish the remuneration framework for the 2027-2032 period have commenced, including revising the following circulars. In 2025, the following circulars will be processed:

- Proposed Circular amending Circular 9/2019 of December 12, establishing the methodology for determining the remuneration of natural gas transmission and liquefied natural gas plants.
- Proposed Circular to establish the financial remuneration rate for regasification, transportation, technical system

management, and activities related to natural gas distribution for the 2027-2032 regulatory period, in line with Circular 2/2019.

- Proposed Circular to amend Circular 4/2020, of March 31, which sets out the remuneration methodology for natural gas distribution.
- Proposed Circular establishing the methodology for the calculation of tolls for transmission, local networks and regasification of natural gas.

ENVIRONMENTAL INFORMATION



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DISCLOSURE OF INFORMATION UNDER ARTICLE 8 OF REGULATION (EU) 2020/852 (TAXONOMY REGULATION)

In the framework of the EU Sustainable Finance Action Plan, the EU Taxonomy for Sustainable Activities was developed ([Regulation 2020/852](#) and associated legislation¹⁷). It aims to establish criteria for determining whether an activity is considered environmentally sustainable for the purpose of determining the degree of environmental sustainability of an investment and to facilitate the use of a common concept of socially sustainable investment by Member States and the European Union.

In the various associated Delegated Regulations, technical selection criteria have been established to determine the conditions under which an economic activity is considered to contribute substantially to environmental objectives: climate change mitigation, adaptation to climate change, sustainable use and protection of water and marine resources, transition to a circular economy, prevention and control of pollution, and protection and restoration of biodiversity and ecosystems.

In addition, the European Commission has published several communications on the interpretation of the legal provisions (FAQs) included in the delegated regulations, which have contributed to the interpretation of the implementing legislation. However, the current regulatory framework is under development, which implies a continuous review of the criteria and methodologies established by the company to respond to the established requirements.

Eligibility and alignment concepts

An activity is considered eligible when it has the potential to substantially contribute to the corresponding environmental target, while an activity is considered aligned when it additionally meets the criteria of substantial contribution, do no significant harm (DNSH) and the minimum social safeguards set out in the taxonomy regulation, which ensure that the activity is carried out in compliance with characteristics that ensure a contribution to the environmental targets set by the European Union.

Assessment of the eligibility of Enagás' activities

Since 2021, Enagás has been assessing the eligibility of its activities regarding the mitigation and adaptation to climate change targets. Since 2023, in line with the reporting requirements, Enagás also assesses the eligibility of its activities regarding the other four environmental targets.

As a result of this assessment, Enagás has identified eligible activities that have the potential to contribute to three of the environmental targets covered by the EU Taxonomy:

Mitigation and climate change adaptation

They correspond to activities associated with the area of renewable gases: mainly the adaptation of infrastructure to be able to transport these renewable gases, to the construction of hydrogen transmission and distribution pipelines and hydrogen storage (see disclosure requirement [SBM-1](#) in chapter 2).

- **Activity 4.14 CCM. Transmission and distribution networks for renewable and low-carbon gases:** Enagás, an independent European TSO, is an international benchmark in the development and maintenance of gas infrastructures and the operation and management of gas networks. In addition, since December 2023, Enagás has been designated as Provisional Hydrogen Transmission Network Operator (HTNO) in Spain and in 2024 it has been authorised to provisionally exercise the functions of developing European Projects of Common Interest (PCI) for hydrogen networks.

For all these reasons, and in line with one of the growth drivers of the 2025-2030 Strategic Update, Enagás is working on the renewal of gas transmission and distribution infrastructures to promote the integration of hydrogen and other low-carbon gases and on the construction of new transmission and distribution networks for hydrogen and other low-carbon gases.

- **Activity 4.12 CCM. Storage of hydrogen:** Enagás has three underground natural gas storage facilities. In line with one of the growth drivers of the 2025-2030 Strategic Update, Enagás is currently working on the conversion of these infrastructures into hydrogen storage facilities and the construction of new facilities.
- **Activity 6.15 CCM. Infrastructure enabling road transport and public transport:** Enagás' subsidiary Scale Gas has a 700 bar HRS (Hydrogen Refuelling Station) with the capacity to supply hydrogen-powered electric vehicles in Madrid (Spain). This activity is eligible, as the hydrogen refuelling station is considered to be an infrastructure for the circulation of vehicles with zero CO₂ exhaust emissions.

¹⁷[Regulation \(EU\) 2021/2139. Delegated Regulation \(EU\) 2021/2178. Delegated Regulation \(EU\) 2022/1214. Delegated Regulation \(EU\) 2023/2485 and Delegated Regulation \(EU\) 2023/2486.](#)

- Activity 4.1 CCM. Power generation using solar photovoltaic technology: Enagás considers eligible projects aimed at generating electricity through photovoltaic panels for self-consumption at some of its facilities, thus improving energy efficiency and reducing greenhouse gas emissions.
- Activity 3.10 CCM. Manufacture of hydrogen: Enagás considers as eligible the renewable hydrogen manufacture projects for self-consumption that it develops at some of its facilities, thus enabling the improvement of energy efficiency and the reduction of greenhouse gas emissions.
- Activity 7.3 CCM. Installation, maintenance and repair of energy efficient equipment: Enagás considers projects for the installation and replacement of energy-efficient light sources as eligible.
- Activity 7.4 CCM. Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings): Enagás considers projects to install charging stations for electric vehicles in its facilities' parking spaces to be eligible.
- Activity 8.1 CCM. Data processing, hosting and related activities: Enagás considers projects for the renovation of storage arrays at Enagás' data centres to be eligible.
- Activity 8.2 CCM. Data-driven solutions for GHG emissions reductions: Enagás considers the company's carbon footprint digitalisation and modelling project to be eligible as it is based on the collection, transmission and storage of data, as well as its modelling and use, which will enable the company to reduce its greenhouse gas emissions.

Transition to a circular economy

- Activity 3.3 EC. Demolition and wrecking of buildings and other structures: Enagás holds that the project to seal off and permanently abandon the Castor underground gas storage wells is eligible, as it forms part of the above-mentioned underground storage dismantling project. All of the above is in accordance with the 'demolition of wells and boreholes' activity included in the description of the activity. Although this infrastructure does not form part of the Enagás Group, the Spanish Ministry for Ecological Transition and the Demographic Challenge appointed Enagás Transporte S.A.U. to carry out this activity¹⁸. The demolition of buildings at risk of collapse at our facilities is also eligible.

Once the eligible economic activities were identified, for each of them, the projects implemented during the year were identified.

Assessment of the alignment of Enagás' activities

Enagás has analysed the alignment of its activities that contribute to the objective of climate change mitigation and those activities that also contribute to the objective of transition to a circular economy.

To assess alignment, it has been analysed whether eligible projects comply with the criteria of substantial contribution defined in the Delegated Regulation (EU) 2021/2139: technical selection criteria that do not cause significant harm to any of the other environmental objectives and comply with the established minimum social safeguards.

In order to assess compliance with the requirements set out by the Taxonomy, Enagás has assessed its existing policies, procedures and processes at a corporate level, as well as detailed documentation at project level.

In assessing the substantial contribution criteria of Taxonomy activities aligned with the climate change mitigation target:

- In the activities 4.14 CCM. Transmission and distribution networks for renewable and low-carbon gases and 4.12 CCM. Storage of hydrogen. Documents such as the technical reports of the projects have been assessed to ensure that the nature of the projects under consideration complies with the nature of the activity itself, which is the main requirement for assessing compliance.
- Activity 6.15 CCM. Infrastructure enabling road transport and public transport, part of the work of our subsidiary Scale Gas, also meets the criteria, as it is related to enabling hydrogen refuelling stations.
- Activity 4.1 CCM. Power generation using solar photovoltaic technology. It fulfils the criteria, as it is linked to the operation of solar panels to generate electricity for self-consumption.
- In relation to the projects associated with the activity 3.10 CCM. Manufacture of hydrogen. It should be noted that these consist of hydrogen production for self-consumption. For these projects, the EU Taxonomy regulations requires threshold requirements to ensure greenhouse gas emission reductions. Although Enagás has included requirements in the investment plan to ensure that the design of the hydrogen manufacturing process complies with the thresholds established by the technical criteria to ensure the reduction of greenhouse gas emissions, given that these have not yet been implemented, it is not possible to verify compliance with the technical criteria. Therefore, projects belonging to this activity are not considered to be aligned.

¹⁸ [Resolution of November 6, 2019, of the Secretary of State for Energy, publishing the Agreement of the Council of Ministers of October 31, 2019, which ends the hibernation of the 'Castor' underground storage facility.](#)

[agreeing to their dismantling and ordering the sealing and definitive abandonment of the wells.](#)

- Activity 7.3 CCM. Installation, maintenance and repair of energy efficient equipment meets the requirements since the installed light sources are energy efficient according to the applicable regulations.
- Also, activity 7.4 CCM. Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings), meets the criteria as well, as it is linked to the installation of charging stations.
- In relation to the projects of activity 8.1 CCM. Data processing, hosting and related activities: it has not been possible to obtain independent third-party verification of whether the project to renovate the storage arrays at Enagás' data centres has applied all pertinent practices to comply with the technical selection criterion of substantial contribution to the mitigation of climate change. Therefore, the project pertaining to this activity is considered non-aligned.
- The project is eligible under Activity 8.2 CCM. Data-driven solutions for GHG emissions reductions. It is currently in a very early stage, so it has not yet been possible to verify if the solution has reduced greenhouse gas emissions. No independent third party has yet been asked to calculate and verify life-cycle greenhouse gas emissions.

In assessing the substantial contribution criteria of Taxonomy activities according to the transition to a circular economy target:

- According to Activity 3.3 CE. Demolition and wrecking of buildings and other structures: there is a demolition project for a building at risk of collapse at our facilities (at the Cartagena LNG regasification terminal). Although there was a waste management plan, a prior external audit was not carried out in accordance with the Construction and Demolition Waste Protocol in the EU, considering it non-aligned for not complying with the technical selection criterion mentioned above. Likewise, the project for the sealing and definitive abandonment of the Castor underground gas storage wells is still at a very early stage, with a waste management plan aligned with the technical selection criteria and in line with the fulfilment of the rest of the requirements in the next phases.

Do no significant harm criteria (DNSH)

Compliance with the do no significant harm (DNSH) to the other objectives criteria is assessed below for eligible activities that meet the substantial contribution criteria:

- 4.14 CCM. Transmission and distribution networks for renewable and low-carbon gases:
 - Climate change adaptation: Enagás has a physical climate risk analysis for its current infrastructures. Where applicable, it also has control and management measures in place to mitigate these (for more information, see disclosure requirement IRO-1 in chapter E1).

For new construction projects, these are currently at a very early stage. However, Enagás is preparing initial project documents which already include specific analyses of the vulnerability of projects to climate-related hazards.

- Sustainable use and protection of water and marine resources and protection and restoration of biodiversity and ecosystems: existing facilities with significant environmental impacts have integrated environmental authorisations or environmental licences, in accordance with the environmental requirements set by the relevant authorities. In order to obtain these authorisations, Enagás carried out studies to assess potential impacts, establishing (where applicable) measures to avoid, mitigate and/or compensate for these negative impacts. In addition, in the event of significant modifications to existing facilities, the procedure provides for new impacts to be assessed and measures to be taken.

The company also has an ISO 14001 certified environmental management system and a natural capital and biodiversity management model.

For new construction projects, these are currently at a very early stage. However, Enagás is preparing initial project documents in which the projects' environmental impact is already being assessed. Corresponding Environmental Impact Assessments will be carried out in the coming years with more exhaustive assessments.

- Transition to a circular economy: not applicable.
- Pollution prevention and control: Enagás has an ISO 50001-certified Energy Management System and has established energy efficiency criteria in its equipment procurement requirements via their technical specifications.

This criterion is not yet applicable to new construction projects as it corresponds to criteria to be applied in the Detailed Engineering phase, at which point the equipment characteristics (including energy efficiency) will be assessed.

- 4.12 CCM. Storage of hydrogen:
 - Climate change adaptation: Enagás has a physical climate risk analysis for its current infrastructures. Where applicable, it also has control and management measures in place to mitigate these (for more information, see disclosure requirement IRO-1 in chapter E1).

For new construction projects, these are currently at a very early stage. However, Enagás is preparing Initial Project Documents which already include specific analyses of the vulnerability of projects to climate-related hazards.

- Sustainable use and protection of water and marine resources: not applicable.
- Transition to a circular economy: the company has an ISO 14001-certified environmental management system and takes specific actions in the field of circular economy. Likewise, each project has its own waste management plan. In addition, Enagás Transporte S.A.U obtained the 'Zero Waste' certification in accordance with AENOR's specific regulations, which recognises the company's progress in maximising the volume of waste recycled or recovered, as well as minimising the waste generated.
- Pollution prevention and control: this criterion is not yet applicable as it corresponds to criteria to be applied in later phases, such as the detailed engineering phase, where the control of risks inherent to major accidents involving hazardous materials will be assessed.
- Protection and restoration of biodiversity and ecosystems: current facilities with significant environmental impacts have integrated environmental authorisations or environmental licences, in accordance with the environmental requirements set by the relevant authorities. In order to obtain these authorisations, Enagás carried out studies to assess potential impacts, establishing (where applicable) measures to avoid, mitigate and/or compensate for these negative impacts. In addition, in the event of significant modifications to existing facilities, the procedure provides for new impacts to be assessed and measures to be taken.

The company also has an ISO 14001 certified environmental management system and a natural capital and biodiversity management model.

For new construction projects, these are currently at a very early stage. However, Enagás is preparing initial project documents in which the projects' environmental impact is already being assessed. Corresponding environmental impact assessments will be carried out in the coming years with more exhaustive assessments.

- 6.15 CCM. Infrastructure enabling road transport and public transport:
 - Climate change adaptation: Enagás has a physical climate risk analysis for its current infrastructures. Where applicable, it also has control and management measures in place to mitigate these (for more information, see disclosure requirement IRO-1 in chapter E1).
 - An environmental report was prepared during the installation phase of the hydrogen supply unit. It assessed the environmental impact on the sustainable use and protection of water and marine resources, the transition to a circular economy, pollution prevention and control, and the protection and recovery of biodiversity and ecosystems. The report also outlined the necessary corrective measures.

• 4.1 CCM. Power generation using solar photovoltaic technology:

- Climate change adaptation: Enagás has a physical climate risk analysis for its current infrastructures. Where applicable, it also has control and management measures in place to mitigate these (for more information, see disclosure requirement IRO-1 in chapter E1).
- Sustainable use and protection of water and marine resources: not applicable.
- Transition to a circular economy: in the power generation projects using solar photovoltaic technology at company facilities, equipment has been purchased whose technical specifications show that it meets the criteria of high durability and recyclability and that it is easy to dismantle and refurbish.
- Pollution prevention and control: not applicable.
- Protection and restoration of biodiversity and ecosystems: current facilities with significant environmental impacts have integrated environmental authorisations or environmental licences, in accordance with the environmental requirements set by the relevant authorities. In order to obtain these authorisations, Enagás carried out studies to assess potential impacts, establishing (where applicable) measures to avoid, mitigate and/or compensate for these negative impacts. In addition, in the event of significant modifications to existing facilities, the procedure provides for new impacts to be assessed and measures to be taken.

The company also has an ISO 14001 certified environmental management system and a natural capital and biodiversity management model.

• 7.3 CCM. Installation, maintenance and repair of energy efficient equipment:

- Climate change adaptation: Enagás has a physical climate risk analysis for its current infrastructures. Where applicable, it also has control and management measures in place to mitigate these (for more information, see disclosure requirement IRO-1 in chapter E1).
- Sustainable use and protection of water and marine resources: not applicable.
- Transition to a circular economy: not applicable.
- Pollution prevention and control: the light sources installed are certified as energy efficient.
- Protection and restoration of biodiversity and ecosystems: not applicable.

- 7.4 CCM. Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings):
 - Climate change adaptation: Enagás has a physical climate risk analysis for its current infrastructures. Where applicable, it also has control and management measures in place to mitigate these (for more information, see disclosure requirement IRO-1 in chapter E1).
 - Sustainable use and protection of water and marine resources: not applicable.
 - Transition to a circular economy: not applicable.
 - Pollution prevention and control: not applicable.
 - Protection and restoration of biodiversity and ecosystems: not applicable.
- 3.3. EC. Demolition and wrecking of buildings and other structures:

In relation to the project to seal and definitively abandon the Castor underground gas storage wells, which meets the criteria for substantial contribution depending on the stage of the project:

- In terms of climate change mitigation, the removal of waste that contributes to climate change is not anticipated due to the nature of the installation, thereby complying with Regulation (EU) No. 517/2014 and Regulation (EU) No. 1005/2009.
- Climate change adaptation: Enagás has a physical climate risk analysis for its current infrastructures. Where applicable, it also has control and management measures in place to mitigate these (for more information, see disclosure requirement IRO-1 in chapter E1).
- Sustainable use and protection of water and marine resources, pollution prevention and control and protection and restoration of biodiversity and ecosystems: this project has an integrated environmental statement issued by the Spanish Government's Directorate General for Environmental Quality and Assessment, which establishes the actions to be implemented by Enagás to minimise, mitigate and/or avoid negative impacts on the indicated environmental aspects.

Minimum safeguards

The Taxonomy Regulation requires the company to carry out its activities in compliance with minimum safeguards in terms of human rights, corruption prevention, proper tax management and respect for fair competition. The different mechanisms that the company has in place to ensure compliance with these requirements are set out below.

- Human rights: Enagás has a Human Rights Policy, which includes the necessary commitments to ensure human rights due diligence (see disclosure requirement S1-1 for more information). This policy commits to developing and maintaining a due diligence system aimed at anticipating, preventing, mitigating, and/or remedying negative impacts on people (both its own workforce and those in the value chain), the environment, and society.

Enagás also facilitates its employees, as well as its suppliers, contractors and those who collaborate with it or act on its behalf, including business partners, to resolve any doubts or to report any irregularities or breaches through the Whistleblowing Line (canal.etico@enagas.es) or any other means the company may set up in the future. The complainant receives updated information of the status of their report at all times (for more information on the Whistleblowing Line, see disclosure requirement G1-1).

Communications to the Line can be made anonymously and are handled confidentially. This means they cannot be disclosed to the user or any third party without the informant's consent, ensuring the protection of the whistleblower's identity. Enagás will not tolerate any form of retaliation against individuals who, in good faith, use the Whistleblowing Line to raise concerns or report potential breaches of the Code of Ethics or relevant regulations, nor against those who assist in investigations into alleged misconduct.

- Corruption: Enagás has a corporate Code of Ethics and various policies, all approved by the Board of Directors, related to business conduct issues (for more information, see disclosure requirement G1-1):
 - Enagás Group's Code of Ethics: establishes the conduct that is expected from all the professionals in the company, irrespective of their responsibilities and their geographic or functional location. It is structured in accordance with the company's values and includes Enagás' principles in matters related to each of its values.
 - Anti-Fraud, Corruption and Bribery Policy: this Policy reflects the vehement opposition to the committing of illicit or unlawful acts and its firm will to combat and prevent them, for the purpose of fulfilling its 'zero tolerance' principles. This policy is aligned with the United Nations Convention against Corruption.

In relation to the prevention and detection of corruption and bribery (for more information, see disclosure requirement G1-3), all of the company's activities have been assessed with respect to potential corruption risks. The company has a control framework in place to prevent and mitigate such risks, especially the risk of corruption in dealings with public officials or other third parties with which Enagás works. In this context, Enagás has established clear guidelines for action: to accurately record all payments to third parties and not to accept or make inappropriate payments, such as facilitation payments, payments in kind or commissions, or advantages or privileges of any kind for unethical purposes. These measures also contribute to the prevention of potentially more serious acts, such as money laundering. Of course, in order to avoid any appearance of money laundering, both the offer and the acceptance of payments in cash or equivalent are expressly prohibited. Enagás pays special attention to suspicious payments from third parties, such as payments by bearer cheques, payments in currencies other than agreed currencies, payments from persons or entities domiciled in non-cooperative jurisdictions under current Spanish tax law, payments from entities where it is not possible to identify the parties or the final beneficiaries, among others.

Enagás also collaborates with the authorities if they require help to investigate possible cases in the markets in which Enagás operates. It also provides the information they may request in a transparent manner.

The Enagás Corruption Prevention Programme is based on the ISO 37001 standard on anti-bribery management systems, and is laid out in the Enagás Anti-Fraud, Corruption and Bribery Policy, and the internal regulations which implement it.

- Taxation: Enagás adopts a focus of responsible tax practice based on prudence and aligned with the recommendations set out in the OECD Guidelines for Multinational Enterprises.

The Responsible Tax Practice Policy, approved by the Board of Directors, sets out the strategy and principles that must guide the conduct of all employees, senior managers and directors of Enagás, as well as third parties with whom the company has relationships.

Enagás adheres to the Code of Good Tax Practices, and presents a Fiscal Transparency Report in line with the company's commitment to tax transparency. The Board of Directors reviews and approves this report on an annual basis.

Moreover, in accordance with the public reporting commitments set out in the Fiscal Policy, the company publishes in this report the total tax contribution and the taxes paid in the different jurisdictions where the company operated through affiliates.

With regard to non-cooperative jurisdiction under current Spanish tax laws, and in accordance with the Fiscal Policy, Enagás does not use opaque structures in order to reduce its tax burden, nor does it carry out artificial operations not linked to its business activity to reduce taxation. Likewise, it will not make investments in or through territories classified as non-cooperative jurisdiction under current Spanish tax laws in order to reduce its tax burden. The Enagás Group does not currently have a presence or carry out any activities in territories classified as non-cooperative jurisdiction under current Spanish tax laws.

- Fair competition: as part of the company's Compliance Management System, Enagás has implemented an Antitrust Programme whose purpose is not only to avoid or reduce any possible administrative sanctions in this issue, but also to promote a corporate culture of ethics and compliance that respects the regulations that defend free competition. The pillars of the Antitrust Programme are:
 - The Antitrust Policy establishes the bases and mechanisms to promote a culture of business ethics that is conscious and respectful of the principles of free competition, and sets out the essential guidelines for corporate and employee behaviour in this regard.
 - The Antitrust General Standard describes in a structured manner the elements that Enagás has established for the prevention, detection and management of risks, in order to comply with the provisions of antitrust regulation and to achieve the company's strategic and operational goals and objectives where Compliance is concerned.

This Standard is aligned with the recommendations in this area of the National Commission on Markets and Competition. To this end, the main purpose of the Standard is to structure an environment of prevention, detection and early management of antitrust risks, as well as to reduce any undesired effects in the event that they do materialise, contributing to the creation of a culture of ethics and respect for the law among all professionals in all applicable areas, so that all can reflect it in their daily conduct.

In 2023, Enagás approved a guide to best practices in antitrust matters. This has been made available to all professionals; it enables them to prevent, detect and react in a timely manner to conduct likely to be anti-competitive or generate liability for the company in its relations with other economic operators and/or affect its reputation. In addition, antitrust training courses have been held for those employees considered to be at a higher risk in this area.

Calculation of key performance indicators

The identification of the key performance indicators for the projects associated with the taxonomic activities has been carried out after the closure of the annual accounting consolidation. Projects have been identified for accounting purposes by project code, thus eliminating the potential risk of double counting. In the analysis of the Enagás Group's key indicators 'Total (A+B)'; transactions between Enagás Group companies have not been considered.

Based on the organisation's existing formal accounting and consolidation procedures, the different economic indicators detailed in the Taxonomy Regulation have been calculated and prepared, taking into account the considerations detailed below.

As for the denominator, the following information relates to eligibility and alignment.

- Turnover: revenues from regulated and non-regulated activities and other operating revenues of the Enagás Group (See '[Note 2.1.a. Operating profit, Income](#)' of the Consolidated Annual Accounts).
- CapEx: investments in material and intangible fixed assets of the Enagás Group, discounting the effect of the IFRS16 accounting regulations (sum of the additions of material fixed assets in '[Note 2.4. Property, plant and equipment, Supplementary information on IFRS16](#)' and additions of intangible fixed assets in '[Note 2.5. Intangible fixed assets](#)', discounting the additions by IFRS16 of '[Note 2.4. Property, plant and equipment, Supplementary information on IFRS16](#)' in the Consolidated Annual Accounts). No business combinations have taken place in the last three financial years.

- OpEx: non-capitalised direct costs that relate to research and development, building renovation measures, short-term leases, maintenance and repairs and other direct expenses related to the day-to-day maintenance of property, plant and equipment assets by the company or a third party to whom activities are outsourced and that are necessary to ensure the continued effective operation of such assets. Wages and salaries of personnel involved in the maintenance of the facilities related to the identified activities have not been included as it is not possible to separate them at the accounting level.

Regarding the numerator:

- Eligible and aligned: information related to projects that conform with the description of activities included in the taxonomy and comply with substantial contribution criteria, principles of no significant harm to other objectives (DNSH) and minimum social safeguards:
 - Turnover: revenues from regulated and non-regulated activities and other operating revenues associated with economic activities that conform to the taxonomy.
 - CapEx: all allocations during the year to identified project assets associated with economic activities that conform to the taxonomy and those investments that are part of a plan to expand economic activities that conform to the taxonomy or to enable taxonomy-eligible economic activities to conform to the taxonomy. All this without taking into account amortisation, depreciation or value adjustments. CapEx is the consolidation of the investments allocated to the projects assessed; it is determined using the company's accounting systems, reflecting the amounts recorded in the investment work orders for the goods and services needed for the projects to achieve their full scope¹⁹.
 - OpEx: includes operating expenses associated with economic activities that conform to the taxonomy, specifically research and development and maintenance expenses. OpEx is the consolidation of operating expenses that meet the criteria set out in applicable regulations, allocated to the projects analysed, and is determined using the company's accounting systems to reflect the amounts recorded in the work orders.

The criteria applied for each activity are detailed below:

- Activity 4.14 CCM. Transmission and distribution networks for renewable and low-carbon gases:
 - Turnover: this includes revenues generated from the transmission of hydrogen and other low-carbon gases are allocated here. For 2024, revenues from biomethane connection studies at Enagás Transporte S.A.U. are included.

- CapEx: this includes additions to assets related to the renewal of gas transmission and distribution infrastructures to facilitate the integration of hydrogen (including the necessary auxiliary equipment) and other low-carbon gases and the construction of new transmission and distribution networks for hydrogen or other low-carbon gases by the companies Enagás Transporte S.A.U., Enagás S.A., Enagás Infraestructuras de Hidrógeno, S.L. and Enagás Transporte del Norte S.L. It also includes investment in the studies and research required to adapt the infrastructures.

In line with the taxonomy, for those investments related to the replacement of auxiliary equipment to support hydrogen transmission, only the proportional volume of the investment that is related to the transmission capacity of hydrogen and low-carbon gases is considered.

In relation to projects for the construction of new hydrogen transmission networks, Enagás has an investment plan for 2030 in line with its strategy, and has therefore considered investment in these assets despite their initial nature, as they will be aligned by then.

- OpEx: this includes research and development expenses related to the activities of Enagás Transporte, S.A.U.
- Activity 4.12 CCM. Storage of hydrogen:
 - Turnover: this includes revenues generated from hydrogen storage. There is no income from this activity in 2024, as it has not yet started.
 - CapEx: this includes additions to assets related to the conversion of these infrastructures into hydrogen storage facilities and the construction of other hydrogen storage facilities of Enagás Transporte S.A.U. Investment in studies and research necessary for the development of the activity is also included.

In line with the taxonomy, for those investments related to the retrofitting of auxiliary equipment to support hydrogen storage, only the proportional volume of the investment that is related to the storage capacity of hydrogen and low-carbon gases is considered.

- OpEx: there were no operating expenses associated with this activity during 2024.

¹⁹ To calculate CapEx in the 2023 report, the figure obtained in the forecast amount for year N-1 was reduced; it was then increased in the investment forecast for year N, if applicable and provided for. In 2024, in order to ensure consistency in the calculation methodology for the key performance indicators of the Taxonomy Regulation and the CapEx indicator in the financial statements, forecasts were no longer taken into account. As a result of this change, the information for the previous year has been recalculated: Indicator: 2023 CapEx: A.1 Environmentally sustainable activities (conforming to the taxonomy): Activity 4.14 Transmission and distribution networks for renewable and low-carbon gases: 3,506,484 euros, revised figure for comparison:

3,538,518 euros; Activity 4.12 Storage of hydrogen: figure reported in the previous year: 1,186,401 euros, revised figure for comparison: 1,469,452 euros; Activity 4.1 Power generation using solar photovoltaic technology: figure reported in the previous year: 908,974 euros, revised figure for comparison: 890,1662 euros; Activity 7.4 Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings); figure reported in the previous year: 115,781 euros, revised figure for comparison: 49,887 euros.

- Activity 6.15 CCM. Infrastructure enabling road transport and public transport:
 - Turnover: revenue generated by the HRS (Hydrogen Refuelling Station) of the company Scale Gas Solutions, S.L.²⁰ is allocated here. This corresponds to the invoicing issued to customers under existing contracts.
 - OpEx: there were no additions to assets associated with this activity during 2024.
 - OpEx: this includes HRS operating expenses. The following items are included: repairs, maintenance and spare parts.
- Activity 4.1 CCM. Power generation using solar photovoltaic technology:
 - Turnover: the electricity generated is self-consumed at the company's facilities, and there is no income from this activity.
 - CapEx: this includes additions in assets related to solar photovoltaic technology that enable power generation by the companies Enagás Transporte S.A.U. and Efficiency for LNG Applications, S.L.
 - OpEx: this includes operating expenses associated with the maintenance and repair of photovoltaic power generation assets.
- Activity 7.4 CCM. Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings):
 - Turnover: the charging service for electric vehicles is for the company's vehicle fleet and for employees' vehicles, and there is no income from this activity.
 - CapEx: this includes additions to assets related to the installation of charging stations at Enagás Transporte S.A.U. facilities.
 - OpEx: this includes operating expenses associated with the maintenance and repair of charging stations for electric vehicles. There were no operating expenses associated with this activity during 2024.
- Activity 7.3 CCM. Installation, maintenance and repair of energy efficient equipment:
 - Turnover: this project involves installing energy-efficient lighting in our facilities, with no income generated from this activity.
 - CapEx: this includes additions to assets related to the installation of lighting sources by Enagás Transporte S.A.U.
 - OpEx: this includes the operating costs related to the installation of these lighting sources. There were no operating expenses associated with this activity during 2024.
- Activity 3.3 EC. Demolition and wrecking of buildings and other structures:

In relation to the project for the sealing and definitive abandonment of the Castor underground gas storage wells:

 - Turnover: Given the nature of the project, this is the allocation of the expense incurred in the year (OpEx without considering taxonomy criteria) applying an industrial margin.
 - CapEx: given the nature of the project, there are no additions to related assets.
 - OpEx: operating expenses for the sealing and definitive abandonment of the Castor underground gas storage wells of Enagás Transporte S.A.U., mainly dismantling work.
- Eligible and non-aligned: information relating to projects that fit the description of the activities included in the taxonomy, but after assessment are deemed not to comply with the criteria of substantial contribution or the principles of do no significant harm (DNSH) to other goals.
 - Activity 3.10 CCM. Manufacture of hydrogen: as these are projects in development that have not yet been launched, it is not possible to verify their technical requirements; consequently, compliance with the established thresholds cannot be guaranteed. Therefore, all projects are considered eligible but non-aligned.
 - Turnover: the renewable hydrogen generated will be self-consumed at the company's facilities, and there is no income from this activity.
 - CapEx: this includes additions in assets related to the renewable hydrogen production activity for self-consumption.
 - OpEx: this includes operating expenses associated with the maintenance and repair of the renewable hydrogen production assets. There were no operating expenses associated with this activity during 2024.
 - Activity 8.1 CCM. Data processing, hosting and related activities: it has not been possible to obtain independent third-party verification of whether the project to renovate the storage arrays at Enagás' data centres has applied all pertinent practices to comply with the technical selection criterion of substantial contribution to the mitigation of climate change. Therefore, the project pertaining to this activity is considered non-aligned.
 - Turnover: as this is an internal data centre, there is no revenue from this activity.
 - CapEx: this includes additions to assets related to the refurbishment of storage arrays at Enagás' data centres.
 - OpEx: this includes operating expenses of the activity associated with the storage of data using data centres.

²⁰ In line with the provisions of disclosure requirement BP-1 on the scope of financial and non-financial information, the financial information of this company is included.

There were no operating expenses associated with this activity during 2024.

- Activity 8.2 CCM. Data-driven solutions for GHG emissions reductions: given the early stage of the project, it has not yet been possible to verify whether the solution has reduced greenhouse gas emissions or to have an independent third party calculate and verify life cycle greenhouse gas emissions. Therefore, the project pertaining to this activity is considered non-aligned.
 - Turnover: as this is a data-driven solution for internal use, there is no revenue from this activity.
 - CapEx: includes costs associated with the development of data-driven solutions.
 - OpEx: this includes operating expenses for the development of the solution. There were no operating expenses associated with this activity during 2024.

- Activity 3.3 EC. Demolition and wrecking of buildings and other structures:

In relation to the project to demolish a building at the Enagás facilities at risk of collapse:

- Turnover: this involves the demolition of a building at the facilities of Enagás Transporte SAU. No income is derived from this activity.
- CapEx: additions to assets related to the demolition project.
- OpEx: there were no operating expenses associated with this project during 2024.

Details of the key performance indicators in the framework of the European Taxonomy for Sustainable Activities are given below.

Absolute turnover

Fiscal year 2024		Year		Substantial contribution criteria						No significant harm criteria ('Does not cause significant harm')							Proportion of taxonomy-aligned (A.1) or -eligible (A.2) turnover, year 2023		Category (enabling activity) / Category (transitional activity)	
Economic activities	Code(s) ⁽¹⁾	Absolute turnover	Proportion of turnover	Climate change mitigation	Climate change adaptation	Water and marine	Pollution	Circular economy	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity and ecosystems	Minimum safeguards	%	F	T	
		Currency (€)	%	Y; N;	Y; N;	Y; N;	Y; N;	Y; N;	Y; N;	(Y/N)	(Y/N)	(Y/N)	(Y/N)	(Y/N)	(Y/N)	(Y/N)				
Text																				
A. TAXONOMY-ELIGIBLE ACTIVITIES																				
A.1 Environmentally sustainable activities (Taxonomy-aligned)																				
Power generation using solar photovoltaic technology	4.1 CCM	0	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%			
Storage of hydrogen	4.12	0	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	F		
Transmission and distribution networks for renewable and low-carbon gases	4.14	60,000	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%			
Infrastructure enabling road transport and public transport	6.15 CCM	119,613	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	F		
Installation, maintenance and repair of energy efficient equipment	7.3 CCM	0	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	F		
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	7.4 CCM	0	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	F		
Demolition and wrecking of buildings and other structures	3.3 CE	15,252,977	1.7%	N/EL	N/EL	N/EL	N/EL	EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%			
Turnover of environmentally sustainable activities		15,432,590	1.7%	0.0%	0.0%	0.0%	0.0%	1.7%	0.0%	Y	Y	Y	Y	Y	Y	Y	0.01%			
(Taxonomy-aligned) (A.1)																				
Of which: facilitators		119,613	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	Y	Y	Y	Y	Y	Y	Y	100%	F		
Of which: transitional		0	0.0%	0.0%						Y	Y	Y	Y	Y	Y	Y	0.0%		T	
A.2. Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																				
Manufacture of hydrogen	3.10 CCM / 3.10 CCA	0	0.0%	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%			
Power generation using solar photovoltaic technology	4.1 CCM / 4.1 CCA	0	0.0%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%			
Data processing, hosting and related activities	8.1 CCM / 8.1 CCA	0	0.0%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%			
Data-driven solutions for GHG emissions reductions	8.2 CCM / 8.2 CCA	0	0.0%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%			
Demolition and wrecking of buildings and other structures	3.3 CE	0	0.0%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.0%			
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%								0.0%			
A. Turnover of Taxonomy-eligible activities		15,432,590	1.7%	1.7%	0.0%	0.0%	0.0%	0.0%	0.0%								0.01%			
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																				
Turnover of Taxonomy non-eligible activities (B)		897,785,410	98.3%																	
Total		913,218,000	100.0%																	

Turnover ratio / total turnover

(1)	which conforms to the taxonomy by target	eligible according to taxonomy by target
CCM	0.0%	0.0%
CCA	0.0%	0.0%
WTR	0.0%	0.0%
EC	1.7%	1.7%
PPC	0.0%	0.0%
BIO	0.0%	0.0%

(1) The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the section number of the activity in the relevant Appendix covering the objective, i.e.:

- Climate change mitigation: CCM
- Climate change adaptation: CCA
- Water and marine resources: WTR
- Circular economy: EC
- Pollution prevention and control: PPC
- Biodiversity and ecosystems: BIO

CapEx

Fiscal year 2024		Year		Substantial contribution criteria						No significant harm criteria ('Does not cause significant harm')							Proportion of taxonomy-aligned (A.1) or -eligible (A.2) CapEx, year 2023		Category (enabling activity) / Category (transitional activity)	
Economic activities	Code(s) ⁽¹⁾	Absolute CapEx	Proportion of CapEx	Climate change mitigation	Climate change adaptation	Water and marine	Pollution	Circular economy	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine	Pollution	Circular economy	Biodiversity and ecosystems	Minimum safeguards	%	F	T	
		Currency (€)	%	Y; N;	Y; N;	Y; N;	Y; N;	Y; N;	Y; N;	(Y/N)	(Y/N)	(Y/N)	(Y/N)	(Y/N)	(Y/N)	(Y/N)				
A. TAXONOMY-ELIGIBLE ACTIVITIES																				
A.1 Environmentally sustainable activities (Taxonomy-aligned)																				
Power generation using solar photovoltaic technology	4.1 CCM	275,199	0.3%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.6%			
Storage of hydrogen	4.12	495,864	0.6%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.9%	F		
Transmission and distribution networks for renewable and low-carbon gases	4.14	4,905,888	5.9%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	2.3%			
Infrastructure enabling road transport and public transport	6.15 CCM	0	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	F		
Installation, maintenance and repair of energy efficient equipment	7.3 CCM	54,412	0.1%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	F		
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	7.4 CCM	73,076	0.1%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	F		
Demolition and wrecking of buildings and other structures	3.3 CE	0	0.0%	N/EL	N/EL	N/EL	N/EL	EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%			
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		5,804,438	7.0%	7.0%	0.0%	0.0%	0.0%	0.0%	0.0%	Y	Y	Y	Y	Y	Y	Y	3.8%			
Of which: facilitators		623,352	0.8%	0.8%	0.0%	0.0%	0.0%	0.0%	0.0%	Y	Y	Y	Y	Y	Y	Y	25.6%	F		
Of which: transitional		0	0.0%	0.0%						Y	Y	Y	Y	Y	Y	Y	0.0%		T	
A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																				
				N/EL	N/EL	N/EL	N/EL	N/EL	N/EL											
Manufacture of hydrogen	3.10 CCM / 3.10 CCA	3,372	0.0%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.5%			
Power generation using solar photovoltaic technology	4.1 CCM / 4.1 CCA	0	0.0%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.5%			
Data processing, hosting and related activities	8.1 CCM / 8.1 CCA	194,309	0.2%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.3%			
Data-driven solutions for GHG emissions reductions	8.2 CCM / 8.2 CCA	74,914	0.1%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%			
Demolition and wrecking of buildings and other structures	3.3 CE	28,213	0.0%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.0%			
CapEx from activities eligible according to the taxonomy but not environmentally sustainable (activities that do not conform with the taxonomy) (A.2)		300,807	0.4%	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%								1.3%			
A. CapEx of taxonomy-eligible activities (A.1+A.2)		6,105,246	7.4%	7.4%	0.0%	0.0%	0.0%	0.0%	0.0%								5.1%			
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																				
CapEx from ineligible activities according to taxonomy (B)		76,446,755	92.6%																	
Total		82,552,000	100.0%																	

CapEx ratio /Total CapEx

(1)	which conforms to the taxonomy by target	eligible according to taxonomy by target
CCM	7.0%	7.4%
CCA	0.0%	0.4%
WTR	0.0%	0.0%
EC	0.0%	0.0%
PPC	0.0%	0.0%
BIO	0.0%	0.0%

(1) The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the section number of the activity in the relevant Appendix covering the objective, i.e.:

- Climate change mitigation: CCM
- Climate change adaptation: CCA
- Water and marine resources: WTR
- Circular economy: EC
- Pollution prevention and control: PPC
- Biodiversity and ecosystems: BIO

OpEx

Fiscal year 2024		Year		Substantial contribution criteria						No significant harm criteria ('Does not cause significant harm')							Proportion of taxonomy-aligned (A.1) or -eligible (A.2) OpEx, year 2023		Category (enabling activity) / Category (transitional activity)	
Economic activities <i>Text</i>	Code(s) ⁽¹⁾	OpEx <i>Currency (€)</i>	Proportion of OpEx <i>%</i>	Climate change mitigation	Climate change adaptation	Water and marine	Pollution	Circular economy	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine	Pollution	Circular economy	Biodiversity and ecosystems	Minimum safeguards	<i>%</i>	<i>F</i>	<i>T</i>	
				<i>Y; N;</i>	<i>Y; N;</i>	<i>Y; N;</i>	<i>Y; N;</i>	<i>Y; N;</i>	<i>Y; N;</i>	<i>Y; N;</i>	<i>Y; N;</i>	<i>Y; N;</i>	<i>Y; N;</i>	<i>Y; N;</i>	<i>Y; N;</i>	<i>Y; N;</i>				
A. TAXONOMY-ELIGIBLE ACTIVITIES																				
A.1 Environmentally sustainable activities (Taxonomy-aligned)																				
Power generation using solar photovoltaic technology	4.1 CCM	4,398	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%			
Storage of hydrogen	4.12 CCM	0	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	F		
Transmission and distribution networks for renewable and low-carbon gases	4.14 CCM	1,348,615	1.9%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.1%			
Infrastructure enabling road transport and public transport	6.15 CCM	41,907	0.1%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.1%	F		
Installation, maintenance and repair of energy efficient equipment	7.3 CCM	0	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	F		
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	7.4 CCM	0	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	F		
Demolition and wrecking of buildings and other structures	3.3 CE	3,540,237	5.0%	N/EL	N/EL	N/EL	N/EL	EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%			
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		4,935,157	7.0%	2.0%	0.0%	0.0%	0.0%	5.0%	0.0%	Y	Y	Y	Y	Y	Y	Y	0.2%			
Of which: facilitators		41,907	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	Y	Y	Y	Y	Y	Y	Y	50.4%	F		
Of which: transitional		0	0.0%	0.0%						Y	Y	Y	Y	Y	Y	Y	0.0%		T	
A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																				
Manufacture of hydrogen	3.10 CCM / 3.10 CCA	0	0.0%	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%			
Power generation using solar photovoltaic technology	4.1 CCM / 4.1 CCA	0	0.0%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%			
Data processing, hosting and related activities	8.1 CCM / 8.1 CCA	0	0.0%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%			
Data-driven solutions for GHG emissions reductions	8.2 CCM / 8.2 CCA	0	0.0%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%			
Demolition and wrecking of buildings and other structures	3.3 CE	0	0.0%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.1%			
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		0	0.0%	0.0 %	0.0 %	0.0 %	0.0 %	0.0 %	0.0 %								0.1 %			
A. OpEx of taxonomy-eligible activities (A.1+A.2)		4,935,157	7.0%	2.0%	0.0%	0.0%	0.0%	5.0%	0.0%								0.3 %			
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																				
OpEx of non-eligible activities (B)		65,454,694	93.0%																	
Total		70,389,851	100.0%																	

OpEx ratio/Total OpEx

(1)	which conforms to the taxonomy by target	eligible according to taxonomy by target
CCM	2.0%	2.0%
CCA	0.0%	0.0%
WTR	0.0%	0.0%
EC	5.0%	5.0%
PPC	0.0%	0.0%
BIO	0.0%	0.0%

(1) The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the section number of the activity in the relevant Appendix covering the objective, i.e.:

- Climate change mitigation: CCM
- Climate change adaptation: CCA
- Water and marine resources: WTR
- Circular economy: EC
- Pollution prevention and control: PPC
- Biodiversity and ecosystems: BIO

The increase in eligible and aligned CapEx under the taxonomy (7.0% in 2024 compared to 3.7% in 2023) reflects the progress made by the company in line with the 2025-2030 Strategic Update. It also indicates its potential to contribute to climate change mitigation objectives by transforming its activities to align with the taxonomy. The investments included in the 2025-2030 Strategic Update envisage that 83% of these investments by 2030 (3.35 billion euros) will be eligible, as they belong to activities defined by the EU Taxonomy Regulation as contributing to the environmental objective of climate change mitigation. These eligible investments include those associated with hydrogen infrastructure, biomethane connections, renovation of infrastructure to carry hydrogen and CO₂ transmission, among others.

Currently, the economic activities covered by the Delegated Regulation (EU) 2022/1214 of the Commission, of March 9, 2022, are not included in the Enagás business model.

Activities specified in the Delegated Regulation (EU) 2022/1214 of the Commission of March 9, 2022

Nuclear energy related activities	Enagás activity
The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No
The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No
Fossil gas related activities	Enagás activity
The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	No
The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	No
The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	No

Control measures established by Enagás in the framework of the EU Taxonomy Report

In order to meet all the reporting requirements defined in the Taxonomy Regulation, Enagás has an environmental taxonomy reporting procedure which sets out a methodology for preparing the annual eligibility and alignment exercise through the collection of the necessary information. In this process, and in order to ensure compliance with the disclosure standards, the financial area is mainly involved in extracting the financial information and ensuring its equivalence with the Consolidated Annual Accounts. The infrastructure and sustainability areas are mainly involved in identifying projects and assessing their compliance with the Taxonomy Regulation requirements.

In addition, the Control System for Sustainability Information (for more information see disclosure requirement GOV-5) covers the reporting cycles for the key performance indicators required by the Taxonomy Regulation that are most relevant to Enagás (CapEx and OpEx). This entails assigning responsibilities in the calculation and reporting of indicators, as well as defining and implementing controls that improve the segregation of duties and reduce the risk of completeness and accuracy of information as well as the risk of non-compliance with regulations.

E1. CLIMATE CHANGE

Governance

GOV-3

Integration of sustainability-related performance in incentive schemes

At Enagás there is a governance structure led by the Board of Directors that supervises the company’s climate change performance. The Board of Directors is informed on a quarterly basis about the risk control processes, where climate change risks and opportunities are integrated. The Sustainability and Appointments Committee, through the Sustainability Committee, approves and monitors the CO₂ emissions reduction targets linked to variable remuneration as well as initiatives that help achieve said reduction that are included in the Energy Efficiency and Emissions Reduction Plan. Furthermore, the Audit and Compliance Committee supervises the efficiency of risk control and management systems and assesses the possible impact of climate change. The Executive Committee establishes the overall risk management strategy and global limits for the company, and also reviews the level of risk exposure and corrective actions.

The Sustainability Committee is made up of the company’s main General Managements, including the Energy Transition General Management. This General Management presides over the functions of Sustainability and Climate Action, Strategy and National and International Regulation, areas that provide the input for the definition of the decarbonisation strategy, as well as the identification of risks and opportunities derived from climate change.

The Health and Safety, Environment and Quality Committee periodically assesses and manages issues related to climate change associated with business processes, impact assessment studies and the evaluation of environmental aspects.

There are also various working groups reporting to these committees, such as the Energy Efficiency and Emissions Reduction Group, responsible for drafting and monitoring the Energy Efficiency Plan and setting the company’s emissions reduction targets, among other matters.

The aim is to achieve Net Zero by 2040 for scopes 1 and 2, and by 2050 for scope 3. To this end, it has outlined a decarbonisation pathway with emission reduction targets by 2030 and 2040, and additionally by 2050 for scope 3, aligned with the 1.5°C temperature increase scenario.

In line with this commitment, Enagás has set annual targets related to climate change and the energy transition. These are included in the annual target management programme and are therefore linked to variable remuneration (for more information, see disclosure requirement GOV-2 in chapter 2). These targets account for 20% of Enagás’ variable remuneration and are broken down along the following lines:

- Total greenhouse gas emission reductions (Scopes 1 and 2).
- Reduction of methane emissions.
- Proposal of actions and investments to boost the Energy Transition framework (H2med, Hydrogen backbone, etc.).
- Future business development: CO₂ and other renewable molecules.
- Incorporation of technologies and knowledge to develop new businesses (HTNO, CO₂, NH₃, etc.).

Moreover, Enagás has a Long-Term Incentive Plan (ILP) in place, requiring the fulfilment of targets aligned with strategic priorities, thus linking remuneration to the commitment to long-term management (for more information see disclosure requirement GOV-3). Specifically, 12% of this Long-Term Incentive target is linked to climate-related considerations:

- Reduction of CO₂ emissions in line with the decarbonisation pathway (emissions 2024 vs. emissions 2021).
- Investment in renewable gases: investment and associated studies regarding the adaptation of infrastructures for the transmission of renewable gases and development of infrastructures dedicated to the transmission and storage of renewable gases

Strategy

E1-1

Transition plan for climate change mitigation

The company's 2025-2030 Strategic Update (for more information, see disclosure requirement SBM-1 in chapter 2) comprises Enagás' transition plan to mitigate climate change. It has been approved by the Board of Directors. This plan sets out the investments and actions needed to ensure the goal of Net Zero by 2040 for Scope 1 and 2 and by 2050 for Scope 3. These targets have been set based on the cross-sector methodology of the Science-Based Targets initiative (SBTi)²¹.

This strategy has a clear purpose: to contribute to security of supply and decarbonisation, creating value, working towards sustainable and profitable growth and focusing on Spain and Europe. Therefore, the climate change mitigation actions that the company plans to carry out involve highlighting the value of gas infrastructures and accelerating the deployment of renewable gases, leveraging existing infrastructures. Enagás' goal with this Plan is to become the leading TSO and HNO in Europe²².

Enagás maintains a policy of liquidity and financial planning with the capacity to adapt to new investments in the hydrogen network. It also has proven access to capital markets, as well as bank and institutional financing.

There are essentially two main courses of action to mitigate climate change: decarbonisation of the energy sector and decarbonisation of own operations.

Decarbonisation of the energy sector

Enagás prioritises the development of hydrogen infrastructure as a key axis for contributing to security of supply and decarbonisation. The company has set up the subsidiary Enagás Infraestructuras de Hidrógeno S.L.U. to separate its work as a natural gas transmission system operator (TSO) from its work as the same for hydrogen, in compliance with national and European law and plans.

These activities are eligible under Regulation 2020/852 on the establishment of a framework to facilitate sustainable investment (hydrogen transmission, storage of hydrogen, CO₂ transmission, etc.), because of their contribution to the climate change mitigation objective. For further details, see 'Disclosure of information under Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)':

Enagás plans to invest 3.125 billion euros in hydrogen infrastructure, including underground storage facilities and a hydrogen network.

Among the key development areas is a focus on other molecules related to the energy transition, such as carbon dioxide and ammonia. This strategy builds on our capabilities and assets and aligns with our vision to adapt regasification plants into multi-molecule terminals.

In 2024, Enagás has allocated 7.0% of its CapEx (over 5.8 million euros) and 2.5% of its OpEx (nearly 1.7 million euros) to activities that support the climate change mitigation target and are taxonomy-aligned. For more information, see the '[Disclosure of information under Article 8 of Regulation \(EU\) 2020/852 \(Taxonomy Regulation\)](#)' section. However, it is estimated that in 2024, Enagás has allocated a gross CapEx of 87 million euros to activities related to natural gas²³.

The 2025-2030 Strategic Update envisage that 83% of planned investments by 2030 (3.365 billion euros) will be eligible, as they belong to activities defined by the EU Taxonomy Regulation as contributing to the environmental objective of climate change mitigation. These eligible investments include, in addition to those associated with hydrogen infrastructure, biomethane connections and the necessary infrastructure for the development of CO₂ logistics, among others.

Decarbonisation of own operations

Enagás is committed to the decarbonisation of its own operations and its value chain. The company has established a decarbonisation pathway to reach Net Zero by 2040 for Scope 1 and 2 and by 2050 for Scope 3. These targets are based on a 1.5°C temperature increase scenario in line with the Paris Agreement. They are also linked to the company's overall performance (for more information, see disclosure requirement E1-4). To reach these objectives, Enagás has reviewed and updated its Plan for the electrification of turbocompressors at compressor stations and underground storage facilities, as well as establishing other emissions reduction actions (for more information, see disclosure requirement E1-3).

Enagás' most greenhouse gas-intensive assets are the turbocompressors in its compressor stations. We therefore plan to replace them with electrically driven compressors powered by electricity with guarantees of renewable origin. This electrification plan provides for the replacement of the turbocompressors with the highest expected usage by 2040 (approximate CapEx of 106 million euros by 2030), leaving 135,303 tonnes of CO₂e as locked-

21 As of the preparation of this report, the Science Based Targets Initiative (SBTi) has not yet defined a methodology for the Oil & Gas sector that covers Enagás' activities (midstream), so these targets have not been validated by SBTi. However, Enagás incorporates the main recommendations of the Science Based Targets Initiative in the methodology for setting its targets. Once the methodology for Oil & Gas is approved, Enagás will ensure compliance to align with the goal of limiting global warming to 1.5°C, as established in the Paris Agreement.

22 Enagás is excluded from the EU Paris-aligned Benchmarks.

23 The estimate was made considering the gross additions of tangible and intangible assets of the companies with NACE codes corresponding to the Oil and Gas - Midstream and Downstream sectors, Energy Production and Utilities sector, and Oil and Gas - Upstream sector and services (for more information, see the SBM-1 disclosure requirement in Chapter 1) and subtracting the eligible asset additions according to the EU Taxonomy Regulation.

in emissions²⁴ by 2030, corresponding to Scope 1 and 2 emissions from assets whose electrification is not planned because their use is expected to decline. Enagás considered these locked-in emissions when establishing its 2030 decarbonisation pathway, with the aim of ensuring that they do not jeopardise our ability to reach the targets.

SBM-3

Material impacts, risks, and opportunities and their interaction with the strategy and business model

Enagás’ climate resilience analysis ranges from mitigation to adaptation, with a focus on decarbonisation and carbon neutrality, considering the risks and opportunities related to climate change in its own operations and value chain (affiliates, supply chain and customers). In addition, the transition plan for climate change mitigation - the 2025-2030 Strategic Update - integrates the physical and transitional risks arising from climate change, considering short, medium and long-term time horizons, as well as opportunities with adaptation and resilience criteria (for more information, see disclosure requirement E1-1) To this end, Enagás has taken into account all the assets and activities identified as being at risk in the establishment of the strategy. This includes a detailed assessment of each asset and activity, the identification of specific vulnerabilities and the implementation of appropriate mitigation measures.

The constant evolution of regulation, technology and stakeholder expectations - together with the inherent variability of the climate - presents a complex scenario with uncertainties. Our resilience analysis addresses this complexity through a flexible and adaptive strategy, enabling us to identify opportunities and manage risks in a constantly changing environment.

Enagás has conducted an analysis to determine the impacts, risks and opportunities, assessing which of these are materially relevant regarding climate change. For more information on this assessment in relation to climate change and its results, see disclosure requirements IRO-1 (in this chapter) and E1-9. The results of this analysis were integrated into the company’s materiality assessment, as described in disclosure requirement IRO-1 in chapter 2. This analysis takes into account Enagás’ strategy and business model, covering all internal activities and the locations of the company’s infrastructure. It also considers the upstream and downstream phases of the value chain.

Enagás maintains a policy of liquidity and financial planning with the capacity to adapt to new investments in the hydrogen network. It also has proven access to capital markets, as well as bank and institutional financing.

In terms of the ability to redeploy, upgrade or decommission existing assets, Enagás has made significant progress in the timing of renewable hydrogen as a key vector for decarbonisation. During the last quarter of 2024, the company applied for funding from the Connecting Europe Facility (CEF) to carry out studies for its Projects of Common Interest (PCI), which include the H2med corridor, the Spanish backbone and the two associated storage facilities. These projects reflect Enagás’ ability to adapt its portfolio of products and services to the new demands of the energy market.

In addition, Enagás invests in the training and professional development of its workforce to ensure that they are prepared to face the challenges of climate change and take advantage of the opportunities that arise. The company encourages participation in working groups and collaborative projects that enable employees to acquire new skills and knowledge relevant to the energy transition.

The material impacts, risks and opportunities identified from this analysis are outlined below: The mitigation actions and resources taken into account are detailed in disclosure requirement E1-3.

Table of impacts

Topic	Sub-topic	Impact	Nature
Climate action and energy efficiency	Climate change mitigation	High direct (scope 1) and indirect (scope 3) greenhouse gas emissions due to the company’s own operations and those of its value chain.	Negative - Current
	Energy	Contribute to the transition of the energy model towards a more sustainable version by integrating renewable gases	Positive - Potential

24 There are no locked-in emissions corresponding to Scope 3.

Table of risks and opportunities

Topic	Sub-topic	Risk / Opportunity	Nature
Climate action and energy efficiency	Climate change adaptation	Operational cost overruns due to natural disasters that damage the company's infrastructures or due to the adaptation of the company's infrastructures to the consequences of climate change, as the case may be.	Physical risk
		Reputational deterioration that may negatively impact the valuation of intangibles by stakeholders, due to loss of relevance in sustainability indices for not reaching the expected standard of climate management or due to climate change impacts.	Transition risk
		Failure to meet the announced carbon neutrality commitments due to the materialisation of the identified transition risk factors, among others	Transition risk
	Climate change mitigation	Worsening financing conditions / attraction of capital flows for the development of activities not aligned with the EU taxonomy of sustainable activities or similar	Transition risk
		The value of the assets is recovered with the current remuneration life; in the long term, there may be possible lower revenues for the company due to lower remuneration associated to the extension of the assets' useful life (Spain business)	Transition risk
		Hydrogen infrastructure development	Opportunity
		New logistics services that promote natural gas consumption	Opportunity
	Development of infrastructure for CO ₂ transport and storage	Opportunity	

Enagás has been provisionally appointed as the manager of the Spanish Hydrogen Backbone Network (provisional HTNO), with Enagás Infraestructuras de Hidrógeno S.L.U. authorised to temporarily carry out the development of European Projects of Common Interest for hydrogen networks. In these new activities, the company is evaluating the significance of climate change, as well as the potential impacts, risks (including physical and climate) and opportunities associated, during the initial conceptual phase before conducting an Environmental Impact Assessment (EIA).

Management of impacts, risks, and opportunities

IRO-1

Description of the processes to identify and assess material impacts, risks, and opportunities related to climate

Enagás has conducted an analysis to determine the impacts, risks, and opportunities, assessing the materiality of these in relation to climate change. The results of this analysis were integrated into the company's materiality assessment, as described in disclosure requirement IRO-1 in chapter 2. This analysis takes into account Enagás' strategy and business model, covering all internal activities and the locations of the company's infrastructure. It also considers the upstream and downstream phases of the value chain.

This analysis is carried out on an annual basis in a working group in which the teams charged with the corporate management of Strategy, Risks and Finance, among others, are involved.

For more information on the impacts, risks and opportunities identified as material, see [disclosure requirement SBM-3](#) in this chapter.

Analysis of climate-related risks

Enagás has identified current and potential sources of greenhouse gases from its own activities (all its facilities) and in its value chain (for more information, see disclosure requirement E1-6), assessing the associated actual and potential impacts on climate change.

Climate-related risk analysis

At Enagás, the processes for identifying and assessing climate risks are integrated into the corporate risk control and management model, which ensures that the company's targets are met in a predictable manner and with a medium-moderate total risk profile. This model makes it possible to identify and quantify the risks likely to affect the company's performance, including those arising from climate change. These risks are framed within the company's risk taxonomy (basically, physical risks are 'operational and technological' risks and transition risks are 'strategic and business' risks). Quantifying these risks allows them to be integrated into the 2025-2030 Strategic Update and targets to be set in order to minimise risks and maximise opportunities.

To define the level of each of these risks, the impact and the expected probability of occurrence have been determined for the different time horizons.

Risk assessment methodology

Enagás follows the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD) (for more information, see the Annex 'TCFD Content Index' of the Consolidated Management Report)²⁵ in its management of climate risks and has a methodology for their identification, prioritisation and economic quantification. In accordance with the classification provided by the TCFD standard, physical risks (extreme weather events, sea level rise) and transitional risks (regulatory, technological, market and reputational) are identified and assessed using the same RCP scenarios²⁶.

The assessment methodology allows us to assess the probability of occurrence and financial impact of each different temperature scenario for the RCPs and time horizons considered: short term 2025 (aligned with the company's annual budget), medium term 2026-2030 (aligned with the company's 2025-2030 Strategic Update, regulatory period and the PNIEC) and long term beyond 2031 (aligned with European decarbonisation objectives and the PNIEC).

Measuring climate change-derived risks means estimating possible prospective climate and business scenarios that could eventually have a negative impact on the company's interests. 'Standard' methodologies are used for measurement according to the risk typology:

- Physical risks at all company sites are assessed by stochastic methods, using standard climate models (XDI tool, AEMET models) to evaluate exposure to climate factors related to temperature (e.g. fires), wind (e.g. extreme winds), water (e.g. river and coastal flooding) and solid mass (e.g. earth movements, extreme winds). This was done by conducting sensitivity analyses and stress tests on the most important RCP 4.5 and RCP 8.5 scenarios from the sixth report (AR6) of the Intergovernmental Panel on Climate Change (IPCC), for the short, medium and long time horizons (the latter, up to 2030 and 2050).

Expert assessments are also available to evaluate the need for additional adaptation and prevention measures. This analysis is carried out using the specific geo-spatial coordinates of each facility. In particular, heat maps are used for some larger assets to determine critical points for each of the different threats that affect them²⁷.

- Transition risks (technological, regulatory, market, reputational) are assessed using deterministic methods. For this purpose, the company's projections and its 2025-2030 Strategic Update are taken as a base scenario, against which sensitivity analysis are carried out based on the scenarios set out by the International Energy Agency (IEA) in its World Energy Outlook 2024 report (STEPS, APS and NZE). This analysis is completed with additional information on the relevant variables by business and geographical area for the short, medium and long time horizons (the latter to 2030). To assess these transition risks, the

²⁵ This link refers to unverified information within the framework of the review of the Non-Financial Information and Sustainability Information Statement.

²⁶ Representative Concentration Pathways (RCPs) that represent a theoretical projection of the greenhouse gas concentration trajectory adopted by the Intergovernmental Panel on Climate Change (IPCC).

²⁷ In some cases, such as extreme rainfall, there are certain limitations in the RCP scenario projections when providing annual average impacts and maximum impacts.

variables of magnitude, probability and duration have been considered.

Within these transition risks, it is worth highlighting the identification of a risk linked to assets whose useful lives will not be extended, given that they will not accompany the company in the long term in its transition towards carbon neutrality.

The physical and transition risks linked to climate change have a clear interconnection with other risks included in our Corporate Risk Map, as they either strongly influence other risks or are influenced by others. To follow up on this, there is an

interconnections map reflecting how uncertainty in the geopolitical context, the market and regulatory environment, or changes in European policies have a direct impact on physical and transition risks.

This methodology for analysing climate-related risks has also been used for preparing the information in section 'a) Information on the impact and management of climate change' in note 4.6 Other Information in the Consolidated Annual Accounts, ensuring information consistency in both documents.

Reference scenarios

IPCC physical scenarios	Transition scenarios (IEA/PNIEC)	Description
RCP 8.5	<ul style="list-style-type: none"> No change - Business as Usual (BAU). 	<ul style="list-style-type: none"> Climate policies are not implemented. Very significant increase in emissions.
RCP 6.0	<ul style="list-style-type: none"> On trend - Stated Policies Scenario (STEPS). PNIEC baseline scenario. 	<ul style="list-style-type: none"> Trend-aligned evolution of climate policies. Emissions growth in excess of the Paris Agreement target. Scenario compatible with an average temperature increase in the year 2100 of 2.7°C.
RCP 4.5	<ul style="list-style-type: none"> Advertised policies - Announced Pledges Scenarios (APS). 	<ul style="list-style-type: none"> Significant policy changes, as needed to meet the Paris Agreement target.
RCP 2.6	<ul style="list-style-type: none"> Neutrality by 2050 (NZE 2050). PNIEC target scenario. 	<ul style="list-style-type: none"> The APS is compatible with an average temperature increase of 1.7°C, and Net Zero with an increase of 1.5°C by 2100.

Analysis of climate-related opportunities

In line with the European Union's energy sector decarbonisation policy, and framed within the company's 2025-2030 Strategic Update, Enagás has identified opportunities arising from climate change linked to changes in our business model and/or services offered in the short, medium and long terms. These opportunities have been assessed using viability, profitability, adaptation and resilience criteria, allowing identified risks to be mitigated by committing to the company's transformation and its contribution to the decarbonisation of the energy sector.

In line with the European Union's commitment to meeting its climate targets and the key role that renewable hydrogen plays in achieving them, Enagás' development of hydrogen transmission and storage infrastructure will be of vital importance in the development of the new hydrogen market. In addition, in line with our commitment to decarbonisation, Enagás has the opportunity to position itself in other midstream businesses associated with other molecules related to the energy transition (CO₂ and NH₃). Enagás also promotes innovation and flexibility in its operations by exploring new technologies.

For this analysis, the reference climate scenarios indicated in the climate-related risk analysis were taken into account, as was alignment with the European Union's energy policies to accelerate the energy transition.

E1-2

Policies related to climate change mitigation and adaptation

Enagás has a [Climate Action Policy](#), also approved by the Board of Directors, which sets out key commitments in addressing climate change mitigation, climate change adaptation, energy efficiency, and the use of renewable energy sources. This policy includes the commitments necessary to guarantee due diligence in climate action, aimed at driving decarbonisation and thus contributing to the energy transition process. These commitments have been identified as relevant issues for Enagás, and include the following highlights:

- Drive decarbonisation beyond direct operations, addressing the value chain through:
 - Promoting the development of renewable gases and the development and adaptation of networks to transport them.
 - Collaborating with affiliates, the supply chain, customers and industry associations domestically and internationally.
- Integrating the physical and transition risks arising from climate change in short, medium and long term time horizons, as well as the opportunities, into the business strategy by building in appropriate assessment, management and mitigation mechanisms that take into account adaptation and resilience criteria.

- Establish a decarbonisation pathway towards Net Zero by 2040, including scope 1 and 2 emissions reduction targets, and by 2050 including scope 3 emissions reduction targets, aligned with the 1.5°C scenario.
- Include its targets in the short- and long-term variable remuneration incentive schemes for all company professionals covered by these schemes.
- Achieve Net Zero by 2040 for scope 1 and 2, and by 2050 for scope 3, by applying the greenhouse gas emissions mitigation hierarchy:
 - Prioritising energy savings and efficiency measures, as well as emission reduction measures with the greatest decarbonisation impact.
 - Increasing the use of renewable energy for self-consumption.
 - Offsetting residual emissions once the maximum reduction level is reached with available technology, giving preference to nature-based solutions.
- Calculating and verifying the carbon footprint regularly and ensuring maximum data reliability.
- Providing training and information to ensure that the Company's employees and third parties it interacts with are aware of and understand the obligations of the Climate Action Policy.
- Stepping up efforts to promote responsible climate and energy policies through participation in platforms, associations or forums, ensuring alignment of these activities to the Paris Agreement.

In 2024, this policy was updated to align the company's commitments with those required by the European Sustainability Reporting Standards developed by EFRAG, as well as with the best trends in the field.

This policy applies and is communicated to all employees and managers of all companies making up the Enagás Group, including any affiliates effectively controlled by it, within the limitations established in the regulations applicable. Consequently, it covers all activities of Enagás Group companies globally.

In affiliates where Enagás does not have effective control, it is recommended that their Boards promote principles aligned with this policy. The company also promotes the application of the policy's principles, wherever possible, to temporary joint ventures, joint ventures, and other similar partnerships or entities. The company also emphasises these principles and commitments with contractors, suppliers, and collaborators, particularly regarding the supply chain.

The policy is accessible to stakeholders on the company's [corporate website](#), as well as on the corporate Intranet for all employees.

This policy sets out that the Board of Directors, through the Sustainability and Appointments Committee, is responsible for overseeing climate action performance. The Sustainability and Appointments Committee, through the Sustainability Committee²⁸, is also responsible for setting targets and plans of action and monitoring climate performance. The Audit and Compliance Committee supervises the efficiency of risk control and management systems and assesses the possible impact of climate change. For its part, the Executive Committee oversees and implements the overall risk management strategy agreed by the Board of Directors, as well as the global limits for the company, and also reviews the level of risk exposure and corrective actions. Similarly, the Health and Safety, Environment and Quality Committee periodically assesses and manages issues related to climate change associated with business processes, impact assessment studies and the evaluation of environmental aspects.

By doing so, the company makes commitments to address the impacts, risks and opportunities identified as significant. For more details, refer to the table of impacts included in the SBM-3 disclosure requirement in this chapter.

In addition, through the Ethical Principles and Guidelines for Suppliers, Enagás considers that its suppliers and contractors shall undertake to preserve natural capital, controlling and minimising the environmental impact of the activities they carry out at Enagás facilities, taking into account aspects such as energy efficiency and the reduction of atmospheric emissions (for more information, see disclosure requirement G1-1).

E1-3

Actions and resources in relation to climate change policies

Decarbonisation of own operations

In order to meet the carbon neutrality and scope 1 and 2 emissions reduction targets established in the decarbonisation pathway, Enagás is applying the mitigation hierarchy by implementing specific actions that the company has identified and planned as part of its Energy Efficiency and Emissions Reduction Plan.

Energy Efficiency and Emissions Reduction Plan

At Enagás, energy efficiency plays a key role in emissions reduction and considerable efforts have been made in this regard. In recent years, since 2015, we have reduced our CO₂ emissions by 53% by taking energy efficiency measures.

During the 2015-2024 period, the Energy Efficiency and Emissions Reduction Plan (PEERE) has enabled the avoidance of 1,130,332 tonnes of CO₂e. These emissions include the accumulated emissions prevented as a result of the measures of the Energy Efficiency and Emissions Reduction Plan implemented from 2015 to 2024.

We are working to ensure the continuous improvement of the energy efficiency of our infrastructures. As such, we have an energy management system certified according to the ISO 50001 standard that allows us to identify opportunities to improve the energy performance of our facilities and to evaluate progress in the reduction of energy consumption. Enagás has been implementing regular campaigns to publicise and raise awareness on this issue for years.

Through its Efficiency and Emissions Reduction Plan, defined on an annual basis, Enagás establishes specific measures aimed at ensuring that its facilities continue to increase their

energy efficiency and consequently reduce emissions. Enagás also focuses on specific initiatives to reduce methane emissions.

The measures put in place for the year are monitored and followed-up on a quarterly basis, and, on an annual basis, a follow-up of measures taken in previous years is carried out. An analysis will be carried out in early 2025 to determine the measures to be applied during the year. These will be similar in nature to those for 2024 and will include those planned for 2024 that could not be implemented.

Below are the main measures taken in 2024, which involved approximately 1.78 million euros OpEx (related to methane emissions reduction measures) and a CapEx investment of 2.95 million euros. This information is detailed in notes '2.1 Operating Profit' and '2.4. Property, plant and equipment' in the Consolidated Annual Accounts). In 2025, a similar amount of OpEx and CapEx is planned for energy efficiency measures.

Energy efficiency and emissions reduction measures implemented during 2024

Energy efficiency and emissions reduction measures ²⁹	Savings type	Energy savings achieved in 2024 (GWh)(2) ³⁰	Emission reductions achieved in 2024 (tonnes of CO ₂ e)
Installation of frequency inverters on the GA-224F seawater return pump of the Cartagena Plant	Electricity	0.07	0
Partial replacement of the lighting in the Yela underground storage facility with LEDs (light-emitting diodes)	Electricity	0.002	0
Installation of photovoltaic panels in position 23	Natural gas	0.07	0
Installation of photovoltaic canopy at the Zaragoza metrology centre	Electricity	0.08	0
Installation of a photovoltaic facility at the Almendralejo compressor station	Electricity	0.72	0
Installation of frequency inverters on GA-246C seawater collection pumps of the Cartagena Plant	Electricity	0.18	0
Replacement of pneumatic valves at the J-17 wellhead at Serrablo	Natural gas	0.19	304.32
Installation of 3-way valves in the pilot systems of the ERM 9.03.2 regulators and ERM 4.03 regulators of the Bañeras centre	Natural gas	0.001	2.05
Replacement of pressure safety valves at the Serrablo underground storage facility plant and wells	Natural gas	0.09	148.66
LDAR (Leak Detection and Repair) campaign at regasification terminals	Natural gas	0.79	1,256.80
LDAR (Leak Detection and Repair) campaign for underground storage facilities	Natural gas	0.26	424.53
LDAR (Leak Detection and Repair) campaigns in transmission	Natural gas	3.18	5,112.17
TOTAL		5.46	7,263.70

²⁹ Including those emissions reduction or efficiency measures verified in 2024 and completed in the last quarter of 2023 or before the last quarter of 2024, considering that sufficient time has elapsed for savings to be measured.

³⁰ The energy savings achieved are calculated on the basis of the energy consumption of the previous year.

In general terms, the measures included in the Energy Efficiency and Emissions Reduction Plan can be classified according to their nature:

Turbocompressor electrification plan

Enagás is working on a plan to electrify the turbocompressors at compressor stations and underground storage facilities by 2040. This is estimated to reduce emissions by approximately 92,516 tonnes of CO₂e by 2030 and 93,008 tonnes by 2040 (for more information, see disclosure requirement E1-4). The plan is revised and updated in line with the operating context and taking into account the following premises in the selection of facilities:

- Act on the facilities that are going to be more intensive in operation (higher CO₂ emissions).
- Make the most of the useful remunerative life of the facilities.
- Match interventions to the need for maintenance development to minimise costs.
- Act on facilities with restrictions, either due to atmospheric emissions (NO_x emission limits) or due to operational problems which could compromise their operation.
- Have H₂-ready facilities distributed along the main axes of the Gas System.

This plan foresees the electrification of 14 turbocompressors in the 2023-2040 period. In 2023, the first two electric motors were installed (15 million euros of CapEx). Enagás continues to make progress to complete the plan established for 2040, which is expected to involve a total CapEx of 106 million euros.

In 2024, a total of 2.7 million euros has been invested in the electrification of turbocompressors³¹ (figure included in Note '2.4. Property, plant and equipment' in the Consolidated Annual Accounts).

Methane emissions reduction measures

During 2024, various methane reduction measures were implemented that enabled Enagás to achieve a -46% reduction in methane emissions compared to the 2015 base year considered for setting its targets aligned with the Global Methane Alliance initiative. The main measures implemented in 2024, which have entailed OpEx of approximately 1.78 million euros and a CapEx investment of 382,487 euros, are listed below (information included, respectively, in notes '2.1 Operating profit' and '2.4. Property, plant and equipment' in the Consolidated Annual Accounts).

With the entry into force of the new Regulation (EU) 2024/1787 of the European Parliament and of the Council of June 13, 2024, on the reduction of methane emissions in the energy sector and amending Regulation (EU) 2019/942, a number of measures are planned for implementation, including the following:

³¹ In line with the UE Taxonomy Regulation, investments related to the replacement of auxiliary equipment that support hydrogen transmission, only consider the proportional volume of the investment that is related to the transmission capacity of hydrogen and low-carbon gases. Therefore, only 10% of these investments are included as eligible and aligned reported CapEx for

Measure	Implementation period	Planned investment (CapEx) (thousands of euros)
Facility upgrades		
Replacement of leaking valves	2025-2026	1,680
Removal of venting in compression stations	2026-2030	54,075
Modification of position 41.10 to prevent gas venting associated with in-line inspections (ILI)	2026-2028	160
Production of green hydrogen to reduce internal consumption		
Huelva regasification terminal	2025-2026	752
Cartagena regasification terminal	2025-2026	994
Barcelona regasification terminal	2026-2029	1,840
Musel regasification terminal	2026-2029	1,515
Equipment		
Acquisition of mobile compressors to recover gas released during maintenance of compression stations and in-line inspections	2026-2029	1,110
Purchase of portable flares	2025-2027	70
Systems		
Enhanced application for monitoring methane emissions	2025	100

These measures are expected to reduce emissions by about 54% by 2030 and 86% by 2040 compared to 2024 levels (for more details, see disclosure requirement E1-4).

In addition, the company continues to make progress in reducing the uncertainty of methane emissions data under the OGMP2.0 (Oil and Gas Methane Partnership) initiative, to which it adheres. This is an initiative for the reporting of methane emissions in line with the European Union Methane Emission Reduction Strategy.

In 2024, the International Methane Emissions Observatory (IMEO) recognised Enagás with its highest rating, 'Gold Standard', for the fourth consecutive year, highlighting its methane emissions plan as one of the most robust and detailed in the framework of 'The Oil & Gas Methane Partnership 2.0' (OGMP 2.0), as well as the improved reliability of methane data for both the assets over which Enagás has operational control and for its affiliates.

In this area, Enagás has carried out several actions in 2024 applying continuous technological improvement, among which the following are noteworthy:

- Emissions are measured using top-down technologies, such as CH₄ Airborne Remote Monitoring (CHARM) from a helicopter, and SENSIA semi-fixed cameras. This data will be reconciled with the Enagás inventory. These measurements allow Enagás to compare localised emissions with bottom-up inspections and

activity 4.14 CCM. Transmission and distribution networks for renewable and low-carbon gases. For more information, see the 'Disclosure of information under Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)' section.

draw lessons learned in order to make further progress on mitigating these emissions in the framework of the OGMP2.0 initiative.

- Development and continuous improvement of a digital application to record venting and fugitive emissions in the transmission network and adapt to new methane regulations. This application allowed for the more detailed monitoring of venting at regasification terminals and underground storage facilities and during transmission and to obtain the information broken down in accordance with the OGMP2.0 reporting framework.
- Leadership in the research project promoted by GERG (European Gas Research Group). Enagás coordinated and led a pioneering global innovation project to provide guidelines on how reconciliation should be carried out at source and site level. After testing the performance of 12 state-of-the-art technologies (nine top-down and three bottom-up) to assess their accuracy and reliability for the quantification of methane emissions, a pilot reconciliation project was carried out. A series of measurements were taken at an operating compressor station, allowing methodologies for the reconciliation and verification of the reported data to be evaluated. In 2024, the project was completed, which led to the establishment of general recommendations for the reconciliation process at transmission, storage and regasification facilities.
- Participation in a project focusing on methane emissions from the operation of analysis equipment. Specifically, a benchmarking exercise was carried out to identify the emissions produced by the different analysis systems installed in the infrastructures. In this way, emissions and some practises to eliminate/reduce them could be identified. It is being investigated how the project can be extended to test the effectiveness of new technologies to eliminate emissions.

Other emission reduction measures

Enagás also implements other measures that entail significant emissions reductions, including the purchase of electricity with renewable energy guarantees of origin. These efforts have resulted in an 19% reduction in total scope 1 and 2 emissions in 2024. As mentioned above, it is a company goal to maintain this supply from renewable sources in order to reduce emissions from electricity to zero. This means signing contracts with electricity providers in which renewable origin is guaranteed for the duration of the contract.

Emissions offsetting

Enagás' decarbonisation strategy is based on prioritising measures to reduce emissions and subsequently offsetting emissions that cannot be reduced for technical reasons (for more information, see disclosure requirement [E1-7](#)).

Enagás' methodology establishes that emissions are offset annually after the close of the year; consequently, in 2024, 37,856 euros were spent on the purchase of carbon credits to cover 8,520 tonnes of CO₂e in 2023. For further information, see note '4.6 Other Information' in the Consolidated Annual Accounts. In 2025, carbon credits will be purchased to cover the 5,839 tonnes of CO₂e from 2024.

Decarbonisation of the energy sector and the value chain

Enagás is also extending its commitment to decarbonisation all the way down its value chain. In order to achieve the established scope 3 emission reduction targets (for more information, see disclosure requirement [E1-4](#)), the company is working on the following medium- and long-term lines:

Renewable gases

Essentially, in 2024, the adaptation of existing infrastructure and the development of new infrastructure for renewable gases has continued (for more information, see disclosure requirements [E1-1](#) and [SBM-1 in Chapter 2](#)).

In this regard, one of the main areas of the company's technological innovation focuses on the evolution of the gas infrastructure in line with the decarbonisation of the energy sector, considering the inclusion of hydrogen and other renewable gases in a pure or mixed state in the company's infrastructures. In this field, collaboration projects with other TSOs and companies such as 'HyLoop+', 'The Next Pangea' and 'Hystorenew', among others, stand out. In 2024, of the 17.6 million euros allocated to technological innovation (CapEx and OpEx), 4.1 million euros relate to activities related to hydrogen and other renewable gases, For more information, refer to notes "2.4. Property, plant and equipment" and "2.1 Operating Profit" in the Consolidated Annual Accounts³².

In addition, through its subsidiary Enagás Renewable, it promotes renewable gas production projects. All this will allow these to be progressively incorporated in the energy model in order to decarbonise the entire natural gas value chain. Enagás plans to invest, in line with its 2025-2030 Strategic Update, 65 million euros by 2030 in this affiliate (CapEx).

New logistics services

In 2024, we continued to promote new uses for natural gas in mobility, mainly in land and maritime transport (for more information, see disclosure requirements [E1-1](#) and [SBM-1 in chapter 2](#)). In line with its 2025-2030 Strategic Update, Enagás plans to invest approximately 46 million euros by 2030.

Other matters

In addition, Enagás will continue to work during 2024 on other links in the value chain, such as affiliates and the supply chain³³:

³² This figure comprises the costs associated with the approved projects (amount entered as R&D expenses in the '[Other operating expenses](#)' section

of the Consolidated Annual Accounts), procurement of R&D, personnel expenses and the purchase of equipment and instruments.

³³ The cost of these initiatives is not significant.

- Collaboration with industry and associations on decarbonisation.
- Promotion of decarbonisation at Enagás affiliates: emissions reduction and energy efficiency measures are among the critical management standards that Enagás extends to its affiliates. In addition, a climate action due diligence analysis has been performed on all our affiliates, which has allowed us to verify the progress of the companies in terms of setting emission reduction targets, as well as in terms of calculating and reporting methane emissions and evaluating best practices for reducing methane emissions. Regarding this last point, Enagás will continue to monitor methane emissions through the OGMP2.0 reporting framework.
- Promotion of decarbonisation in the supply chain: Enagás has several platforms to approve and evaluate its suppliers' performance (for more information, see disclosure requirement [G1-2](#)). In this way, Enagás evaluates its main suppliers in terms of climate action and identifies working areas aimed at reducing its carbon footprint.

Enagás is in the process of establishing a methodology to enable the quantification of the emission reductions associated with these initiatives in the coming years.

Enagás has planned all the mentioned actions and their corresponding investments aimed at decarbonising both its operations and the energy sector, as outlined in its 2025-2030 Strategic Update.

Metrics and targets

E1-4

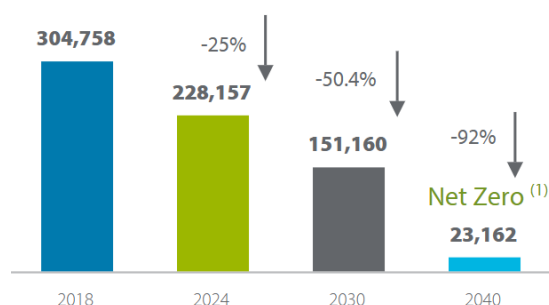
Targets related to climate change mitigation and adaptation

Enagás has made the commitment to reach Net Zero by 2040 for scope 1 and 2 (covering all own activities), and by 2050 for scope 3. To this end, it has outlined a decarbonisation pathway with emissions reduction targets for 2030, 2040 and 2050, taking into account forecast demand for natural gas and other renewable gases, as well as new technologies. These targets have been set based on the methodology of the Science-Based Targets initiative (SBTi).³⁴ These reduction targets are aligned with the carbon neutrality commitment set out in Enagás' Climate Action Policy (for more information, see disclosure requirement E1-2) and with the decarbonisation commitments required by stakeholders, such as investors.

Scopes 1 and 2 emissions reduction targets

In 2024, Enagás remained on track to meet its emissions reduction targets to reach Net Zero by 2040, having achieved a 25% reduction compared to 2018.

Scopes 1 and 2 emissions reduction targets (tonnes of CO₂e)



Year	Emissions target			
	Scopes 1 and 2		Scope 1	Scope 2
	Tonnes of CO ₂ e	Percentage of change	Tonnes of CO ₂ e	
2018	304,758		274,458	30,300
2024	228,157	-25.0 %	228,157	0
2030	151,160	-50.4 %	151,160	0
2040	23,162	-92.0 %	23,162	0

(1) Reduction of our CO₂e emissions by at least 90% and offsetting of residual emissions with nature-based solutions projects.

Each year, Enagás sets the goal of ensuring that the electricity it consumes at 100% of its facilities comes with renewable energy guarantees of origin (in 2024, electricity consumption amounted to 216,018 MWh).

The Scope 1 and 2 emission reduction targets include the Global Methane Alliance methane emissions reduction commitment, which will reduce methane emissions from our business by 45% by 2025 and 60% by 2030, compared to 2015 levels.

We held to our emissions reduction targets linked to variable remuneration (for more information, see the disclosure requirement GOV-3 on chapter 2), including the emissions reduction targets in both the annual Target Management Programme and the Long-Term Incentive Plan.

As part of the annual Target Management Programme, for 2024, the company set a target of a 5% reduction in Scope 1 and 2 emissions compared to 2023 (279,917 tonnes of CO₂e). This target was met, achieving a 22.6% reduction in emissions compared to the previous year, a percentage significantly higher than the decrease in demand for natural gas, which fell by almost 4% in 2024. This reduction was made possible by the implementation of energy efficiency and emissions reduction measures that have enabled us to meet the targets set for 2024.

In 2024, this decarbonisation pathway has been adjusted to the status of planned emissions reduction measures. As a result, the scope 1 and 2 emissions reduction target set for 2026 has been eliminated, as the implementation of some of these measures has been delayed until 2029.

Enagás has achieved its goal of zero emissions from electricity consumption (scope 2) at its facilities thanks to its acquisition of 100% of supplied electricity for all facilities with renewable energy guarantees of origin, as well as continuing its commitment to the self-generation of power produced through efficient, clean and renewable sources with an emission factor of zero.

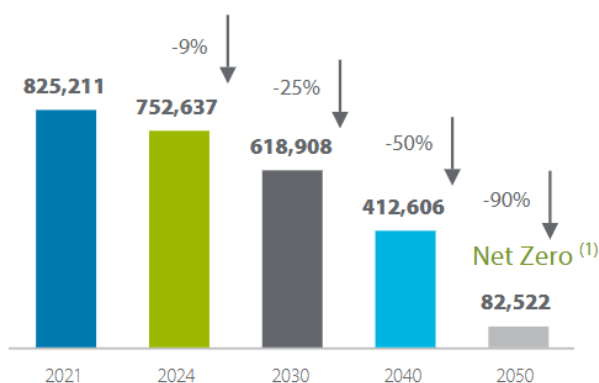
34 At the date of preparation of this report, the Science Based Targets Initiative (SBTi) has not yet defined a methodology for the Oil&Gas sector that covers Enagás' activities (midstream), so these targets have not yet been validated by SBTi. However, Enagás incorporates the main recommendations of the Science Based

Targets Initiative in its target setting methodology. Once the methodology for Oil & Gas is approved, Enagás will ensure compliance to align with the goal of limiting global warming to 1.5 °C, as set out in the Paris Agreement.

Scope 3 emissions reduction targets

In addition, the company has set the following targets for the reduction of its indirect Scope 3 emissions by 2050. Enagás, in its efforts to decarbonise and remain firm in its compliance with efforts to limit global warming to 1.5°C, is committed to reaching Net Zero by 2050, reducing its scope 3 emissions by more than 90% and offsetting residual emissions with nature-based projects.

Scope 3 emissions reduction targets (tonnes of CO₂e)^{35 36}



Year	Emissions target	
	Scope 3	
	Tonnes of CO ₂ e	Percentage of change
2021	Base year	825,211
2024	Real data	752,637 -8.8 %
2030	Target	618,908 -25.0 %
2040	Target	412,606 -50.0 %
2050	Net Zero Target ⁽¹⁾	82,522 -90.0 %

(1) Reduction of our CO₂e emissions by at least 90% and offsetting of residual emissions with nature-based solutions projects.

In 2024, Enagás reduced its Scope 3 emissions by 9% compared to the base year 2021, thus moving towards the decarbonisation of its value chain and in line with the targets set.

Methodology for setting targets

All these targets have been set in line with the following commitments included in the Climate Action Policy:

- Defining a decarbonisation pathway towards carbon neutrality including emission reduction targets (Scopes 1, 2 and 3) aligned with the 1.5°C scenario and included in the short- and long-term variable remuneration incentive programmes.

- Achieving carbon neutrality by 2040 (Scopes 1 and 2) by applying the greenhouse gas mitigation hierarchy.

The scope of these targets is the same as that included in the Enagás Carbon Footprint calculation (for more information, see disclosure requirement E1-6).

The selected base year of these targets is considered representative from the point of view of volume of activity, companies and activities covered. In 2024 no significant changes occurred in any of the three variables mentioned that could be subject to an adjustment of the base year emissions calculation. Therefore, no need to modify the calculation of the base year has been identified.

One of the key assumptions for the establishment of the emission reduction pathway was the forecast future demand for natural gas, modelled internally. This factor significantly impacts the self-consumption of natural gas at our compression stations, which is the main source of our scope 1 emissions.

These targets have been set taking into account the commitments adopted through adherence to various international climate action initiatives:

- Science-Based Targets³⁷: targets have been defined based on the general methodology following the absolute contraction approach, aiming for a linear reduction of 4.2% over the target period.
- We Mean Business: we are committed to driving policies towards a low-carbon economy, setting a carbon price and reporting climate change information in corporate publications.
- Global Methane Alliance: we are committed to reducing methane emissions from our activity by 45% by 2025 and 60% by 2030 with respect to 2015 figures.
- Methane Guiding Principles: we have signed up to commitments on methane emissions reduction and transparency.

Although best practices in the sector have been followed in setting these targets, Enagás has not externally ensured its decarbonisation pathway.

Enagás monitors the degree of compliance with these targets on a monthly basis. This allows it to identify significant changes or trends, as well as to take decisions to implement any measures needed to meet these targets.

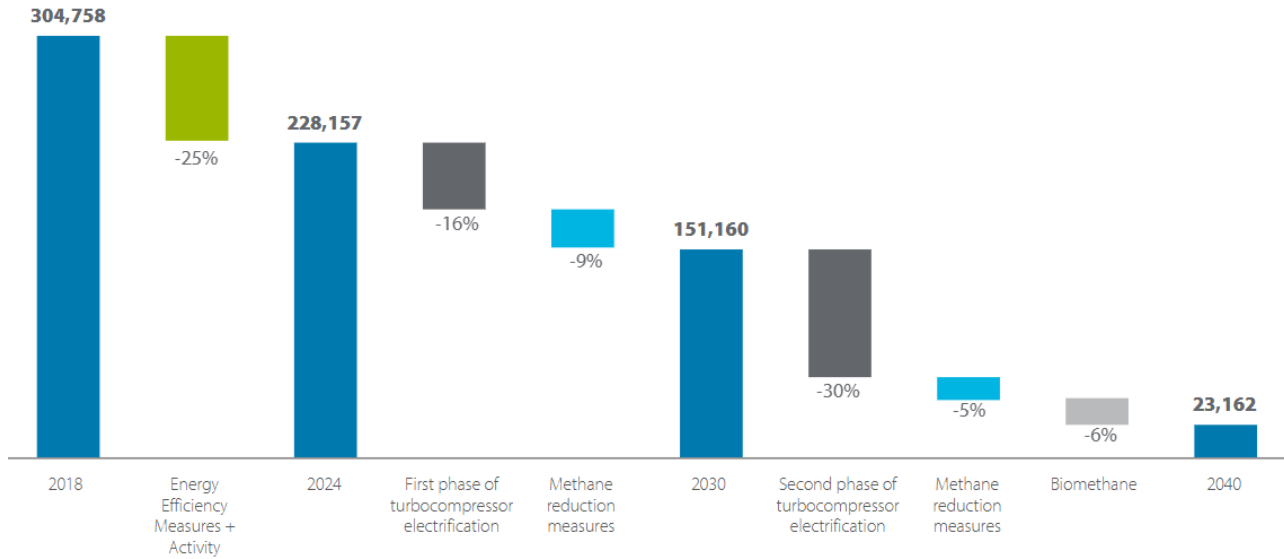
Enagás promotes various decarbonisation levers aligned with the Climate Transition Plan to achieve the targets described above, as described in disclosure requirement E1-3.

³⁵ According to the SBTi methodology and aligned with a 'well below 2°C' scenario by 2030 and compatible with limiting global warming to 1.5°C by 2050.

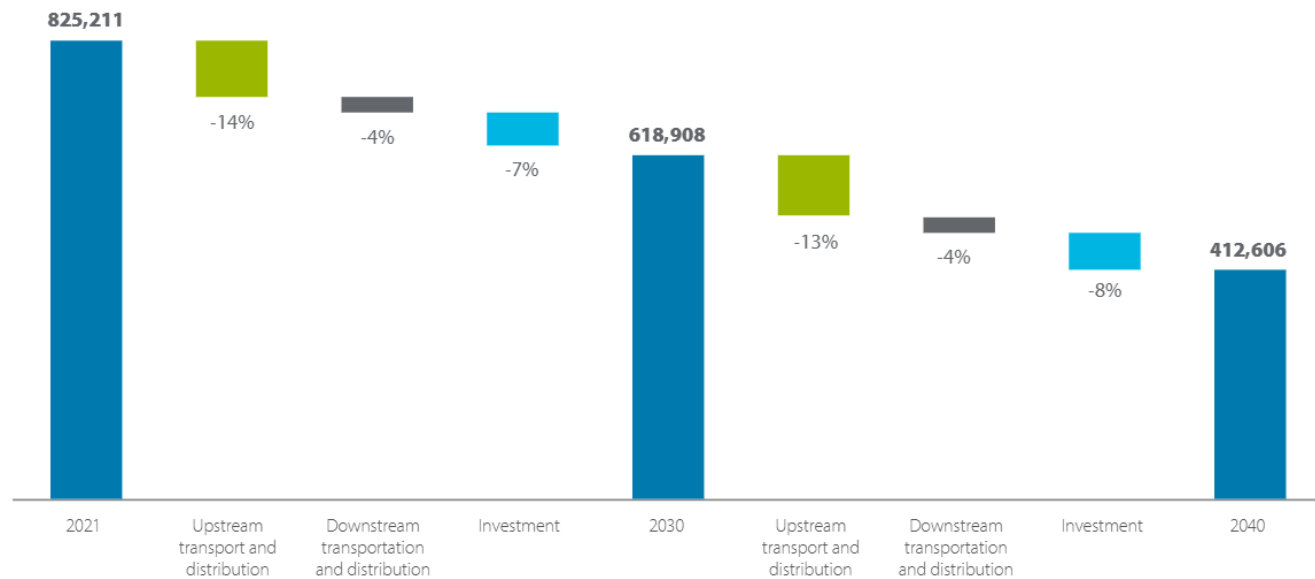
³⁶ The selected base year is considered representative from the point of view of selected categories. Targets corresponding to 100% of indirect Scope 3 emissions, the most significant of which include emissions derived from natural gas flowing on and off our infrastructure network, emissions from our affiliates and our main suppliers (GHG Protocol categories 1, 2, 3, 4, 5, 6, 7, 9, 11, 15).

³⁷ At the date of preparation of this report, the Science Based Targets Initiative (SBTi) has not yet defined a methodology for the Oil&Gas sector that covers Enagás' activities (midstream), so these targets have not yet been validated by SBTi. However, Enagás incorporates the main recommendations of the Science Based Targets Initiative in its target setting methodology.

Contribution of levers to scope 1 and 2 targets (tonnes of CO₂e)



Contribution of levers to scope 3 targets (tonnes of CO₂e) ⁽¹⁾



(1) Enagás has defined the main actions to be carried out in the coming years to comply with the Scope 3 decarbonization targets (for more information, see disclosure requirement E1-3), the definition of the contributions of these levers from 2040 onwards presents major challenges given the indirect nature of these emissions, the complexity of the value chains involved and the lack of standardized methodologies.

E1-5

Energy consumption and mix

The information on energy consumption comes from real consumption data derived from the activity itself. This is obtained from meters or internal sources, meaning that 100% of the data is of primary origin.

Enagás consumes electricity with guarantees of renewable origin in all its facilities. In 2024, the percentage of electricity with a guarantee of renewable origin over total electricity consumption

from the grid was 100% in all facilities. In other words, all electricity consumed by Enagás has a zero emission factor.

In 2024, own electricity generation from renewable, clean or efficient sources reached 14,811 MWh, representing approximately 7% of total electricity consumption. Part of the energy generated is delivered to the national grid and another part is consumed at Enagás’ own facilities. The energy sent back to the grid (7,674 MWh) helps reduce 1,995 tonnes of CO₂ for third parties, contributes to reducing the national electricity mix factor and reinforces the principles of the circular economy, whereby Enagás’ surplus electricity is used by third parties, thereby reducing their carbon footprint.

Energy consumption (MWh) ⁽¹⁾

Energy consumption and mix	Comparison	2023	2024
1) Consumption of fuel from coal and coal derivatives (MWh)	-	0	0
2) Fuel consumption from crude oil and petroleum products (MWh)	3 %	9,843	10,121
3) Fuel consumption from natural gas (MWh)	-25 %	1,297,540	967,881
4) Fuel consumption from other fossil fuel sources (MWh)	-	0	0
5) Consumption of electricity, heat, steam and cooling purchased or acquired from fossil sources (MWh)	-	0	0
6) Total fossil energy consumption (MWh) (calculated as the sum of lines 1-5)	-25 %	1,307,383	978,002
Share of fossil sources in total energy consumption (%)	-4.28 %	85.84 %	82.17 %
7) Consumption of fuel from nuclear sources (MWh)	-	0	0
Share of nuclear sources in total energy consumption (%)	-	— %	— %
8) Fuel consumption from renewable sources, such as biomass (which also includes industrial and municipal bio-waste, biogas, renewable hydrogen, etc.) (MWh)	-	0	0
9) Consumption of electricity, heat, steam and cooling purchased or procured from renewable sources (MWh)	-0.29 %	206,473	205,871
10) Consumption of self-generated renewable energy (MWh)	30 %	119	155
11) Total renewable energy consumption (MWh) (calculated as the sum of lines 8-10)	-0.27 %	206,592	206,026
Share of renewables in total energy consumption (%)		13.56 %	17.3 %
12) Consumption of energy from other clean sources (use of waste heat and/or pressure jumps)	-23 %	9,098	6,983
Share of clean sources in total energy consumption (%)	-1.67 %	0.60 %	0.59 %
Total energy consumption (MWh)	-22 %	1,523,073	1,191,011

(1) These parameters have been verified by an independent third party (SGS) within the carbon footprint verification framework, in line with ISO 14064.

Renewable and non-renewable energy consumption (MWh)

	2023	2024
Renewable energy	206,592	206,026
Non-renewable energy	1,316,481	984,985
Total energy consumed	1,523,073	1,191,011

Energy intensity per net income

	2023	2024	% Change
Total energy consumption from activities in sectors with high climate impact per net income from activities in sectors with high climate impact ⁽¹⁾ (MWh / M€)	1,728.8	1,356.0	-22 %

(1) Enagás considers as net income from activities in sectors with high climate impact income directly related to the natural gas sector. These are the Enagás Group companies which, according to their NACE code, belong in the 'Oil and gas - Midstream and Downstream', 'Energy production and utilities' and 'Oil and gas - Upstream and services' sectors as set out in the ESRS (for more information, see disclosure requirement SBM-1 and note 2.1 Operating income in the Consolidated Annual Accounts).

The indicator of water intensity relative to total revenue is not the most accurate measure of our environmental performance, as 97.5% of our revenue (100% of income from sectors with a high climate impact) comes from regulated activities determined by the current regulatory framework. This revenue is defined by a methodology that does not consider the level of use of gas infrastructure, which is the parameter related to environmental impacts.

E1-6

Gross Scopes 1, 2, 3 and Total GHG emissions

Enagás' carbon footprint is ISO 14064:2019 certified and is registered in the carbon footprint record of the Ministry for Ecological Transition and the Demographic Challenge.



Enagás, from 2018 to 2024, has reduced its Scope 1 and 2 emissions by 25% thanks to the measures included in its Efficiency and Emissions Reduction Plan.

Scopes 1, 2 and 3 CO₂e emissions (tonnes of CO₂e)⁽⁷⁾

	Retrospective					Milestones and target years				
	Base year	Base year data	2023	2024	Change (%)	2025	2030	2040	2050	Target % per year / base year
Scope 1 GHG emissions										
Scope 1 gross GHG emissions (tonnes of CO ₂ e)	2018	274,458	294,649	228,157	-23%	0%	-50%	-92%	-92%	-17%
Percentage of scope 1 GHG emissions from regulated emissions trading systems (%)	N/A	N/A	70%	66%	-6%	N/A	N/A	N/A	N/A	N/A
Scope 2 GHG emissions										
Location-based scope 2 gross GHG emissions (tonnes of CO ₂ e)	2018	72,078	58,644	52,003	-11%	0%	0%	0%	0%	-28%
Market-based scope 2 gross GHG emissions (tonnes of CO ₂ e)	2018	30,300	0	0	0%	-100%	-100%	-100%	-100%	-100%
Significant scope 3 GHG emissions										
Gross total indirect GHG emissions (Scope 3) (tonnes of CO ₂ e)	2021	825,211	723,986	752,636	4%					-9%
1 Goods and services purchased	2021	22,094	45,735	50,546						N/A
Optional subcategory: Cloud computing and data centre services	2021	0	0	0	0%					
2 Capital goods	2021	6,197	13,087	6,609	-49%					
3 Activities related to energy production (not included in scopes 1 or 2)	2021	36,468	42,228	29,737	-30%					
4 Transportation and distribution in earlier stages	2021	402,205	458,204	274,157	-40%					
5 Waste generated during operation	2021	172	68	15	-78%					
6 Business travel	2021	206	1,195	538	-55%					
7 Employee commuting	2021	398	447	564		0%	0%	0%	0%	
8 Assets leased in previous stages	2021		N/A	N/A						
9 Transportation and distribution	2021	122,209	114,693	269,126	135%					
10 Transformation of products sold	2021		N/A	N/A						
11 Use of products sold (1)	2021		0	0						
12 End-of-life treatment of sold products (2)	2021		N/A	N/A						
13 Assets leased in later stages (3)	2021		N/A	N/A						
14 Franchises (5)	2021		N/A	N/A						
15 Investments (4)	2021	235,261	48,329	121,344	151%					
Total GHG emissions										
Total GHG emissions (location-based) (tonnes of CO ₂ e)	N/A	1,171,747	1,077,279	1,032,796	-4%	N/A	N/A	N/A	N/A	N/A
Total GHG emissions (market-based) (tonnes of CO ₂ e)	N/A	1,129,969	1,018,635	980,793	-4%	N/A	N/A	N/A	N/A	N/A

(1) Category 11 emissions from gas use are considered to correspond to the same emissions as GHG Protocol Cat. 9 emissions from distribution companies. This is due to the nature of our business, as Enagás does not own or sell natural gas, and therefore we consider distribution companies to be end customers of our services, and their emissions to be the final ones linked to the natural gas we transport.

(2) This category is not applicable to Enagás as our activity is limited to the transmission of natural gas, classified within the midstream segment. Enagás is not the owner of the gas at any stage of the value chain and is not responsible for emissions related to the end-of-life treatment of products or the processing of products for sale.

(3) This category is not applicable to Enagás as we do not operate any upstream or downstream leased assets.

(4) Includes emissions from Enagás' affiliates, specifically the Bahía de Bizkaia Gas (BBG) Regasification Terminal; Sagunto Regasification Terminal (Saggas); LNG Regasification Terminal from the operator DESFA; Trans Adriatic Pipeline (TAP); Enagás Renewable; Scale Gas.

(5) This category is not applicable to Enagás because the company does not have franchises.

(6) In addition to the emission factors used in the calculation of Scope 1 and 2 emissions, the following emission factors have been considered for the calculation of Scope 3 emissions:

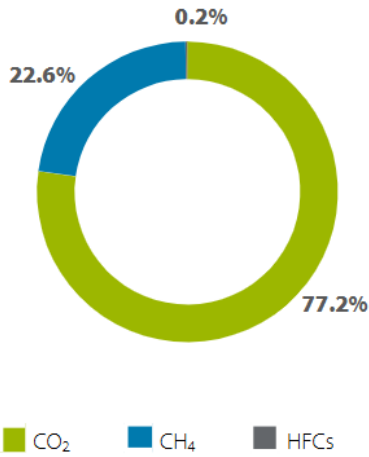
- Maritime transport: DEFRA, Pestaña Fuels, Maritime Oil. 2023. version 1.

- Air transport: Aviation: COMMISSION IMPLEMENTING REGULATION (EU) 2018/2066 of December 19, 2018, on the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/87/EC of the European Parliament and of the Council and amending Commission Regulation (EU) No 601/2012 (<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R2066>). Using emission factor (Annex 3.2 Table 1) 3.10/ 3.10/ 3.15 tonnes of CO₂/tonnes of fuel for the density provided by the same source of 0.8 kg/litre (Article 53).

(7) These parameters have been verified by an independent third party (SGS) within the carbon footprint verification framework, in line with ISO 14064

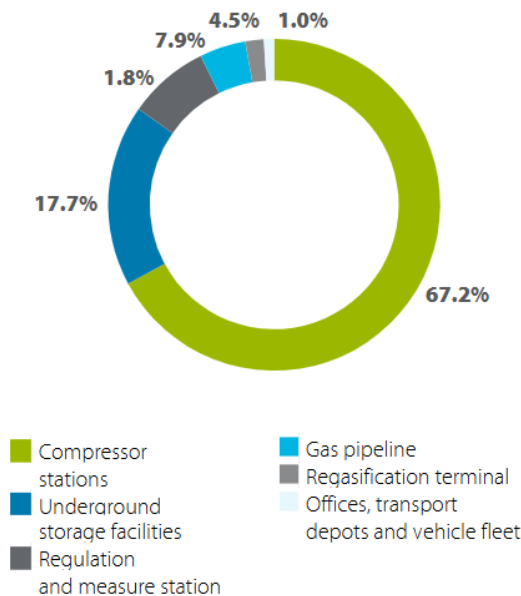
Scopes 1 and 2

Distribution of scope 1 and 2 emissions by gas type in 2024 ³⁸



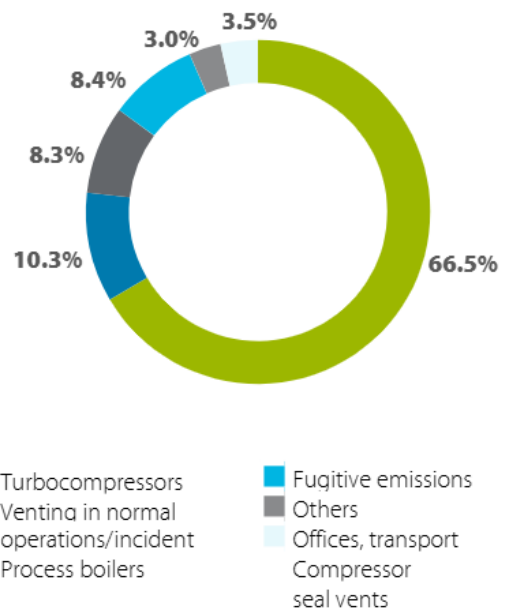
Type of gas	Distribution of scope 1 and 2 emissions
CO ₂	77.2%
CH ₄	22.6%
HFCs	0.2%

Distribution of scope 1 and 2 emissions by facility type in 2024



Type of installation	Distribution of scope 1 and 2 emissions
Compressor stations	67.2%
Underground storage facilities	17.7%
Regulation and metering stations	7.9%
Gas pipeline	4.5%
Regasification terminal	1.8%
Offices, transport depots and vehicle fleet	1.0%

Distribution of scope 1 and 2 emissions by source in 2024

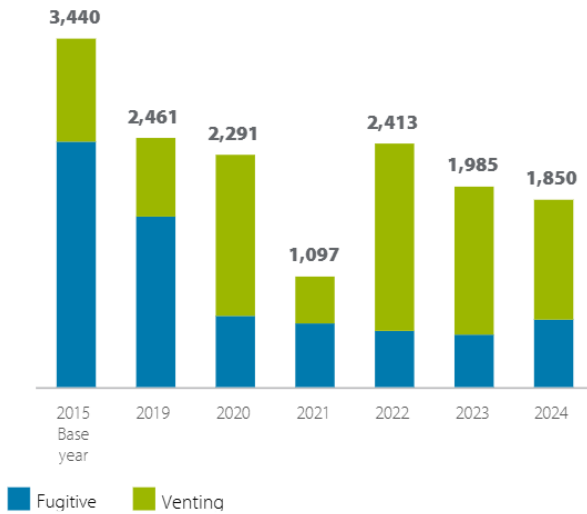


Source	Distribution of scope 1 and 2 emissions
Turbocompressors	66.5%
Venting in normal operations/incident	10.3%
Process boilers	8.3%
Fugitive emissions	8.4%
Compressor seal vents	3.0%
Others	3.5%

³⁸Enagás assumes an oxidation factor of 1 in the combustion of natural gas; in other words, it is assumed that all the gas burned is transformed into CO₂, with no unburned CH₄ or N₂O emitted. Enagás uses an oxidation factor of 1 in line with the requirements set out in the EU ETS emission allowances

regulations. It also does not emit the greenhouse gases NF₃ or PFCs. Emissions of SF₆ are not significant, representing less than 0.1% of the year's emissions.

Change in Scope 1 methane emissions (tones of CH₄)



77.2% of Enagás’ scope 1 emissions correspond to CO₂ emissions generated mainly during the combustion of natural gas in stationary sources, i.e. turbocompressors, boilers, flares, etc. Methane emissions, which account for 22.6% of the footprint, are mainly due to natural gas venting (63%) and fugitive emissions (37%). Venting may occur as a result of operation and maintenance, operating safety, pneumatic valves and analysis equipment such as chromatographs. For their part, fugitive emissions correspond to uncontrolled gas leaks in the equipment (flanges, connectors, etc.). The latter have increased by 26.8% compared to the previous year. With regard to gas losses, in 2024 they represented 0.0023% and 0.00005% in transmission and storage activities respectively.

Globally, emissions of this gas (CH₄) have decreased by 7% compared to 2023, mainly due to:

- Improved data recording on venting at regasification terminals and underground storage facilities and during transmission thanks to the development of a computer application that improves data collection and consolidation.
- Improvements in the quantification methodology, incorporating the guidelines that are being developed at the international level.
- Improvements to incident detection, quantification and reporting.

Enagás’ adherence to the methane emissions reporting framework of the Oil & Gas Methane Partnership 2.0 (OGMP2.0), together with significant efforts to reduce the uncertainty of this data, entail a constant review of our quantification methodology. In this regard, the Enagás Implementation Plan for maintaining the Gold Standard involves the review of all our methane sources and therefore, the possibility of incorporating possible new sources in the coming years. In addition, various measurements have been carried out with new technologies that allow data reconciliation. This comprehensive review will continue in the coming period, by which time Enagás expects to achieve the

highest data quality in line with OGMP commitments and deadlines.

Regarding scope 2 emissions, these are at zero according to the market-based methodology, given that in 2024 100% of electrical energy consumed had renewable guarantees of origin (GoO).

Scope 1 GHG emissions from regulated emissions trading systems

66.1% of emissions included in the Carbon Footprint (scopes 1 and 2) are included in the EU Emissions Trading System (EU ETS).

In 2024, 55,637 emission allowances were received through free allocation (50,881 in 2023) and 40,000 emission allowances were purchased (274,000 in 2023) to cover the period’s emission rights needs.

Scope 3

In 2024, emissions increased by 4% compared to 2023. This was mainly due to downstream distribution, a category that increased by more than 100%.

In 2024, Enagás reached an agreement to sell its 30.2% stake in the American company Tallgrass Energy to Blackstone Infrastructure Partners. This has no impact on scope 3 in our carbon footprint, as we did not have quantifiable data on the emissions of this affiliate. Enagás also increased its stake in the Hanseatic Energy Hub (HEH) consortium to 15% to build Germany’s first onshore liquefied natural gas terminal. Last year, it also sold the Soto La Marina compressor station in Mexico. All of this will have an impact on the company’s scope 3 emissions. All of this will have an impact on the company’s Scope 3 emissions in the coming year. In the data for 2024, data from the company Enagás Renewable, for which no data was previously available, has been included.

Methodology for calculating the Carbon Footprint

Enagás establishes the operational limits of its organisation; it operates within Spain. To this end, it has identified the emissions associated with its operations (by sources and facilities), classifying them as direct or indirect emissions according to the categories established in UNE-EN ISO 14064:2019 and their correlation with the scopes defined by the GHG Protocol:

- Direct emissions: emissions from Enagás’ own operations (scope 1: emissions from sources such as stationary combustion, mobile combustion, fugitive emissions, etc.).
- Indirect emissions are those produced as a consequence of the generation of electricity, heat or steam. At Enagás, these are the emissions related to the energy we consume in our work. Emissions from power generation and consumption at facilities.
- The remaining indirect emissions correspond to organisational activities that come from sources that are not owned and controlled by Enagás, i.e. in its value chain.

Scopes 1 and 2

Enagás identifies all sources of emissions in its tool. Each month and year, Enagás compiles all activity and consumption data from various sources, including manuals and internal applications. Activity data is then converted into the equivalent CO₂ emissions for all identified emission sources at each facility, using emission factors. These factors are drawn from the MITECO calculator and other sources such as DEFRA.

The calculations made for scope 1 and 2 of the Enagás carbon footprint are based on real consumption data derived from the activity itself, obtained from meters or internal sources. In other words, 100% of the data are of primary origin. This is why Enagás does not make exclusions in these scopes. It accounts for 100% of the emissions associated with its operation.

For scope 2, Enagás calculates its market-based emissions on the basis of the factor of the contracted suppliers. This is zero, as it has guarantees of origin. It also calculates the derived emissions using a location-based methodology, thus being able to track its consumption.

Scope 3

In addition to its activity chain's impact on emissions, Enagás includes the impact of the gas transmitted by the company in the natural gas value chain in its Scope 3 emissions. It is important to note that the gas Enagás transports through its infrastructure is not owned by the company. Therefore, Enagás includes only the emissions associated with the services it provides to its customers – specifically, the transmission of this gas – in its scope 3 emissions. Emissions that cannot be calculated or estimated due to insufficient information are excluded from this scope and represent less than 5% of all categories. And the rest of the categories do not apply to Enagás' own activity (Categories excluded by activity 8, 10, 12, 13 and 14).

These categories include:

- Category 1: Procurement of goods and services and Category 2: Capital or production goods. For both categories, scope 1 and 2 emissions were estimated together with reported and unreported turnover by suppliers through the responses given to a questionnaire we provided.
- Category 3: activities related to energy production that are not included in scopes 1 or 2; primary data obtained from consumption associated with Enagás that have not been included in scope 1 and 2.
- Category 4: upstream transmission and distribution. This includes consumption derived from the transport of LNG using tanker vessels. Two external and public sources are used to extract emission factors by vessel name and year and the distance travelled by each vessel. With these two elements, we obtain the tonnes of CO₂e involved in the transport of the vessels to Enagás plants. In addition, helicopter fuel used for on shore-off shore transit is included as primary data, as is data for aerial and maritime land surveillance.

- Category 5: waste generated during operation, includes emissions derived from the transport, management and treatment of waste generated at Enagás facilities. Different DEFRA emission factors are used depending on the treatment of the waste; along with the amount of waste transported, these used to calculate the tonnes of CO₂ corresponding to each process.
- Categories 6 and 7: business travel and employee commuting. For business travel, primary data is available from contracted travel agencies. For employee commuting, a generic estimate from the Ministry for the Ecological Transition and the Demographic Challenge is used. This calculates commute emissions by number of employees, taking into account positions and teleworking hours.
- Category 9: downstream transmission and distribution. Given that Enagás does not own the gas it transports, emissions in this category are estimated with the emissions of Spanish distributors by consulting the best available and updated data, ensuring that there have been no significant changes in the final period that could cause a deviation from the data. Category 11 emissions from gas use are considered to correspond to the same emissions as Category 9 emissions from distribution companies. This is due to the nature of Enagás' business, as the company does not own or sell natural gas, and therefore considers distribution companies to be end customers of its services, and their emissions to be the final ones linked to the natural gas that Enagás transports.
- Category 15, Investments. It includes the issues of affiliates, attributing the figure proportional to the percentage of ownership of their scope 1 and 2. Scope 1 and 2 emissions at affiliates are primary data, provided by the affiliates themselves. In the event that data is not available in time, an estimate is made using data from the previous year, ensuring that there are no relevant changes. In 2024, the emissions of this category have been estimated with the 2023 emissions data of the investee companies.

Scope 3 emissions account for 63% of the categories calculated with primary data and 37% of the estimated ones.

In 2021, Enagás reviewed the indirect emissions relevance analysis according to the criteria set out by the ISO 14064 standard, namely: volume of emissions in each category with respect to the total, level of influence, access to information, data accuracy and relevance. As a result of the significance analysis, the categories corresponding to upstream transmission and distribution of goods, downstream transmission and distribution, purchased goods, investments and fuel and energy related activities not included in scope 1 and scope 2 have been classified as relevant. It should be noted that, although only five categories were identified as significant, Enagás is aware of the importance of emissions linked to the value chain and reports all categories in a bid for transparency.

Greenhouse gas emissions intensity

Greenhouse gas emissions intensity (scope 1, 2 and 3) per net income

	2023	2024	% Change
Total GHG emissions (location-based) per net income (tonnes of CO ₂ e / M€)	1,171.0	1,130.0	-0.04
Total GHG emissions (market-based) per net income (tonnes of CO ₂ e / M€)	1,107.0	1,074.0	-0.03

1 Enagás considers as net income the revenues indicated in note 2.1 Operating income in the Consolidated Annual Accounts.

Total GHG emissions intensity calculated with respect to net income - although a standard and widely used indicator - does not represent the most precise unit to measure our environmental performance, as 97.5% of our income comes from regulated activities. The current regulatory framework's methodology to determine this revenue does not consider the level of use of gas infrastructure, which is the parameter related to environmental impacts.

Enagás assesses efficiency in terms of emissions (emissions intensity) through indicators aligned with the emissions derived from the most significant energy consumption and activity data with which Enagás has identified correlations. For this reason, the ratios for each facility type and the overall ratio of total Scope 1 and 2 emissions to total compressed, injected and regasified gas are included below.

Infrastructure activity data

		Unit	2023	2024	2024 vs. 2023 (%)
Regasification terminals	Regasified gas, tank and ship loading at regasification terminals	GWh	138,870	103,282	-26%
Compressor stations	Compressed gas at Compressor stations	GWh	260,424	180,039	-51%
Underground storage facilities	Total net injection underground storage facilities	GWh	7,009	8,821	26%
	Total gross withdrawal from underground storage facilities	GWh	8,194	10,370	26%

E1-7

GHG removals and GHG mitigation projects financed through carbon credits

Enagás' decarbonisation strategy is based on prioritising measures to reduce emissions and subsequently offsetting emissions that cannot be reduced for technical reasons. Enagás follows certain criteria to offset its residual emissions:

- Mitigation hierarchy: only proceed to offset residual emissions once the maximum level of reduction has been achieved with the available technology.

Scopes 1 and 2 GHG emissions intensity

	2023	2024	% Change
Emissions at compressor stations with respect to compressed gas at compressor stations (tonnes of CO ₂ e at compressor stations/TWh)	870.2	863.0	-0.01
Emissions in storage facilities with respect to gas injected into underground storage facilities (tonnes of CO ₂ e in storage facilities/TWh)	5,095.2	4,571.6	-0.10
Emissions at plants with respect to gas regasified at LNG regasification terminals (tonnes of CO ₂ e at terminals/TWh)	55.00	46.6	-0.15
Emissions with respect to total compressed, injected and regasified gas (tonnes of CO ₂ e/TWh)	780.7	834.5	0.07

At a facility level, 67.2% of emissions are concentrated at compressor stations, followed by underground storage facilities, which account for 17.7%. In terms of emission sources, 66.5% of the total emission footprint (Scope 1 and 2) is generated by the self-consumption of natural gas in turbocompressors at compressor stations and underground storage facilities. In this regard, Enagás has an ambitious turbocompressor electrification plan to progressively replace natural gas compressors with electric compressors, thereby reducing emissions and helping to achieve the targets set out in the decarbonisation pathway. In 2023 and 2024, two turbocompressors were electrified.

- Offset against credits generated by projects that meet the following requirements:
 - Be located in geographic areas where the company is present.
 - Have quality certificates that guarantee the solvency and reliability of the projects.
 - Prioritise nature-based solutions.

Therefore, after applying these criteria, in 2024 Enagás spent 37,856 euros on purchasing carbon credits to offset 8,520 tonnes of CO₂e for the 2023 financial year. For more information, refer to note '4.6 Other Information' in the Consolidated Annual Accounts. In 2025 it will offset the emissions derived from its regasification terminals, the Euskadour compressor station, the corporate fleet and headquarters via the cancellation of carbon

credits amounting 5,839 tonnes of CO₂e, corresponding to 2024. In this way, these facilities have maintained the carbon neutrality they achieved in 2017 (in the case of Euskadour, 2020). This compensation was carried out with the purchase and cancellation of carbon credits for avoided-deforestation projects in Peru and the Motor Verde reforestation project in Spain, developed by Repsol and Sylvestris³⁹.

Carbon credits cancelled in reporting year	2023	2024	Change
Total (tonnes of CO₂e)	8,520	5,839	-31.47 %
Proportion of phase-out projects (%)	0%	0%	Not applicable
Proportion of reduction projects (%)	100%	100%	0%
Recognised quality standard Verified Carbon Standard (VCS) (%)	99%	98%	-1%
Recognised quality standard Registration with the OECC (Spanish Office for Climate Change) (%)	1%	2%	100%
Proportion of projects within the EU (%)	1%	2%	100%
Proportion of carbon credits that can be considered as corresponding adjustments (%)	99%	98%	(1%)

Carbon credits expected to be cancelled in the future	Quantity to 2025
Total (tonnes of CO₂e)	5,986

Enagás plans to continue its decarbonisation pathway, reaching net zero in 2040 for scope 1 and 2. During this period, it will prioritise the reduction and elimination of emissions, committing to offsetting the remaining emissions in 2040 and in 2050 for scope 3. It will do so by offsetting its residual emissions with carbon credits from projects associated with nature-based solutions (reforestation) certified under recognised standards (for more information, see disclosure requirement [E1-4](#)).

Enagás is not working on GHG elimination and/or storage projects in its own operations, nor has it contributed to any projects in its value chain.

E1-8

Internal carbon pricing

The Enagás Internal Carbon Price is applied uniformly to all facilities and each business unit. There are numerous uses for it at the company. The main ones are:

- Monetisation of GHG emissions and inclusion of GHG emissions in business plans in order to optimise decision-making when evaluating projects with associated capital investment.

- Risk management.
- Planning of the company's sustainability strategy.
- Integration in Climate Change Risk Analysis for strategic operational decision making.
- Ensure compliance with GHG regulations.
- Drive domestic behavioural change to reduce GHG emissions, as well as increase energy efficiency and low-carbon investments.

The internal carbon pricing scheme was used, with 228,157 tonnes of scope 1 CO₂ covered by this system (23.3% of total generated emissions and 100% of scope 1 and 2 emissions).

The Internal Carbon Price is updated quarterly based on market forecasts. In 2024, an average price of 65.85 euros per tonne of CO₂ was set, provided by the company SENDECO2. In addition, forecasts were made for the 2025-2030 period based on information provided by the company's Carbon Pulse, which averages the estimated values of a significant number of market analysts (last updated in April 2024)⁴⁰ and for 2040 based on the International Energy Agency's (IEA) 'Announced Commitments Scenario' for advanced economies with Net Zero commitments.

E1-9

Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

Enagás is working to ensure compliance with the disclosure requirement in future reporting years. However, the company has been working for years to identify and quantify climate risks and opportunities in line with the methodology described in disclosure requirement [SBM-3](#).

For more information on the financial effects of risks, see section '[a\) Information on the impact and management of climate change](#)' in note '[4.6 Other Information](#)' of the Consolidated Annual Accounts of the Enagás Group.

³⁹ Carbon credits from projects to reduce or eliminate GHG emissions within the value chain are not included.

⁴⁰ This is a comprehensive methodology that combines market analysis as well as regulatory and economic factors. It is supported by sources and data backed by the scientific community and international organisations.

Climate change risks

	Risks		Time horizon	Scenarios	Level of risk	Risk control and management measures
	Factors	Events				
Physical risks	Natural disasters or adverse weather conditions: <ul style="list-style-type: none"> River and coastal flooding. Fires. Earth movements. Extreme winds, among others ⁽¹⁾. 	Operational cost overruns due to natural disasters that damage the company's infrastructures or due to the adaptation of the company's infrastructures to the consequences of climate change, as the case may be.	Long term	RCP 4.5	Medium scenario: Tolerable Probability: medium Impact: 8.6% net profit ⁽²⁾	<ul style="list-style-type: none"> Environmental certifications (ISO 14001 and EMAS). Emergency response action plans. Procedures for the investigation and monitoring of incidents. Development of demand scenarios that determine the infrastructure to develop in order to guarantee security of supply. Insurance policy covering catastrophic damage. Review of plans for adaptation to climate change in infrastructures and the associated investments.
				RCP 8.5	Stress scenario (remote) ⁽³⁾ : Tolerable Probability: low Impact: 15.5% net profit ⁽²⁾	
	Increased demand for transparency and climate action from regulators, society, shareholders and others.	Loss of relevance in sustainability indices due to not reaching the expected standard of climate management, or reputational damage resulting from climate change impacts, which may negatively affect the assessment of intangibles by stakeholders.	Short, medium and long term	NZE 2050	Tolerable Probability: low Impact: moderate (Qualitative assessment)	<ul style="list-style-type: none"> Corporate positioning on climate change including Net Zero target by 2040 for Scopes 1 and 2 and by 2050 for Scope 3. Leadership in the main sustainability indices such as CDP Climate or Dow Jones Best In Class Index. Priority in the 2025-2030 Strategic Update. Fluent, direct communication with stakeholders. Periodic roadshows with significant shareholders, minority shareholders, analysts and proxies, with the very active participation of the Department of Sustainability and Climate Action.
	Worsening financing conditions	The push for sustainable finance by regulators and investors (EU taxonomy, EIB investment policy, European Green Deal, and other similar measures) could affect the company's financing conditions in the medium and long term.	Medium term	NZE 2050	Tolerable Probability: moderate Impact: medium (Qualitative assessment)	<ul style="list-style-type: none"> Development of renewable gas projects aligned with the EU Taxonomy and the ESG requirements of regulators and investors that will enable sustainable debt issuance and improved financing conditions.
Transition risks	The speed of renewable energy deployment will condition the offsetting of lower revenues from measures implemented by authorities and governments in response to climate change.	The value of the assets is recovered with the current remuneration life; in the long term, there may be possible lower revenues for the company due to lower remuneration associated to the extension of the assets' useful life (Spain business). Lower contribution from investees due to non-renewal of commercial contracts.	Long term	NZE 2050	Acceptable Probability: low Impact: 1.6% net profit ⁽⁴⁾	<ul style="list-style-type: none"> Promotion of the development of renewable gases, especially renewable hydrogen. Promotion of the development of new technologies and infrastructures for the capture, transmission and storage or use of CO₂ and small-scale liquefaction Promotion of new services and uses of natural gas in the transportation (sea, rail and road), industrial and household sectors. Use of natural gas as a backup for the electricity system. Long-term customer contracts. 'Take or pay' business model not exposed to demand variation.
					Medium scenario Acceptable Probability: medium-moderate Impact: low 0.2% net profit	
				Worst case (NZE) Acceptable Very low probability Impact: 0.5% net profit		
	The delay or non-development of the turbocompressor electrification plan, the availability of biomethane for its use as well as the evolution of its prices.	Failure to meet the announced carbon neutrality commitments due to the materialisation of the above risk factors, among others.	Medium term	NZE 2050	Tolerable Probability: medium-moderate Impact: low (Qualitative assessment)	<ul style="list-style-type: none"> Energy Efficiency and Emissions Reduction Plan. Promotion of the development of gas from renewable sources and its integration in gas infrastructures. Promotion of the development of new technologies and infrastructures for the capture, transmission and storage or use of CO₂ and small-scale liquefaction. Nature-based solutions for offsetting residual emissions.

(1) Although it is not considered as a climatic factor to be assessed, the risk of tsunami has been included in the analysis of the plants due to their location.

(2) The economic impact amounts to 24,802,656 euros in the medium scenario and 44,564,447 euros in the stress scenario. The estimated cost of managing the lines of action is 6 million euros per year.

(3) The impact of a stress scenario (a scenario with a remote probability of occurrence) has been analysed for the case of tsunami and extreme damage from other climatic factors.

(4) The economic impact amounts to 6 million euros. No significant estimated cost of managing the measures has been identified.

Level of risk ■ Acceptable ■ Tolerable ■ Significant ■ Critical

Climate change opportunities

Opportunity	Lines of action	Impact ⁽¹⁾		
Hydrogen infrastructure development	<ul style="list-style-type: none"> Spanish and European Hydrogen Backbone Network (H2Med). Research and development of salt caverns for storage. Joint Ventures for technological development and the promotion of renewable hydrogen production and transmission infrastructures. Projects under study focus on the use of hydrogen in mobility and auxiliary machinery applications. 	High		
	New logistics services that promote natural gas consumption	<ul style="list-style-type: none"> Design and development of new services in infrastructures, turning them into logistical centres for LNG supply. Development of other new services: bunkering (refuelling LNG, between tanks or from a satellite plant to a tank), small scale (refuelling small LNG tanks), bulk breaking (refuelling LNG in medium-sized tanks and trucks), parking gas (long-term storage of gas in tanks). Extension of the tank refuelling service. Mobility: gas and hydrogen refuelling stations. 	Average	
		Development of infrastructure for CO₂ transport and storage	<ul style="list-style-type: none"> Positioning as an independent operator of CO₂ infrastructures Development of necessary CO₂ infrastructures in Spain in cooperation with customers, authorities, distributors and other partners (Spanish CO₂ backbone) Build up Enagás' plants as multi-molecular hubs. Development of CO₂ transport and storage projects by Enagás affiliates. 	Low

(1) Investments eligible under the EU taxonomy for the 2025-2030 period amount to 3.365 billion euros, accounting for 83% of the total planned investment for that time frame. This new investment cycle, primarily focused on developing hydrogen infrastructure and, to a lesser degree, other key molecules in the energy transition like CO₂, is expected to lead to an average annual EBITDA growth of 2.5% from 2024 to 2030 for Enagás. Investment will ramp up from 2027, driving the average annual EBITDA growth to 9.5% from 2026 to 2030.

E2. POLLUTION

Management of impacts, risks, and opportunities

IRO-1

Description of the processes to identify and assess material impacts, risks, and opportunities related to pollution

Enagás has conducted an analysis to identify impacts, risks, and opportunities and to assess which are material concerning pollution, as outlined in disclosure requirement [IRO-1](#) in chapter 2⁴¹.

This analysis encompasses all activities and infrastructure locations of companies under financial control, including both upstream and downstream stages of the value chain. In identifying potential impacts, risks and opportunities related to pollution, Enagás has pinpointed the main pollutants at its facilities that are subject to environmental regulations. These regulations are considered to be linked with more significant impacts and the risk of penalties.

The table below details the impacts identified as having relative importance from the analysis:

Table of impacts

Topic	Sub-topic	Impact	Nature
Pollution	Air pollution	The deterioration of air quality due to the emission of pollutants associated with energy consumption in the organisation's operations.	Negative - Current

Enagás has been provisionally appointed as the manager of the Spanish Hydrogen Backbone Network (provisional HTNO), with Enagás Infraestructuras de Hidrógeno S.L.U. authorised to temporarily carry out the development of European Projects of Common Interest for hydrogen networks. Currently, no material impacts, risks, or opportunities have been identified related to this new activity. However, Enagás is in the process of examining the relevance of pollution, along with potential impacts, risks, and opportunities in an initial conceptual stage before conducting the Environmental Impact Assessment (EIA).

The main non-greenhouse gases emitted at our facilities are CO, SO_x, NO_x, PM₁₀ particles and Non-Methane Volatile Organic Compounds (NMVOC). The emissions of these polluting gases are produced by the consumption of natural gas and diesel by different equipment, particularly in compressor stations.

Below are listed the company's facilities and activities where the impacts are considered material, based on criteria such as the volume and trends of atmospheric pollution (92% of the self-consumption of all company compressor stations).

Facilities with significant negative impact

Enagás facilities	
Compressor stations (CS)	
Chinchilla Compressor Station	Córdoba Compressor Station
Haro Compressor Station	Villar de Arnedo Compressor Station
Alcázar de San Juan Compressor Station	Coreses Compressor Station
Montesa Compressor Station	Almodóvar Compressor Station

E2-1

Pollution-related policies

Enagás has an [Environmental Policy](#), approved by the Board of Directors, that outlines key commitments for environmental protection and aspects related to the Environmental Management System. These commitments address atmospheric pollution, identified as relevant issue for Enagás, and include the following highlights:

- Prevent, control, and mitigate negative impacts associated with air pollution (emissions of non-greenhouse gases: CO, NO_x, SO_x, PM₁₀ and COVDM).
- Identify and implement preventive measures to achieve established targets and prevent environmental accidents, as well as corrective measures (including emergency responses) to control and minimise environmental impact in the event of accidents.

In 2024, this policy was revised following a corporate decision to split the former combined Health and Safety, Environment, and Quality Policy into three distinct policies. This change enables more effective implementation of commitments related to these crucial aspects of the business.

This policy applies and has been communicated to all employees and managers of all companies making up the Enagás Group, including any affiliates effectively controlled by it, within the

⁴¹ Sub-topics 'microplastics' and 'substances of concern' have not been included in the materiality analysis as they are not relevant to the company's business model.

limitations established in the regulations applicable. Consequently, it covers all activities of Enagás Group companies globally.

In affiliates where Enagás does not have effective control, it is recommended that their Boards promote principles aligned with this policy. The company also promotes the application of the policy's principles, wherever possible, to temporary joint ventures, joint ventures, and other similar partnerships or entities. The company also emphasises these principles and commitments with contractors, suppliers, and collaborators, particularly regarding the supply chain.

The policy is accessible to stakeholders on the company's [corporate website](#), as well as on the corporate Intranet for all employees.

The policy assigns the Board of Directors, through the Sustainability and Appointments Committee, the responsibility for guiding, supervising, and controlling the company's environmental strategy and policy, as well as managing related risks and public information. The Health and Safety, Environment, and Quality Integrated Management System Committee is tasked with setting the basic guidelines for developing and monitoring the integrated management system. It is also responsible for coordinating relevant actions and reporting to the Executive Committee. The various company Departments are responsible for setting and prioritising action plans, targets, and monitoring indicators.

In addition, Enagás has a [Climate Action Policy](#), also approved by the Board of Directors, which sets out key commitments in addressing climate change mitigation, climate change adaptation, energy efficiency, and the use of renewable energy sources. For further details about this policy, please refer to disclosure requirement [E1-2](#).

By doing so, the company makes commitments to address impacts identified as significant. For more details, refer to the table of impacts included in the [IRO-1](#) disclosure requirement in this chapter.

In addition, through the [Ethical Principles and Guidelines for Suppliers](#), Enagás considers that its suppliers and contractors shall undertake to preserve natural capital, controlling and minimising the environmental impact of the activities they carry out at Enagás facilities, taking into account aspects such as pollution prevention (for more information, see disclosure requirement G1-1).

E2-2

Pollution-related actions and resources

The Company fulfils its environmental commitments, as detailed in its Environmental Policy, through its management system. 100% of Enagás activity is [ISO 14001](#) standard certified. In 2024, more than 47 thousands of euros in OpEx was allocated to this certification for internal and external verifications and for monitoring legal requirements (see note '2.1 Operating profit' in the Consolidated Annual Accounts for details). Furthermore, the Serrablo and Yela storage facilities and the Huelva and Barcelona regasification terminals are [EMAS](#) (Eco-Management and Audit Scheme) certified.

Enagás evaluates the environmental aspects and impacts of its construction, operation, and maintenance activities via its Environmental Management System. Among these environmental aspects, pollution is particularly noteworthy. Environmental monitoring is carried out through audits, environmental surveillance programmes, assessments of legal compliance at all facilities and monitoring of environmental indicators and improvement plans.

Enagás regularly provides training and raises environmental awareness among its employees, covering issues related to pollution.

To prevent atmospheric pollution, Enagás periodically conducts regulatory monitoring in areas required by current legislation. Additionally, the company voluntarily performs self-monitoring to cover most of the combustion sources within its operations.

In 2024, the monitoring actions taken at the compressor stations were as follows:

- Periodic regulatory inspections (conducted by an authorised inspection organisation (AIO)). A total of 40 measurements were carried out during the year (90% of them with favourable results). These measurements have incurred an OpEx cost of 46,799 euros (see note '2.1 Operating profit' of the Consolidated Annual Accounts for details).
- Annual TESTO check carried out with their own resources (analysing team and Enagás employees). A total of 40 TESTO measurements were carried out during 2024, 95% of which were favourable. The cost of maintaining this equipment has amounted to 9,921 euros in OpEx (see note '2.1 Operating profit' in the Consolidated Annual Accounts for details).

In both cases, when an unfavourable measurement appears, Enagás carries out the necessary maintenance and repeats the measurement to ensure compliance.

In 2025, Enagás will continue to implement similar control measures, maintaining both the number of inspections and the level of operating expenses as were undertaken during the year.

Both the regulatory inspections and the internal TESTO checks are planned annually for every facility as part of the 'Atmospheric Monitoring Programme'.

Furthermore, Enagás employs mitigation strategies aimed at reducing emissions of atmospheric pollutants by implementing specific actions identified and planned within the framework of its Energy Efficiency and Emission Reduction Plan. For further details, refer to disclosure requirement [E1-3](#).

Metrics and targets

E2-3

Targets related to pollution

Due to the nature of these atmospheric emissions, the CO₂ reduction targets set by the company (for further details, see disclosure requirement E1-4) are directly linked to reducing the emissions of the specified non-greenhouse gases.

For 2024, Enagás has voluntarily set an annual target to reduce NO_x emissions by 5%⁴² compared to 2023 levels (0.03 Kg NO_x/GWh activity⁴³) across all its facilities. This goal will primarily be achieved through the Energy Efficiency and Emissions Reduction Plan. This is a preliminary objective, for which Enagás has achieved compliance by 2024, achieving a reduction of 19% in emissions compared to the previous year (249 tonnes in 2023 vs 191 tonnes in 2024). This is aligned with Enagás' reduction by 22.6% of its scope 1 and 2 emissions compared to the previous year. It is a significantly higher percentage than the decrease in demand for natural gas, which in 2024 fell by almost 4%. This reduction was possible thanks to the implementation of energy efficiency and emissions reduction measures.

This voluntary target aligns with the commitment set out in the Environmental Policy to establish goals aimed at minimising impacts and dependencies on less significant environmental aspects, such as NO_x emissions.

Compliance with this target and the identification of improvement actions are reviewed annually as part of Enagás' monitoring of natural gas and diesel consumption in the equipment across its facilities.

E2-4

Pollution of air, water and soil

Non-GHG emissions (tonnes) ⁽¹⁾

	2022	2023	2024
NOx	329	249	191
CO	44	41	29
SOx	4	4	3
PM ₁₀ /PST	3	5	3
NMVOOC	11	10	7
NH ₃	8	6	5
PAH	2.1·10 ⁻⁰⁵	1.6·10 ⁻⁰⁵	1.2·10 ⁻⁰⁵
Ma	1.2·10 ⁻⁰⁶	1.1·10 ⁻⁰⁶	1.1·10 ⁻⁰⁶
Cd	2·10 ⁻⁰⁷	1.9·10 ⁻⁰⁷	1.8·10 ⁻⁰⁷
Cr	4·10 ⁻⁰⁶	3.7·10 ⁻⁰⁶	3.7·10 ⁻⁰⁶
Cu	6·10 ⁻⁰⁶	5.6·10 ⁻⁰⁶	5.5·10 ⁻⁰⁶
Hg	2.2·10 ⁻⁰⁶	2·10 ⁻⁰⁶	2·10 ⁻⁰⁶
Ni	2·10 ⁻⁰⁷	1.9·10 ⁻⁰⁷	1.8·10 ⁻⁰⁷
Pb	3·10 ⁻⁰⁶	2.8·10 ⁻⁰⁶	2.8·10 ⁻⁰⁶
Zn	0.0012	0.0011	0.0011
Benzene	0.039	0.03	0.024

(1) The reported amount of polycyclic aromatic hydrocarbons (PAH) includes the compounds Benzo(a)pyrene, Benzo(b)fluoranthene, Benzo(k)fluoranthene and Indeno(1,2,3-cd)pyrene.

The reported values are calculated based on fossil fuel consumption data for operational activities, sourced from Enagás' Reading and Measurement System software tool (SLM) and fuel purchase invoices, along with specific emission factors for each pollutant⁴⁴. The source of the emission factors used for the calculation of these pollutant emissions is the EMEP/EEA air pollutant emission inventory guidebook 2023, by the European Environment Agency.

Enagás has chosen this quantification methodology because direct measurements are not taken annually at all emission sources. This approach ensures the accurate quantification of atmospheric pollutant emissions associated with all the company's activities and facilities.

E2-5

Substances of concern and substances of very high concern

Enagás does not handle substances of concern or very high concern in its operations and, as such, does not consider these sustainability issues to be significant for the company.

⁴² This target aligns with the company's greenhouse gas emissions reduction goals, as they are directly related (following the methodology outlined in disclosure requirement E1-4). These targets are not based on scientific criteria, and stakeholders have not participated in setting them.

⁴³ The specific pollutant load is defined as the mass of pollutant emitted per mass of product manufactured. Enagás does not sell products but provides services, so the specific load is based on the company's activities, which

include the sum of the following: regasified gas (GWh), loading of tankers and ships at regasification terminals (GWh), compressed gas at compressor stations (GWh), and total injection and extraction at underground storage facilities (GWh).

⁴⁴ These parameters have only been verified by the verification provider and not validated by any other external body.

E2-6

Expected financial implications of pollution-related risks and opportunities

The company's materiality analysis has not identified any significant risks or opportunities associated with pollution. However, Enagás has an environmental liability policy that covers the costs of preventing and remedying any damage to the environment inside or outside the company's facilities, with an annual aggregate liability limit of 20 million euros per claim. It also has an industrial liability policy that covers compensation payments to third parties arising from sudden, accidental and unforeseen pollution or contamination with a limit of 300 million euros per claim.

Non-financial and diversity reporting requirements (Law 11/2018)

Significant environmental fines and penalties

Enagás has not received any significant fines or penalties during 2024 (neither did it in 2023). To be classified as significant, they must have a significant impact from a financial or reputational point of view.

Pollution

Measures to prevent, reduce or repair air pollution specific to an activity, including noise and light pollution

Noise at Enagás' facilities is produced by the operation of regulators, turbines, vaporisers and pumps, among others. Regular environmental noise measurements are carried out at all facilities, where legally required, around their perimeter to ensure that noise levels remain within the limits established in applicable legislation. In those cases where deviations are found, corrective actions are implemented (acoustic screens, silencers, soundproofing, etc.).

With regard to light pollution, Enagás has also reduced night-time lighting at its facilities by switching off the lighting at night, with the exception of regasification terminals, where minimum perimeter lighting is maintained.

E3. WATER AND MARINE RESOURCES

Management of impacts, risks, and opportunities

IRO-1

Description of the processes to identify and assess material impacts, risks, and opportunities related to water and marine resources

Enagás has conducted an analysis to determine the impacts, risks, and opportunities, assessing the materiality of these in relation to water and marine resources, as outlined in disclosure requirement [IRO-1](#) in chapter 2. This analysis encompasses all activities and infrastructure locations of companies under financial control, including both upstream and downstream stages of the value chain.

From an initial analysis, Enagás has not identified any activities that have material impacts on water and marine resources either upstream or downstream in its value chain. This analysis considered the relevance and criticality of these activities to the company.

Below is a detailed account of the impacts deemed significant as a result of this analysis:

Table of impacts

Topic	Sub-topic	Impact	Nature
Water and marine resources management	Water	Reduction in water resources due to the consumption of water from municipal networks, underground sources, or surface sources.	Negative - Current
	consumption		

Enagás has been provisionally appointed as the manager of the Spanish Hydrogen Backbone Network (provisional HTNO), with Enagás Infraestructuras de Hidrógeno S.L.U. authorised to temporarily carry out the development of European Projects of Common Interest for hydrogen networks. Currently, no material impacts, risks, or opportunities have been identified in relation to this new activity. However, Enagás is already examining the relevance of water and marine resources, as well as the potential impacts, risks, and opportunities, in an initial conceptual stage before the Environmental Impact Assessment (EIA).

The following section identifies the company's facilities and activities where the negative impact is material, based on criteria such as trends in water consumption, volume of water consumption, areas experiencing high water stress, and/or situations where water use is restricted due to resource scarcity:

Facilities with significant negative impact

Enagás facilities	Geographical area (Municipality / Autonomous Community / Country)	River basin	Cause of materiality
Regasification terminals			
Barcelona	Barcelona/Catalonia/Spain	Internal River Basin Authorities ('C.H.') of Catalonia	Consumption restriction situations due to scarcity of water resources
Cartagena	Cartagena/Murcia/Spain	Segura River Basin Authority	Extremely high water stress zone Evolution of water consumption
Huelva	Palos de la Frontera/Andalucía/Spain	Guadalquivir River Basin Authority	High water stress zone Evolution of water consumption
Underground storage facilities			
Yela	Brihuega/Castilla La Mancha/Spain	Tajo River Basin Authority	High water stress zone

E3-1

Policies related to water and marine resources

Enagás has an [Environmental Policy](#), approved by the Board of Directors, that outlines key commitments for environmental protection and aspects related to the Environmental Management System. These commitments include those concerning water and marine resources (use and consumption of water), which have been identified as important issues for Enagás. Key commitments include:

- Minimising water consumption and using marine resources responsibly in our operations.
- Using more sustainable water supply methods.
- Preventing and addressing potential water pollution that could result from our activities.

In 2024, this policy was revised following a corporate decision to split the former combined Health and Safety, Environment, and Quality Policy into three distinct policies. This change enables more effective implementation of commitments related to these crucial aspects of the business.

This policy applies and is communicated to all employees and managers of all companies making up the Enagás Group, including any affiliates effectively controlled by it, within the limitations established in the regulations applicable. The policy applies to all activities conducted by Enagás Group companies across all the regions where they operate, including those in areas facing water risk and high water stress.

In affiliates where Enagás does not have effective control, it is recommended that their Boards promote principles aligned with this policy. The company also promotes the application of the policy's principles, to the extent possible, to temporary joint ventures, joint ventures, and other similar partnerships or entities. The company also emphasises these principles and commitments with contractors, suppliers, and collaborators, particularly regarding the supply chain.

The policy is accessible to stakeholders on the company's [corporate website](#), as well as on the corporate Intranet for all employees.

The policy assigns the Board of Directors, through the Sustainability and Appointments Committee, the responsibility for guiding, supervising, and controlling the company's environmental strategy and policy, as well as managing related risks and public information. The Health and Safety, Environment, and Quality Integrated Management System Committee is tasked with setting the basic guidelines for developing and monitoring the integrated management system. It is also responsible for coordinating relevant actions and reporting to the Executive Committee. The various company Departments are responsible for setting and prioritising action plans, targets, and monitoring indicators.

By doing so, the company makes commitments to address impacts identified as significant. For more details, refer to the table of impacts included in the IRO-1 disclosure requirement in this chapter.

In addition, through the Ethical Principles and Guidelines for Suppliers, Enagás considers that its suppliers and contractors shall undertake to preserve natural capital, controlling and minimising the environmental impact of the activities they carry out at Enagás facilities, taking into account aspects such as efficiency in the use of resources (for more information, see disclosure requirement G1-1).

E3-2

Actions and resources related to water and marine resources

The company undertakes its environmental commitments (as outlined in the Environmental Policy) through its management system. 100% of Enagás activity is [ISO 14001](#) standard certified. In 2024, more than 47 thousands of euros in OpEx was allocated to this certification for internal and external verifications and for monitoring legal requirements (see note '2.1 Operating profit' in the Consolidated Annual Accounts for details). Furthermore, the Serrablo and Yela storage facilities and the Huelva and Barcelona regasification terminals are EMAS (Eco-Management and Audit Scheme) certified.

Enagás evaluates the environmental aspects and impacts of its construction, operation, and maintenance activities via its Environmental Management System. Among these environmental aspects, water consumption is particularly noteworthy. Environmental monitoring is carried out each year through audits, environmental surveillance programmes, assessments of legal compliance at all facilities and monitoring of environmental indicators and improvement plans.

Enagás regularly conducts training and awareness programmes for its workforce on environmental issues, including those related to water and marine resources.

The company has a General Plan for Reducing Water Consumption at its facilities, and carries out individualised monitoring of consumption trends at its facilities on a yearly basis in order to identify improvements in water efficiency. Based on this monitoring, Enagás implements measures to reduce water usage. In 2024, the following stand out:

- Rainwater recovery systems.
- Implementation of mechanical weeding in fields to replace water-diluted herbicides in areas facing water risk. At the Barcelona regasification terminal, these measures and other best practices aimed at reducing water use – such as significantly decreasing irrigation and increasing the use of the desalination plant – have achieved a 73% reduction in consumption compared to 2022, the year before these measures were introduced. The implementation of mechanical weeding has also significantly reduced pesticide use, from 1,300 litres in 2022 to 350 litres in 2024. In 2024, implementing this measure resulted in an operating expense of 28,123.50 euros. See note '2.1 Operating profit' in the Consolidated Annual Accounts for details. Enagás plans to continue with this initiative in the coming year, allocating an equivalent amount of money.

These measures have been deployed in areas classified as high water stress by the 'Aqueduct' tool of the World Resources Institute (WRI) Water Risk Atlas. At Enagás, areas designated as water risk are considered to be those under water stress.

Metrics and targets

E3-3

Targets related to water and marine resources

Enagás has voluntarily established targets to cut water consumption at facilities deemed significant (see ESRS 2 IRO-1 disclosure requirement), implementing necessary measures to ensure these targets are met.

Globally, the aim for 2024 is to decrease annual sanitary water collection from municipal networks by 2% compared to 2023 levels (1,789 m³ reduction) across all company facilities⁴⁵. This goal has been preliminarily set by targeting reductions at facilities where water use exceeds their three-year average consumption. In 2024, Enagás achieved this target with a 25.2% reduction in its water withdrawal from the public network compared to the previous year (for more information, see disclosure requirement E3-4).

This voluntary target aligns with the commitment in the Environmental Policy to set objectives aimed at minimising impacts and dependencies on less significant environmental factors, such as water consumption⁴⁶.

Monitoring compliance with these targets and identifying areas for improvement are conducted annually through the evaluation of environmental aspects.

E3-4

Water consumption

At Enagás, we do not consume water in our production processes. Water consumption in 2024 was 55,866 m³ (including the 2,209 m³ of seawater collected at the Barcelona terminal for desalination), a figure that represents only 0.001% of the total water withdrawn.

Water collected, discharged and consumed (m³)⁽¹⁾

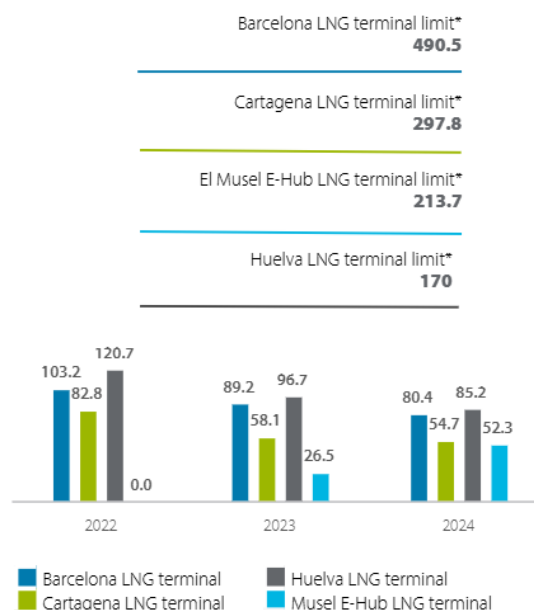
	2022	2023 ⁽²⁾	2024
Water collected (m ³)	306,916,449	270,498,111	272,635,121
Water discharged (m ³)	306,863,023	270,407,832	272,579,255
Water consumed (m ³) (water collected minus water discharged)	53,426	90,279	55,866

(1) These parameters have only been verified by the verification provider and not validated by any other external body. In those facilities for which a quantification of the water discharged is not available, an estimate is made based on the water captured (11% for LNG regasification plants and subway storage facilities, 50% for compressor stations and 85% for other facilities).
 (2) In 2023, stored water (10,857 m³) was considered as water withdrawn (270,508,968 m³ were reported as water withdrawn and 101,136 m³ as water consumed). In 2024, these data have been recalculated considering stored water as water that does not affect the final balance (for more information, see disclosure requirement BP-2 in chapter 2).

⁴⁵ Including facilities with a significant negative impact (for more information, see the table in the IRO-1 disclosure requirement in this chapter).

The main collection of water that Enagás carries out is that of seawater for use in floodwater vaporisers or at regasification terminals. The volume of water taken is directly proportional to the quantity of gas regasified. This seawater accounts for 99.9% of the total water withdrawn and is returned in such a way that its nature is maintained (the decrease in temperature is minimal and does not affect the marine ecosystem).

Seawater withdrawn and returned to its source (hm³)

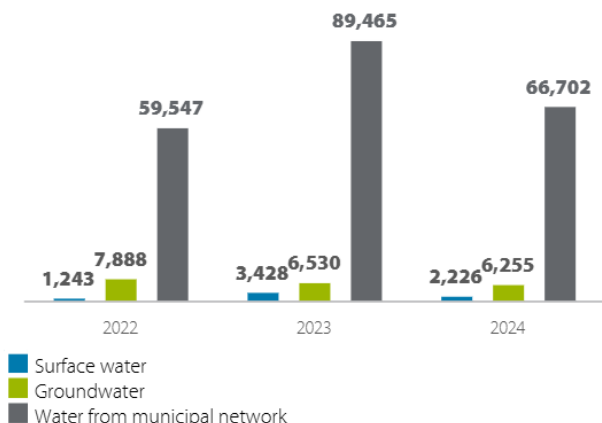


* Legal extraction limit established for each Regasification Terminal

The aggregate figure for water withdrawn at the four LNG regasification terminals (Barcelona, Huelva, Cartagena and Musel E-Hub) remained virtually the same in 2024 as in 2023 (+0.8%). This stability was due to a combination of reduced regasification activity at the Barcelona, Huelva and Cartagena LNG regasification terminals and increased regasification activity at the Musel E-Hub following its start-up.

⁴⁶ The target is not based on scientific criteria or ecological thresholds. Furthermore, stakeholders were not involved in setting it.

Water collected from other sources (m³) ⁽¹⁾



In 2024, water withdrawn from public mains fell mainly due to the adoption of water-saving measures at the Barcelona LNG regasification terminal and the water leak detection and monitoring campaign carried out at the Cartagena LNG regasification terminal. Thanks to these actions, consumption from public mains fell from 89,465 m³ in 2023 to 66,702 m³ in 2024, representing a reduction of 25.2%, thus meeting the target of a 2% reduction in water withdrawn set for 2024.

Of the 75,183 m³ withdrawn in 2024 from surface water, groundwater and public mains for sanitation, irrigation and fire-fighting equipment, 20,450 m³ were discharged. This water is mainly discharged into the sewage system and septic tanks, in the latter case complying with all the limit values established by the relevant authorities. As a result, no improvements in wastewater quality have been identified.

Enagás also has fire suppression ponds or water tanks at its facilities, with an estimated volume of stored water of 10,857 m³ (unchanged with respect to the previous year). At the Denia and Lumbier compressor stations, these ponds are filled using recycled rainwater. During 2024, 24.5 m³ of rainwater was collected at the Lumbier compressor station and 30 m³ at the Denia compressor station. This water was reused (representing 0.1% of the total water consumed).

Regarding facilities with a significant negative impact in water-stressed areas (for more information, see the table in disclosure requirement IRO-1 of this chapter), 28,864 m³ of water have been consumed.

Water withdrawn is obtained from flow metres, while water discharged is estimated from water withdrawn at most facilities. Stored water is an estimate based on the capacities of the fire suppression ponds which are kept full.

Water intensity (m³)

	2022	2023	2024
Water intensity: water consumed relative to total revenue (m ³ /million euros)	55.1	98.2	61.2

The indicator of water intensity relative to total revenue is not the most accurate measure of our environmental performance, as 97.5% of our revenue comes from regulated activities determined by the current regulatory framework. This revenue is defined by a methodology that does not consider the level of use of gas infrastructure, which is the parameter related to environmental impacts.

E3-5

Expected financial impacts of risks and opportunities related to water and marine resources

In the materiality analysis conducted, the company did not identify any material risks or opportunities related to water and marine resources. However, Enagás has an environmental liability policy that covers the costs of preventing and remedying any damage to the environment inside or outside the company's facilities, with an annual aggregate liability limit of 20 million euros per claim. It also has an industrial liability policy that covers compensation payments to third parties arising from sudden, accidental and unforeseen pollution or contamination with a limit of 300 million euros per claim.

E4. BIODIVERSITY AND ECOSYSTEMS

Strategy

E4-1

Transition plan and consideration of biodiversity and ecosystems in strategy and business model

Enagás analyses the risks and opportunities related to biodiversity and ecosystems to reduce vulnerability and enhance the resilience of its business model. Following this, it assesses the impacts of its activities on biodiversity, examining how factors like land use changes, resource use, climate change, and pollution affect ecosystems. This assessment is tailored to each phase of a facility's life cycle, from construction to decommissioning. So far, given the company's current business model, the analysis has primarily focused on the operation phase, identifying an impact of relative importance (for more details, see disclosure requirement [IRO-1](#)). Enagás has implemented the actions needed to appropriately manage this impact, without causing significant changes to the existing business model or strategy (for more information, see disclosure requirement [E4-3](#)).

However, the update of the 2025-2030 Strategic Update focuses heavily on new construction projects. Given the potential risk of cost overruns, delays, or unavailability due to the protection of endangered species or biodiversity, the company is exposed to such risks in upcoming projects. Enagás is already examining the various impacts and opportunities that the future hydrogen network may have on biodiversity and is considering measures to mitigate these impacts. An example of this approach is the

development of Initial Project Documents (IPD), which primarily aim to identify and analyse environmental impacts, while proposing mitigation and risk management measures concerning biodiversity. Additionally, Concept Plans for Public Participation are prepared for areas likely to be affected by the future hydrogen network, enabling stakeholders to be heard and actions to be taken accordingly.

In the coming years, Enagás will delve deeper into the impacts, risks, and opportunities arising from these new projects, along with the potential financial implications and their effects on the company's business model and strategy. This analysis will be conducted in accordance with the methodology outlined in the [IRO-1](#) disclosure requirement. It will help identify the actions needed to minimise these effects and to adapt to and manage associated risks, ensuring the company's resilience.

SBM-3

Material impacts, risks, and opportunities and their interaction with the strategy and business model

The following details the areas sensitive to biodiversity where our operational sites are located and assesses whether they have a significant negative impact on biodiversity. This information is detailed for sites of material significance (for more details, see disclosure requirement [IRO-1](#) of this standard).

It is important to highlight that no significant negative impacts have been identified concerning land degradation, desertification, or soil sealing.

Sites of material significance and their impact on biodiversity-sensitive areas

Material sites in own operations	Figure	Protected area (most unfavourable habitat conservation status) ⁴⁷	Significant negative impact ¹
Regasification terminals			
Barcelona			No
Cartagena			No
Huelva			No
Musel			No
Underground storage facilities			
Yela			No
Serrablo	Site of Community Importance (Habitats Directive)	El Pirineo	No
Gaviota	Biosphere reserve (National)	Urdaibai (B)	No
	Special Protection Area for Birds (Natura 2000 Network)	Urdaibaiko itsasadarra / Urdaibai estuary (B)	No
Castor			No
Compressor stations (CS)			
Tivissa CS			No
Montesa CS			No
Paterna CS			No
Crevillente CS			No
Zaragoza CS			No
Haro CS			No
Bañeras CS			No
Algete CS			No
Dos Hermanas CS			No
Lumbier CS			No
Villafranca de Córdoba CS			No
Almodóvar del Campo CS			No
Coreses CS			No
Alcázar de San Juan CS			No
Almendralejo CS			No
Villar de Arnedo CS			No
Chinchilla CS			No
Denia CS	Natural Park (National)	Marjal de Pego - Oliva (B)	No
	Wetlands (National)	Racons river mouth and waterfront	No
	Wetlands (National)	Marjal de Pego - Oliva (B)	No
	Special Protection Area for Birds (Natura 2000 Network)	Marjal de Pego - Oliva (B)	No
Euskadour CS			No

⁴⁷In order to determine the protected spaces affected by the presence of Enagás facilities, in addition to the actual surface area occupied by the facility, an area of influence has been taken into account. The area of influence varies according to the type of facility. It is 100 metres for underground storage facilities, regasification terminals and compressor stations, and 2 metres on each side of the line for gas pipelines.

In addition, the habitat types listed in Appendix I of the Habitats Directive are structured into 9 major habitat groups. For each of the habitat groups, there are sub-groups for different habitat types of Community interest. The degree of conservation of these sub-groups for each protected area is taken from the database of Spanish Natura 2000 Network protected areas provided by the Ministry for Ecological Transition and the Demographic Challenge. Once we know the protected area where the company is present, we can determine the conservation status of each of the habitats it contains. Given the large number of protected spaces, and in order to make this information easier to read, the company is providing the degree of conservation of the most unfavourable habitat contained in each of these spaces.

Material sites in own operations	Figure	Protected area (most unfavourable habitat conservation status) ⁴⁷	Significant negative impact ¹
Gas pipeline network			
	Special Areas of Conservation (Habitats Directive)	Vegas, cuestras y páramos del sureste de Madrid (C), Guadiato-Bembezar (C), Cuenca del río Guadarrama (B), Sistema Prelitoral meridional (B), Planas y estepas de la margen derecha del Ebro (C), Sierra de Guadarrama (B), Embalse de Cornalvo y Sierra Bermeja (B), Sierra de Ugarra (B), Guadalmellato (C), Montes de Toledo (B), Telera-Acumuer (C), Aizkorri-Aratz (C), Montes de Miranda de Ebro y Ameyugo (B), Cuencas de los ríos Jarama y Henares (C), Sierra Morena (C), Suroeste de la Sierra de Cardeña y Montoro (C), Yesos de la Ribera Estellesa (B), Monegros (C), Massís de Bonastre (C), Tivissa-Vandellòs-Llaberia (C), Cuenca del río Manzanares (C), Valle del Cuerpo de Hombre (B), Granadilla (B), Los Alcornocales (C), Doñana (C), Monfragüe (B), Río y Embalse del Ebro (C), Hoces del Alto Ebro y Rudrón (C), Sierras del Campanario y Las Cabras (C), Sierra de Cabrera-Bedar (C), Ramblas de Gergal, Tabernas y Sur de Sierra Alhamilla (C), Secans del Montsià (C), Sierras de Santo Domingo y Caballera y río Onsella (B), Montaña Central de León (B), Cuencas del Rumblar, Guadalen y Guadalmena (C)	Yes
	Special Areas of Conservation (Birds Directive)	Massís de Bonastre (C), Campiña sur - Embalse de Arroyo Conejos (C), Tivissa-Vandellòs-Llaberia (C), Sistema Prelitoral meridional (B), Secans del Montsià (C), Matarraña - Aiguabarreix (B), Estepas de Belchite -El Planerón - La Lomaza (B), Llanos de Cáceres y Sierra de Fuentes (B), Embalse de Cornalvo y Sierra Bermeja (B), Área esteparia de la margen derecha del río Guadarrama (C), Cortados y cantiles de los ríos Jarama y Manzanares (C), Montes de Toledo (B), Carrizales y sotos de Aranjuez (C), Montes de Miranda de Ebro y Ameyugo (B), La Sierra de Escalona y su entorno (C), Sierra Morena (C), Área esteparia del este de Albacete (C), Sierra de Martés-Muela de Cortes (B), La Retuerta y Saladas de Sástago (C), Los Alcornocales (C), Monfragüe y las Dehesas del Entorno (B), Sierra de Guadarrama (B), Hoces del Alto Ebro y Rudrón (C), Espacio marino del poniente y norte de Ibiza (A), Plataforma-talud marinos del Cabo de la Nao (C), Sierras del Gigante-Pericay, Lomas del Buitre-Río Luchena y Sierra de la Torrecilla (B), Alto Guadiato (C), Estepas cerealistas de los ríos Jarama y Henares (C), Espacio marino de la Ria de Mundaka-Cabo de Ogoño (C), Serres de Mariola i el Carrascar de la Font Roja (C), Doñana (C), Sierras de Santo Domingo y Caballera y río Onsella (B), Campiñas de Sevilla (B), Lagunas de Villafafila (B), Páramo Leonés (C)	Yes
Gas pipeline	Sites of Community Importance SCI (SPA/SCA)	Guadalmellato (C), Guadiato-Bembezar (C), Los Alcornocales (C), Doñana (C), Sierras del Campanario y las Cabras (C), Sierra de Cabrera-Bedar (C), Ramblas de Gergal, Tabernas y Sur de Sierra Alhamilla (C), Alto Guadiato (C), Campiñas de Sevilla (B), Cuencas del Rumblar, Guadalen y Guadalmena (C), Suroeste de la Sierra de Cardeña y Montoro (C)	Yes
	Special Protection Plan (SPP)	Secans del Montsià (C), Serres de Pàndols-Cavalls (C), Muntanyes de Tivissa-Vandellòs (C), Serra de Llaberia (C), Massís de Bonastre (C)	Yes
	Regional Park	Curso Medio del Río Guadarrama y su entorno (B), Cuenca del río Manzanares (C), Ejes de los Cursos Bajos de los Ríos Manzanares y Jarama (C)	Yes
	Natural Park	Sierra de Guadarrama (B), Embalse de Cornalvo and Sierra Bermeja (B), Aizkorri-Aratz (C), Valle de Alcudia and Sierra Madrona (C), Oyambre (C), Los Alcornocales (C), Hoces del Alto Ebro and Rudrón (C), Doñana (C), Las Ubiñas-La Mesa (C), Llanos de Cáceres and Sierra de Fuentes (B), Llanos de Cáceres and Sierra de Fuentes (B)	Yes
	Area of Regional Interest	Llanos de Cáceres y Sierra de Fuentes (B)	Yes
	Protected Landscape	Valle del Río Hungría (C), La Sierra de Escalona y su entorno (C), Río y Embalse del Ebro (C)	Yes
	European Ecological Network Area (Natura 2000)	Río y Embalse del Ebro (C)	Yes
	Nature Reserve	Lagunas de Villafafila (B)	Yes
	Site of Community Importance (Habitats Directive)	La Sierra de Escalona y su entorno (C), Dehesa del Estero y Montes de Moguer (C), Serres de Mariola i el Carrascar de la Font Roja (C)	Yes
	Municipal Natural Site	El Tello (C)	Yes
	Ramsar Site, Wetlands of International Importance	Marjal de Pego-Oliva (B), Doñana (C), Mediterranean cetacean migration corridor (C)	Yes
	Marine Protected Area	Mediterranean cetacean migration corridor (C)	Yes
	Biosphere Reserve	Urdaibai (B)	Yes
Marine Protected Area (OSPAR)	Marine area of the Ria de Mundaka-Cabo de Ogoño (C)	Yes	

¹ For more information on the significant adverse effect analysis, see the IRO-1 disclosure requirement within this chapter.

Enagás has also identified the endangered species included on the IUCN Red List with habitats in the areas where it operates in order to prevent effects on them. The following table shows the number of IUCN Red List species identified around Enagás' facilities, without this signifying any impact or threat derived from the company's activity.

Presence of endangered species in infrastructures with significant negative impact

	Critically endangered (CR)	Endangered (EN)
Gas pipeline	35	84

Management of impacts, risks, and opportunities

IRO-1

Description of the processes to identify and assess material impacts, risks, and opportunities related to biodiversity and ecosystems

Enagás has conducted an analysis to identify relevant impacts, risks, and opportunities concerning biodiversity and ecosystems. This process aligns with the LEAP methodology, which has been incorporated into the company's materiality analysis, as outlined in the [IRO-1](#) disclosure requirement in chapter 2. This analysis encompasses all activities and infrastructure locations of companies under financial control, including both upstream and downstream stages of the value chain.

The material impacts identified from this analysis are outlined below:

Table of impacts

Topic	Sub-topic	Impact	Nature
Biodiversity	Terrestrial and fluvial ecosystems	Impacts affecting the health of terrestrial ecosystems and their natural resources, stemming from maintenance activities on pipeline infrastructure, such as weeding, in both protected areas and other ecologically valuable regions.	Negative - Current

For further details on sites located in biodiversity-sensitive areas, refer to disclosure requirement [SBM-3](#). For more information on biodiversity-related mitigation measures, see disclosure requirement [E4-3](#).

Enagás has been provisionally appointed as the manager of the Spanish Hydrogen Backbone Network (provisional HTNO), with Enagás Infraestructuras de Hidrógeno S.L.U. authorised to temporarily carry out the development of European Projects of Common Interest for hydrogen networks. For these new activities, the company is examining the importance of biodiversity and ecosystems, alongside the potential impacts, dependencies, risks, and opportunities associated with all phases of the project. This analysis takes place in the initial conceptual stage before the Environmental Impact Assessment (EIA).

Analysis of impacts, risks, and opportunities using the LEAP methodology

Since 2023, Enagás has applied the LEAP (Locate, Evaluate, Assess, Prepare) process from the TCFD (Taskforce on Nature-related Financial Disclosures) framework across the entire life cycle of our assets. This process has identified the impacts, risks, and opportunities highlighted in the materiality analysis⁴⁸.

Understanding the protected areas where we operate and the species inhabiting the regions influenced by our facilities is crucial for effectively managing our activities. This involves assessing the actual and potential impacts on biodiversity and ecosystems to prevent harm and implement mitigation measures, or to develop recovery and conservation projects.

Identification of priority areas

According to the TCFD reporting framework, a facility is a priority if it is located in a sensitive location and has a materiality relationship with one of the valued aspects of nature (impacts and dependencies).

Enagás has evaluated which of its facilities are in biodiversity-sensitive areas and concluded that it has sites both within and near these areas. For this evaluation, three geographic information sources were used:

- The World Database on Protected Areas (WDPA), which provides global information on protected areas to assess ecosystem integrity.
- The Biodiversity Integrity Index (BII) shows the presence of areas rich in biodiversity where there are high risks associated with the loss or deterioration of nature.
- Overall Water Risk (OWR), which is used to assess water stress.

To evaluate the materiality of the sites, impacts and dependencies were identified and assessed based on the five drivers of biodiversity loss outlined by the Intergovernmental Platform on Biodiversity and Ecosystem Services (IPBES): land use change, climate change, resource use, pollution, and biodiversity.

The significant impacts and dependencies during the infrastructure operation phase are detailed below. This analysis also considered the potential ecosystem services affected.

48 Enagás has not included systemic risks in this analysis.

Significant impacts and dependencies associated with the operation

Impact driver	Impact or dependence			Main preventive and mitigation actions for impacts and risks
	Type of impact or dependency	Valuation	Description	
Climate change	Dependency	Moderate	Situations affecting the operation: increase in natural disasters and adverse weather conditions (floods, landslides, fires, etc.). For more details, refer to the IRO-1 disclosure requirement of chapter E1.	<ul style="list-style-type: none"> • Environmental certifications (ISO 14001 and EMAS). • Emergency response action plans. • Procedures for the investigation and monitoring of incidents. • Development of demand scenarios that determine the infrastructure to develop in order to guarantee secure supply. • Emergency response action plan. • Insurance policy covering catastrophic damage. • Review of plans for adaptation to climate change in infrastructures and the associated
Biodiversity and climate change	Negative impact	Low	Weed control and removal of vegetation along the pipeline route	<ul style="list-style-type: none"> • Ecosystem restoration and preservation • Pilot initiatives for vegetation control through nature-based solutions (extensive livestock management)
Change of land use	Dependency	Low	Regulation/standards related to pipeline maintenance work ⁽¹⁾	

(1) The dependency relates to the identified negative impact because the regulation concerning gas pipeline maintenance work results in weeding and the removal of plant species.

This analysis concludes that during the operation phase, the significant negative impact is solely on gas pipelines. For more details on the infrastructure, refer to the SBM-3 disclosure requirement in this chapter. Specifically, 56% of the pipelines are classified as priority because they are situated in protected areas, where the negative impact arises from weeding and the removal of plant species along the route. This situation is significantly dependent on the regulations associated with maintenance work (for further information, see disclosure requirement E4-5).

Risks arising from nature and biodiversity

Drawing from these impacts and dependencies, Enagás, in collaboration with the company's materiality analysis and risk assessment processes, identifies and evaluates the risks associated with nature and biodiversity.

The identified physical risks are linked to our dependence on ecosystems, while regulatory and reputational risks stem from impacts on these ecosystems. In addition, some risks concern specific environmental issues, such as greenhouse gas emissions or protected species, as illustrated in the table below.

Type of risk

Type of risk	Risks	Level of risk	Main mitigating actions
Physical risks	Operational cost overruns due to natural disasters	Tolerable	<ul style="list-style-type: none"> • Forecast contingencies associated with infrastructure development projects.
Strategic and business risks	Cost overruns, delays or unavailability due to protection of protected species or biodiversity	Tolerable	<ul style="list-style-type: none"> • Monitoring of infrastructure development projects to identify potential cost overruns, detours or contingencies.
Regulatory risks	Delays or failure to obtain authorisations, licences or permits due to negative environmental impacts	Acceptable	<ul style="list-style-type: none"> • Previous experience in resolving this type of contingency.
	Regulatory and legal non-compliance (environmental regulation), including liability for contractor non-compliance	Tolerable	<ul style="list-style-type: none"> • Enagás' Environment Policy, the principles of which are embodied in the Enagás Environmental Management System, certified in accordance with ISO 14001. • Environmental Impact Assessment (EIA) according to the typology and applicable regulations (subject to public record with stakeholder consultation processes).
Reputational risks	Negative stakeholder perception of the natural capital and biodiversity management	Acceptable	<ul style="list-style-type: none"> • Carrying out actions aimed at avoiding, minimising, restoring and rehabilitating, compensating for environmental impacts. • Sustainable Management Model, Sustainable Management Plan with lines of action for Natural Capital and Biodiversity Management.

Level of risk: Acceptable / Tolerable / Significant / Critical

Information and consultation processes

For infrastructure construction projects, Enagás conducts environmental impact studies based on the project's type and relevant regulations. These studies include consultation processes with stakeholders (for more information, see disclosure requirement S3-2). This approach enables us to integrate best practices during the design and construction phases to minimise environmental impact.

In connection with the occupation of private property during construction projects, a regulated procedure is applicable in Spain which includes public information and consultation with the entities affected, which also guarantees transparency in the construction of infrastructure and equal treatment before the law.

E4-2

Policies related to biodiversity and ecosystems

Enagás has an [Environmental Policy](#), approved by the Board of Directors, that outlines key commitments for environmental protection and aspects related to the Environmental Management System. These commitments include those related to biodiversity and ecosystems, identified as key issues for Enagás, with the following highlights:

- Integrating biodiversity conservation into the company's activities – including design, construction, operation, maintenance, technical management, and dismantling of energy infrastructures – by regularly assessing the dependencies and impacts of these activities on natural capital and implementing specific initiatives within the company's environmental management plans and programmes.
- Preserving ecosystems and their biodiversity across Enagás' activities and areas of operation through actions aligned with the impact mitigation hierarchy. The company emphasises the importance of identifying threatened ecosystems, habitats, species, and communities for each project in order to monitor them and implement prevention and mitigation measures. Planning for the development of energy infrastructures is also crucial, with a focus on minimising necessary installations, reducing energy resource requirements, and enhancing operational efficiency. Efforts are made to minimise infrastructure placement in protected areas and to prioritise expanding existing pipelines over creating new routes. The importance of making design adjustments to prevent habitat fragmentation and following existing infrastructure corridors wherever possible is highlighted.
- Energy infrastructures should be built and operated to minimise their impact on ecosystems, habitats, and endangered species, all of which have environmental, social, economic, cultural, or scientific significance.
- The company also develops programmes for species recovery and soil restoration through decompaction and topsoil replacement. Revegetating affected land involves sowing herbaceous species and planting shrubs and trees that are compatible with the local environment and do not threaten the area's biological diversity.

Enagás remains committed to its policy of 'No net loss and net positive impact on nature and biodiversity'.

In 2024, this policy was revised following a corporate decision to split the former combined Health and Safety, Environment, and Quality Policy into three distinct policies. This change enables more effective implementation of commitments related to these crucial aspects of the business.

This policy applies and is communicated to all employees and managers of all companies making up the Enagás Group, including any affiliates effectively controlled by it, within the limitations established in the regulations applicable. Consequently, it covers all activities of Enagás Group companies globally.

In affiliates where Enagás does not have effective control, it is recommended that their Boards promote principles aligned with this policy. The company also promotes the application of the policy's principles, to the extent possible, to temporary joint ventures, joint ventures, and other similar partnerships or entities. The company also emphasises these principles and commitments with contractors, suppliers, and collaborators, particularly regarding the supply chain.

The policy is accessible to stakeholders on the company's [corporate website](#), as well as on the corporate Intranet for all employees.

The policy assigns the Board of Directors, through the Sustainability and Appointments Committee, the responsibility for guiding, supervising, and controlling the company's environmental strategy and policy, as well as managing related risks and public information. The Health and Safety, Environment, and Quality Integrated Management System Committee is tasked with setting the basic guidelines for developing and monitoring the integrated management system. It is also responsible for coordinating relevant actions and reporting to the Executive Committee. The various company Departments are responsible for setting and prioritising action plans, targets, and monitoring indicators.

By doing so, the company makes commitments to address impacts identified as significant. For more details, refer to the table of impacts included in the IRO-1 disclosure requirement in this chapter.

In addition, through the Ethical Principles and Guidelines for Suppliers, Enagás considers that its suppliers and contractors shall undertake to preserve natural capital, controlling and minimising the environmental impact of the activities they carry out at Enagás facilities, taking into account aspects such as the preservation of nature and its biodiversity (for more information, see disclosure requirement G1-1).

E4-3

Actions and resources related to biodiversity and ecosystems

Enagás is committed to managing biodiversity based on a hierarchy of impact mitigation, with the aim of preserving ecosystems and their biodiversity within our activities and operational areas. This management approach involves:

- Avoiding impacts on sensitive areas concerning biodiversity and species with high ecological value.
- Applying nature-based solutions to minimise the impacts generated.
- Striving to closely match the types of habitats and species affected during both restoration and compensation efforts.

Enagás conducts annual environmental assessments of operational infrastructures and Environmental Impact Assessments (EIA) for new construction projects, depending on the type and applicable regulations. These assessments cover 802 operational facilities occupying an area of 3.8 km². These evaluations help Enagás identify the necessary mitigation measures for biodiversity and ecosystems, ensuring the allocation of resources required for their implementation. So far, the company has not established biodiversity offsets as part of its mitigation measures.

In the case of gas pipeline construction projects, the route design already takes into account criteria for minimising the impact on local plant and animal wildlife, and for avoiding the occupation of private property. In addition, whenever possible, we follow existing infrastructure corridors or reduce track widths to protect areas of natural vegetation, protected zones, or other regions of ecological interest. We also prioritise using existing pipeline routes over creating new ones, and we make design adjustments to minimise or prevent habitat and ecosystem fragmentation.

Enagás has undertaken various projects focused on biodiversity and ecosystems, particularly noteworthy are our collaborative initiatives and nature-based solutions:

Vegetation control through extensive livestock management

Since 2016, Enagás has been working on collaborative projects with different stakeholders (environmental companies, other companies, Public Administrations and farmers) to carry out vegetation control through the pasturing of range livestock (horses) along gas pipelines.

The results obtained over the years have demonstrated the effectiveness and benefits of the use of livestock, for example in the growth of plant cover resulting from the animals' activity.

This is the case for gas pipeline sections located in the province of Huesca, attached to the Caspe Transmission Centre and the Sabiñánigo Transmission Centre, and the sections located in the Alto Bernesga Biosphere Reserve (León). In these sections, regular grazing is used as the most sustainable solution for vegetation control, due to its high positive impact on the environment and the community:

- Fertilisation and soil disturbance by livestock has a favourable effect on flora and fauna, increasing biodiversity. For this reason, the International Union for Conservation of Nature (IUCN) is assessing its classification as a nature-based solution.
- This highlights the ability of the local livestock sector to deliver ecosystem services while utilising indigenous expertise. Through initiatives like the online Grazing Round Tables, Enagás engages directly with local livestock farmers, energy companies, universities, and environmental organisations via a biannual, in-person communication forum.

Since 2023, an assessment of the impact of these actions on natural capital has been carried out, with the aim of learning about differential biodiversity rates in areas with livestock activity compared to areas without it. To this end, several samplings were carried out during the year to measure the following aspects:

- Landscape impact indicators:
 - Diversity and richness of tree, shrub, and herbaceous species (including floristic richness).
 - Changes in the vegetation layer.
- Biodiversity indicators for pollinating and soil-dwelling arthropods:
 - Total and relative abundance.
 - Functional biodiversity.
 - Arthropod richness.
 - Diversity indices.

Previous results obtained after sampling were favourable, reinforcing the positive effect of livestock on the biodiversity of the grazed area.

In 2024, the company spent 66,815 euros (OpEx) on the development of this project. See note '2.1 Operating profit' in the Consolidated Annual Accounts for details. Enagás plans to continue this initiative in the following financial year, carrying out similar activities and earmarking a comparable budget.

Collaboration with associations

Since 2023, Enagás has had a five-year partnership agreement with the Bearded Vulture Conservation Foundation, focusing on socio-environmental initiatives to conserve biodiversity in the mountainous regions of northern and central Spain. A key initiative is the 'Annual programme for the recovery of bearded vultures from nests with low reproductive success', aimed at increasing the population through captive breeding and subsequent release into the wild. During 2024, Enagás allocated 15,000 euros (OpEx) to collaborate with this Foundation. See note '2.1 Operating profit' in the Consolidated Annual Accounts for details.

Furthermore, Enagás has teamed up with the Foundation for the Protection of Wild Animals (FAPAS) in 2024, with efforts concentrated on conserving the brown bear in the Valgrande-Pajares Valley by bolstering trophic resources. The aim is to improve the quality of the ecosystem and natural habitat through natural seed dispersal in order to increase the bear population by creating the most suitable environment and natural trophic resources for feeding. Efforts to enhance the bear's habitat include installing protective systems for beehives and planting trees that provide food. Collaboration with this Foundation amounted to a total of 85,320 euros in 2024 (OpEx). See note '2.1 Operating profit' in the Consolidated Annual Accounts for details.

In the coming years, Enagás aims to continue its collaborations with biodiversity-related associations and those tied to ecosystems where we have an active presence, tailoring our involvement to the specific projects developed, which will involve similar financial costs.

Metrics and targets

E4-4

Targets related to biodiversity and ecosystems

Evaluating the state of biodiversity and how it responds to human disturbances is a challenging endeavour, due to the complex web of interactions within ecosystems. The diversity of factors affecting biodiversity makes it difficult to define assessment methodologies, indicators, metrics, and ecological thresholds.

Aligned with our commitments to achieve no net loss of biodiversity in energy infrastructure construction and operation by 2040, and to create a positive impact on nature by 2050 as outlined in our Environmental Policy, Enagás has set specific biodiversity targets for all its construction activities. These targets align with the Kunming–Montreal Global Biodiversity Framework and the EU Biodiversity Strategy⁴⁹:

- By 2024, we aim to restore 100% of the areas affected by construction projects from the second half of 2023 that were not completely restored in the previous year, as well as all construction projects from the first half of 2024 (57,146 m² restored). This goal has been met this year with the restoration of 100% of the altered areas in the alternative route of the León-Oviedo gas pipeline project (for more information, see disclosure requirement E4-5). This target will also apply in 2025, with the objective of restoring 100% of the affected area.

Moreover, Enagás employs biodiversity offset strategies, such as using carbon credits from deforestation prevention projects (for more details, see disclosure requirement E1-7) and engaging in collaborative projects with associations (for further information, see block '[Processes to remediate negative impacts and channels for customers to raise concerns](#)'), to fulfil these commitments.

Restoration is intended to occur as soon as possible following disruption, although it may sometimes take place in the subsequent months. Thus, the degree of achievement of this target is assessed at the project level after its completion. The degree of achievement is then evaluated at a company level on an annual basis considering only the projects completed during the year and an interval of two years. The construction project manager monitors the altered and restored surface areas throughout the project's development to oversee these targets.

These targets align with our Environmental Policy's commitment to setting goals for neutrality and generating a positive net impact on the most significant environmental aspects, including: No net loss and net positive impact on nature and biodiversity (for more information, see disclosure requirement E4-2).

The table '[Impacts and dependencies associated with the operation](#)', found in disclosure requirement IRO-1 of this standard, outlines the impacts and dependencies on natural capital. It highlights ecosystem restoration and preservation, as well as avoiding deforestation, as key actions to prevent and mitigate impacts.

E4-5

Impact metrics related to biodiversity and ecosystems change

In 2024, Enagás' priority infrastructures⁵⁰ occupied a surface area of 4.5 km² of land located in Protected Natural Spaces: Natura 2000 Network (LIC/ZEPA), Ramsar wetlands and Biosphere Reserve, representing 11% of the total area occupied by the company's facilities⁵¹.

In 2024, a number of construction projects were carried out using the corridors of other existing infrastructures and existing accesses to the work area were also used, thus reducing the damage to soil and waters. These projects restored 100% of the affected land, returning it to its previous state as soon as possible after its alteration⁵² (57,146 m² altered, 57,146 m² restored and 31,730 m² revegetated). This minimises the risk of erosion and helps re-establish the land's natural watershed, as well as the state of affected habitats and the landscape.

E4-6

Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities

The materiality analysis did not reveal any significant risks or opportunities associated with biodiversity and ecosystems. However, Enagás has an environmental liability policy that covers the costs of preventing and remedying any damage to the environment inside or outside the company's facilities, with an annual aggregate liability limit of 20 million euros per claim. It also has an industrial liability policy that covers compensation payments to third parties arising from sudden, accidental and unforeseen pollution or contamination with a limit of 300 million euros per claim.

⁴⁹ Target linked to the restoration mitigation measure. It is associated with regulatory requirements set by public authorities and is not based on scientific targets or ecological thresholds. Biodiversity offsets are not being considered in setting this target.

⁵⁰ Enagás' priority facilities refer to the gas pipeline network, which has been analysed as a single site.

⁵¹ The information was obtained by overlaying cartographic layers of Protected Natural Areas (for more information, see the IRO-1 disclosure requirement)

with the geographical coordinates of Enagás' infrastructure. This parameter has only been verified by the verification provider and not validated by any other external body.

⁵² Considering construction projects in the second half of 2023 that were not restored in the past financial year and construction projects in the first half of 2024. These parameters have only been verified by the verification provider and not validated by any other external body.

E5. RESOURCE USE AND CIRCULAR ECONOMY

Management of impacts, risks, and opportunities

IRO-1

Description of the processes to identify and assess material impacts, risks, and opportunities related to resource use and the circular economy

Enagás has conducted an analysis to identify impacts, risks, and opportunities, assessing which are materially significant concerning resource use and the circular economy, as detailed in the [IRO-1](#) disclosure requirement in chapter 2. This analysis encompasses all activities and infrastructure locations of companies under financial control, including both upstream and downstream stages of the value chain.

In identifying potential impacts, risks and opportunities related to resource inputs, outputs, and waste, Enagás has incorporated the identification of the primary resources and waste generated by activity at its facilities, along with the applicable environmental regulations. This analysis is based on historical information from environmental evaluations carried out at our facilities within the framework of the environmental management systems, as well as on monitoring of applicable environmental legislation.

Below is a detailed account of the impacts deemed significant as a result of this analysis:

Table of impacts

Topic	Sub-topic	Impact	Nature
Circular economy	Waste management	Generation of hazardous and non-hazardous waste	Negative - Current

Enagás has been provisionally appointed as the manager of the Spanish Hydrogen Backbone Network (provisional HTNO), with Enagás Infraestructuras de Hidrógeno S.L.U. authorised to temporarily carry out the development of European Projects of Common Interest for hydrogen networks. In these new activities, the company is evaluating the significance of resource use and the circular economy, as well as the potential impacts, risks, and opportunities, during the initial conceptual phase before conducting an Environmental Impact Assessment (EIA).

The following table identifies the company's facilities and activities where the negative impact is relatively significant based on the criteria of waste generation volume and type:

Facilities with significant negative impact

Enagás facilities	
<u>Regasification terminals</u>	<u>Underground storage facilities</u>
Barcelona	Yela
Cartagena	Serrablo
Huelva	Gaviota
Musel	Castor

E5-1

Policies related to resource use and the circular economy

Enagás has an [Environmental Policy](#), approved by the Board of Directors, that outlines key commitments for environmental protection and aspects related to the Environmental Management System. These commitments address issues vital to Enagás, such as efficient resource use and the circular economy. A key focus is managing towards zero waste by following the waste hierarchy and prioritising waste prevention.

In 2024, this policy was revised following a corporate decision to split the former combined Health and Safety, Environment, and Quality Policy into three distinct policies. This change enables more effective implementation of commitments related to these crucial aspects of the business.

This policy applies and is communicated to all employees and managers of all companies making up the Enagás Group, including any affiliates effectively controlled by it, within the limitations established in the regulations applicable. Consequently, it covers all activities of Enagás Group companies globally.

In affiliates where Enagás does not have effective control, it is recommended that their Boards promote principles aligned with this policy. The company also promotes the application of the policy's principles, wherever possible, to temporary joint ventures, joint ventures, and other similar partnerships or entities. The company also emphasises these principles and commitments with contractors, suppliers, and collaborators, particularly regarding the supply chain.

The policy is accessible to stakeholders on the company's [corporate website](#), as well as on the corporate Intranet for all employees.

The policy assigns the Board of Directors, through the Sustainability and Appointments Committee, the responsibility for guiding, supervising, and controlling the company's environmental strategy and policy, as well as managing related risks and public information. The Health and Safety, Environment, and Quality Integrated Management System Committee is tasked with setting the basic guidelines for developing and monitoring the integrated management system. It is also responsible for coordinating relevant actions and reporting to the Executive Committee. The various company Departments are responsible for setting and prioritising action plans, targets, and monitoring indicators.

By doing so, the company makes commitments to address impacts identified as significant. For more details, refer to the table of impacts included in the [IRO-1](#) disclosure requirement in this chapter.

In addition, through the Ethical Principles and Guidelines for Suppliers, Enagás considers that its suppliers and contractors shall undertake to preserve natural capital, controlling and minimising the environmental impact of the activities they carry out at Enagás facilities, taking into account aspects such as waste management and recovery and efficiency in the use of resources (for more information, see disclosure requirement G1-1).

E5-2

Actions and resources related to resource use and the circular economy

The Company fulfils its environmental commitments, as detailed in its Environmental Policy, through its management system. 100% of Enagás activity is [ISO 14001](#) standard certified. In 2024, more than 47 thousands of euros in OpEx was spent on this certification for conducting internal and external verifications and monitoring legal requirements. See note '2.1 Operating profit' of the Consolidated Annual Accounts for details. Furthermore, the Serrablo and Yela storage facilities and the Huelva and Barcelona regasification terminals are [EMAS](#) (Eco-Management and Audit Scheme) certified.

Enagás evaluates the environmental aspects and impacts of its construction, operation, and maintenance activities via its Environmental Management System. Notable environmental considerations include the consumption of auxiliary materials and waste generation. Environmental monitoring is carried out through audits, environmental surveillance programmes, assessments of legal compliance at all facilities and monitoring of environmental indicators and improvement plans.

Enagás regularly offers environmental training and awareness programmes for its workforce, covering topics such as resource use and the circular economy.

In line with its commitment to the circular economy, in 2024, Enagás renewed the [Zero Waste certification from AENOR](#)⁵³, which recognises the company's progress in maximising the volume of waste recycled or recovered, as well as minimising the waste generated.

In its commitment to advancing the circular economy, Enagás undertakes initiatives focused on the efficient use of materials, reducing consumption, and managing waste in accordance with the waste hierarchy. During the year, the following actions were implemented:

- Waste management at all facilities prioritises, where feasible, reuse or recovery, aligning with the commitments in the Environmental Policy. As a result, in 2024, Enagás recycled and/or recovered 95.7 % of the waste generated (91.6% in 2023). More information can be found in disclosure requirement E5-5. Enagás employs authorised waste managers to handle waste management outside the company's facilities. In 2024, Enagás has allocated more than 659 thousands of euros for the management of this waste (OpEx) (see note '2.1 Operating profit' in the Consolidated Annual Accounts for details), including payment to waste managers and a waste management platform. A similar budget is expected for the next financial year⁵⁴.
- At the Serrablo underground storage facility, a methanol water regeneration plant recovered 121,103 litres of methanol in 2024 (8,366 litres in 2023) by treating 1,204.07 tonnes of methanol-laden water. This treatment resulted in savings of 108,366 euros in external waste management costs.
- Recycling of triethylene glycol (TEG) used in the gas drying process at Yela and Serrablo underground storage facilities by subjecting it to a distillation process that optimises the life cycle of this product.
- Enagás has also entered into a collaboration agreement with Oroel to study the durability and life cycle of the personal protective clothing used across all its facilities.
- In 2024, merchandise and books without monetary value were donated to the NGO Asociación Solidaria Universitaria and the NGO Construyendo Futuro.

Enagás plans to continue with these actions in the coming year.

⁵³ Waste management certification for 2023, which resulted in a 'Zero Waste' certificate for Enagás Transporte S.A.U. (the Barcelona plant is outside the scope of this certification).

⁵⁴ Payments to waste managers depend on the volume of waste generated, which is directly linked to operational activity.

Metrics and targets

E5-3

Targets related to resource use and the circular economy

In its various contracts with waste managers, the company has set out the treatments to be applied to each waste product in line with applicable legislation and its commitments, which include the annual target of treating (recycling/recovering) a percentage equal to or greater than 90% of all hazardous and non-hazardous waste generated during the year. Furthermore, Enagás has developed a plan with initiatives aimed at increasing the percentage of waste recovery at its facilities, as well as specific measures to minimise waste generation, prioritising prevention according to the waste hierarchy. For more information, refer to disclosure requirement [E5-2](#).

In 2024, Enagás met its goal of recycling and/or recovering 90% of the total waste it generated. This equates to a target of 2,522.28 tonnes recycled/recovered with an actual recovery or recycling rate of 95.7% (2,682.85 tonnes recycled/recovered). For more information, refer to disclosure requirement [E5-5](#).

Moreover, the Serrablo underground storage facility has set a target to regenerate at least 50% of the methanol-laden water it produces each year through its own regeneration plant (1,471.15 tonnes managed in total). By 2024, the facility exceeded this goal, treating more than 81.8% of the methanol water generated (1,204.07 tonnes).

These voluntary targets align with the waste hierarchy levels that focus on preparing for reuse, recycling, and other forms of recovery.⁵⁵

However, they align with the commitment in the Environmental Policy to establish goals for neutrality and a positive net impact on key environmental aspects, such as achieving zero waste.

Enagás monitors compliance with these targets and identifies improvement actions on a quarterly basis through its waste management oversight. Additionally, the annual assessment of environmental aspects highlights new improvement actions. The company ensures that all necessary resources, both material and human, are available to implement the identified actions.

⁵⁵ These objectives are not based on scientific criteria, but on the criteria established by AENOR's Zero Waste certification. Stakeholders were not involved in setting them, nor were ecological thresholds considered.

E5-4

Resource inflows

Enagás does not use raw materials in its production process but only consumes auxiliary materials⁵⁶. As a result, no significant impacts, risks, or opportunities have been identified related to resource input.

Nevertheless, Enagás is committed to promoting the circular economy through the efficient use of these auxiliary materials, reducing consumption, pollution, waste generation and its impact on the environment while encouraging innovation.

E5-5

Resource outflows

Waste from the transmission and storage of natural gas

According to the European Waste Catalogue, the LER codes for waste from the purification and transmission of natural gas are as follows:

- 05 07 01* Wastes containing mercury
- 05 07 02 Wastes containing sulphur
- 05 07 99 Wastes not otherwise specified

In 2024, the company did not produce any waste in the first two categories (05 07 01*, 05 07 02). For the category '05 07 99 Wastes not otherwise specified', the waste generated includes wood and inert industrial materials.

Hazardous waste

After gas is extracted from underground storage, it needs to be treated to meet quality standards before it enters the transmission network. Initially, the liquid phase (comprising water and methanol) is separated from the gas phase. Then, triethylene glycol (TEG) is used in a counterflow process to dry the gas. Following this, the gas is odourised and measured before being fed into the transmission network.

The physical separation of the liquid and gaseous phases produces methanol-laden water, which is the main waste product for the company. Its generation is closely tied to the system's gas demand.

Other hazardous wastes include depleted TEG, water-oil-detergent mixtures, aqueous cleaning fluids, as well as absorbents, rags, filtering materials, and nickel-cadmium batteries.

⁵⁶ The main auxiliary materials include tetrahydrothiophene (THT), sodium hypochlorite, chlorine dioxide, methanol, and triethylene glycol (TEG). For more information, see the Requirements section of '[Non-financial and diversity reporting requirements \(Law 11/2018\)](#)'.

As a result of inspection and maintenance activities on our infrastructure, a quantity of waste is occasionally generated that is classified as naturally occurring radioactive waste. This natural radioactivity originates from the natural gas itself, which has had prolonged contact with geological structures containing radioactive elements at the extraction site. Consequently, Enagás cannot implement measures to reduce the generation of this type of waste. To manage this waste, Enagás transfers it to ENRESA (Empresa Nacional de Residuos Radiactivos) for appropriate handling. In 2024, 0.0083 tonnes of radioactive waste were generated⁵⁷ (0.0451 tonnes in 2023).

Non-hazardous waste

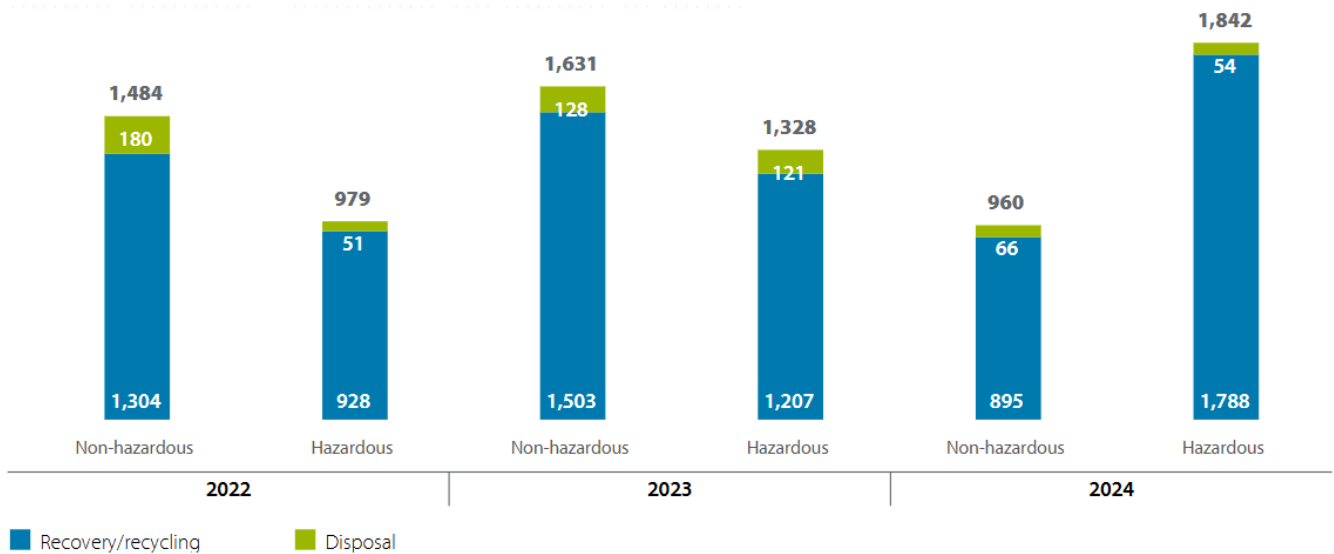
As a result of facility use by individuals, various types of non-hazardous domestic waste are generated. The most notable

types include municipal solid waste, rubble or scrap metal, and paper and cardboard.

Waste generation and management

Enagás has a waste management platform that guarantees better traceability of the treatment of the waste generated in its facilities, greater control of management documentation in accordance with national requirements and those of each autonomous community and optimal communication with the government. The reported data are based on direct measurements of the waste quantity and treatment types, as provided by waste managers through the platform. This information on waste generation and management is verified by AENOR as part of their 'Zero Waste' certification (for more information, see disclosure requirement [E5-2](#)).

Waste generated and managed by type of waste (tonnes)



⁵⁷ This radioactive waste has not been included in the 'Waste generated and managed by waste type' figure nor the 'Waste generated and managed by

waste type and waste destination' table due to the particularity of the waste and because it is not suitable for any kind of treatment.

Waste generated and managed by waste typology and waste destination (t)

Type of waste	Waste destination	2022	2023	2024	
Non-hazardous	Recovery	Preparation for re-use	0.0	0.0	0.0
		Recycling	1,285.1	1,391.5	668.8
		Other recovery operations	19.1	111.9	225.8
	Total recovery	1,304.2	1,503.4	894.6	
	Disposal	Incineration (with energy recovery)	0.0	0.0	0.0
		Incineration (without energy recovery)	0.0	0.0	0.0
		Transfer to a landfill	28.5	22.1	14.1
		Other disposal operations	151.9	105.6	51.5
	Total elimination	180.4	127.7	65.6	
	Total non-hazardous waste		1,484.6	1,631.1	960.2
Hazardous	Recovery	Preparation for re-use	0.1	0.0	0.4
		Recycling	893.6	1,120.8	1,637.7
		Other recovery operations	34.6	86.2	150.2
	Total recovery	928.3	1,207.0	1,788.3	
	Disposal	Incineration (with energy recovery)	0.0	0.0	0.0
		Incineration (without energy recovery)	0.5	1.8	7.1
		Transfer to a landfill	4.9	15.6	2.0
		Other disposal operations	45.7	102.9	45.0
	Total elimination	51.1	120.3	54.1	
	Total hazardous waste		979.4	1,327.3	1,842.4

Waste by treatment type (t)

		2022	2023	2024
Waste recovered	Amount (t)	2,232.5	2,710.4	2,682.8
	%	91%	92%	96%
Waste disposed of	Amount (t)	231.5	248.1	119.7
	%	9%	8%	4%
Total generated waste		2,464.0	2,958.5	2,802.5

Solid waste generated and managed by treatment (t)⁽¹⁾

		2022	2023	2024
Recovery / recycling ⁽²⁾		727.6	681.4	589.8
Disposal	Incineration (with energy recovery)	0.0	0.0	0.0
	Incineration (without energy recovery)	0.5	0.1	0.1
	Transfer to a landfill	33.3	38.1	15.5
	Other disposal operations	7.6	11.8	5.8
Total elimination	41.4	50.0	21.4	
Total solid waste generated		769.0	731.4	611.2

(1) Excludes contaminated soils produced by accidents and soaked sepiolite (clean-up material for small spills).

(2) Includes energy recovery, capture, recycling and other recovery treatments.

E5-6

Expected financial impact of risks and opportunities related to resource use and the circular economy

In its materiality analysis, the company did not identify any significant risks or opportunities associated with resources and the circular economy.

However, Enagás has an environmental liability policy that covers the costs of preventing and remedying any damage to the environment inside or outside the company's facilities, with an

annual aggregate liability limit of 20 million euros per claim. It also has an industrial liability policy that covers compensation payments to third parties arising from sudden, accidental and unforeseen pollution or contamination with a limit of 300 million euros per claim.

Non-financial and diversity reporting requirements (Law 11/2018)

Detailed information on the current and foreseeable effects of the company’s activities on the environment

The amount of provisions and guarantees for environmental risks

Enagás facilities have a useful life set out during their design and construction. Enagás makes investments and technical improvements to extend the useful life of its assets while maintaining the required levels of safety, quality, environmental protection and efficiency.

Once the company’s facilities have reached the end of their useful lives, as part of the decommissioning process, Enagás will establish decommissioning and rehabilitation plans that consider the possible impacts on the environment and local communities, taking into account the different stakeholders and involving local communities. Enagás has recorded financial provisions for the dismantling of all its regasification terminals and underground storage facilities, amounting to more than 237 thousands of euros.

Although the useful life of the underground storage facilities has not yet ended, these infrastructures already have detailed closure and rehabilitation plans as required by the Hydrocarbons Law. In the case of pipelines, decommissioning plans are regularly updated in line with annual maintenance plans.

In the last three years, no Enagás facilities were closed down.

Circular economy and waste prevention and management

Actions to combat food waste

Given the company’s activity and the material topics identified, food waste is not a relevant issue for the company.

Sustainable use of resources

Consumption of raw materials and the measures adopted to improve efficiency in their use

Enagás does not consume raw materials in its production process; only auxiliary materials are used. Enagás is committed to promoting the circular economy through the efficient use of these materials, reducing consumption, pollution, waste generation and its impact on the environment while encouraging innovation.

Consumption of main auxiliary materials

Auxiliary material	2022	2023	2024
Tetrahydrothiophene (THT) (kg)	440,839	391,783	132,752
Sodium hypochlorite (kg)	523,882 ⁽¹⁾	554,282	397,370
Chlorine dioxide (kg)	45,695	9,946	3,920
Methanol (litres)	265,030	431,894	597,756
Triethylene glycol (TEG) (litres)	2,050	3,127	7,825

In 2024, there was an increase in methanol consumption (38% compared to 2023) and in triethylene glycol consumption (150% compared to 2023). These products are used in the gas extraction process in underground storage facilities, and their variation is directly related to the increase in extraction activity (which increased more than 26% compared to 2023).

SOCIAL INFORMATION



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S3	Affected communities	179

S1. OWN WORKFORCE

Strategy

SBM-2

Interests and views of stakeholders

Enagás' professionals are one of the company's main stakeholders, a commitment that is reflected in the different policies, actions and goals described in this chapter. In order to ensure proper alignment between the interests and opinions of the company's own workforce and its strategies, Enagás has different channels to meet their needs and concerns (for more information, see disclosure requirement S1-3).

In 2024, we launched a specific consultation with key stakeholders, including the company's own employees, as part of the company's materiality assessment (for more information, see disclosure requirement IRO-1). Through this consultation, more than 50% of employees have expressed their opinion on the company's strategy and on the most significant sustainability issues.

These stakeholder opinions have been used to determine the impacts, risks and opportunities identified in the materiality assessment (for more information, see disclosure requirement IRO-1 in chapter 2). These were also determined on the basis of a prior analysis of the company's business model and strategy, i.e. based on an analysis of Enagás' own practices.

Digital Transformation Plan

In order to address the company's strategic challenges and meet the interests of its professionals, Enagás has presented its 2024-2026 Digital Transformation Plan. This Plan, coordinated and sponsored by senior management, promotes a culture change with a priority focus on digitalisation and people.

This Digital Transformation Plan is articulated around a model based on large areas or domains. For each of these domains, two reference layers are included, namely strategy and culture. There are three major transformation levers: talent, operating model, technology and data. There are also two cross-cutting layers: cybersecurity and adoption and change management.

The Digital Transformation Plan integrates both the vision of People and that of Digitalisation, approaching the transformation from two points of view:

- People: equipping professionals with new skills, leadership models, organisation, new ways of working and management frameworks that enable them to deal effectively with future challenges.
- Digitalisation: equipping professionals with the technology and data they need to become agile and adapt to new scenarios.

To coordinate the management of related projects and initiatives, a Transformation Office has been set up. This office oversees the vision and impact of the transformation, ensuring team and initiative coordination, as well as supporting proper communication and change management.

This new Digital Transformation Plan highlights the importance of the collaboration of Enagás professionals as an active part of the change, participating in the identification and development of initiatives as work teams as well as ensuring success and the measurement of the impact on results.

SBM-3

Material impacts, risks, and opportunities and their interaction with the strategy and business model

Enagás own workforce

At year-end 2024, Enagás' own workforce that could be significantly affected by the company was distributed as follows:

- 1,362 employees (1353.2 FTEs).
- Non-employee workers:
 - 13 people hired through temporary employment companies who were doing work at Enagás, mainly to replace professionals who are temporarily absent (13 in 2023).
 - 70 people with scholarships (55 people in 2023).
 - Enagás has no non-employee workers working as independent contractors.

Impacts, risks and opportunities

Enagás has conducted a materiality analysis to identify own workforce impacts, risks, and opportunities, as detailed in the IRO-1 disclosure requirement. This analysis encompasses all activities and infrastructure locations of companies under financial control, including both upstream and downstream stages of the value chain.

This materiality assessment has identified the impacts, risks and opportunities arising from Enagás' current business model. The 2025-2030 Strategic Update is tailored to the results of this materiality assessment, based on the implementation of policies, actions and targets to manage the impacts, risks and opportunities identified as material. In this assessment, Enagás did not identify any material impact on its own workforce as a result of the Transition Plan.

In general terms, it is the Transformation Plan deployed in the company that aims to address these identified impacts, risks and opportunities with specific actions in line with the new update to the Enagás Strategy.

As a result of this assessment, the following positive and negative material impacts have been identified as affecting mainly employees.

Table of impacts

Topic	Sub-topic	Impact	Nature	Scope	
People	Stable, quality employment	Maintenance of quality employment through the provision of jobs with short, medium and long-term stability and favourable working conditions for workers.	Consistently positive - Current	All employees	
	Satisfaction and motivation of professionals	Use of programmes and policies to ensure the well-being of professionals in the workplace	Consistently positive - Current	All employee and non-employee workers	
	Collective bargaining	The right of professionals to join trade unions to promote and defend their economic and social interests without discrimination.	Consistently positive - Current	All employees	
	Work-life balance and co-responsibility	Improving the balance between the different aspects of professionals' lives thanks to the implementation of a comprehensive plan of measures favouring work-life balance and co-responsibility.	Consistently positive - Current	All employees	
	Health and safety		Implementation of occupational health and safety plans, protocols and training for the company's professionals to improve the performance of their duties in a safe and healthy manner.	Consistently positive - Current	All employee and non-employee workers
			Possibility of harmful work situations for professionals that generate insecurity in the work environment, including situations that negatively affect both mental and physical health.	Negative related to individual cases - Potential	All employee and non-employee workers
	Awareness and development of in-house talent	Professional development and qualification of workforce through appraisals and development plans, as well as continuous learning and training	Consistently positive - Current	All employees	
	Diversity and inclusion	Ensure non-discrimination and equal opportunities, regardless of gender, race, ethnicity or other personal characteristics, through the implementation of policies, strategies and action plans	Consistently positive - Current	All employee and non-employee workers	

Table of risks and opportunities

Topic	Sub-topic	Risk / Opportunity	Nature
People	Collective bargaining	Establishment of a fair and stable employment framework through collective bargaining to strengthen the employment relationship, raise professional satisfaction, commitment and expertise and contribute to a more productive working environment in a collaborative climate	Opportunity
	Health and safety	Economic and reputational consequences resulting from serious incidents involving professionals during operations, such as fatal workplace accidents	Risk
	Awareness and development of in-house talent	Optimisation of operational efficiency by promoting professional development and training for internal workforce	Opportunity
Human rights	Human rights of own workforce	Reputational improvement and improvement of the due diligence management model for the protection of human rights, derived from the company's alignment with international initiatives and principles in defence of human rights (UN, ILO, etc.).	Opportunity

When identifying and assessing these impacts, risks and opportunities, different characteristics of the company's own workforce have been examined, such as place of work, gender, inclusion (or not) in the collective bargaining agreement, age range, etc. The conclusion is that no material impacts, risks or opportunities for specific groups of people have been identified.

Enagás has not identified any operations with a significant risk of forced labour, compulsory labour or child labour. However, Enagás guarantees these human rights and the stability and quality of employment by implementing various measures, such as those reflected in the [IV Collective Bargaining Agreement of the Enagás Group](#).

Management of impacts, risks, and opportunities

S1-1

Policies related to own workforce

People management is a key area for the company, which enables Enagás to equip itself with the resources required for the deployment of its strategy.

Enagás has set out commitments to effectively manage the impacts, risks, and opportunities related to own workforce mentioned above in its [Group Code of Ethics](#), as well as in more specific policies approved by the Board of Directors (for further details on the Code of Ethics, refer to disclosure requirement [G1-1](#)). The company thus establishes commitments addressing the significant impacts, risks, and opportunities identified:

Link between significant impacts, risks, and opportunities and corporate policies

Topic	Sub-topic	Impact, risk or opportunity	Nature	Corporate policies	
People	Stable, quality employment	Maintenance of quality employment through the provision of jobs with short, medium and long-term stability and favourable working conditions for workers.	Impact	Code of Ethics Human Capital Management Policy Human Rights Policy Collective Bargaining Agreement	
	Satisfaction and motivation of professionals	Use of programmes and policies to ensure the well-being of professionals in the workplace	Impact	Code of Ethics Human Capital Management Policy Human Rights Policy Diversity and Inclusion Policy Collective Bargaining Agreement	
	Collective bargaining	The right of professionals to join trade unions to promote and defend their economic and social interests without discrimination.	Impact	Code of Ethics Human Capital Management Policy Human Rights Policy Collective Bargaining Agreement	
	Work-life balance and co-responsibility	Improving the balance between the different aspects of professionals' lives thanks to the implementation of a comprehensive plan of measures favouring work-life balance and co-responsibility.	Impact	Code of Ethics Human Capital Management Policy Human Rights Policy Collective Bargaining Agreement	
	Health and safety		Implementation of occupational health and safety plans, protocols and training for the company's professionals to improve the performance of their duties in a safe and healthy manner.	Impact	Code of Ethics Human Capital Management Policy Human Rights Policy Health and Safety Policy
			Possibility of harmful work situations for professionals that generate insecurity in the work environment, including situations that negatively affect both mental and physical health	Impact	Code of Ethics Human Capital Management Policy Human Rights Policy Health and Safety Policy
	Awareness and development of in-house talent	Professional development and qualification of workforce through appraisals and development plans, as well as continuous learning and training	Impact	Code of Ethics Human Capital Management Policy Human Rights Policy Collective Bargaining Agreement	
	Diversity and inclusion	Ensure non-discrimination and equal opportunities, regardless of gender, race, ethnicity or other personal characteristics, through the implementation of policies, strategies and action plans	Impact	Code of Ethics Human Capital Management Policy Diversity and Inclusion Policy Human Rights Policy Collective Bargaining Agreement	
	Collective bargaining	Establishment of a fair and stable employment framework through collective bargaining to strengthen the employment relationship, raise professional satisfaction, commitment and expertise and contribute to a more productive working environment in a collaborative climate	Opportunity	Code of Ethics Human Capital Management Policy Diversity and Inclusion Policy Human Rights Policy Collective Bargaining Agreement	
	Health and safety	Economic and reputational consequences resulting from serious incidents involving professionals during operations, such as fatal workplace accidents	Risk	Code of Ethics Human Capital Management Policy Health and Safety Policy Human Rights Policy	
Development of in-house talent	Optimisation of operational efficiency by promoting professional development and training for internal workforce	Opportunity	Code of Ethics Human Capital Management Policy Human Rights Policy Collective Bargaining Agreement		
Human rights	Human rights of own workforce	Reputational improvement and improvement of the due diligence management model for the protection of human rights, derived from the company's alignment with international initiatives and principles in defence of human rights (UN, ILO, etc.).	Opportunity	Code of Ethics Human Capital Management Policy Diversity and Inclusion Policy Human Rights Policy	

Salaried workforce

Corporate policies

- **Human Capital Management Policy:** it includes commitments in the area of human capital management aimed at attracting, developing and retaining talent, providing the company with the skills and competencies, company size and structure, processes, tools and management models necessary to roll out its strategy, as well as offering a value proposition to professionals.

This policy was updated in 2024 to align the objectives and commitments made in the transformation plan, as well as to reinforce the commitment to transparency of information and its alignment with trends and best practices in talent management.

- **Human Rights Policy:** this outlines Enagás' commitments to ensure due diligence in human rights areas. These commitments align with relevant internationally recognised instruments, including:
 - The United Nations Guiding Principles on Business and Human Rights.
 - The United Nations (UN) International Bill of Human Rights and its associated covenants (the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights).
 - The OECD Due Diligence Guidance for Responsible Business Conduct.
 - The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.
 - The International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and its core conventions.
 - The Universal Declaration of Human Rights.

This policy addresses respect for human rights, including labour rights and the rights of society, customers and local communities. Explicitly included are freedom of association, human trafficking and forced labour, compulsory labour and child labour.

The policy commits to developing and maintaining a due diligence system aimed at anticipating, preventing, mitigating, and/or remedying negative impacts on people (both its own workforce and those in the value chain), the environment, and society. This is achieved by regularly taking the following actions, which are based on a continuous improvement approach and cooperation with stakeholders:

- Establish mechanisms to identify, assess and prioritise actual and/or potential negative impacts on human rights arising from the company's own activities and those of the value chain in all geographical areas where the company is present.
- Implement actions to avoid, prevent, or mitigate identified negative impacts, within the company's sphere of influence, should they materialise. This will prevent associated human rights violation risks.

- Monitor the actions taken to ensure that they have achieved their purpose, thereby assessing the effectiveness of the due diligence system.
- Accountability to stakeholders on the due diligence system through public reporting.

In 2024, this policy was updated to strengthen the company's commitment to developing and maintaining a human rights due diligence system, as outlined in the European Sustainability Reporting Standards developed by EFRAG, the proposed Sustainability Due Diligence Directive, and the OECD Due Diligence Guidance for Responsible Business Conduct.

- **Diversity and Inclusion Policy:** it includes the commitments and lines of action to position diversity management and inclusion as key elements of its global strategy. This policy promotes equal opportunities as the central axis around which human resources policies should be oriented, with the aim of creating strategic assets and promoting the full personal and professional development of company employees at all times, thus consolidating the right of all professionals to truly equal opportunities and equal treatment. It also includes the integration of diversity in the main human resources processes such as access to employment, personal progress and professional development and promotion, all while guaranteeing a management free of bias associated with differences.

Through this Policy, Enagás expresses its firm commitment to equal opportunities and non-discrimination, expressly rejecting any direct or indirect discrimination, harassment or other forms of intolerance based on, among others, gender, age, disability, nationality or culture, race, religious beliefs, thought and sexual orientation, or any other personal, family, economic or social circumstance that may be a cause of discrimination.

Enagás is committed to integrating in the organisation the richness provided by the confluence of knowledge, skills and different experiences, by managing the diversity of its professionals in the areas of gender, age, disability, nationality and culture, race, religious beliefs, thought and sexual orientation, or any other personal, family, economic or social circumstance that may be a cause of discrimination.

Diversity leadership:

The Board of Directors is responsible for the orientation, supervision and control of the company's diversity and inclusion strategy and policy. For its part, the Sustainability, Appointments and Remuneration Committee is responsible for controlling and monitoring diversity and inclusion.

In terms of management, although not specifically reflected in the Policy, Enagás has a specific People and Diversity Department, reporting to the People and Transformation General Manager. This General Manager is a member of the Executive Committee reporting directly to the CEO; his duties include the development and maintenance of Enagás' Diversity and Inclusion Strategy.

Company diversity targets:

Enagás sets gender diversity targets as part of its annual and three-year company objectives. These targets are linked to the variable remuneration of all Enagás professionals, including the CEO, thus linking remuneration to diversity goals. For further details, see disclosure requirement [GOV-3 in chapter 2](#).

The Diversity and Inclusion Master Plan, as well as the company's 2nd Gender Equality Plan, define specific measures to ensure compliance with these targets. In addition, last year, Enagás approved a set of specific measures planned for the company's LGBTI community.

Company diversity targets

Mechanism	Term	Indicator	Target value	Final value	Percentage achieved	
Company targets 2024	2024	Percentage of promotion of the less-represented gender in management positions	40%	40%	Target achieved	✓
	2024	Number of persons of the less-represented gender hired as a percentage of total workforce	40%	46%	Target achieved	✓
Company targets 2025	2025	Number of persons of the less-represented gender hired as a percentage of total	45%		In progress	
	2025	Percentage of candidates with cultural diversity in external recruitment processes	15%		In progress	
Targets for long-term incentives 2022- 2024	2024	Percentage of women on the Board of Directors	40%	40%	Target achieved	✓
	2024	Percentage of women in managerial and pre-managerial positions	40%	41%	Target achieved	✓
	2024	Percentage of promotions that are women in managerial and pre-managerial positions	50%	48%	Target not achieved	✗
Targets for long-term incentives 2025-2027	2027	Percentage of women in managerial and pre-managerial positions	40%		In progress	
	2027	Percentage of women in infrastructure	20%		In progress	

- [Health and Safety Policy](#): this includes commitments relating to safety (covering individuals, infrastructure, the environment, and road safety), as well as physical and emotional well-being. In order to comply with the commitments described in this policy, Enagás has established a Safety, Health and Well-being management model, certified in accordance with the following regulations and standards: ISO 45001, ISO 39001 and WHO (World Health Organisation) Healthy Workplace.

In 2024, this policy was revised following a corporate decision to split the former combined Health and Safety, Environment, and Quality Policy into three distinct policies. This change enables more effective implementation of commitments related to these crucial aspects of the business.

The Code of Ethics and all other policies are applicable and communicated to all employees and directors within the Enagás Group, including those of affiliates over which it has effective control, subject to the constraints of the relevant regulations. Therefore, these policies apply to all activities undertaken by Enagás Group companies across all the regions where they operate.

In affiliates where Enagás does not have effective control, the Board of Directors recommends promoting principles and guidelines that are consistent with those outlined in the Code of Ethics and the previously mentioned policies. The company also seeks to encourage, as much as possible, the adoption of the Code of Ethics and related policies by temporary joint

ventures, joint ventures, and other comparable associations or entities. The company also emphasises principles and commitments aligned with the Code of Ethics and company policies with contractors, suppliers, and collaborators, particularly regarding the supply chain.

The Code of Ethics and all policies are accessible to stakeholders on the company's [corporate website](#), as well as on the corporate Intranet for all employees.

These policies assign the Board of Directors the responsibility for guiding, overseeing, and monitoring strategy, policies, risks, objectives, and performance concerning the management of issues related to the subject matter of each policy (human capital, diversity and inclusion, human rights and health and safety). It is also the responsibility of the committees set up at the Board of Directors level to oversee and monitor the aforementioned matters (Sustainability and Appointments Committee for human capital, diversity and inclusion and human rights, and the Remuneration Committee for diversity and inclusion). On the other hand, in the area of Health and Safety, the Health and Safety, Environment, and Quality Integrated Management System Committee is tasked with setting the basic guidelines for developing and monitoring the integrated management system. It is also responsible for coordinating relevant actions and reporting to the Executive Committee. In addition, various departments within the company are tasked with setting up action plans, goals, and monitoring indicators.

It should be noted that all of the above policies are in line with the relevant internationally recognised standards, including the UN Guiding Principles on Business and Human Rights.

Collective Bargaining Agreement

In 2024, following a negotiation process, the company signed the Enagás Group's IV Collective Bargaining Agreement (2023-2026) with the aim of guaranteeing a stable framework of working conditions for four years in order to meet the company's new challenges, in line with the strategic plan. As established in the Agreement, regardless of its commercial configuration, and strictly for labour law purposes, the Group includes companies in which Enagás' stake is equal to or greater than 50%, provided that Enagás organises and manages the workers and their labour activity is within the scope of representation of the Trade Union Federations of the Unions that signed the Agreement. This agreement applies all Group employees except Senior Management, Directors, Managers and Coordinators, as well as professionals who have signed a contract with the company that excludes them from the agreement.

The agreement regulates matters such as work organisation, remuneration, professional promotion, training, working hours, holidays, leave and contract suspensions, geographical mobility, risk prevention, social benefits, collective representation rights and trade union rights, among others. The People and Transformation General Manager, a member of the Executive Committee, is responsible for the effective implementation of the Collective Bargaining Agreement.

Non-employee workers

All the policies described above, with the exception of the collective bargaining agreement, also apply to non-employee workers. Suppliers and contractors are also subject to the [Ethical Principles and Guidelines for Suppliers, which are available to all stakeholders on the corporate website](#). Among the commitments it contains, aligned with the company's Code of Ethics are those related to:

- Health and safety protection. Health and safety protection and compliance with the health and safety policy.
- Respect for human rights via compliance with the United Nations International Charter of Human Rights, the OECD Guidelines for Multinational Enterprises, the International Labour Organisation (ILO) Declaration and its fundamental conventions and the European Convention on Human Rights. Of special relevance is the commitment not to tolerate child or forced labour, and the duty to ensure respect for freedom of association and collective bargaining in the workplace. Moreover, the commitment to expressly reject abuse of authority, harassment, and any other behaviour that could create an intimidating, offensive, or hostile work environment is also included.
- Equal opportunities and non-discrimination.

S1-2

Processes for engaging with own workers and workers' representatives about impacts

In line with the company's corporate commitments regarding own workforce, Enagás has established various procedures and channels to facilitate communication and collaboration so that own workforce can convey to the company their concerns and needs related to labour issues identified as material. In summary, the main channels are:

- **Workplace climate surveys:** As part of the Global Employee Listening Strategy, Enagás has been conducting a workplace climate survey every two years since 2008, allowing all its employees to participate in assessing the company's general situation, with the aim of gathering their views on various issues that will enable the company to improve and advance as a whole.

This initiative has evolved over the years and now includes regular surveys that help understand how employees see different areas, as well as measuring the company's organisational climate, professionals' experience and sustainable engagement index. This climate survey is the central pillar of the Global Employee Listening Strategy, and stands out for its voluntary, anonymous and confidential nature, covering all sustainability issues with material impacts, risks or opportunities

Through this survey, the company assesses whether employees are aware of the mechanisms in place for Management to listen to ideas, complaints and/or suggestions, as well as Enagás' harassment prevention and action procedure.

- **Collective bargaining:** In 2024, the company signed the Enagás Group's fourth collective bargaining agreement to provide it with a framework of employment stability until 2026 in line with the current socio-economic climate and the needs and evolution of the company (for more information, see disclosure requirement S1-1). This collective bargaining agreement was the result of various collective negotiations conducted during the previous year between the company and workers' representatives.

In addition, Enagás enters into collective bargaining and carries out regular consultations with the workers' legal representation regarding working conditions, remuneration, dispute resolution, internal relations and issues of mutual concern. In 2024, various working group meetings were held with social representatives, including meetings to negotiate the Enagás Group's IV Collective Bargaining Agreement and the ordinary meetings of the joint committees established in the Collective Bargaining Agreement, the Equality Plan, the Pension Plan and the LGBTI panel. All of this has led to various agreements, among which the following stand out: the final agreement document issued by the Negotiating Committee for the IV Collective Bargaining Agreement of the

Enagás Group, the new Protocol for Prevention and Action in any case of workplace harassment, and the set of measures planned to support equality and non-discrimination against LGBTI people at Enagás.

- Mechanisms for professionals to participate in the framework of the Digital Transformation Plan. Enagás has various communication mechanisms in place to facilitate and coordinate employee collaboration with the framework of the Digital Transformation Plan, from the conception of initiatives and employee involvement to their completion and the compilation of lessons learned (for more information, see disclosure requirement SBM-2):
 - ‘Transforma’ inbox to channel ideas, reflections and questions about the Plan.
 - Cultural and transformational challenge-solving events.
 - Other communication channels, such as the project team, to activate professional participation.
- Specifically in health and safety:
 - Health and Safety Committees: Enagás has various employee representative bodies where they may exercise their participation and consultation rights. Different committees comprise health and safety officers and management representatives. The Health and Safety Committees⁵⁸ meet every three months, while the Group and Enagás Transporte SAU Intercentre Health and Safety Committees meet with a frequency set out in the Collective Bargaining Agreement. The results produced by these committees and an effectiveness assessment are reviewed annually through the Management System Management Review. Enagás gathers information on these channels and the associated processes in the communication in SMAC matters procedure and the operating procedures of the integrated management committees.
 - Own workforce, both employees and non-employee workers, have access to various channels through which they can participate in and consult the operation, implementation and assessment of the management system. These include the suggestions and questions box, bulletin board, forms, meetings, internal memos, informational pamphlets, posters and/or electronic communications, as well as any other method that can be documented and guarantees receipt by the intended recipient. Additionally, there are cross-company and cascading communication channels that also cover health and safety issues. Enagás also has a chatbot (virtual assistant) to answer the most frequently asked health and safety questions. Enagás collects information on these channels and the associated processes in the communication procedure for safety, environment and quality.
 - Evaluation of psychosocial factors: Enagás carries out this assessment every five years for all its professionals.

Psychosocial factors are factors that may appear in the work environment related to matters such as the organisation, the work contents or task execution. These may affect both people’s well-being or health and work progress. The psychosocial factor evaluation is a tool whose main objective is to provide information that allows different areas of the company to receive psychosocial diagnoses, in turn allowing them to take improvement actions appropriate to the risks detected and the environment in which they are to be carried out. This evaluation is carried out through a voluntary, anonymous and confidential survey. Enagás collects information on this channel and the associated process in the communication procedures on safety, environment and quality and risk assessment methodologies.

Enagás has a Collective Bargaining Agreement (for more information, see disclosure requirement S1-1) that regulates sustainability issues with positive and negative impacts identified as material. Through collective bargaining, the workers, through the corresponding trade union sections, present their suggestions and/or proposals to the company.

At management level, Enagás has a specific People and Transformation General Management. This is the area responsible for ensuring that this collaboration takes place effectively through all the processes described above, as well as ensuring that the results serve as the basis for the company’s approach, covering all the identified material impacts. The People and Transformation General Manager sits on the Executive Committee and reports directly to the CEO.

S1-3

Processes to remediate negative impacts and channels for own workers to express concerns

Enagás provides its own workforce with different mechanisms for raising and/or addressing negative impacts or complaints related to labour issues:

- Whistleblowing Line: All the company’s own workforce, as well as third parties with which the company has relations, have this channel available to report any reasonable sign of irregularities, illegal acts or behaviour contrary to the commitments set out in the Code of Ethics. Managing and investigating notifications will follow the guidelines set out in the Procedure for handling notifications and queries concerning irregularities or breaches of the Ethics and Compliance Model. For further details on the Whistleblowing Line, such as how to gain access or its no retaliation policy, see disclosure requirement G1-1.
- When it comes to workplace harassment prevention, Enagás has a [Prevention and Action Protocol for any Situation of Harassment in the Workplace](#), the aim of which is to set out guidelines for identifying a situation of harassment, whether

⁵⁸ Health and Safety Committees are established, as per regulation, for centres with more than 50 workers. In those centres with less than 50

employees at which there is a Prevention Delegate, health and safety meetings are held on a regular basis.

psychological or moral, sexual, or on the basis of gender, sexual orientation or identity or gender expression. It aims to resolve a discriminatory situation, ensuring that the rights of the victims are guaranteed at all times and has been brought into line with the legal provisions in force in 2024.

The protocol expressly states that the victim may choose to use the Whistleblowing Line or report the harassment verbally to the Head of the People and Diversity General Management in situations where it is expected that simply informing the aggressor of the intimidating and offensive consequences of his/her conduct will solve the problem quickly and efficiently.

The Ethical Compliance Committee is responsible for the overall management of this Protocol, ensuring its correct application, dissemination, monitoring and continuous improvement, so that it is always in tune with actual operations, and must ensure agility, diligence and speed in the investigation and resolution of reported conduct, which must be carried out without undue delay, respecting the timelines established for each part of the process. The person chairing the Ethical Compliance Committee may fully delegate to People and Diversity General Management the conduct of the proceedings and the taking of any action deemed necessary to clarify the facts and prepare the report on the alleged harassment under investigation, which shall include the conclusions, possible mitigating or aggravating circumstances and a proposal for possible action to be taken. Any of the parties can request the intervention of the workers' legal representative or the relevant prevention delegate at any time.

- Direct contact with the area responsible for people management: any member of the workforce can directly contact the teams responsible for different employment issues (discrimination, remuneration, development and training, work-life balance, etc.) via email, telephone or in person. On this occasion, it is the responsibility of the department in question to monitor and oversee the complaint or issue raised, with the aim of ensuring the channel is effective and a proper response is provided in a timely fashion.
- Direct contact with trade unions: professionals can contact workers' representatives and/or trade unions to resolve any incidents, as well as to manage other needs. Contact can be established through various channels, both in person and remotely, such as via email.
- Specifically, in the area of health and safety, Enagás has an internal procedure for reporting risks or anomalies that any employee may encounter as they work, without risk of possible reprisals, as well as an action and communication procedure for serious and imminent risks. There are various channels for establishing these communications, such as Health and Safety Committees and meetings, workers' representatives, an electronic suggestion mailbox available to all professionals, and coordination meetings with contractors, through the prevention service or through those directly responsible, and a specific mailbox enabled on the SACE platform for contractors and suppliers (including non-employee workers). Along these lines, continuous sensitivity-

raising and awareness-raising campaigns are carried out with the aim of promoting a culture of risk observation and hazard warnings where necessary.

Enagás has a digital tool to manage its Integrated Management System. This aims to ensure that impacts and opportunities for improvement detected in the different preventive activities are properly handled by identifying, scheduling and assigning those responsible for corrective actions and assessing their effectiveness in resolving the incident.

Enagás has a procedure for action, notification, investigation and statistical analysis of all incidents.

If the following circumstances arise, a specialised investigation using a cause analysis methodology is carried out, which generates a specific register:

- Incidents with a risk score above a specific level, established according to the method included in the procedure.
- By request of the Intercentre Health and Safety Committee and/or the Health and Safety Committee of the facility, the chain of command or the Prevention Service.
- Major or fatal accidents.
- Major accidents according to RD 840/2015.

Following the investigation, a report is produced including the causes of the incident, the potential risk assessment, the corrective actions identified, the persons responsible for carrying out and monitoring the corrective measures (including those that affect the risk assessment review or changes to the management system), as well as resources and timelines, following the procedure for managing corrective actions.

The criteria used for recording and consolidating reported accident data is based on the OSHA standard.

In the event of any accident, Enagás has a procedure of lessons learned where the method of dissemination is established that uses a cascade approach so that it reaches all personnel at the company.

Following any risk assessment, corrective actions are established to mitigate the relevant identified risks, and the effectiveness of the action is subsequently evaluated. The tool allows all activities, incidents and corrective actions to be recorded, as well as associated indicators to be collected. This is to facilitate the review of these results by management, potentially leading to improvements in the management system.

Through this workplace climate survey (for more information, see disclosure requirement S1-2), the company assesses whether employees are aware of the mechanisms in place for Management to listen to ideas, complaints and/or suggestions, as well as Enagás' harassment prevention and action procedure.

S1-4

Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

Stable, quality employment

In relation to the management of the positive material impact 'Maintenance of quality employment through the provision of jobs with short, medium and long-term stability and favourable working conditions for workers', Enagás maintains stable, quality employment with a high percentage of permanent, full-time contracts.

Enagás' commitment to its workforce is supported by an organisational culture based on flexibility, responsibility, respect and mutual commitment. A project that links the continuous improvement of the company with raising the quality of the professional and personal lives of all of us who are part of it.

In this regard, Enagás ensured that the following were maintained in 2024:

- Quality in employment, ensuring the provision of adequate wages higher than minimum wage (at Enagás, minimum wage is 1.66 times higher). Their review, as agreed in the Collective Bargaining Agreement, takes as a reference the cumulative CPI (Consumer Price Index) over the term of the agreement. In 2024, Enagás allocated over 105 million euros to wages and salaries for its employees. For details, see section b) Personnel expenses, of note 2.1 operating profit in the Consolidated Annual Accounts.
- Flexibility in terms of time and space, establishing mechanisms that allow working hours to be monitored, including overtime, the remuneration for which is specifically regulated in the Collective Bargaining Agreement.
- In addition, Enagás enters into collective bargaining and carries out regular consultations with the workers' legal representation regarding working conditions, remuneration, dispute resolution, internal relations and issues of mutual concern. For further details, see the 'Collective bargaining' section in this disclosure requirement.

Enagás evaluates the satisfaction of its employees via the actions carried out to manage the impacts indicated by the workplace climate survey.

Satisfaction and motivation of professionals

In relation to the management of the positive material impact 'Use of programmes and policies to ensure the well-being of professionals in the workplace', Enagás has carried out its workplace climate survey. This survey is part of the Global Listening Strategy, in line with the Company's Digital Transformation Plan.

Enagás launched the workplace climate survey in 2024 under the slogan 'Tu experiencia nos mueve' (Your experience moves us). Its aim is to gather the views of Enagás professionals on various issues that will enable the company to improve and advance as a whole. This survey is conducted regularly every two years, and it is sent to all employees for their participation.

The 2024 survey reflects changes that, in line with market trends and the company's current context, make up 4 thematic blocks: sustainable engagement, high-performance employee experience, culture, and overall satisfaction and eNPS (employer recommendation index). The workplace climate survey is an inclusive process that gives a voice to all employees to express themselves, while preserving the confidentiality of individual opinion. It allows us to measure key indicators in order to design action plans that foster high levels of sustainable engagement and employee experience as key levers to retaining talent and achieving business objectives.

The project provides a digital diagnosis at the organisational level. Different levels of segmentation can also be obtained, allowing data-driven decisions to be made in a very agile way. This also allows us to identify changes in subsequent audits.

That year, participation by our professionals increased compared to the previous survey, reaching 78% (77% in 2022). Overall professional satisfaction stood at 71% (72% in 2022) and the sustainable engagement index at 82% (82% in 2022), the latter remaining in line with external benchmarks.

In the culture dimension, results orientation and a focus on people predominate, with 81% responding favourably the four dimensions assessed (innovation and adaptation to change, people, results orientation and hierarchy and procedures).

The Employee Experience metric received a 76% favourable score, making the company stand out for its ability to inspire employees around its purpose, generate high levels of trust in its leadership, drive a competitive market position through intense customer focus, agility and innovation, and recognise employees through tailored, differentiated, transparent and equitable compensation and benefits. The eNPS stands at 42, the average in Spain being 5.

As conclusions of the results of the climate survey, 94% of professionals consider Enagás a good place to work, and most of them understand how their work contributes to the business objectives.

To carry out this project, Enagás relied on the services of an external consultant and two professionals from the company. They assessed, established and coordinated the process, setting out the framework of strengths and opportunities regarding people with a possible impact on business results.

The Listening to Employees project contributes to the achievement of the company's 2025-2030 Strategic Update and to the commitment established in the Human Capital Management Policy to position professionals at the centre of the management model and improve their experience throughout their life cycle, ensuring the commitment, engagement and development of Enagás' key talent.

In 2025, to continue with the Global Listening Strategy, the following actions will be taken:

- Establishment of action plans derived from the areas for improvement found through the survey.
- Launch of a brief survey to monitor the global listening process; by randomly selecting a representative sample of the company (50% of the workforce), this survey aimed to gather the views of Enagás persons in order to continue identifying opportunities for improvement and deepen the degree of knowledge of the professionals on the projects implemented by the company. The initiative, in line with the Enagás Digital Transformation Plan, will aim to strengthen the commitment and development of people in order to continue growing as a company.
- Launch of a specific survey on social benefits and work-life balance measures aimed at all company professionals. The purpose of this survey will be to give Enagás professionals the opportunity to share their thoughts on a series of measures provided by the company to support co-responsibility and facilitate work-life balance.

Enagás evaluates the satisfaction of its employees via the actions carried out to manage the impacts indicated by the workplace climate survey.

In 2024, Enagás's main operating expenses (OpEx) for these initiatives will primarily involve the hours of employees working on designing the survey model, completing the survey, and collaboratively developing the associated action plans. These expenses are covered under wages and salaries in the Consolidated Annual Accounts (see section b) Personnel expenses, in note 2.1. operating profit).

Collective bargaining

Enagás carried out various actions during the year to manage the positive material impact 'The right of professionals to join trade unions to promote and defend their economic and social interests without discrimination' and the material opportunity 'Establishment of a fair and stable employment framework through collective bargaining to strengthen the employment relationship, raise professional satisfaction, commitment and expertise and contribute to a more productive work environment in a collaborative climate'.

Signing of the new collective bargaining agreement

In 2024, the company signed the Enagás Group's IV Collective Bargaining Agreement with the aim of guaranteeing a stable framework of working conditions for four years in order to meet the company's new challenges, in line with the Strategic Plan. The agreement was ratified unanimously by the company and the workers' representatives.

This new framework is an agreement that allows the company to advance its objectives in a context of great challenges and profound transformation, where the talent, technical capacity and commitment of the people who make up Enagás is fundamental.

Collective bargaining and consultations with the workers' legal representation

Enagás enters into collective bargaining and carries out regular consultations with the workers' legal representation regarding working conditions, remuneration, dispute resolution, internal relations and issues of mutual concern. In 2024, the LGBTI panel was created, and various working group meetings were held with social representatives, including meetings to negotiate the Measures Planned for LGBTI People at Enagás and the ordinary meetings of the joint committees established in the Collective Bargaining Agreement, the Equality Plan and the Pension Plan. All of this has led to various agreements, including the updating of the Protocol for Prevention and Action in any Case of Workplace Harassment, incorporating the legal requirements regarding LGBTI people.

In 2024, Enagás's main operating expenses (OpEx) related to these collective bargaining actions will primarily involve the hours worked by employees from the people and diversity department, who lead the negotiation process, and by workers' representatives, who engage in negotiations during their working hours. These costs are included under wages and salaries in the Consolidated Annual Accounts (for more details, see section b) Personnel expenses, in note 2.1. operating profit).

Work-life balance and co-responsibility

For Enagás, work-life balance means reconciling professionals' needs and interests with those of the company. For this reason, the company took the following actions last year to promote the positive material impact 'Improving the balance between the different aspects of professionals' lives thanks to the implementation of a comprehensive plan of measures favouring work-life balance and co-responsibility':

In 2024, Enagás was again [certified as a Family-Friendly Company](#), a certification it has held since 2007; it obtained the highest rating (A+ Level) for excellence in work-life balance from the Más Familia Foundation. Work-life balance is a voluntary commitment that Enagás has made to contribute to the professional and personal success of its workforce.

To this end, in 2024 the company has more than 120 measures aimed at reconciling the different aspects of people's lives. They support professional and personal development and facilitate a balance between the different dimensions of each person's life, as well as those of their immediate family. Work-

life balance becomes a key instrument to guarantee equality of opportunity.

Enagás believes that the Family-Friendly Company model is integrated into the management of the business and is a valuable tool that has also allowed the company to be perceived as an excellent place to work. The Family-Friendly Company model is subject to an external audit, which evaluates, among other aspects, the return on investment of work-life balance and obliges the company to always be in a process of continuous improvement.

Some of the relevant reconciliation measures available to our professionals⁵⁹ in 2024 are as follows:

Family

- Flexible Remuneration Plan: includes health insurance, childcare, travel card, remuneration in shares and training.
- Study allowance for children of professionals covered by the collective agreement.
- 80% subsidy on special schooling expenses for professionals who have children with disabilities.
- ‘Día sin Cole’ (No School Day) programme and subsidised urban summer camps in Madrid for professionals’ children on workdays throughout the school year⁶⁰.
- Specific measures for female workers who are victims of gender-based violence.
- VivoFacil Family Support Programme:
 - ‘Mi Asistente’ (My Assistant) personal manager, which takes care of all necessary day-to-day procedures and information.
 - Free assistance with various administrative processes, such as procedures for vehicle purchase and sale, procedures for the birth of a child, renewal of driving licences, applications for or renewal of licences and visas, applications for certificates and reports and procedures involving municipal records.
 - Free service for selecting domestic helpers and healthcare personnel.
 - Services for making online wills and living wills, expert legal advice, signings before a notary public and registrations.
 - Specialised treatment (physiotherapy, speech therapy) and 56 free hours of home help service in the event of convalescence, illness or accident.
 - Digital erasure service to remove personal information from the Internet.
 - ‘My mediator’ service, offering the assistance of a person authorised by the Ministry of Justice for conflict resolution.
 - Ecological washing of the professional’s personal vehicle.

⁵⁹ Unless the scope is specified, these measures are aimed at 100% of the workforce of the category to which they apply, including both full- and part-time professionals.

Work flexibility

- Flexibility in start times and lunch break.
- Flexible working (teleworking)⁶¹
- Shorter workday during the summer and every Friday throughout the year.
- Division of annual leave into a maximum of four periods.

Quality employment

- Annual medical check-up and flu vaccine campaigns.
- 90% subsidy on the cost of private medical healthcare insurance for professionals and 100% for their children. Medical cover on international trips.
- Meal subsidies (canteens, financial aid, restaurant vouchers).
- Temporary disability allowance: payment of 100% of the fixed gross annual salary in the event of illness, accident or parental leave and childcare.
- Extension of the period during which a reduction in working hours for childcare purposes can be requested (until the child is 14).
- Access to a programme of discounts and exclusive prices on a wide range of online products, services and leisure.
- Pension plans for employees with two years’ effective or recognised service.
- Healthy food corner¹⁸.
- Help towards sports activities.
- Lactation room¹⁸.

Enagás has continued developing its ‘Reconexión’ (Reconnection) programme, a support programme designed for Enagás professionals who return to the company after parental leave, a leave of absence to care for a child or dependent family member, or prolonged temporary disability, with the aim of facilitating their adaptation and return.

For the eighth consecutive year, Enagás is offering its training programme ‘Aliados con la educación’ (Education Allies) in 2024, together with the NGO ‘Educar es Todo’ (Education is Everything). This programme consists of four online training sessions that offer professionals the opportunity to learn and answer their education-related questions with different renowned experts.

Enagás monitors the use of these work-life balance measures, promoting awareness of the same and encouraging their present implementation at the company.

In 2024, Enagás has allocated over 3.2 million euros to contributions to external pension funds and more than 10 million euros to other personnel expenses. These include several work-life balance measures, such as the flexible remuneration plan, healthcare, and meal expense subsidies (for further information, refer to section b) Personnel expenses, in note 2.1. operating profit).

⁶⁰ At corporate headquarters, where 44% of the company’s professionals and 70% of its women are located.

⁶¹ For all positions compatible with this type of work.

Health and safety

The following is a summary of various actions carried out by Enagás during the year to manage the positive material impact 'Implementation of occupational health and safety plans, protocols and training for the company's professionals to improve the performance of their duties in a safe and healthy manner', the negative material impact 'Possibility of harmful work situations for professionals that generate insecurity in the work environment, including situations that negatively affect both mental and physical health' and the material risk 'Economic and reputational consequences arising from serious incidents involving professionals during operations, such as fatal workplace accidents'.

Health and Safety Management System

The Enagás Group Health and Safety Management System is certified under ISO 45001 and has procedures and systems that seek to prevent injuries and illnesses caused by working conditions in addition to the protection and health promotion of professionals.

Enagás also has a Road Traffic Safety Management System certified in accordance with ISO 39001. On this topic, the company has a Mobility and Road Safety Plan, a vehicle use protocol, a Sustainable and Safe Fleet management procedure and a Road Safety Best Practices Guide for the management of the company fleet.

In general terms, the main actions carried out in 2024 within the framework of these certifications were as follows:

- Organisational context: analysis of the needs and expectations of own workforce and other stakeholders.
- Leadership and commitment: establishment of clear workplace health and safety policies and goals for each of the Group's companies.
- Planning: identification of hazards, assessment of risks and opportunities, and establishment of mitigation actions.
- Support and operation: ensuring the availability of resources, training and adequate communication, as well as change and emergency management.
- Evaluation and improvement: internal and external audits, performance review and implementation of continuous improvement actions.

In the area of health and safety, the monitoring and effectiveness of the management system is carried out through the annual Management Review Committee.

The cost of the safety management system is mainly associated with the cost of the Prevention Service's own workforce (included in the information reported in section b) personnel expenses in note 2.1 Operating income in the Consolidated Annual Accounts for 2024), and the cost of external audits (approximately 25,000 euros in 2024) (information included in note '2.1 Operating income' in the Consolidated Annual Accounts).

Training and awareness-raising

Health and Safety training is a key part of any preventative action to improve worker awareness and protection from the hazards that may be present in daily operations. This is why Enagás has designed a training schedule for all different job profiles at the company that sets out the specific training activities needed for each risk group. In 2024, these activities notably included training regarding work with dangerous goods, explosive atmospheres, storage of chemical products, hygiene and ergonomics, first aid and road safety, among others.

In 2024, a total of 11,991 hours of health and safety training were provided (12,206 hours in 2023); 65% of professionals received training (60% in 2023). The cost of these training hours surpassed 142 thousands of euros in 2024. In 2025, training actions for professionals will continue to take place, with a continuous approach both in terms of training hours and budget.

In addition, during the 2024 fiscal year, more than 40 messages were sent to all Enagás workforce through the corporate mailbox with bite-sized facts promoting health programmes (Steppers challenge, vaccinations, etc.), talks on different topics (choking, fostering social relations and avoiding unwanted loneliness, etc.), etc. For example, on the occasion of World Road Safety Day, which is commemorated every year on June 10, Enagás organised various initiatives to raise awareness among its professionals so that they take extreme care at the wheel.

In 2024, Enagás carried on the 'Guide Project' campaign to guide employees towards a culture of health and safety through the acquisition of knowledge and good habits that enable people to maintain their well-being in the professional and personal spheres. The actions launched within the framework of this project include an awareness-raising campaign on best safety practices promoted by the members of the Executive Committee, as well as informative videos on safety guidelines in innovation projects, as well as road safety and road safety habits. We have also implemented an awareness-raising campaign of 'safety moments' and 'safety walks' promoted by the Executive Committee.

The estimated cost of these corporate communication and awareness activities in 2024 is over 30,000 euros (see note '2.1 Operating profit' in the Consolidated Annual Accounts for details).

Psychosocial risk assessment

In 2024, the review of the planned psychosocial risk assessments was completed. This fiscal year, 600 professionals were assessed using both quantitative and qualitative data, the latter involving more than 100 individual interviews. Preliminary results show favourable results in areas such as worker interest and compensation, psychological demands and autonomy. In 2025, the establishment and implementation of corrective actions to manage the identified areas with the greatest room for improvement will continue.

The cost of this assessment includes the cost of the specialised external prevention service that provided support by carrying out the psychosocial risk assessment in 2024 (35,000 euros) (see note '2.1 Operating income' in the Consolidated Annual Accounts for details), as well as the cost of the Prevention Service's own workforce (included in the information reported in section b) personnel expenses in note 2.1 Operating income in the Consolidated Annual Accounts for 2024).

Emergency management

Enagás is moving towards a resilient management model, promoting improvements in different areas of accident and emergency management. As part of its Global Security Plan, the organisation organises annual legal drills to reduce the response time and possible consequences of an emergency. In 2024, 36 legal drills were conducted at facilities. Likewise, to facilitate its response capacity, Enagás has maps of both corporate and local stakeholders so that, in the event of a hypothetical crisis situation, both the key people and the communication channels are identified, enabling efficient management.

Enagás also periodically reviews its emergency and self-protection plans and establishes emergency collaboration agreements with the authorities in each Autonomous Community through the signing of agreements in order to achieve a rapid, effective response in the event of a possible crisis situation. In 2024, 14 emergency/self-protection plans for different facilities were updated.

Emergency plans are sent to the relevant public administrations so that they can be taken into account in external emergency plans and in for any communication of information of public interest that may be required.

In 2025, work will continue along the aforementioned lines, carrying out drills, reinforcing emergency agreements with the Autonomous Communities and updating the corresponding emergency/self-protection plans.

Healthy Workplace

Enagás is certified as a Healthy Workplace according to the protocol of the World Health Organisation. The Management System encompasses aspects and information regarding the physical working environment, the psychosocial environment, personal health resources and community participation.

In addition, there is an agreement with an external prevention service to provide coverage to the occupational medicine and health monitoring speciality at all centres.

Enagás' head office has a doctor to provide primary care to its own workforce and deal with emergencies among professionals and contractors. The Gaviota platform also has a nursing service and remote assistance from a medical service. In addition, Enagás offers its employees private medical insurance at a subsidised rate. Through the 'VivoFácil' family assistance programme available to all professionals, there are also health benefits such as physiotherapy and speech therapy.

In 2024, Enagás launched once again its Steppers Challenge, part of the company's 'BienEstar' project, with the aim of beating the sedentary lifestyle and improving its professionals'

health. Last year, the number of steps increased proportionally with respect to the previous year. Participants reached 348 million steps taken during the three-week competition.

Other initiatives promoting the physical and mental well-being of our professionals through measures such as encouraging healthy eating, regular physical activity and improving the health of professionals and their environment continued this year.

The company has a specific Emotional Well-being programme whose main objective is to provide professionals with tools to improve their emotional management and prevent stress at work. This programme includes a range of actions, such as stress management workshops (involving 80% of the company), a mindfulness programme, a digital well-being programme, emotional management improvement programme, relaxation and sleep hygiene workshops, interventions by a specialised psychologist to bring together work teams and awareness of digital switch-off.

In 2024, we launched a programme called 'Catching your sleep', mainly aimed at shift workers, where circadian rhythms are comprehensively assessed with the aim of detecting sleep or performance problems and possible solutions.

Related to the improvement of nutrition, in 2024, sessions took place with a personalised service featuring nutrition experts available to professionals at headquarters.

Updates to the medical service

Besides the specific medical check-up for each position, Enagás also carries out voluntary basic analytics, a cholesterol breakdown, prostate cancer check-ups for men over 45 years of age, an electrocardiogram and a colon cancer diagnostic test. In 2024, cardiovascular risk parameters, a nutritional assessment, a diabetes development risk assessment and a fatty liver index risk assessment were also included in the survey.

Enagás has implemented a programme to encourage professionals to gather the necessary knowledge to become promoters of their own health. In 2024, the following actions were carried out:

- 405 medical consultations of Enagás workforce plus 47 of external personnel.
- 1,152 health examinations.
- 1,120 examinations for high blood pressure and cardiovascular risk (including 74 blood tests and 50 blood pressure measurements in the medical service, both at specific times and in follow-up).
- 478 tests of early diagnosis of prostate cancer.
- 374 tests of early diagnosis of colon cancer.
- 409 flu vaccinations and one other type of vaccination administered.

With the aim of promoting a healthy lifestyle among employees, Enagás provides professionals with healthy and natural food at the head office and in infrastructure canteens. Enagás also has a locker room, showers and bicycle parking facilities on its premises.

The cost of actions related to Healthy Workplace in 2024, including those related to physical and emotional well-being and the medical service, was approximately 276,000 euros (see note '2.1 Operating income' in the Consolidated Annual Accounts for details). In addition, there is the cost associated with personnel expenses for the Prevention Service's own workforce who participate in these actions (included in the information reported in section b) personnel expenses in note 2.1 Operating income in the Consolidated Annual Accounts for 2024).

Diversity and inclusion

Enagás promotes a culture that ensures a diverse and inclusive environment, and fosters a working environment in which trust and mutual respect prevail and where integration and recognition of individual merit are hallmarks of the company. All this by promoting actions and initiatives associated with managing the positive impact 'Ensure non-discrimination and equal opportunities, regardless of gender, race, ethnicity or other personal characteristics, through the implementation of policies, strategies and action plans'.

Enagás has designed a Diversity and Equality Master Plan whose objective is to guarantee equal opportunities by fostering a diverse and inclusive environment. This supports the company's Diversity and Inclusion Strategy (gender diversity, disability, generational diversity, diversity of thought, cultural diversity and LGBTI). Among the actions included in this plan and carried out in 2024, the following stand out:

- In 2024, one meeting of the Diversity Committee was held with the aim of monitoring the company's commitments. This involved the company's management team and middle management in the Diversity and Inclusion Strategy, promoting inclusion in their areas of responsibility, being active and prominent advocates of inclusive practices and leadership. This provides a space for sharing experiences, reflecting, finding synergies and proposing concrete actions to advance with a sustainable, inclusive and egalitarian model of people management. This Committee is composed of directors representing all areas of the company.
- The Diversity Allies Network held six meetings to continue working to promote an inclusive culture. This network, made up of 90 professionals from all areas of the company, is an initiative that aims to raise awareness of the importance of having diverse and inclusive environments in all areas of life, including the workplace. This is a voluntary space open to all Enagás employees who want to support and defend diversity and inclusion, both inside and outside the company.

In May and June 2024, in commemoration of European Diversity Month, the company relied on the involvement of the professionals that make up this network. Their testimonies raised the visibility of the six axes of diversity that make up the company's Diversity and Inclusion Strategy. In

this regard, seven Enagás professionals shared with the entire organisation the personal icons that inspire, motivate and move them to form part of this network of allies, as well as the reason why they focus on a particular axis.

In order to be able to monitor and evaluate the effectiveness of these actions and initiatives, Enagás has included a category on Diversity and Inclusion in the climate survey, with general questions and other explicit questions on each area of diversity. Moreover, in 2024, the company launched a tool to self-evaluate inclusive behaviour at the company.

In 2024, Enagás allocated over 110 thousands of euros (OpEx) to the diversity and inclusion initiatives listed below (see note '2.1 Operating profit' in the Consolidated Annual Accounts for details). In 2025, Enagás plans to continue these efforts with a similar budget.

Non-discrimination

The company is determined to create diverse and inclusive work environments, where each and every person feels that they can be themselves and that they are valued, without prejudice, for their work and their talent. In 2024, Enagás continued its specific programme on cognitive biases aimed at Directors and managers, as well as those in the diversity allies network, to help develop a culture favourable to the diversity and inclusion model that the company seeks. Its goal is to help identify the presence of biases and assess their influence and impact on interpersonal interactions and management, providing team managers with both the necessary tools to be aware of their existence and the measures and actions available to eliminate them. In 2024, this training was extended to all professionals through online bite-size trainings, which included the self-assessment tool 'I am an inclusive person'.

Gender diversity

Enagás has an [Equality Plan](#) that sets out a framework for action to promote effective equality, equity, merit, personal progress, shared responsibility and work-life balance among all professionals.

The Equality Plan covers nine areas of application:

- Awareness-raising and communication
- Hiring and recruitment
- Training, promotion and professional development
- Remuneration
- Hazardous situations for women in the workplace: harassment
- Gender-based violence
- Under-representation of women
- Co-responsibility in the exercise of rights to personal, family and working life
- Working conditions and workplace health

Each of the above points includes and develops specific measures with execution deadlines and prioritisation. These guarantee the principle of equal treatment and opportunities between women and men and non-discrimination on the basis

of sex in all policies, procedures and actions of the company's Human Resources management.

Gender diversity programmes

In 2024 Enagás has promoted measures aimed at increasing the participation of women in positions of responsibility, such as the 'Promociona' and the 'Progresa' projects. They are being developed in collaboration with the CEOE, and aim to create networking groups based on the sharing of experiences to provide high-potential women with the tools and skills necessary to boost their professional careers and take on positions of high responsibility in the future. Other programmes have been launch, which contribute to the achievement of the company's strategic targets, recognising, promoting and developing female talent and guaranteeing equal opportunities and non-discrimination principles. These are:

- The Management Development Programme 'Women with High Potential', together with the EOI.
- The mentoring programme for managers, AED Lead Mentoring.
- Executive programme for women in digital and human leadership (LDH).
- External mentoring with PWN (Professional Women's Network) Madrid, an organisation which, among other ends, is dedicated to the organisation of activities aimed at promoting gender equality, female leadership, respect for diversity, inequality reduction, the promotion of social justice and the empowerment of women.
- The management development programme: STEM Woman/Engineer and Manager.

In 2024, 15 women (18 in 2023) participated in one of the female management development programmes in which Enagás participates.

Other actions

The company has also carried out the following gender diversity initiatives during the year:

- Adjusted pay gap analysis in the framework of the European Directive on Pay Transparency and Equal Pay.
- Holding a meeting of female managers with the CEO to deepen solutions to boost female leadership and STEM careers. Various proposals emerged from the meeting, including: organising 'science camps' for sons and daughters, improving Enagás' employer brand through networks used by children and young people, mentoring and coaching processes for female professionals, raising awareness of prejudices and stereotypes, promoting women's leadership at regasification terminals and facilities, building Enagás' presence at job fairs, scholarships at facilities for recent female graduates, increasing the company's involvement in educational systems and continuing to build female role models, among other proposals.
- Signing of an agreement with the Spanish Association of Women in Energy (AEMENER) with the aim of ensuring that

the presence of women in all areas of the company is balanced and that the teams are diverse, through the promotion of female careers in technology, science, mathematics and engineering.

- Membership of the ClosinGap Association to promote economic growth through gender equality. This initiative seeks to promote and accelerate social transformation towards an economy without gender gaps in both private and public-private partnerships.
- Participation in the DEI MaKers programme.
- Volunteering activity with the Exit Foundation's Coach project, which seeks to guide and motivate young people in situations of social vulnerability.
- Participation in forums and working groups by the Diversity team and other company professionals as ambassadors of Enagás' commitments.
- Awareness-raising campaigns on co-responsibility through the Enagás training programme 'Aliados con la educación' (Education Allies).
- Closing event for the #EllasTeLoCuentan (#Shestellingyou) campaign, which was launched in 2022 with the aim of improving the company's employer brand in the search for and recruitment of talent, in recognition of all the people who participated in it.

Generational diversity

The company is a partner of the Generation and Talent Observatory which encourages innovation and promotes active policies of generational diversity based on values and ethics. Enagás also collaborates in the dissemination of best practices in this area through Capital Radio's Human Resources forum, where it highlights the richness of the confluence of different generations in the workplace, and has sponsored and collaborated in various studies such as 'Diagnosis of generational diversity: analysis of intergenerational talent in companies', 'Intergenerational leadership' and 'Intergenerational health and well-being'.

In 2024, Enagás collaborated in the closure of the Diversity Excellence 360° Management Model, the aim of which was to establish a tool for comprehensive diversity management in the workplace. Following the project's completion in 2023, the conclusions of the study were presented in 2024.

Additionally, Enagás professionals have been provided with online training on generational diversity, deepening the intergenerational culture present at the company.

Disability

The Certification Committee of the Bequal Foundation, a non-profit organisation that recognises organisations that are socially responsible towards people with disabilities, has renewed Enagás' certification in the PLUS category. This certification recognises the company's commitment to people with disabilities as one of the main lines of action included in its Diversity and Inclusion policy. In 2024, Enagás successfully passed the second review of this certification, which will remain valid until November 2025.

In addition, Enagás has taken action to improve accessibility for people with disabilities, such as the progressive elimination of architectural barriers at our facilities and the 'AA' accessibility level of our corporate website.

Other initiatives carried out during the year included the following:

- Launch of the corporate volunteering initiative on artificial intelligence training for people with disabilities.
- Raising awareness of disability through the campaign 'For the sum of abilities', the purpose of which was to provide all professionals with an external confidential and personalised advice service on disability issues, together with the Fundación Juan XXIII.

LGBTI diversity

The company has signed a collaboration agreement with REDI (Business Network for LGBTI Inclusion).

As part of International LGBTI Pride Day, Enagás has organised initiatives to raise awareness of LGBTI people in the workplace, based, among other things, on the testimonies of people who have joined the Allies network for this axis of diversity at the company.

In addition, in 2024 the company established a planned set of measures to promote equality and non-discrimination against LGBTI people at Enagás. To this end, the following measures have been taken:

- Formalisation and monitoring of the negotiating committee to establish a set of measures and actions that guarantee equality and non-discrimination against LGBTI people.
- Elaboration of a report on the current situation in order to establish a planned set of measures and resources to achieve real and effective equality for LGBTI people.
- Updates to the Prevention and Action Protocol for workplace harassment, incorporating aspects related to the LGBTI community.

This document takes on the challenges of today's world in the following areas of action:

- Equal treatment and non-discrimination.
- Access to employment.
- Professional classification and promotion.
- Training, awareness and language.
- Diverse, safe and inclusive work environments.
- Leave and social benefits.
- Disciplinary regime.

Cultural diversity

In 2024, Enagás promoted cultural diversity in access to employment, focusing on the search for international profiles. The resulted in the hiring of nine people in 2024 born outside Spain (representing 13.84% of all new hires).

In addition, the Diversity Allies Network has boosted this axis of diversity, aiming to work towards the inclusion of all groups, with an explicit focus on Cultural Diversity.

In June 2024, an awareness-raising talk on cultural diversity was given to the entire Enagás workforce.

Awareness and development of in-house talent

Enagás carries out different actions to manage the material impact 'Professional development and qualification of workforce through appraisals and development plans, as well as continuous learning and training' and the opportunity 'Optimisation of operational efficiency by promoting professional development and training for internal workforce':

Awareness of in-house talent

In order to deliver on our Human Capital commitments related to talent development and retention, we have a number of talent awareness initiatives across the company as a whole. To this end, we take as a reference our Leadership Model; in it, skills and behaviours are classified and categorised for all professional levels, allowing us to identify strengths and areas for improvement for each and every one of our professionals

Focused and focusing on the collective excluded from the agreement, there is a management-by-objectives model to align professionals' individual performance and contribution with the company's strategic challenges, via the annual definition of measurable and defined objectives for each excluded professional with regular monitoring by their managers, through the annual variable remuneration of professionals. These assessments are carried out annually with the support of our HR digital platform Workday, and serve as a base for promoting continuous improvement and designing personal development plans (for more information, see disclosure requirement S1-13).

Likewise, for workers covered by the Collective Bargaining Agreement, we have the Performance Evaluation (for more information, see disclosure requirement S1-13). This is an annual points-based evaluation system that takes into account six factors:

- Assessment of the manager using our skills model, which is carried out through our digital Workday platform.
- Training associated with the completion of training pathways.
- Performance of objective tests of skills and aptitudes.
- Innovation, through participation in our corporate entrepreneurship programme.
- Knowledge transmission, through the creation of bite-size facts that any employee can create and upload to Workday so that they can be viewed and assessed by any professional.
- Career path that takes into account a professional's average evaluations over the last five years.

In addition, and with the aim of continuing to work on adapting the capabilities of the management team to successfully face the challenges of updating the 2025-2030 Strategic Update and the Digital Transformation Plan, the

Leadership Development Programme is being continued. In 2024, we continued to develop the 40 professionals of the Directors team (members of the Executive Committee and Directors of the company) with both individual and group actions to promote the development of skills and critical capabilities for Enagás. In addition, of the other members of the management team, 111 managers and referents have participated in a 360° evaluation process (evaluation by their managers, teams and peers and/or internal customers) to provide them with an expanded vision of their strengths and areas for improvement. This process has been carried out through a digital platform provided by an external supplier.

Associated with the identification of employees' potential for promotions, and with the goal of fostering professionals' self-development and self-knowledge, Development Centre days were held. At these, through various techniques and simulation exercises provided by an external provider, participants obtain personalised feedback on their potential strengths and areas for improvement with a view to the performance of different roles and responsibilities. In 2024, in response to the company's organisational needs during the year, 40 professionals (43 in 2023) participated in a talent identification programme.

Lastly, with the aim of continuing to promote feedback culture at the company and fostering open communication, Enagás' digital platform workday enables all professionals to receive and give feedback to other professionals. This aims to encourage the identification of improvements at work and to recognise achievements.

Professional development programmes

The information obtained from the different evaluations of professionals enables all of them to design customised development plans through our digital platform Workday. In addition, they can receive specific online training through the Workday platform on the main recommendations for pursuing an Individual Development Plan, as well as receive personalised advice. These individualised development plans are approached from an integral perspective, following the 70:20:10 learning model. 70% refers to actions based on experiential learning, 20% to actions derived from mentoring and coaching processes and 10% to formal learning derived from more traditional training itineraries.

In relation to the first area of experiential learning, in addition to concrete actions that each employee proposes in their current situation, internal rotation programmes are fostered at company level so that new knowledge can be applied to real situations, and participation in transversal projects or temporary assignments can also be taken advantage of. In 2024, there were 78 internal movements (144 in 2023), of which 16 were promotions and 62 horizontal movements. 33% of hirings selected internal candidates (46% in 2023).

In relation to the second area, namely exposure or informal learning, there is the option of carrying out internal and/or external coaching and mentoring programmes. These programmes contribute to the achievement of the company's strategic objectives, and their main benefits are the development and retention of talent, increased satisfaction and

motivation of professionals, improved internal communication and teamwork, increased productivity, leadership development and strategic vision, as well as the promotion of female talent and the increased presence of women in positions of responsibility.

- Enagás promotes personalised coaching programmes aimed at working on the capabilities and skills necessary for the performance of each professional, facing times of change or undertaking new roles. In 2024, 35 professionals participated in coaching programmes (29 professionals in 2023). In addition, professionals in the company have received training and are certified in coaching; they are therefore qualified to carry out internal coaching processes.
- Enagás continued to strengthen its internal mentoring programme, aimed at all company professionals. This programme allows for two-way learning between peers. 53 professionals (27 mentees and 27 mentors) have participated in it. We have also continued to promote participation in external mentoring programs, in which 94 professionals (88 mentees and 8 mentors) participated during 2024. The aim of these external programmes is to encourage and enable professionals to reach senior management positions, to foster their development and to receive advice from more senior professionals from a company other than their own, allowing for a greater exchange of experiences.

Finally, the third area - education - promotes a culture of continuous learning, putting the employee at the centre, empowering them and providing them with the capacity for self-development through training ecosystems where they can access different learning programmes and initiatives.

Training

Enagás is committed to training its professionals from when they join the company and throughout their professional career.

Training begins with the Enagás Welcome Plan, which includes communication and training activities. It includes e-learning training on aspects such as the Code of Ethics, a corporate defence programme, a corruption prevention programme, human rights and equality, among others, which are compulsory for all professionals, and face-to-face training on the Enagás value chain that offers professionals a global vision of the company's business. As a complement to this plan, new recruits participate in a buddy programme; during their Enagás onboarding process, they are accompanied by a colleague who guides and helps them as they take their first steps.

Besides, depending on the type of work the person performs, a training plan has been designed in areas related to operations, maintenance, security and administrative management.

Additionally, as part of Enagás' strategy to promote the continuous training of our professionals to guarantee success in the performance of their duties, there are customised training schedules for each of the company's profiles and levels. These schedules are set out to generate progressive improvements in professionals' qualification levels, anticipating their short- and long-term needs, and include corporate,

operation and maintenance, environmental and health and safety training.

During 2024, and in line with the initiatives framed in the Digital Transformation Plan (for more information, see disclosure requirement [SBM-2](#)) aimed at promoting the development of new skills and knowledge to face future challenges, we launched itineraries in new training areas such as Agility and New Ways of Working, Digital Transformation and Hydrogen. These initiatives also reinforce our commitment to guaranteeing an agile, resilient and digital organisation with a greater capacity to adapt to strategic challenges, as set out in the Enagás Human Capital Management Policy.

The training associated with all of these training itineraries (training considered mandatory) represents 29% of the training hours and 13% of the economic investment per professional. This covers the entire company, that is, all professionals must complete the different training courses in the periods established for each of them.

Additionally, we have programmes based on the skills and behaviours established for each profile associated with our leadership model. We also have training, upskilling and reskilling programmes that provide technical training to new employees, allowing them to take on new roles and participate in new projects and initiatives.

This Enagás training activity is driven by the new Enagás Corporate University, where over 10% of the workforce participate as trainers in different programmes. Beyond classroom and on-the-job training, virtual training, e-learning, mobile training and communities of practice, we also promote the use of experiential technologies, allowing real cases to be simulated and people to learn from experience without putting people's safety at risk or modifying infrastructure operations.

Enagás' commitment to establish and develop the necessary competencies and skills in its professionals to achieve its strategic objectives is evidenced by a training penetration rate⁶² of 99.1 % in 2024 (94.9% in 2023), an average of 57.2 hours of training per professional (58.1 hours in 2023) and an average investment of 1,138.9 euros per professional (1,096 euros in 2023). In 2024, investment in training (OpEx) exceeded 1.8 million euros, compared to 1.5 million euros in 2023 (see note '2.1 Operating profit' in the Consolidated Annual Accounts for details).

Enagás assesses the satisfaction of professionals who have received training; this increased in 2024 compared with the previous year, reaching 8.9 out of 10 (8.8 in 2023).

Within the framework of the Enagás Knowledge Management Model, with the aim of promoting the dissemination and transfer of critical knowledge generated within the company, especially in Infrastructure, the company has continued to work on a series of initiatives, including the promotion of social

learning so that professionals can earn and share knowledge through the 'Expert Talk' programme (in 2024, 7 sessions on different topics have been held). In this programme, experts and company leaders share their knowledge with the rest of the company's professionals through monthly lectures on relevant topics in the gas sector, and the creation of lessons on different subjects that other professionals can consult. Likewise, in order to minimise knowledge loss, we continue with the critical knowledge transfer plans linked to the relay plans.

Human rights

Identification of rights and risk assessment

Human rights management is addressed using a continuous improvement approach aligned with our Sustainable Management Model. Enagás has a global system in place to identify human rights violation risks and impacts on a regular basis.

The identification of these violation risks and impacts is carried out for different points of the company's value chain both current (Enagás activities with management control, affiliates without management control and supply chain and customers) and potential (analysis of new business opportunities), taking into account international standards based on location and activity⁶³, communications and consultations with stakeholders, as well as consultations with external experts in human rights. The human rights identified include labour rights, safety, the environment, ethics and integrity, as well as fundamental rights.

The evaluation of the identified violation risks is carried out through the following assessments:

- Assessment of country-specific risks.
- Corporate risk map.
- Assessments of safety risks in work places and facilities.
- Assessments of environmental impact/ environmental risks.
- Supply chain assessments.

In the assessments carried out in 2024, Enagás considers the level of violation risk to be low across the board due to the measures that the company has implemented as part of its Sustainable Management Model. Thus, Enagás has human rights risk prevention and mitigation plans in all the geographical areas in which the company operates. These plans include the following main measures for each of the main issues identified and target the identified vulnerable groups⁶⁴. These measures have been set out according to the company's capacity to influence the different points of its value chain.

It is the responsibility of the different areas of the company to establish, within their management scope (people, supply chain, local communities, etc.), action plans, objectives and

⁶² The training penetration rate is the number of professionals who have received at least one training activity during the year out of the total number of employees at year-end.

⁶³The World Bank, UNICEF, The Economist Intelligence Unit, IPIECA, The Danish Institute for Human Rights, etc.

⁶⁴Within the framework of the risk assessments that Enagás carries out each year, vulnerable groups have been identified among the stakeholders (professionals, local communities and suppliers). In these cases, action is focused.

monitoring indicators to ensure compliance with the commitments established in the policy and to mitigate the risks and negative impacts identified. They are also responsible for periodically evaluating possible changes in risks and impacts.

During the 2024 assessments - as in the assessments of the previous two years (100% of the assets covered in the last three years) - Enagás did not find any human rights violations, so no remediation actions were required.

In addition to human rights violation risks, Enagás, in an integrated manner with the company's risk assessment processes, identifies and assesses the risk level of each of the risks associated with human rights. These identified risks relate to human rights related to labour practices and to society and local communities:

- Work practices: operational and technological risks and criminal liability.
- Society and local communities: strategic, business, compliance and model risks.

In 2025 Enagás will review its Due Diligence Processes in relation to own operations and third parties, focusing on the protection of Human Rights and the Environment, in line with the new European Directive on this issue.

Enagás provides an online training programme for all professionals so that they can learn the company's methods for ensuring compliance with human rights.

Human rights assessed in own workforce

Human rights assessed	Assessment result	Measures to reduce the level of risk
LABOUR PRACTICES		
The right to decent work and the rejection of forced, compulsory and child labour	Low risk of violation	Enagás guarantees stability and quality of employment, a commitment that is reflected in its Human Capital Management Policy. The Enagás Collective Bargaining Agreement prohibits the company from employing minors of under 16 years of age.
Right to rest and leisure	Low risk of violation	Enagás improves and extends the periods and conditions of rest and leisure established in current legislation (flexibility in start times and lunch break, intensive working days during the summer and every Friday throughout the year, division of annual leave into a maximum of four periods, etc.).
Right to family life	Low risk of violation	Enagás improves and extends paid leave beyond the provisions of current labour regulations (death of a close relative, illness, reduced working hours for childcare, special circumstances, etc.).
Freedom of association	Low risk of violation	Enagás professionals can freely exercise their right to belong to trade unions in order to promote and defend their economic and social interests without this being the basis for discrimination, and any agreement or decision by the company contrary to this principle is deemed null and void, as established in the Enagás Group Collective Bargaining Agreement.
Collective bargaining	Low risk of violation	Enagás has in place a collective bargaining agreement, in line with its Human Capital Management Policy, which enters into collective negotiations and carries out regular consultations with authorised employee representatives.
Workplace non-discrimination and diversity	Low risk of violation	The company has in place a Diversity and Inclusion Strategy, a Diversity and Inclusion Policy, an Equality Plan and a Prevention and Action Protocol at the disposal of its professionals for any situation of workplace harassment. This protocol provides a confidential channel for reporting workplace harassment (canal.etico@enagas.es).
Fair and favourable remuneration	Low risk of violation	Part-time employees receive remuneration that is proportional to the salary of full-time employees, with identical employee benefits. In addition, in 2024, Enagás' minimum salary was 1.66 times the minimum inter-professional salary in Spain.
Living wage	Low risk of violation	Enagás is committed to establishing a salary high enough for all its professionals to have a decent standard of living, sufficient to cover basic needs in accordance with the local cost of living.
Right to a safe working environment	Low risk of violation	Enagás' Occupational Risk Prevention Management System, certified under ISO 45001, provides mechanisms for identifying and preventing incidents.
Right to life, liberty and security of person	Low risk of violation	The company exercises due diligence when rendering its services in order to prevent errors or omissions that could harm the life, health or safety of consumers or others who may be affected. It also complies with national laws and relevant international guidelines.
Right to freedom of opinion, expression and information	Low risk of violation	Enagás has various clear and transparent internal communication channels that allow workers to communicate with senior management.

Repair procedures and mechanisms

Enagás also has in place procedures for redress should there be non-compliance with any of the previously mentioned human rights, such as:

- Procedure for the management of consultations and reporting regarding irregularities or breaches of the Code of Ethics.
- Self-protection and interior emergency plans, the incident and transmission network emergency response action plan and the procedures regulating it, the accident and incident management procedure and procedure for reporting them to stakeholders (crisis manual, incident reporting, etc.).
- Procedure for compensation and indemnification for gas pipeline routes through private property areas.

Additionally, as mechanisms for redress, Enagás has in place a Whistleblowing Line (accessible to all stakeholders) and an Ethical Compliance Committee. There are also corporate mailboxes available for specific areas.

Metrics and targets

S1-5

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Stable, quality employment

In order to boost the positive material impact ‘Maintenance of quality employment through the provision of jobs with stability in the short, medium and long term and favourable working conditions for workers’, the company has set the goal of creating an environment where all professionals can achieve personal well-being, offering working conditions propitious to professional growth, facilitating a balance between the different aspects of people’s lives. Related to the implementation of fair wages, Enagás aims to maintain a minimum salary above the national minimum wage⁶⁵. In 2024, this minimum wage was set at 1.66 times the national minimum wage, thereby achieving the target. Workers’ legal representatives have been involved in defining, monitoring performance, and identifying improvements related to this goal, as salary ranges for employees covered by the collective agreement are established through collective bargaining negotiations.

This goal is aligned with the commitment to stable and quality employment included in the Human Capital Policy.

Satisfaction and motivation of professionals

To enhance the positive impact identified as ‘Use of programmes and policies to ensure the occupational well-being of professionals’, the company aimed to maintain the sustainable commitment index results from the 2022 workplace climate survey at 82% in 2024⁶⁶. Enagás achieved this goal by recording an 82% sustainable commitment index in the latest workplace climate survey. Professionals have been involved in monitoring this goal by being informed of the survey results and participating in the identification of lessons or improvements through action plans developed by multidisciplinary teams.

This goal is aligned with the commitment established in the Human Capital Management Policy to position professionals at the centre of the management model and improve their experience throughout their life cycle, ensuring the commitment, engagement and development of Enagás’ key talent.

Collective bargaining

In order to boost the positive material impact ‘The right of employees to join trade unions to promote and defend their economic and social interests without discrimination’ and to manage the material opportunity ‘Establishment of a fair and stable employment framework through collective bargaining to strengthen the employment relationship, raise professional satisfaction, commitment and expertise and contribute to a more productive work environment in a collaborative climate’, in 2024 the company set the target of signing a memorandum of understanding for the entry into force of the Enagás Group IV Collective Bargaining Agreement⁶⁷. This goal was reached in 2024 with the signing of the new Collective Agreement, with workers’ representatives involved in its definition, monitoring, and improvements.

This goal is aligned with our commitment to ensure respect for collective bargaining in the labour sphere included in the Enagás Group’s Code of Ethics.

Work-life balance and co-responsibility

In order to boost the positive material impact ‘Improving the balance between the different aspects of professionals’ lives thanks to the implementation of a comprehensive plan of measures favouring work-life balance and co-responsibility’, the company has set the goal of maintaining its level of excellence in the efr certification in 2024. This means that the measures are aimed at 100% of the employees, with a distribution of more than 120 measures across the following blocks⁶⁸:

- Quality employment.
- Time and location flexibility.
- Family support.
- Professional development.
- Equal opportunities.

The goal set by the company was achieved with 128 measures aimed at 100% of employees, maintaining the above-mentioned measures and fostering an organisational culture based on flexibility, responsibility, respect and mutual commitment. A sustainable project that links the continuous improvement of the company with raising the quality of the professional and personal lives of all of us who are part of it.

This objective is aligned with the commitment to respect labour rights, with a special focus on the area of work-life balance and co-responsibility, as reflected in its Human Capital Policy.

⁶⁵ Given the nature of this goal, which is not meant for comparison, setting a base year is not applicable.

⁶⁶ However, professionals or workers’ representatives were not directly involved in setting this goal.

⁶⁷ Given the nature of this goal, as it is not meant for comparison, setting a base year is not applicable.

⁶⁸ Given the nature of this goal, as it is not meant for comparison, setting a base year is not applicable. Professionals or workers’ representatives have not been directly involved in the definition, performance monitoring, or identification of lessons learned from this goal.

Health and safety

In order to boost the positive material impact 'Implementation of occupational health and safety plans, protocols and training for the company's professionals to improve the performance of their duties in a safe and healthy manner', reduce the negative material impact 'Possibility of harmful work situations for professionals that generate insecurity in the work environment, including situations that negatively affect both mental and physical health' and manage the materiality risk of 'Economic and reputational consequences of serious incidents affecting professionals during operations, such as, for example, injuries, accidents, among others' the company has set the following targets for each strategic commitment in 2024. These are included in the annual Health and Safety Programmes for each Enagás Group company. The goals are as follows⁶⁹:

- Promotion of health and well-being:
 - To achieve 80% compliance with the actions planned in the #Well-being programme. This programme includes specific activities aimed at improving indicators of physical, mental, and occupational well-being, as well as nutrition. These actions directly impact the issues identified in 'Implementation of occupational health and safety plans, protocols and training for the company's professionals to improve the performance of their duties in a safe and healthy manner' and 'Occupational hazards such as harassment, stress, discrimination, injuries, accidents, among others, that create insecurity in the work environment'. All planned actions for 2024 have been completed, fully meeting this target.
- Promotion of Health and Safety Culture:
 - Production and dissemination of four awareness-raising videos of the Health and Safety Culture Guide project. The purpose of these videos is to enhance leadership, integration, and a culture of health and safety among our professionals. They cover various topics, including change management related to new molecules, health, road safety, and management system processes. These actions have a direct impact on the identified impact 'Implementation of occupational health and safety plans, protocols and training for the company's professionals to improve the performance of their duties in a safe and healthy manner'. All four awareness-raising videos were produced in 2024, achieving this objective.
 - The 'safety walks' process has been fully implemented at the senior management level to highlight the importance of health and safety across the organisational structure and to share best practices as a method for continuous learning in a safe and healthy manner. These actions have a direct impact on the identified impact 'Implementation of occupational health and safety plans, protocols and training for the company's professionals to improve the performance of their duties in a safe and healthy manner'. All planned actions for 2024 have been completed, meeting this goal.

- Change management: innovation, transformation and new processes.
 - Deliver 100% of the training courses scheduled for the company's own employees on hydrogen, with the aim of adequate change management and training in the new risks and measures associated with the new molecules (hydrogen) as a driver for the transformation plan projects. All planned content and courses for 2024 were completed, fulfilling this target.
 - Dissemination of the Guide to project safety management: broadcasting of an informative video. Both targets have a direct effect on the identified impact 'Implementation of occupational health and safety plans, protocols and training for the company's professionals to improve the performance of their duties in a safe and healthy manner'. All planned actions for 2024 have been completed, fully meeting this target.
- Promoting resilience in management:
 - Conducting 100% of the planned crisis management and business continuity drills to understand and practise preparation, resolution, and recovery actions following a crisis or emergency, thereby achieving a resilient structure. These actions directly impact 'Economic and reputational consequences arising from serious incidents involving professionals during operations, such as fatal workplace accidents' and 'Implementation of occupational health and safety plans, protocols and training for the company's professionals to improve the performance of their duties in a safe and healthy manner'. The planned drills for 2024 have been completed, thus meeting this objective.
- Promotion of road safety:
 - The results of the mobility and road safety plan have been shared with all Enagás professionals to raise awareness about risk levels and the necessary preventive measures. These actions directly impact the identified issues of 'Implementation of occupational health and safety plans, protocols and training for the company's professionals to improve the performance of their duties in a safe and healthy manner' and 'Economic and reputational consequences arising from serious incidents involving professionals during operations, such as fatal workplace accidents'. The mobility plan results for 2024 have been disseminated using audiovisual material, fulfilling this objective.

All these targets are integrated into the Global Health and Safety Plan, which is drawn up annually at company level, which means that it affects all professionals. It includes, in addition to those indicated here, other targets to achieve continuous improvement in this area. These targets are set on the basis of:

- The analysis of compliance indicators from the previous year.

⁶⁹ Given their nature, as they are not meant for comparison, setting a base year is not applicable.

- Proposals submitted to the Health and Safety Committees of each company.
- The identification of impacts and opportunities for improvement resulting from the previous year's preventive activity.

Workers' representatives are involved in establishing these objectives through the Enagás Group's Health and Safety Committee. The management team monitors each goal through the SMAC Committees of each company, demonstrating its commitment to health and safety.

All these objectives have been fully achieved, with 100% of the planned measures met in 2024.

Diversity and inclusion

In order to boost the positive material impact 'Ensure non-discrimination and equal opportunity, regardless of gender, race, ethnicity or other personal characteristics, through the implementation of policies, strategies and action plans', the company has established the diversity and inclusion goals described in the table 'Company Diversity Objectives' in disclosure requirement S1-1⁷⁰, in order to strengthen the company's commitment to a balanced presence of gender diversity. The Equality Plan Monitoring Committee, comprising worker and company representatives, has helped define, monitor performance, and identify lessons learned from these goals.

These objectives are in line with the commitment reflected in the Human Capital Management Policy to strategically manage diverse and inclusive talent in order to build a team of professionals prepared to face current and future challenges,

All targets set by the company are voluntary and are part of the company's variable remuneration targets for all employees. Enagás monitors compliance with these on a quarterly basis, identifying actions aligned with these targets in order to contribute to their achievement.

Each year, Enagás sets new diversity and inclusion targets as part of the company's annual objectives, ensuring that they are aligned with best practices in this area.

Awareness and development of in-house talent

In order to boost the positive material impact 'Professional development and qualification of workforce through appraisals and development plans, as well as continuous learning and training' and to manage the opportunity 'Optimisation of operational efficiency by promoting professional development and training for internal workforce', Enagás has set the following targets for 2024:

- At least 75% of all professionals, including professionals both covered and not covered by the Collective Bargaining Agreement, receive at least one annual performance review⁷¹. In 2024, this target was reached, with 79.1% of professionals evaluated.
- Enagás aims for the training penetration rate⁷² to exceed 90% in 2024, considering all its employees⁷³. In 2024, this target was reached, with a 99.1% training penetration rate.

These goals are aligned with the commitments of the Human Capital Management Policy, which seeks to establish and develop the necessary skills and capabilities in professionals to achieve our strategic objectives, as well as to foster talent management that places the professional at the centre, promotes self-development and self-learning, and ensures the commitment, engagement and development of key talent.

Human rights

Enagás has not established measurable results-oriented targets for 2024 to manage the identified opportunity 'Reputational improvement and improvement of the due diligence management model for the protection of human rights, derived from the company's alignment with international initiatives and principles in defence of human rights (UN, ILO, etc.)'.

The main reason is that the company has a robust due diligence system that Enagás will continue to manage and improve in the coming years, thereby fulfilling the commitment to developing and maintaining an adequate due diligence system set out in its Human Rights Policy.

In 2025, the company will also assess the alignment of its due diligence system with the requirements of the Sustainability Due Diligence Directive and sustainability best practices, from which measurable and result-oriented targets will be derived in the coming years.

S1-6

Characteristics of the undertaking's employees

Below is the distribution of the 1,362 employees (1,353.2 FTEs⁷⁴) at Enagás by gender, country and contract type at year-end (See section '2.1 Operating income, b) personnel expenses' of the Consolidated Annual Accounts).

Enagás maintains stable, quality employment levels with high percentages of permanent and full-time contracts.

⁷⁰ Given the nature of this goal, as it is not meant for comparison, setting a base year is not applicable.

⁷¹ Given the nature of this goal, as it is not meant for comparison, setting a base year is not applicable. Professionals or workers' representatives have not been directly involved in the definition, performance monitoring, or identification of lessons learned from this goal.

⁷² The training penetration rate is the number of professionals who have received at least one training activity during the year out of the total number of employees at year-end.

⁷³ Given the nature of this goal, as it is not meant for comparison, setting a base year is not applicable. Professionals or workers' representatives have not been directly involved in the definition, performance monitoring, or identification of lessons learned from this goal.

⁷⁴ Full-time equivalent.

Information on the gender 'Other' is based on information reported on a voluntary basis by the employees themselves.

Number of employees by gender at year-end (no. of persons)

Gender	2022	2023	2024
Women	409	401	409
Men	956	953	952
Other ¹	N.D.	N.D.	1
Total employees	1,365	1,354	1,362

(1) Information not available for 2022 and 2023, as it is based on information voluntarily reported by employees and first requested in 2024.

Number of average employees by gender during the year (no. of persons)

Gender	2022	2023	2024
Women	393	402	406
Men	954	953	947
Other ¹	N.D.	N.D.	1
Total employees	1,347	1,355	1,354

(1) Information not available for 2022 and 2023, as it is based on information voluntarily reported by employees and first requested in 2024.

Number of employees per country at year-end (no. of persons)

Country	2022	2023	2024
Spain	1,353	1,352	1,359
Other countries ⁽¹⁾	12	2	3
Belgium	3	2	3
Kuwait	4	0	0
Peru	3	0	0
Greece	1	0	0
Mexico	1	0	0
France	0	0	0
Chile	0	0	0
Total employees	1,365	1,354	1,362

(1) 100% of professionals outside Spain have a permanent full-time contract.

Employees by gender and contract type at year-end (no. of persons)^{(1) (2)}

	2022			2023			2024		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
No. of employees	409	956	1,365	401	953	1,354	409	953	1,362
No. of permanent employees	386	929	1,315	383	932	1,315	386	929	1,315
No. of temporary employees	23	27	50	18	21	39	23	24	47
No. of full-time employees	387	944	1,331	378	938	1,316	384	939	1,323
No. of part-time employees	22	12	34	23	15	38	25	14	39

(1) For confidentiality reasons, and given the non-materiality of the representation of the gender 'other', in the breakdown by gender, sex information has been used for the calculation. For further details, see disclosure requirement S1-6.

(2) Enagás does not have any zero-hours contracts.

Employees by country and contract type at year-end (no. of persons)⁷⁵

	2022						
	Spain	Belgium	Kuwait	Peru	Mexico	Greece	Total
No. of employees	1,353	3	4	3	1	1	1,365
No. of permanent employees	1,303	3	4	3	1	1	1,315
No. of temporary employees	50	0	0	0	0	0	50
No. of full-time employees	1,318	3	4	3	1	1	1,330
No. of part-time employees	35	0	0	0	0	0	35

	2023						
	Spain	Belgium	Kuwait	Peru	Mexico	Greece	Total
No. of employees	1,352	2	0	0	0	0	1,354
No. of permanent employees	1,313	2	0	0	0	0	1,315
No. of temporary employees	39	0	0	0	0	0	39
No. of full-time employees	1,314	2	0	0	0	0	1,316
No. of part-time employees	38	0	0	0	0	0	38

	2024						
	Spain	Belgium	Kuwait	Peru	Mexico	Greece	Total
No. of employees	1,359	3	0	0	0	0	1,362
No. of permanent employees	1,312	3	0	0	0	0	1,315
No. of temporary employees	47	0	0	0	0	0	47
No. of full-time employees	1,320	3	0	0	0	0	1,323
No. of part-time employees	39	0	0	0	0	0	39

Number of employees who have been on leave during the year by gender (no. of persons)⁽¹⁾⁽²⁾

	2022	2023	2024
Women	35	33	22
Men	56	39	26
Total	91	72	48

(1) For confidentiality reasons, and given the non-materiality of the representation of the gender 'other', in the breakdown by gender, sex information has been used for the calculation. For further details, see disclosure requirement S1-6.

(2) For information reporting purposes, only the departures of personnel with permanent contracts are considered, including voluntary departures, retirements, programmed dismissals, involuntary dismissals, among others.

⁷⁵ Enagás does not have any zero-hours contracts.

Voluntary and absolute turnover rate by gender⁽¹⁾

	2022			2023			2024		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
Voluntary turnover rate ⁽²⁾	3%	1%	2%	6%	2%	3%	3%	1%	2%
Absolute turnover rate ⁽³⁾	9%	6%	7%	9%	4%	5%	6%	3%	4%

(1) For confidentiality reasons, and given the non-materiality of the representation of the gender 'other', in the breakdown by gender, sex information has been used for the calculation. For further details, see disclosure requirement S1-6.

(2) Voluntary turnover rate calculated as the ratio of voluntary departures during the year to the workforce with permanent contracts at year-end.

(3) Absolute turnover rate calculated as the ratio of all professional departures (regardless of their nature) during the year to the workforce with permanent contracts at year-end.

S1-7

Characteristics of non-employee workers in the undertaking's own workforce

In addition, in Enagás there are non-employee workers, among which the following are the most notable:

- People hired through temporary employment agencies who were working at Enagás, mainly to stand in for professionals who are temporarily absent (e.g. long-term sick leave, paternity and/or maternity leave, etc.)
- People with training scholarships

Enagás has no independent contractors among its non-employee workers.

Number of non-employee workers at year-end (no. of persons)

	2022	2023	2024
Workers hired through employment agencies	9	13	13
Workers with training scholarships	45	55	70

Average number of non-employee workers during the year (no. of persons)

	2022	2023	2024
Workers hired through employment agencies	30	32	45
Workers with training scholarships	136	127	159

S1-8

Collective bargaining coverage and social dialogue

Enagás has its own collective bargaining agreement for the Enagás Group covering more than half of all employees (for more information, see disclosure requirement S1-2)⁷⁶.

For employees not included in the Enagás Group's Collective Bargaining Agreement, the regulations governing working conditions in general are those outlined in the Spanish Workers' Statute. However, those conditions of the Enagás Group Collective Bargaining Agreement that improve on those established in the Workers' Statute are applicable to 100% of the workforce.

Furthermore, all employees in Spain, with the exception of the CEO, are represented by workers' representatives (99.9% of the workforce in 2024).

⁷⁶ Enagás does not have a European Works Council.

Percentage of employees covered by the Enagás Group Collective Bargaining Agreement and represented in the workplace at year-end

2022			2023			2024		
Coverage of the collective bargaining agreement		Social dialogue	Coverage of the collective bargaining agreement		Social dialogue	Coverage of the collective bargaining agreement		Social dialogue
Employees - EEA (for countries with more than 50 employees, representing more than 10% of the total number of employees)	Employees - Non-EEA (for countries with more than 50 employees, representing more than 10% of the total number of employees)	Workplace representation (EEA) (for countries with more than 50 employees, representing more than 10% of the total number of employees)	Employees - EEA (for countries with more than 50 employees, representing more than 10% of the total number of employees)	Employees - Non-EEA (for countries with more than 50 employees, representing more than 10% of the total number of employees)	Workplace representation (EEA) (for countries with more than 50 employees, representing more than 10% of the total number of employees)	Employees - EEA (for countries with more than 50 employees, representing more than 10% of the total number of employees)	Employees - Non-EEA (for countries with more than 50 employees, representing more than 10% of the total number of employees)	Workplace representation (EEA) (for countries with more than 50 employees, representing more than 10% of the total number of employees)
0-19%								
20-39%								
40-59% Spain ⁽¹⁾			Spain ⁽²⁾			Spain ⁽³⁾		
60-79%								
80-100% Spain			Spain			Spain		

Enagás only has more than 50 salaried employees in Spain

(1) 50.8%

(2) 51.6%

(3) 52.9%

S1-9

Diversity metrics

Number of employees in senior management by gender at year-end ⁽¹⁾

Categories	Senior Management								
	Executive Committee (One level of reporting to the Chief Executive Officer)			Other managers (Two levels of reporting to the Chief Executive Officer)			Total		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
2022									
Number of employees	3	6	9	13	20	33	16	26	42
Percentage	33%	67%	100%	39%	61%	100%	38%	62%	100%
2023									
Number of employees	3	6	9	13	18	31	16	24	40
Percentage	33%	67%	100%	42%	58%	100%	40%	60%	100%
2024									
Number of employees	4	6	10	10	18	28	14	24	38
Percentage	40%	60%	100%	36%	64%	100%	37%	63%	100%

(1) For confidentiality reasons, and given the non-materiality of the representation of the gender 'other', in the breakdown by gender, sex information has been used for the calculation. For further details, see disclosure requirement S1-6.

Number of employees by gender and age group at year-end ⁽¹⁾

	2022				2023				2024			
	Men	Women	Total	Percentage	Men	Women	Total	Percentage	Men	Women	Total	Percentage
<30 years	57	40	97	7.1%	49	37	86	6.4%	49	40	89	6.5%
30-50 years	565	267	832	61.0%	552	256	808	59.7%	528	263	791	58.1%
>50 years	334	102	436	31.9%	352	108	460	34.0%	376	106	482	35.4%
Total	956	409	1,365	100.0%	953	401	1,354	100.0%	953	409	1,362	100.0%
Percentage	70.0%	30.0%	100.0%		70.4%	29.6%	100.0%		70.0%	30.0%	100.0%	

(1) For confidentiality reasons, and given the non-materiality of the representation of the gender 'other', in the breakdown by gender, sex information has been used for the calculation. For further details, see disclosure requirement S1-6.

S1-10

Adequate wages

The Enagás compensation model factors in considerations of equality and non-discrimination, with adequate remuneration for professional worth, skills, experience, responsibility and results achieved. Being consistent with Enagás' inclusive culture, where there is a commitment to incorporate diversity and inclusion management as a key element to connect talent and grow as a Company.

Furthermore, the Enagás Collective Bargaining Agreement sets out different salary levels based exclusively upon objective work criteria. In 2024, the Enagás minimum wage set in the Collective Bargaining Agreement was 1.66 times the minimum interprofessional wage in Spain, without distinguishing by gender (1.5 times in 2023). In conclusion, all employees receive an adequate salary according to the benchmark index in Spain⁷⁷.

S1-11

Social protection

For Enagás, having social security for its employees in case of major life events is beneficial for employees and for the company, as it creates a healthier, fairer and more sustainable working environment.

Therefore, all employees are covered by social security for the following life events through different governmental programmes, sometimes topped up by Enagás:

- **Illness:** employees are entitled to free health care, as well as cash benefits for temporary disability (less than 100% of the regulatory base). In this regard, Enagás provides a temporary disability allowance, which entails the payment of 100% of the fixed gross annual salary in the event of illness, accident or parental leave and childcare.

- **Unemployment benefit** from the moment the professional works for the company: in Spain, the unemployment protection system is designed to help workers who lose their jobs involuntarily providing unemployment benefits as well as other assistance and subsidies.
- **Workplace accidents and acquired disability:** social security is offered through benefits provided by the government in the form of financial, medical and/or rehabilitation coverage. In addition, Enagás provides all its employees with group death and disability insurance. Enagás subsidises 90% of the cost of private medical healthcare insurance for professionals and 100% for their children.
- **Parental leave (maternity/paternity):** With respect to childcare, in addition to the maternity/paternity leave established by law (currently 16 weeks for each parent), professionals of both genders can take fifteen working days of paid leave to care for a child under nine months of age (breastfeeding). Enagás has also extended the period during which a reduction in working hours for childcare purposes can be requested (formerly until the child is 12; now until the child is 14). Enagás also provides a temporary disability allowance, which entails the payment of 100% of the fixed gross annual salary in the event of illness, accident or parental leave and childcare.
- **Retirement:** Upon retirement, employees receive a pension as part of Spain's social security system, which is designed to provide financial support to individuals after the end of their working life. In addition, employees with two years of actual or recognised seniority have a pension plan set up by the company.

⁷⁷ At the end of the financial year, there were three employees outside Spain (in Belgium). For reasons of confidentiality and non-materiality, Enagás does not publish the ratio of the average salary to the country's minimum wage.

S1-12

Persons with disabilities

The company works towards social and labour inclusion through direct hiring (ten people in the workforce at year-end⁷⁸) and indirect job creation for severely disabled profiles, through collaboration agreements with foundations and special employment centres.

Percentage of employees with disabilities at year-end by gender ⁽¹⁾

	2022	2023	2024
Women	0.24%	0.25%	0.49%
Men	0.63%	0.63%	0.84%
TOTAL	0.51%	0.52%	0.73%

(1) For confidentiality reasons, and given the non-materiality of the representation of the gender 'other', in the breakdown by gender, sex information has been used for the calculation. For further details, see disclosure requirement S1-6.

Enagás collects information on employees with disabilities from its human resources management tools based on information provided voluntarily by the professionals themselves.

S1-13

Training and skills development metrics

Percentage of employees who have participated in performance appraisals during the year, broken down by gender and professional group ⁽¹⁾⁽²⁾

		2022	2023	2024
Managers	Women	100%	98%	100%
	Men	100%	100%	100%
Technicians	Women	94%	90%	83%
	Men	70%	70%	69%
Administrative workforce	Women	65%	68%	84%
	Men	78%	55%	100%
Operational workforce	Women	19%	21%	19%
	Men	88%	87%	90%
Total by gender	Women	80%	78%	77%
	Men	80%	79%	80%
TOTAL		79%	79%	79%

(1) For confidentiality reasons, and given the non-materiality of the representation of the gender 'other', in the breakdown by gender, sex information has been used for the calculation. For further details, see disclosure requirement S1-6.

(2) Individual performance assessment. The percentage is calculated by dividing the number of professionals assessed by the number of workforce at year-end. The Chief Executive Officer is not included, as he is not covered by the performance assessment.

Average number of hours of training received by employees during the financial year, broken down by gender and professional group ⁽¹⁾⁽²⁾

		2022	2023	2024
Managers	Women	91.1	111.3	102.4
	Men	68.3	80.0	77.0
Technicians	Women	50.3	58.2	67.6
	Men	60.4	57.8	53.5
Administrative workforce	Women	22.0	21.8	45.9
	Men	31.8	28.9	42.9
Operational workforce	Women	176.0	109.0	89.9
	Men	42.5	49.2	44.0
Total by gender	Women	57.9	62.7	69.9
	Men	54.0	56.1	51.7
TOTAL		55.1	58.1	57.2

(1) For confidentiality reasons, and given the non-materiality of the representation of the gender 'other', in the breakdown by gender, sex information has been used for the calculation. For further details, see disclosure requirement S1-6.

(2) Calculation of the total number of training hours received during the year in relation to the average number of workforce.

S1-14

Health and safety metrics

The Enagás Group's Health and Safety Management System is certified under ISO 45001; it has been subject to internal audits and external certification. It covers 100% of employee and non-employee workers, as well as workers in the value chain who work at the company's facilities and carry out work there.

Number of deaths resulting from workplace injuries and workplace health issues during the fiscal year

	2022	2023	2024
Employees	0	0	0
Non-employee workers	0	0	0
Workers in the value chain working at company facilities	1	0	0

⁷⁸ At the end of the 2023 and 2022 financial years, there were seven persons with disabilities.

Number and rate of recordable workplace accidents

Recordable accident rate: No. of workplace injuries per total number of hours worked and multiplied by 1,000,000

		2022	2023	2024
Employees	Number of recordable accidents	10	11	6
Employees	Recordable accident rate	4.54	4.89	2.75
Non-employee workers	Number of recordable accidents	N.D.	N.D.	0
Non-employee workers	Recordable accident rate	N.D.	N.D.	0
Workers in the value chain working at company facilities	Number of recordable accidents	13	10	5
Workers in the value chain working at company facilities	Recordable accident rate	5.76	6.21	2.72

N.D. Historical information not available.

None of the recordable workplace accidents that occurred in 2024 were considered accidents with major consequences, the main types being falls and blows.

In 2024, the number of hours worked was 2,183,120 hours for employees and 111,577 hours for non-employee workers.

Through its evaluation systems for health and safety-related risks, Enagás has not identified workers at risk of work-related diseases. Enagás has therefore not identified any work-related health problems (cases of occupational illnesses) either for its current or former own workforce or for subcontractors in the last three years.

For own workforce, the number of days lost due to workplace injuries and deaths as a result of workplace accidents, work-related health problems and deaths due to illness was 56 days for employees (134 in 2023) and zero days for non-employee workers.

S1-15

Work-life balance metrics

At Enagás, 100% of employees of both genders are entitled to statutory maternity/paternity leave (parental leave) (currently 16 weeks for each parent) and paid leave of fifteen working days to care for a child under nine months of age (breastfeeding).

In addition, 100% of employees are entitled to take carer’s leave, such as leave to care for a first- or second-degree relative in the event of serious illness, hospitalisation or surgery (five days’ leave).

In relation to maternity leave, in the event that the job poses a risk to the pregnant woman’s state, she is entitled to risk leave during pregnancy.

This leave to care for family members is set out in the Enagás Group Collective Bargaining Agreement and in the Workers’ Statute.

In line with Spanish law, Enagás offers its employees who have children the opportunity to take cumulative unpaid leave of up to eight weeks (continuous or discontinuous) before the child reaches the age of eight.

Percentage of employees who are entitled to family leave who took it ⁽¹⁾⁽²⁾

	2024		
	Women	Men	Total
Percentage of employees benefiting from this entitlement who took family leave	27.1%	30.8%	29.7%

(1) For confidentiality reasons, and given the non-materiality of the representation of the gender ‘other’, in the breakdown by gender, sex information has been used for the calculation. For further details, see disclosure requirement S1-6.

(2) Includes the number of people who have taken family leave during the year, including maternity leave (pregnancy risk leave), paternity leave, parental leave (as defined by ERS S1) and carer’s leave, with respect to the total number of workforce entitled to take such leave (100% of workforce).

S1-16

Compensation metrics (pay gap and total compensation)

Gender pay gap in average gross remuneration by professional group ⁽¹⁾⁽²⁾

(Difference between the average hourly pay levels of female and male employees, expressed as a percentage of the average hourly pay level of male employees)

	2022 (year of settlement of long-term incentive plans) ⁽³⁾	2023 ⁽³⁾	2024
Managers			
Chief Executive Officer ⁽⁴⁾	N.A.	N.A.	N.A.
Other members of the Executive Committee	12.6 % ⁽⁵⁾	7.66%	9.62%
Other managers	7.24%	-3.17%	2.22%
Technicians	4.57%	5.30%	5.79%
Administrative workforce	-7.09%	-9.95%	-4.87%
Operational workforce	14.38%	21.01%	15.38%
TOTAL	1.88%	1.29%	2.55%

N.A. Not applicable

(1) Given the non-materiality of the representation of the gender 'other', sex information has been used for the calculation. For further details, see disclosure requirement S1-6.

(2) The gap has been calculated using average remuneration, which includes the following: base year salary at December 31, variable remuneration, payments to long-term savings plans and any other item. While allowances and overtime pay were included in 2022 and 2023, these items have been excluded in 2024 in accordance with the interpretation of disclosure requirement S1-16. It has been deemed unnecessary to recalculate 2022 and 2023 for comparison, as the exclusion of these items in 2024 resulted in a remuneration variation of 1% for men and 0.1% for women, without affecting the overall gap for 2024. This takes into consideration all professionals in Spain with a permanent or temporary contract, both full-time and part-time, who have remained in the company throughout the year (94.6% of the workforce). In the case of part-time workforce, the base salary has been extrapolated to a full-time salary for comparability. For 2022, given the appointment of the Chief Executive Officer in February 2022, the Chief Executive Officer's annual base salary was considered together with the actual remuneration received in the year for comparability purposes.

(3) In 2022, the long-term incentive plans (2019-2021) were settled, significantly increasing the remuneration of the company's professionals. The allocation of these incentive plans was structured according to the professional group's degree of contribution to the established targets. In 2023, the partial settlement of the term incentive plans (2019-2021) for senior management was finalised.

(4) There are no women in this professional group.

(5) Unrepresentative data, as there are less than three professionals in this group for one of the genders. Although there were three women on the Executive Committee in 2022, only two were taken into account for the wage gap calculation, as one of them was not with the company for the whole year.

When analysing the pay gap by occupational group, the difference in the 'Other members of the Executive Committee' group (9.62%) is due to differences in management seniority among the members of this group, which leads to differences in other remuneration without an identifiable pay gap in base salary among this occupational group.

The difference in the occupational group 'Other managers' (2.22%) increased due to the lower number of women in managerial and pre-managerial positions.

The difference in salary in the professional group of administrative workforce (-4.87%) is due to the fact that this is a category made up mostly of women (88%), in which some positions have function-related bonuses.

Similarly, the difference in the operational workforce category (15.38%) is explained by a greater presence of men (87.5%) with an average seniority greater than that of women (an average of 15.2 years for men compared to 4.8 years for women). In this regard, Enagás is promoting the incorporation of women in the technical specialist professional group through initiatives such as the search for female profiles in vocational schools.

In 2024, the ratio between the total annual remuneration of the highest paid person (CEO) and the average total annual remuneration of all employees (excluding the highest paid person) was 27.3 times (28.8 times in 2023).

Enagás monitors the gender pay gap to ensure equal pay for men and women.

S1-17

Incidents, claims and related serious incidents with human rights

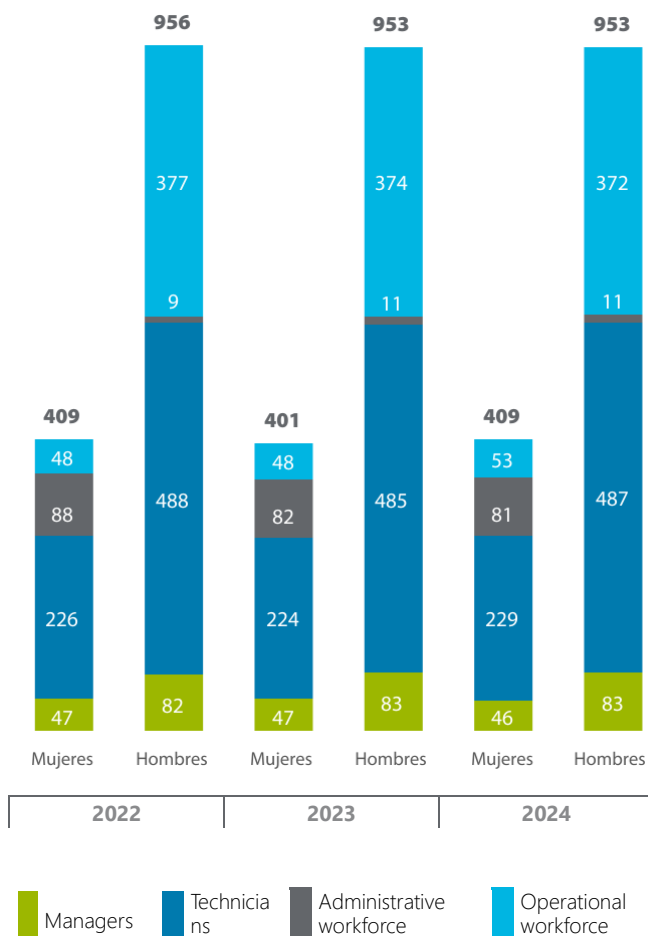
During the financial year, there were no communications received through the Code of Ethics, other company reporting channels, or OECD National Contact Points for Multinational Enterprises. Additionally, no cases of discrimination or serious human rights incidents were identified.

Non-financial and diversity reporting requirements (Law 11/2018)

Employment

Total number and distribution of professionals by gender, age, country and professional group

Number of professionals by professional group and gender at year-end



Yearly average of permanent contracts, temporary contracts and part-time contracts by gender, age and professional group

Average annual number of permanent and temporary contracts broken down by gender, both full-time and part-time

	Permanent contract			Temporary contract		
	Full-time	Part-time	Total	Full-time	Part-time	Total
2022						
Women	355	20	375	18	0	18
Men	909	13	922	31	0	31
2023						
Women	360	21	381	20	0	20
Men	917	15	932	22	0	22
2024						
Women	364	21	385	21	0	21
Men	913	15	928	20	0	20

Average annual number of permanent and temporary contracts broken down by age, both full-time and part-time

	Permanent contract			Temporary contract		
	Full-time	Part-time	Total	Full-time	Part-time	Total
2022						
<30 years	65	1	66	31	0	31
30-50 years	787	27	814	18	0	18
>50 years	428	7	435	1	0	1
2023						
<30 years	64	1	65	21	0	21
30-50 years	774	29	803	20	0	20
>50 years	439	6	445	1	0	1
2024						
<30 years	64	1	65	21	0	21
30-50 years	750	29	779	19	0	19
>50 years	463	6	469	1	0	1

Average annual number of permanent and temporary contracts broken down by professional group, both full-time and part-time

	Permanent contract			Temporary contract		
	Full-time	Part-time	Total	Full-time	Part-time	Total
2022						
Managers	139	3	142	0	0	0
Technicians	689	10	699	13	0	13
Administrative workforce	87	8	95	2	0	2
Operational workforce	349	12	361	34	0	34
2023						
Managers	127	3	130	0	0	0
Technicians	688	14	702	8	0	8
Administrative workforce	87	7	94	1	0	1
Operational workforce	375	12	387	33	0	33
2024						
Managers	127	2	129	0	0	0
Technicians	690	15	705	6	0	6
Administrative workforce	85	6	91	3	0	3
Operational workforce	375	13	388	32	0	32

Number of dismissals by gender, age and professional group

Enagás has not carried out any restructuring in recent years, nor does it plan to do so. The company ensures the appropriate transmission of expert knowledge through planned and voluntary departures. In 2024, there was one involuntary redundancy from the company (male, between 30 and 50 years old, in the technician professional group)⁷⁹.

Average remuneration and its evolution by gender, age and professional group or equivalent

Changes in average remuneration ⁽¹⁾ by professional group, age and gender

	2022 (year of settlement of long-term incentive plans) ⁽²⁾			2023 ⁽²⁾	2024
	Professional group				
Managers	Chief Executive Officer		1,377,688 ⁽³⁾	1,879,700	1848494 ⁽⁴⁾
	Other members of the Executive Committee		595,687	641,438	545,579
	Other managers		176,791	161,048	154,972
Technicians			73,404	70,983	73,347
Administrative workforce			51,109	50,210	51,855
Operational workforce			58,686	57,289	59,682
Age range					
<30 years			55,556	53,320	50,051
30-50 years			83,893	80,975	74,861
>50 years			93,164	91,534	91,398
Gender					
Women			80,573	78,195	78,547
Men			82,116	79,217	80,605

(1) Average remuneration that includes: base year salary at December 31, variable remuneration, payments to long-term savings plans and any other item. While allowances and overtime pay were included in 2022 and 2023, these items have been excluded in 2024 in accordance with the interpretation of disclosure requirement S1-16. It has been deemed unnecessary to recalculate 2022 and 2023 for comparison, as the exclusion of these items in 2024 resulted in a remuneration variation of 1% for men and 0.1% for women.

This takes into consideration all professionals in Spain with a permanent or temporary contract, both full-time and part-time, who have remained in the company throughout the year (94.6% of the workforce). In the case of part-time workforce, the base salary has been extrapolated to a full-time salary for comparability.

(2) In 2022, the long-term incentive plans (2019-2021) were settled, significantly increasing the remuneration of the company's professionals. The allocation of these incentive plans was structured according to the professional group's degree of contribution to the established targets. In 2023, the partial settlement of the term incentive plans (2019-2021) for senior management was finalised.

(3) The appointment of the current CEO took place in February 2022; that year, his annual base salary together with the actual remuneration received in 2022 was considered in the remuneration reported in that fiscal year.

(4) This amount differs from the amount reported in the Annual Report on Directors' Remuneration 2024, as the information reported in this table excludes interim income and remuneration for Board membership (154 thousands of euros for the Chief Executive Officer) and considers the annual base salary for comparison purposes.

⁷⁹ In 2023, two involuntary redundancies occurred at the company (two men, one in the technical professional group under 30 years old; the other in the

operator professional group between 30 and 50 years old). In 2022, no involuntary redundancies took place.

Changes in remuneration ⁽¹⁾ by professional group, age and gender

		2022 (year of settlement of long-term incentive plans) ⁽²⁾	2023 ⁽²⁾	2024	
Managers	Chief Executive Officer ⁽³⁾	Women	N.A. ⁽⁴⁾	N.A. ⁽⁴⁾	
		Men	1,377,688	1,879,700	1848494 ⁽⁵⁾
	Other members of the Executive Committee	Women	540,091	609,812	515,111
		Men	617,925	660,413	569,954
	Other managers	Women	168,460	164,276	152,730
		Men	181,614	159,222	156,194
Technicians	Women	71,043	68,305	70,343	
	Men	74,445	72,129	74,667	
Administrative workforce	Women	51,419	50,685	52,161	
	Men	48,014	46,097	49,740	
Operational workforce	Women	50,599	46,172	51,361	
	Men	59,097	58,452	60,695	
TOTAL	Women	80,573	78,195	78,547	
	Men	82,116	79,217	80,605	

N.A. Not applicable

(1) Average remuneration that includes: base year salary at December 31, variable remuneration, payments to long-term savings plans and any other item. While allowances and overtime pay were included in 2022 and 2023, these items have been excluded in 2024 in accordance with the interpretation of disclosure requirement S1-16. It has been deemed unnecessary to recalculate 2022 and 2023 for comparison, as the exclusion of these items in 2024 resulted in a remuneration variation of 1% for men and 0.1% for women.

This takes into consideration all professionals in Spain with a permanent or temporary contract, both full-time and part-time, who have remained in the company throughout the year (94.6% of the workforce). In the case of part-time workforce, the base salary has been extrapolated to a full-time salary for comparability.

(2) In 2022, the long-term incentive plans (2019-2021) were settled, significantly increasing the remuneration of the company's professionals. The allocation of these incentive plans was structured according to the professional group's degree of contribution to the established targets. In 2023, the partial settlement of the term incentive plans (2019-2021) for senior management was finalised.

(3) The appointment of the current CEO took place in February 2022; that year, his annual base salary together with the actual remuneration received in 2022 was considered in the remuneration reported in that fiscal year.

(4) There are no women in this professional group.

(5) This amount differs from the amount reported in the Annual Report on Directors' Remuneration 2024, as the information reported in this table excludes interim income and remuneration for Board membership (154 thousands of euros for the Chief Executive Officer) and considers the annual base salary for comparison purposes.

(6) Non-representative data, as there are less than three professionals in this professional group.

The average remuneration of directors and managers, including variable remuneration, expenses, compensation, payments to long-term savings plans and any other item by gender

The average remuneration of Directors in 2024, broken down by sex, amounted to 448 thousands of euros for men and 168 thousands of euros for women. The difference in remuneration is due to the fact that the Chairman and the CEO are men (excluding the Chairman and the CEO, remuneration averaged 162 thousands of euros for men).

For further information on the remuneration of directors and senior managers, see the requirement 'Average remuneration and its evolution broken down by gender, age and professional group or equal value', note '4.4 Remuneration of the Board of Directors and Senior Management' of the Consolidated Annual Accounts and sections C.1.13 or C1.14 of the Annual Corporate Governance Report⁸⁰.

Implementation of policies related to the disconnecting from work

Enagás has a Protocol on the Right to Digital Switch-Off, which moderates possible effects of permanent connectivity and

promote a positive impact on people's productivity and well-being.

Organisation of work

Number of hours lost to absenteeism

88,410.2 hours of absenteeism in 2024 (94,738.6 in 2023 and 79,761.2 in 2022).

Health and safety

Work-related accidents

The following is a breakdown by gender of lost time injuries in recent years:

Breakdown of lost time injuries by gender

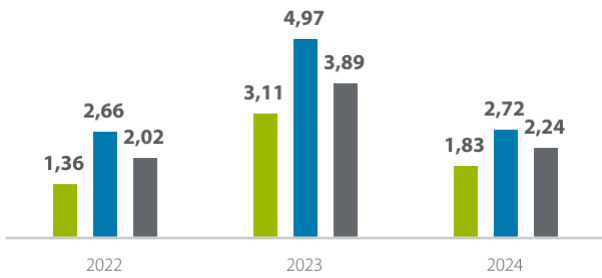
		2022	2023	2024
Lost time injury severity rate (own workforce)	Women	0	1	0
	Men	3	6	4
	TOTAL	3	7	4

⁸⁰ This external link refers to unverified information within the framework of the review of the Non-Financial Information and Sustainability Information Statement.

Frequency and severity, by gender

Lost time injury frequency rate

Number of accidents resulting in lost time injuries per million hours worked (number of lost time accidents x 10⁶ / number of hours worked)

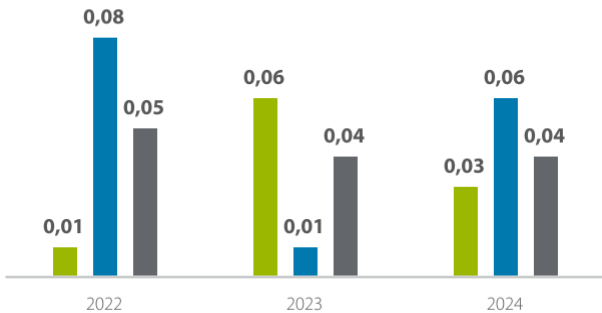


- Lost time injury frequency rate (own workforce)*
- Lost time injury frequency rate (contractor workforce)
- Lost time injury frequency rate (own workforce + contractor workforce)

* In 2024, the lost time injury frequency rate by gender for own workforce was 2.62 for men (3.79 and 1.94 in 2023 and 2022, respectively) and 0.00 for women (0.00 and 1.62 in 2022 and 2021, respectively).

Lost time injury severity rate

Number of working days lost due to accidents per thousand hours worked (number of working days lost x 10³ / number of hours worked)



- Lost time injury severity rate (own workforce)*
- Lost time injury severity rate (contractor workforce)
- Lost time injury severity rate (own workforce + contractor workforce)

* In 2024, the lost time injury severity rate by gender among own workforce was 0.04 for men (0.08 and 0.02 in 2023 and 2022, respectively) and 0.00 for women (0.01 and 0.00 in 2023 and 2022, respectively).

Training

Total number of hours of training courses by professional group

Total hours of training courses completed during the financial year by professional group

	2022	2023	2024
Managers	10,788	11,764	11,097
Technicians	40,688	41,197	41,176
Administrative workforce	2,225	2,143	4,276
Operational workforce	20,512	23,605	20,778
TOTAL	74,213	78,709	77,327

S2. WORKERS IN THE VALUE CHAIN

Strategy

SBM-2

Interests and views of stakeholders

After identifying and assessing the impacts, risks, and opportunities within its value chain, Enagás incorporates the interests and expectations of its stakeholders into its business model and strategy. In its materiality analysis (for more details, see the IRO-1 disclosure requirement in chapter 2), the company has considered the views of various stakeholders, including suppliers and affiliates. This feedback has been collected through various formal and informal listening mechanisms during interactions with these stakeholders. Regarding suppliers, feedback has been mainly gathered through direct engagement by the supply chain management team at Enagás, using tools such as the supplier portal, corporate mailboxes, and ESG performance assessments. For affiliates, information has been compiled through working groups, committees, and other collaborative forums.

SBM-3

Material impacts, risks, and opportunities and their interaction with the strategy and business model

Enagás has conducted an analysis to identify impacts, risks, and opportunities, assessing which are materially significant concerning all workers in the value chain, as detailed in the IRO-1 disclosure requirement in chapter ESRS 2. This analysis takes into account Enagás’ strategy and business model, covering all internal activities and the locations of the company’s infrastructure. It also considers the upstream and downstream phases of the value chain, alongside external developments.

Below is a detailed account of the risks deemed significant as a result of this analysis:

Table of risks and opportunities

Topic	Sub-topic	Risk	Nature
Human rights	Human rights of employees in the value chain	Reputational and financial consequences from human rights violations in the value chain	Risk

Enagás has identified the employees in the value chain who are at the highest risk of human rights violations:

- **Affiliates without operational control:** Enagás holds stakes in affiliates where it does not have operational control at the national, European, or international levels (for more information, see note ‘1.3 Principles of consolidation’ in the

Consolidated Annual Accounts, which lists the companies consolidated by the equity method). The company has conducted a Human Rights due diligence assessment of these affiliates, focusing on aspects particularly relevant to each country where the affiliates operate.

Aligned with the company’s purpose, Enagás is undertaking an asset rotation to concentrate its strategy on Europe, thereby reducing the inherent country risk related to potential human rights violations. For more information on the company’s affiliates, see disclosure requirement [SBM-1](#) within chapter 2.

Enagás therefore considers that the risk to the company is greater for the workers of affiliates present in countries with a high inherent risk of violation of various human rights.

- **Suppliers:** professionals of companies contracted by Enagás. The company considers the risk higher for workers within its facilities and those in countries identified as having an elevated risk of human rights violations.

Enagás has not identified any regions with a significant risk of child, forced, or compulsory labour among workers in the value chain.

The identified risk related to the value chain stems from Enagás’ interactions with other entities within its business model, specifically affiliates and the supply chain. This risk is tied to the potential negative outcomes from human rights violations among workers in this value chain. Consequently, managing this risk is directly connected to due diligence processes and the integration of sustainability criteria, including human rights considerations, into supply chain management models and the governance of investments and affiliates.

Management of impacts, risks, and opportunities

S2-1

Policies related to workers in the value chain

Enagás has made several commitments to ensure the effective management of significant risks associated with workers in the value chain, primarily through its [Code of Ethics](#), which applies to all Enagás Group companies. This code is mandatory for contractors, suppliers, collaborators, and business partners who work with or represent Enagás. In affiliates where Enagás lacks effective control, the company promotes principles and guidelines aligned with its Code of Ethics, in addition to more specific policies. (For more information on the Code of Ethics, refer to disclosure requirement [G1-1](#)).

All Enagás Group suppliers and contractors are bound by the company's Code of Ethics and expressly confirm their commitment to be familiar with it, comply with it and enforce it through acceptance of the general contracting conditions.

- More specifically for suppliers, Enagás has developed the [Ethical Principles and Guidelines for Suppliers of the Enagás Group](#). This document specifies the principles and conduct guidelines for Enagás suppliers and contractors, aligning with the Code of Ethics. It establishes the core values and commitments that suppliers must adhere to and follow.

The document specifies the human rights guidelines that suppliers need to comply with and how Enagás encourages its suppliers and contractors to follow the United Nations International Bill of Human Rights, the OECD Guidelines for Multinational Enterprises, the International Labour Organisation (ILO) Declaration and its core conventions, and the European Convention on Human Rights.

This document mandates that Enagás' suppliers and contractors must understand and adhere to the principles outlined in the Enagás Human Rights Policy. It also includes commitments to respect human rights, including labour rights, with explicit references to child labour, forced labour, freedom of association, and collective bargaining.

Furthermore, suppliers are expected to comply with applicable internal and external regulations, particularly those related to preventing criminal activities, environmental harm, and violations of personal rights.

- Additionally, Enagás has established a [Human Rights Policy](#) that applies both to its own workforce and to workers within the value chain. This policy, approved by the Board of Directors, explicitly states that in affiliates where the Enagás Group lacks effective control, it will propose to their boards the adoption of principles and guidelines consistent with this Policy. The company also emphasises these principles and commitments with contractors, suppliers, and collaborators, particularly regarding the supply chain.

The commitments in this policy align with relevant internationally recognised instruments, including:

- The United Nations Guiding Principles on Business and Human Rights.
- The United Nations (UN) International Bill of Human Rights and its associated covenants (the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights).
- The OECD Due Diligence Guidance for Responsible Business Conduct.
- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.
- The International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and its core conventions.
- The Universal Declaration of Human Rights.

The Universal Declaration of Human Rights serves as a foundation for this policy, which includes commitments to respecting human rights, particularly labour rights. It explicitly references the right to decent work and opposes forced, compulsory, and child labour, as well as all forms of slavery and human trafficking.

The policy commits to developing and maintaining a due diligence system aimed at anticipating, preventing, mitigating, and/or remedying negative impacts on people (both its own workforce and those in the value chain), the environment, and society. It also sets out the commitment to implement processes for the purpose of prior information, participation, dialogue, consultation and collaboration with stakeholders, in order to guarantee that their needs and expectations are known to the company and, where appropriate, added to its management. For further details on the Human Rights Policy, refer to disclosure requirement [S1-1](#).

In addition, the policy sets out commitments related to managing suppliers and affiliates to ensure human rights are respected throughout the value chain. It aims to:

- Ensure that suppliers, particularly those with workers operating within Enagás' facilities, adhere to the general human rights principles stated in the Enagás Group's Policy and the Ethical Principles and Guidelines for Suppliers of the Enagás Group. This is achieved by requiring formal commitment through the necessary documentation and conducting relevant assessments and audits.
- For affiliates where the company lacks effective control, Enagás has committed to:
 - Promoting adherence to corporate policies aligned with the principles outlined in the Enagás Human Rights Policy and within business agreements, depending on the company's level of influence.

- Transmitting essential management standards that cover necessary areas to ensure respect for human rights.
- Evaluating respect for human rights as a critical element in due diligence processes.

In 2024, the Human Rights Policy was updated to strengthen the company's commitment to developing and maintaining a human rights due diligence system, as outlined in the European Sustainability Reporting Standards developed by EFRAG, the proposed Sustainability Due Diligence Directive, and the OECD Due Diligence Guidance for Responsible Business Conduct.

This policy assigns the Board of Directors the responsibility for guiding, overseeing, and monitoring strategy, policies, risks, objectives, and performance concerning human rights issues. It is also the responsibility of the Sustainability Committee to control and monitor these aspects, reporting to the Sustainability and Appointments Committee, which is established at the Board level. In addition, various departments within the company are tasked with setting up action plans, goals, and monitoring indicators.

The Code of Ethics and all policies are accessible to stakeholders on the company's [corporate website](#), as well as on the corporate Intranet for all employees.

This approach allows the company to make commitments that address risks deemed relatively significant. (For further details, refer to the 'Risk and Opportunity Table' included in disclosure requirement [IRO-1](#)).

In 2024, the company has not identified any cases of human rights violations upstream or downstream in its value chain through the mechanisms available.

S2-2

Processes for engaging with value chain workers about impacts

The materiality analysis did not reveal any significant potential or actual negative impacts.

S2-3

Processes to remediate negative impacts and channels for value chain workers to raise concerns

The materiality analysis did not reveal any significant potential or actual negative impacts.

S2-4

Taking action on material impacts on value chain workers, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

Enagás has established, as set out in the Human Rights Policy, a due diligence system to anticipate, prevent, mitigate and/or remedy negative impacts on workers in the value chain and, consequently, the associated dependencies that give rise to the identified material risk (For more information on the materiality assessment, see disclosure requirement SBM-3). To this end, in general terms:

- It identifies, assesses, and prioritises actual or potential negative impacts on human rights in the value chain.
- It implements actions to avoid, prevent, or mitigate (should they materialise) identified negative impacts, within the company's sphere of influence, evaluating the efficiency of the actions implemented.

Enagás is currently reviewing its Due Diligence processes in relation to third parties, focusing on the protection of Human Rights and the Environment, in line with the European Directive on this issue.

In conjunction with the company's risk assessment processes, Enagás identifies and evaluates the risk level of human rights violations within the value chain. For more information about ESG risks and their integration into the company's global risk model, see the 'Risk Management' chapter of the Consolidated Management Report⁸¹.

Enagás has not identified any serious human rights issues or cases related to its affiliated companies or supply chain.

Affiliates without operational control

The actions taken by Enagás to mitigate the negative impact associated with the identified materiality risk are primarily based on the continuous assessment and management of ESG aspects in affiliates without operational control (consolidated by the equity method and managed independently) at various stages of the relationship.

⁸¹ This link refers to unverified information within the framework of the review of the Non-Financial Information and Sustainability Information Statement.

Estándares críticos de gestión

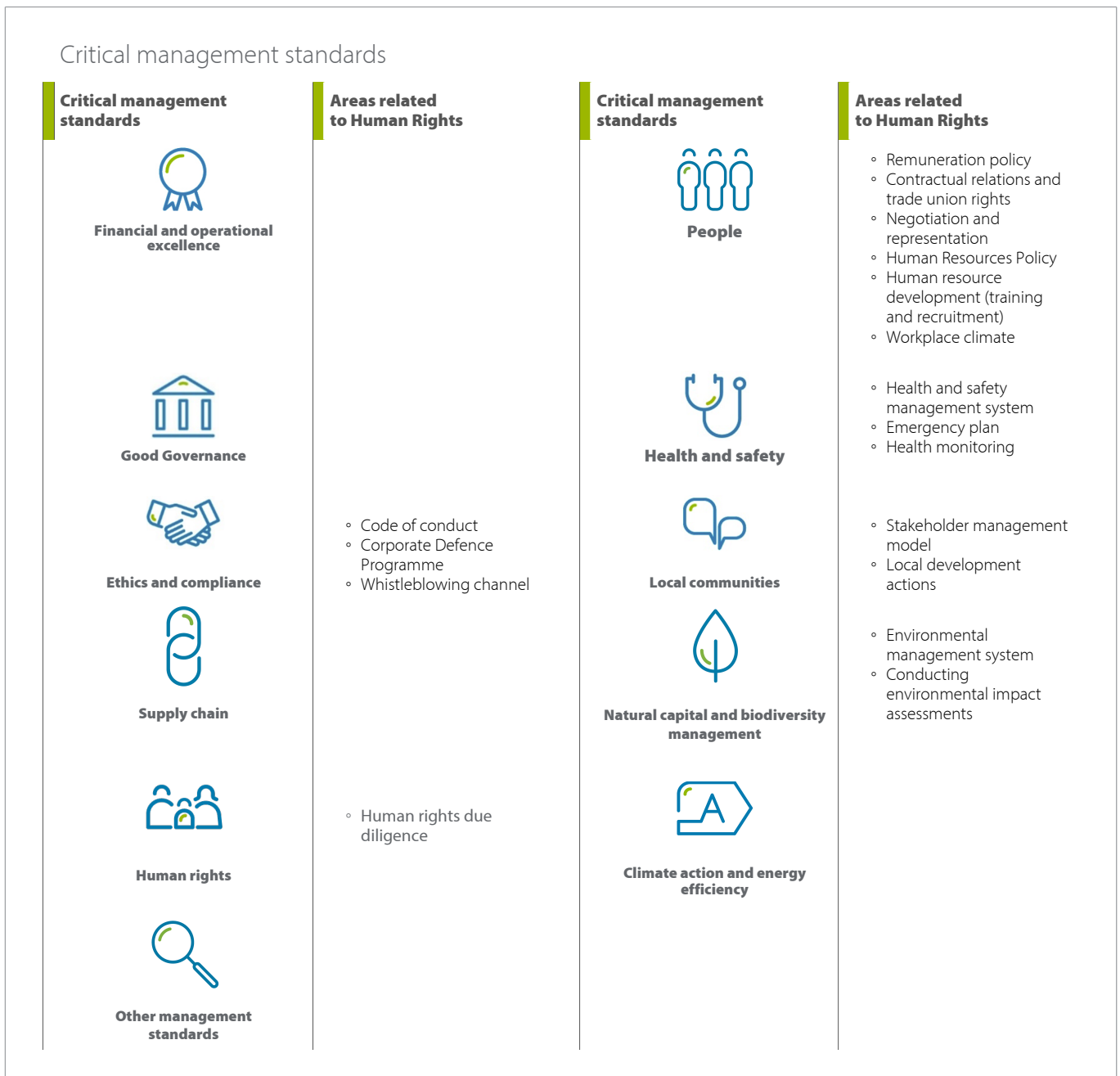
The company has set out critical ESG management standards which include human rights and that Enagás extends to its affiliates according to its level of influence. The company also monitors them by setting out a plan of objectives for each affiliate to be implemented over a five-year horizon.

Critical management standards are transferred through working groups led by the specific managers of each affiliate, involving members of the General Management of Enagás who co-lead matters falling under their remit. These working groups are

instrumental in aligning positions and ensuring the operability of the Board of Directors of the affiliate, where the decisions taken by consensus will be concluded in the groups.

Enagás has an Internal Monitoring Committee, established at the management level, which supervises the critical decisions of affiliates and reports quarterly on key matters to the Enagás Board of Directors.

Below is a summary of the key critical management standards related to human rights:



Internal control in affiliates

Enagás, in collaboration with its business partners, conducts internal audits of its affiliates to verify the robustness of internal controls in high-risk processes, which may at times affect the human rights of the employees within these affiliates.

In 2024, Enagás focused on developing the Audit Plan for our affiliates, concentrating specifically on labour, health, and safety issues, as well as local community management processes. This included work related to the supply chain and business continuity at the Trans Adriatic Pipeline (TAP), the Social Management Plan at Transportadora de Gas del Perú (TGP), and reviewing the occupational health process, safety risk management, and resource contracting process at DESFA.

Specific human rights assessment

Enagás conducts an annual review of the human rights risk assessment for affiliates where the company lacks operational control. All the companies have commitments to human rights included in their codes of ethics or specific policies, though in some cases, it is necessary to continue making progress to reinforce these commitments by making them public and providing training to their professionals.

In general, there is also an advanced level of management regarding the handling of communications and complaints. Due to the importance of this area, Enagás is reinforcing the importance of continuing with this type of action.

This assessment examines the potential country-related risks concerning areas such as human rights management, grievances and communication, employee relations and working conditions, public and private security, and community relations. In the last three years, all 100% of the affiliates without operational control have been assessed. In 2024, 22% have been identified as posing a potential human rights risk linked to country-specific risks.

The management capabilities of these affiliates in dealing with such issues are then evaluated, with the conclusion that, generally, management levels are advanced and help mitigate country-specific risks. Nevertheless, mitigation actions have been implemented in all of them with the support, monitoring and assessment of Enagás.

Through these assessments and the establishment of mitigation actions, Enagás works to ensure its affiliates meet their human rights commitments. The company plans to continue these evaluations in the coming years, aligning with the evolution of its due diligence system.

Human rights assessed	Assessment result	Risk Management
<ul style="list-style-type: none"> • General human rights • Labour • Safety • Environment • Ethics and integrity • Basic rights • Local Communities ⁽¹⁾ 	Low risk of violation	<p>In our business agreements we promote compliance with corporate policies (according to the degree of influence). Our management model for affiliate companies is based on the transfer of critical management standards, which include the necessary areas in order to guarantee respect for the following human rights:</p> <ul style="list-style-type: none"> • People management • Ethics and compliance • Health and safety • Local communities • Environment • Supply chain

Likewise, these areas are evaluated as critical aspects in due diligence processes.

(1) Local and indigenous communities and populations have been identified in affiliates without operational control in Peru and Mexico.

Supply chain

Within the framework of managing its supply chain with a focus on risk management for both the business and its stakeholders, Enagás evaluates the inherent human rights risks of its suppliers, considering the country and sector-specific risks.

During the supplier approval process, the company sets requirements to ensure respect for the human rights of supplier companies. These include the acceptance of the Enagás Code of Ethics, an explicit commitment to adhering to the principles of the United Nations Global Compact and the Universal Declaration of Human Rights, and evidence of compliance with labour legislation, among other criteria. Regarding health and safety, Enagás also requires ISO 45001 certification from suppliers in certain product or service categories.

Annually, through assessments conducted during approval (for all suppliers) or contract execution (based on turnover, inherent risk, and criticality), the company evaluates the residual human rights risks associated with its suppliers. For more details on the assessments carried out in 2024, see disclosure requirement [G1-2](#).

If any assessments reveal a high risk to human rights, action plans are developed to mitigate these risks, with ongoing support and monitoring.

In the last three years, 72.2% of suppliers have been assessed, of which 19.9% have been identified as high risk suppliers. All of them have mitigation actions in place. Enagás monitors the extent to which the defined actions have been implemented.

By conducting these assessments and defining mitigation actions, Enagás helps to ensure that its suppliers meet their human rights commitments. The company plans to continue these evaluations in the coming years, aligning with the progression of its due diligence system.

In 2024, the cost of conducting these supplier evaluations, including the expense for the supplier approval platform and external evaluations and audits, amounts to more than 98 thousands of euros (information included in note 2.1 'Operating profit' to the Consolidated Annual Accounts). In 2025, the cost of these assessments is expected to be similar.

Human rights assessed	Assessment result	Risk Management
<ul style="list-style-type: none"> • General human rights • Labour • Safety • Ethics and integrity 	Low risk of violation	Enagás ensures that its suppliers, and especially those with workers operating within Enagás' facilities, respect these human rights. We demand a commitment from them, we ask them for the necessary documentation and we conduct audits.

In 2024, the company is investing in the development and training of Enagás' small and medium-sized suppliers in human rights, as part of the Global Compact's 'Sustainable Suppliers' training programme. Through this initiative, 77 small and medium-sized Enagás suppliers have received training in human rights management, along with other sustainability-related topics.

As regards health and safety, and in order to guarantee the coordination of business activities and the coordination of health and safety on building projects, the company has the Enagás Contractor Access System (SACE) to manage the safety of its suppliers, contractors and the whole subcontracting chain. This system offers contractors the operating safety procedures applicable to the possible risks involved in the works they perform. It also provides safety training to all its contractors through this platform. This training is complemented to the face-to-face chats at infrastructure facilities where particularly hazardous work may be carried out. In 2024, 5,906 hours of training (5,480 hours in 2023) were delivered through the SACE platform to 2,773 contractors from 556 contractor companies.

Repair procedures and mechanisms

Enagás also has in place procedures for redress should there be non-compliance with any of the previously mentioned human rights, such as:

- Procedure for the management of consultations and reporting regarding irregularities or breaches of the Code of Ethics.
- Self-protection and interior emergency plans, the incident and transmission network emergency response action plan and the procedures regulating it, the accident and incident management procedure and procedure for reporting them to stakeholders (crisis manual, incident reporting, etc.).
- Procedure for compensation and indemnification for gas pipeline routes through private property areas.

Additionally, as mechanisms for redress, Enagás has in place a Whistleblowing Line (accessible to all stakeholders) and an Ethical Compliance Committee. There are also corporate mailboxes available for specific areas.

Enagás is currently reviewing its Due Diligence Processes in relation to third parties, focusing on the protection of Human Rights and the Environment, in line with the European Directive on this issue.

Metrics and targets

S2-5

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Affiliates without operational control

Enagás aims⁸² to ensure ongoing and proper oversight of human rights management across 100% of its companies through corporate governance bodies by 2024, to minimise the likelihood of risks emerging. This objective has been defined in collaboration with the management bodies of the affiliates to ensure the necessary actions can be implemented effectively. In 2024, Enagás carried out regular oversight of 100% of these affiliates through the established governing bodies. This was especially true for the Hanseatic Energy Hub company, as it was in the process of building its infrastructure.

The achievement of this goal contributes, among other things, to the commitment established in the Human Rights policy to promote compliance with corporate policies, aligned with the principles set out in this policy, in business agreements according to the company’s degree of influence.

Supply chain

Enagás has set various targets for the sustainability management of its suppliers. In 2024, the company plans to conduct at least ten on-site audits focusing on ethical, environmental, and social aspects (including a specific human rights assessment) through an independent third party for key suppliers, considering factors such as criticality, sustainability risks, and turnover⁸³. In 2024, Enagás carried out twelve on-site ESG audits by an independent third party, thus meeting that target.

These assessments are a primary tool for the company to identify potential human rights violations (for more information, see disclosure requirement [G1-2](#)).

This goal is aligned with the commitment set out in the Human Rights Policy to ensure that suppliers, especially those with workers operating within Enagás’ facilities, respect the human rights reflected in this Policy and the Ethical Principles and Guidelines of the Enagás Group’s Code of Ethics for Suppliers, by carrying out relevant assessments and audits.

⁸² Given the nature of this target, no specific methodologies have been employed in its definition.

⁸³ Due to the nature of this target, no specialised methodologies have been used in its definition, nor has it been developed in partnership with suppliers.

S3. AFFECTED COMMUNITIES

Strategy

SBM-2

Interests and views of stakeholders

Enagás recognises the importance of the communities potentially impacted by its activities and incorporates their interests and expectations into its business model and strategic planning. To ensure these viewpoints are adequately captured and assessed, Enagás implements various listening mechanisms during the development and operational phases of its assets. One key method is the formal consultation process conducted as part of the environmental assessment during the construction phase (for more details, see disclosure requirement [S3-2](#)).

SBM-3

Material impacts, risks, and opportunities and their interaction with the strategy and business model

Enagás has conducted an analysis to determine the impacts, risks, and opportunities, assessing the materiality of these in relation to affected communities, as outlined in disclosure requirement [IRO-1](#). This analysis takes into account Enagás' strategy and business model, covering all internal activities and the locations of the company's infrastructure. It also considers the upstream and downstream phases of the value chain.

The material impacts and risks identified from this analysis are outlined below:

Table of impacts

Topic	Sub-topic	Impact	Nature
Local communities	Rights of local communities and their development	Contribution to the development of the local economy through the creation of direct and indirect employment in the communities where it operates.	Positive - Current
	Rights of local communities and their development	Impact on local communities in terms of safety, health, environmental aspects or other socio-economic factors in the construction phase.	Negative - Potential and linked to individual cases
	Social action	Helping society by promoting social action initiatives and implementing volunteer programmes	Positive - Current

Table of risks and opportunities

Topic	Sub-topic	Risk / Opportunity	Nature
Local communities	Rights of local communities and their development	Cost overruns, delays, or even temporary or permanent halts to infrastructure projects due to social protests by affected communities or significant impacts on the environment or society.	Risk

The materiality analysis for identifying impacts, risks, and opportunities concerning affected communities was founded on the Enagás Group's strategy and business model. This is evidenced by the fact that the impacts identified originate from Enagás' own activities, stemming directly from the company's business model.

Within the materiality process, dependencies related to affected communities were examined, including those linked to ongoing activities, new projects, and reputational aspects. Consequently, due to the company's business model, Enagás has identified a significant dependency involving the development of new infrastructure and subsequent operational activities. This has manifested as the risk of 'Cost overruns, delays, or temporary or permanent halts of infrastructure development projects due to social protests from affected communities or significant impacts on the environment or society'. Accurately identifying and managing the opinions and interests of affected communities, and integrating them into the company's business model, is crucial for minimising this risk. This risk, considered material, is

also assessed as part of the company's corporate risks, demonstrating a coherent approach in its evaluation and management.

As detailed in this chapter, the company sets out policies, actions, and objectives to manage these impacts and risks related to the business model and the 2025-2030 Strategic Update, facilitating the inclusion of affected communities into the business framework.

The main groups identified as potentially experiencing negative impacts from the company are those connected to its operations, particularly nearby local communities. When evaluating impacts, risks, and opportunities for these groups, Enagás takes into account the socioeconomic context of potentially affected communities. It recognises that groups in what is referred to as 'hollowed-out Spain' might be more vulnerable due to factors like potential disruptions to their economic activities or limited job diversification.

These groups also experience the positive impact deemed material, as Enagás aims to support the socioeconomic development of the local communities where it builds and operates its infrastructure.

It should be noted that Enagás has not identified any location among its direct operations (operational control) where indigenous populations are present or affected.

Management of impacts, risks, and opportunities

S3-1

Policies related to affected communities

Relations with affected communities, specially local communities, are of importance to the company, since our activities impact the areas in which we operate. They encourage competitiveness in the industry, enhance energy security of supply, contribute to decarbonisation and create direct and indirect employment.

When carrying out our activities, we guarantee the safety of infrastructure and minimise impacts on ecosystems and the population.

Enagás sets out its commitments to action for effectively managing impacts, risks, and opportunities related to affected communities in its [Group Code of Ethics](#), as well as in more specific policies approved by the Board of Directors (for further details on the Code of Ethics, refer to disclosure requirement [G1-1](#)).

Through these actions, the company establishes commitments that address the impacts and risks identified as material:

Link between significant impacts, risks, and opportunities and corporate policies

Topic	Sub-topic	Impact, risk or opportunity	Nature	Policy that covers the impact, risk or opportunity
Local communities	Rights of local communities and their development	Contribution to the development of the local economy through the creation of direct and indirect employment in the communities where it operates.	Impact	Code of Ethics Sustainability and Good Governance Policy Human Rights Policy
		Impact on local communities in terms of safety, health, environmental aspects or other socio-economic factors in the construction phase.	Impact	Code of Ethics Sustainability and Good Governance Policy Human Rights Policy Health and Safety Policy
	Social action	Helping society by promoting social action initiatives and implementing volunteer programmes	Impact	Code of Ethics Sustainability and Good Governance Policy
	Rights of local communities and their development	Cost overruns, delays, or even temporary or permanent halts to infrastructure projects due to social protests by affected communities or significant impacts on the environment or society.	Risk	Code of Ethics Sustainability and Good Governance Policy Human Rights Policy

- [Enagás Group Code of Ethics](#): Among the various commitments laid out in the code, Enagás demonstrates its dedication to the environment by supporting the socio-economic development of local communities where it operates. This is achieved through initiatives that enhance positive impacts and help meet societal needs.

The Ethical Compliance Committee, responsible for overseeing the Code of Ethics, directly reports to the Audit and Compliance Committee of the Board of Directors. For further details on the Code of Ethics, refer to disclosure requirement G1-1).

- [Sustainability and Good Governance Policy](#): This policy emphasises the establishment of mechanisms that enable the company to form commitments with stakeholders, particularly local communities, based on collaboration, timely information exchange, and participation. These efforts contribute to due diligence and enhance the management of real or potential negative impacts arising from the company's development, construction, maintenance, operation, and dismantling of its infrastructure and supply chain. This policy also helps achieve social acceptance, generate positive impacts, and integrate

Enagás within the communities where it operates. Enagás is therefore committed to:

- Identifying the affected communities and stakeholders, including the most vulnerable among them.
- Defining and implementing strategies for consultation and participation with local stakeholders, as well as engaging with relevant parties and/or their legitimate representatives, to ensure their views are considered.
- Establishing publicly available and accessible complaints and grievance mechanisms for all identified local stakeholders.

In 2024, this policy was revised to update its sustainability commitments, aligning them with those in other corporate policies approved later, and with the latest edition of the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (2023).

- [Health and Safety Policy](#): this includes commitments relating to safety (covering individuals, infrastructure, the environment, and road safety), as well as physical and emotional well-being.

Among the commitments related to the identified potential negative impacts are:

- Maintaining a high level of safety in facilities and work, guaranteeing safe conditions in the design, operation and maintenance of facilities, processes and equipment.
- Establishing emergency measures and actions in the event of a crisis situation in the various work centres and work sites to ensure the protection of people, goods and the environment while business activities are being engaged in.

In 2024, this policy was revised following a corporate decision to split the former combined Health and Safety, Environment, and Quality Policy into three distinct policies. This change enables more effective implementation of commitments related to these crucial aspects of the business.

• [Human Rights Policy](#): this outlines Enagás' commitments to ensure due diligence in human rights areas. These commitments align with relevant internationally recognised instruments, including:

- The United Nations Guiding Principles on Business and Human Rights.
- The United Nations (UN) International Bill of Human Rights and its associated covenants (the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights).
- The OECD Due Diligence Guidance for Responsible Business Conduct.
- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.
- The International Labour Organisation (ILO) Declaration.
- The Universal Declaration of Human Rights.

It addresses the respect for human rights concerning society and local communities, which includes:

- Rights of communities and indigenous people: contribute to the socio-economic development of local communities, prioritising those areas where the company operates, through sustainable social action models, paying special attention to the most vulnerable communities such as indigenous or tribal populations⁸⁴.
- Property rights, resettlement and compensation: take into account, criteria aimed at avoiding the occupation of privately owned areas when developing infrastructure construction projects and minimise the potential relocation of local communities, applying procedures for information, consultation and fair compensation that guarantee transparency and equal treatment.

In 2024, this policy was updated to strengthen the company's commitment to developing and maintaining a human rights due diligence system, as outlined in the European Sustainability Reporting Standards developed by EFRAG, the proposed

Sustainability Due Diligence Directive, and the OECD Due Diligence Guidance for Responsible Business Conduct.

These policies commit to developing and maintaining a risk-based due diligence system to anticipate, prevent, mitigate, and/or remedy negative impacts on affected communities. This is accomplished through the regular implementation of actions focused on continuous improvement and cooperation with stakeholders.

The Code of Ethics and all specified policies apply to the entire Enagás Group, covering all activities by its companies across all regions where it operates, and encompass commitments to all affected communities. The policy is communicated to all employees and directors within the Enagás Group, including subsidiaries where it has effective control, respecting legal regulations.

In affiliates where Enagás does not have effective control, the Board of Directors recommends promoting principles and guidelines that are consistent with those outlined in the Code of Ethics and the previously mentioned policies. The company also seeks to encourage, as much as possible, the adoption of the Code of Ethics and related policies by temporary joint ventures, joint ventures, and other comparable associations or entities. The company also emphasises principles and commitments aligned with the Code of Ethics and company policies with contractors, suppliers, and collaborators, particularly regarding the supply chain.

The Code of Ethics and all policies are accessible to stakeholders on the company's [corporate website](#), as well as on the corporate Intranet for all employees.

These policies assign the Board of Directors the responsibility for guiding, overseeing, and monitoring the strategy, policies, risks, objectives, and performance concerning the management of issues related to the subject matter of each policy (human rights and sustainability). It is also the responsibility of the Sustainability Committee to control and monitor these aspects, reporting to the Sustainability and Appointments Committee, which is established at the Board level. In addition, various departments within the company are tasked with setting up action plans, goals, and monitoring indicators.

By doing so, the company makes commitments to address material impacts, risks and opportunities. For further details, refer to the table of impacts and the table of risks and opportunities, both included in the [IRO-1](#) disclosure requirement in this chapter.

Over the past three years, Enagás has not identified any instances of non-compliance with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises. This applies both to its own operations and those within its value chain, with regard to affected communities.

⁸⁴ As defined in ILO Convention 169 on indigenous and tribal peoples.

S3-2

Processes for engaging with affected communities about impacts

In the early stages of projects involving construction, operation, maintenance, and decommissioning, an analysis is conducted to assess the area's actual and potential social, economic, and environmental impacts. This analysis helps identify affected communities, key associations, and legitimate representatives such as vulnerable groups, NGOs, and local councils. Collaboration with these parties is crucial to involve them in decision-making and to ensure they are properly informed and consulted throughout the process.

From this analysis, stakeholder maps are created for the management of crises and emergencies affecting infrastructure, in which key collectives, communication channels and relevant issues are identified.

Information and consultation processes

Enagás conducts environmental impact studies (which also assess social aspects) for construction projects and assesses environmental aspects for infrastructure operation and maintenance projects. Environmental impact studies are open to public information and are also subject to processes of consultation in which stakeholders may voice their opinion and even propose modifications. EMAS-certified facilities publish an annual report (Barcelona and Cartagena regasification terminals and Yela and Serrablo underground storage facilities).

In the case of gas pipeline construction projects, the route design already takes into account criteria for minimising the impact on local plant and animal wildlife, as well as other aspects derived from direct collaboration with affected communities (for more information, see disclosure requirement S3-4).

The types and frequency of collaboration will depend on the specific nature of the project and the affected communities involved. Operational responsibility for ensuring proper collaboration and participation of affected communities during the construction phase lies with the Chief Executive Officer of Engineering, Technology and Digitalisation. During the operation and maintenance phase, this responsibility shifts to the Gas Assets General Manager. Both roles are part of the Executive Committee.

As stated, Enagás offers various channels for affected communities and their legitimate representatives to express their needs or concerns. The consultation and listening processes extend to all potentially affected communities, including those identified as particularly vulnerable, such as communities from the 'hollowed-out Spain' phenomenon.

The departments responsible for managing these communication channels will establish mechanisms to honour Enagás' commitment to address all feedback received and to enhance collaboration with affected communities through effective management of these channels.

Communication channels with affected communities

- Contact telephone numbers (switchboard, emergencies, Public Affairs & Investor Relations, etc.)

- Corporate mailboxes (infrastructure, environment, social action, Public Affairs & Investor Relations, etc.)

In matters related to infrastructure safety, Enagás develops internal emergency plans, which include information on stored chemical substances, human and material resources, scenarios, emergency plans, liability, etc. These plans are registered with the local government authorities, which are responsible for communicating them to the community and creating an associated action plan.

Communication channels with affected communities specific to the infrastructure development, construction and decommissioning phases

In the development, construction, and decommissioning phases of infrastructure projects, Enagás sets up additional communication channels specifically for affected communities and their legitimate representatives, beyond those already mentioned, to ensure their active involvement. Recognising the importance of engaging affected communities during these phases, Enagás assesses the effectiveness and stakeholders' awareness of these channels throughout the process.

Enagás holds information sessions in local areas for the purpose of explaining details of projects that are being executed locally, and safety and environment-related issues, among others.

- Citizen participation days.
- Consultation processes for affected communities (e.g. local authorities).
- Permanent information centres.

Public participation concept plan

As part of the general procedures outlined, Enagás has prepared and submitted a Public Participation Conceptual Plan to the Ministry for Ecological Transition and the Demographic Challenge. This Plan is for the Inland Hydrogen Infrastructure project in Spain, which is included in the Portugal - Spain - France - Germany Corridor as part of the Western Europe Hydrogen Interconnections (HI West). This initiative is recognised as a Project of Common Interest by the EU. This Public Participation Plan for the connection to Portugal (CelZa Project) and the North-1 project has also been submitted to the Directorate General of Industry, Energy and Mines of the Government of Cantabria.

The Plan aims to ensure transparency and facilitate the involvement of affected communities and their legitimate representatives during the authorisation process and the project's development. In order to increase the participation of these groups in the permit granting process and ensure prior information and dialogue, stakeholders parties affected are extensively informed and consulted at an early stage, when potential concerns of those affected can still be taken into account.

The plan identifies the main affected communities and their legitimate representatives, including relevant national, regional, and local authorities, landowners, residents near the project site, the general public, and their associations or organisations. It also outlines the minimum measures to be taken for public consultation, detailing communication channels such as public

participation events, a dedicated project website, informational brochures, and telephone and email contacts.

The plan requires an evaluation of the participation process, ensuring transparency of both the process and its outcomes. This will provide information on the results of the collaborations and suggest possible improvements for future phases.

S3-3

Processes to remediate negative impacts and channels for affected communities to raise concerns

Enagás offers channels for affected communities and their legitimate representatives to submit complaints or claims about actual or potential negative impacts on any group, society, or the environment. In addition to the channels for collaboration with affected communities indicated in disclosure requirement S3-2, since these channels can also pose negative impacts, the following are identified:

Communication channels with affected communities

- Whistleblowing Line (for more details on the line, its procedures, the management of communications and the no retaliation policy, see disclosure requirement G1-1):
 - Electronic mailbox: canal.etico@enagas.es
 - Post addressed to the Chairman of the Ethical Compliance Committee, sent to Paseo de los Olmos 19, 28005 - Madrid, Spain
 - Form available on the corporate Intranet and on the [corporate website](#)

The areas responsible for managing the various communication channels will set up mechanisms to ensure Enagás' commitment to addressing all communications received. When necessary, Enagás will analyse and investigate the communications, taking appropriate actions to prevent or reduce identified negative impacts, as far as the company can influence. The company will also assess the effectiveness of these measures after implementation, considering their actual impact on the affected communities.

Enagás evaluates how well these channels are understood and trusted by the groups, as well as their effectiveness, through direct engagement, informal communications, and usage levels.

In keeping with this commitment to addressing grievances, Enagás supports these reporting and resolution channels within its value chain. This is also one of the criteria used to assess the sustainability risk of its suppliers (for more information, see disclosure requirement G1-2).

S3-4

Measures taken related to material impacts on affected communities, approaches to mitigating material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions

Through its activities, Enagás impacts the regions where it operates by enhancing industrial competitiveness, strengthening energy security of supply, contributing to decarbonisation, creating both direct and indirect jobs, and paying taxes to local governments. It also benefits society by promoting social initiatives and implementing volunteer programmes. Enagás determines which actions to take regarding the management of significant impacts and risks, guided by principles of continuous improvement, cost-benefit analysis, and learning from past responses to similar situations. For more details, refer to disclosure requirement SBM-3.

Over the past three years, there have been no identified or reported potential human rights violations related to the affected communities.

Creation of direct and indirect employment

Regarding the management of the positive impact deemed material – 'Contribution to the development of the local economy through the creation of direct and indirect employment in the communities where it operates' – the Enagás Group is active in a large part of Spain, with facilities in over 55 locations. This widespread network of infrastructure leads to the creation of local direct employment across the various regions where it operates, fostering economic growth and strengthening the social fabric. Enagás plans to sustain local employment in these areas in the coming years.

In 2024, 106 new employees were hired (127 in 2023), of which 50.9% were women (46.4% in 2023), of which 50.9% were women (46.4% in 2023) and 79% were filled by external candidates (76% in 2023).

Enagás also contributes to indirect job creation by engaging local suppliers⁸⁵. In 2024, the Enagás Group placed orders with local suppliers amounting to over 264 million euros, representing 79% of the total expenditure in our supply chain (see note '2.3 Trade payables and other accounts payable' in the Consolidated Annual Accounts for details). Enagás also supports a more diversified and resilient local economy by engaging small and medium-sized enterprises⁸⁶, with spending exceeding 94 million euros (for further details on our suppliers, see disclosure requirement [SBM-1](#)). Enagás expects to maintain similar levels of local spending in our supply chain in the coming years.

Socio-economic impact of renewable hydrogen infrastructures

The construction and future operation of this planned renewable hydrogen infrastructure, aligned with our 2025-2030 Strategic Update, will have a significant positive impact on the Spanish economy and society.

In terms of GDP, the construction and operation of H2med and the Spanish Hydrogen Backbone would generate an impact of up to 4.8 billion euros. Likewise, construction alone would have an impact on employment equivalent to 3.7% of the net jobs expected to be generated by the various measures included in the PNIEC review by 2030.

The backbone will also serve as a pull factor for multiple sectors of the national economy, thanks to the various applications of green hydrogen. The pull factor for the national economy generated by the deployment of green hydrogen production capacities will be very significant, with much of it concentrated in key sectors such as industry and professional, scientific and technical activities.

Commitments to affected communities

Enagás is committed to addressing the potential Negative impacts on local communities regarding safety, health, environmental aspects, and other socio-economic factors during the construction phase'. It also recognises the risk of 'Cost overruns, delays, or even temporary or permanent halts to infrastructure projects due to social protests by affected communities or significant impacts on the environment or society' identified as material. Enagás upholds its commitment to due diligence for the groups impacted by its activities across all regions where it operates. This commitment involves active listening and collaboration, and when necessary, taking steps for mitigation, remediation, and/or compensation for the negative impacts that have occurred (for more information, see disclosure requirements S3-2 and S3-3).

Enagás conducts environmental impact studies (which also assess social aspects) for construction projects and assesses environmental aspects for infrastructure operation and maintenance projects. As part of these assessments, information and consultation processes are conducted (for more information, see disclosure requirement S3-2) to help identify impacts. In collaboration with the affected communities, the team responsible for the construction project then defines specific actions to prevent, minimise, mitigate, and/or compensate for the identified negative impacts. Throughout the project, this team evaluates the effectiveness of the measures taken. If these measures do not adequately address the negative impact, they will consider implementing new actions, either during or after the project's completion.

One common negative effect on affected communities during construction projects is typically the occupation of privately owned land. In Spain, there is a regulated procedure (Compensation and Indemnity Procedure for Passage through Private Property) that involves public information and consultation with affected organisations. This process ensures transparency in infrastructure projects and guarantees equal treatment under the law.

In 2024, no significant negative impacts on affected communities have been identified in the construction projects undertaken.

Renewable hydrogen infrastructures

Enagás has been appointed as the provisional HTNO, with Enagás Infraestructuras de Hidrógeno authorised to temporarily carry out the development of European Projects of Common Interest for hydrogen networks. In relation to this new activity, from the earliest stages of project development, Enagás is assessing potential negative impacts to establish mechanisms that minimise the effects on affected communities. In 2024, Initial Project Documents have been prepared for projects scheduled to begin construction in the coming years, evaluating potential impacts on communities and the environment. In 2024, Enagás invested (CapEx) more than 200 thousands of euros in the preparation of these Initial Project Documents for the Hydrogen Backbone Network, Celza and North 1 underground storage facility projects (information included in note 2.4. Property, plant and equipment' in the Consolidated Annual Accounts).

In 2025, as projects progress to more advanced development stages, there will be a deeper examination of the potential impacts on the environment and affected communities. In collaboration with these groups, necessary measures will be determined to prevent these impacts from occurring or, if they do occur, to repair or compensate for the negative effects. To ensure that all these measures effectively mitigate risk, Enagás will continuously monitor their effectiveness and suitability throughout the project's development.

In line with this commitment, in 2025 Enagás will develop a Conceptual Plan for Public Participation for the Projects of Common Interest: '9.1.3. Internal hydrogen infrastructure in Spain', '9.24.1 H₂ storage North-1', and '9.1.2 Hydrogen interconnector Portugal-Spain'. This is aimed at ensuring transparency and public involvement in the authorisation process for these projects (for more information, see disclosure requirement S3-2). Enagás will track progress through continuous self-assessment during the plan's development, allowing for adjustments based on effectiveness to ensure the plan's objectives are met. To develop these Public Participation Concept

⁸⁵ Local purchases are considered to be purchases made domestically in Spain.

⁸⁶ Companies with less than 250 employees in line with the European Union definition.

Plans, Enagás has allocated (CapEx) more than 200 thousands of euros (information included in note 2.4. 'Property, plant and equipment' in the Consolidated Annual Accounts). In 2025, we expect to take the actions outlined in this Plan for the PCI '9.1.3. Internal hydrogen infrastructure in Spain', estimating an investment (CapEx) of approximately 3 million euros

Social action

Enagás has carried out important actions during the year related to the management of the positive material impact 'Helping society by promoting social action initiatives and implementing volunteer programmes'.

In 2023, the company established Enagás' Social Action Strategy, which is aligned with the targets set out in the company's Strategic Plan. The global target of this strategy is to contribute to security of supply and decarbonisation, promoting a just energy transition through socio-economic development projects and initiatives in the country. At Enagás, we maximise the positive social impact of our initiatives through dialogue and collaboration with our stakeholders, whether in the form of volunteering, sponsorship, patronage, partnership or donations.



In 2024, the total amount of this social investment reached 1.7 million euros⁸⁷, distributed as follows:

	2022	2023	2024
Amount allocated for social investment (million euros)	1.94	1.70	1.72

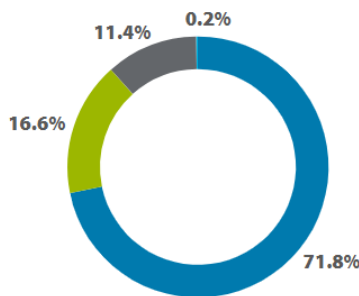
Company commitment to sustainable development (euros)⁽¹⁾

	2022	2023	2024
Contributions to foundations and non-profit organisations (charitable donations: monetary and in kind ⁽²⁾)	151,031	31,129	32,938
Association and sponsorship actions (sponsorship and patronage activities)	1,450,105	1,217,568	1,203,501

(1) Information included in note '2.1 Operating income' in the Consolidated Annual Accounts.

(2) With regard to donations in kind, Enagás mainly donates computer equipment, mobile phones and discontinued promotional material to associations that use this material solely for charitable purposes.

Types of contributions



- Sponsorships, patronage, collaborations and donations
- Management expenses
- Time spent by professionals during the workday on volunteering
- Donations in kind

Sponsorships, patronage, collaborations and donations

Enagás contributes economically with social welfare projects through sponsorship, patronage, collaboration and donation activities.

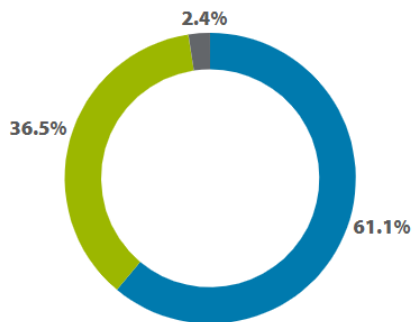
The company's procedure for managing sponsorships, patronage, collaborations and donations establishes the criteria for the reception, approval and follow-up of financial contribution collaboration requests. In 2024, the procedure was updated to include the Ethical Compliance Committee in assessing actions.

⁸⁷ Information included in note '2.1 Operating income' in the Consolidated Annual Accounts.

Enagás follows the London Benchmarking Group (LBG) methodology, a global benchmark for the management, measurement and reporting of activities that companies and their professionals carry out for the benefit of society and the environment. A further step in the company's commitment to best practices in social investment.

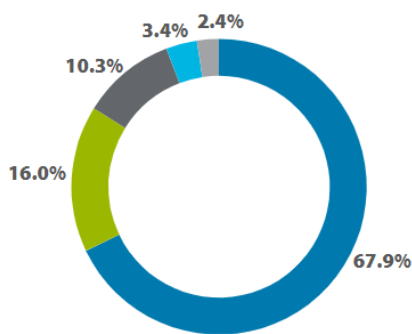
In 2024, Enagás made monetary contributions totalling more than 1.2 million euros, the same amount as in 2023. This information is included in note '2.1 Operating profit' in the Consolidated Annual Accounts. Contributions were allocated as follows:

Rationale for financial contributions



- Business-aligned initiatives
- Social investment
- One-off contribution

Areas of action



- Socio-economic development
- Social well-being
- Education
- Art and culture
- Humanitarian aid

Here are some examples of these initiatives carried out in 2024:

- Contribution to the socioeconomic development and welfare of the communities where it operates through various projects. For example, Enagás supported ACCEM in Brihuega with 15,000 euros to enhance accessibility for people with dependencies and to promote their personal autonomy in rural areas.
- Support for entrepreneurship and innovation initiatives, such as Innoenergy (20,000 euros), South Summit (5,000 euros) or the Isaac Peral Foundation (3,500 euros); through this, our company supports the advancement of new technologies, promoting job creation, the development of new companies and better competitiveness in key sectors such as energy, technology and innovation.
- Participation in initiatives related to digitalisation, artificial intelligence, and cybersecurity, such as IndesIA (20,000 euros) and the ESYS Foundation (20,000 euros), among others.
- We collaborated with cultural and educational institutions such as the Princess of Girona Foundation (43,000 euros), Carlos III University (27,000 euros), and Lumbier Municipal School of Music (5,000 euros), promoting the educational development of young people and children.
- Promotion of forums and debates on sustainability and green hydrogen to share progress on this crucial carrier for decarbonisation and energy security in Spain and Europe. This year, Enagás earmarked 192,720 euros for these efforts.
- In 2024, Enagás responded to the emergency caused by the cut-off low storm in Valencia by collaborating with the Red Cross, offering its professionals the opportunity to make voluntary contributions to support rescue and recovery efforts. The company matched the amount contributed by employees (29,590 euros).
- Enagás employees can also make various charitable donations promoted by the company. Through the 'Euro Solidario' ('Solidarity Euro') initiative, which allows professionals to make micro-donations from their salaries for social projects, 8,423 euros were donated in 2024 (8,832 euros in 2023) to the Children's Villages and ANAR (Aid to Children and Adolescents at Risk) Foundations. Some of our professionals have also donated the money for the traditional Christmas hampers to the Theodora Foundation, reaching a total of 3,900 euros (2,313 euros in 2023).

In 2025, Enagás will continue committed to maintaining short- and medium-term partnerships and will continue supporting both the organisations it already collaborates with and new initiatives that align with its Social Action Strategy.

Enagás tracks all activities and assesses their impact by requesting project reports and sending measurement forms to associations, institutions, and organisations. This process aims to understand the impact of these initiatives on the affected communities.

Corporate volunteering programme

Enagás professionals participate in the company's Corporate Volunteering programme, giving up their time and bringing their skills and talent. For this purpose, there are two forms of collaboration available to all professionals:

- **On-site corporate volunteering directly managed by Enagás:** activities carried out in collaboration with associations and third-sector organisations, supervised by the company. These on-site corporate volunteering initiatives are carried out during working hours and respond to the needs of the local communities in which Enagás is present.
- **On-site and virtual volunteering platform:** the company connects with volunteering opportunities through different associations and third-sector organisations by means of the corporate volunteering portal.

Among the volunteering initiatives in 2024, notable efforts include:

- development of the second Volunteering Week, a successful initiative in which 218 professionals participated in at least one of the 13 scheduled activities in collaboration with different non-profit organisations.
- Promoting corporate values and culture through initiatives that enhance cohesion and teamwork, focusing on environmental conservation and the social integration of vulnerable groups. These efforts target four different areas of the company.
- Launching a gamification section on the volunteering portal to boost active participation among professionals and enhance their social awareness experience.
- Positively impacting the diversity and inclusion policy through two key initiatives: promoting the social and employment integration of vulnerable women and supporting the social and employment inclusion of individuals with disabilities. Within this framework, Enagás held a number of training workshops to promote employability and social normalisation for women in vulnerable situations due to disability or as victims of gender-based violence. These workshops were carried out in collaboration with the Randstad and the José María de Llanos Foundations.

Indicators of volunteering initiatives

	2022	2023	2024
Number of initiatives	21	32	33
Number of participations (not individual volunteers)	438	605	649
Total number of hours	2,210	3,344	3,407

The company carries out a satisfaction survey of the professionals who participate in social initiatives in order to take maximum care of the volunteer experience, and to find out their satisfaction and assessment of the achievement of the targets of each action. The average result of the surveys carried out by the 2024 initiatives reflects high satisfaction, with a rating of 4.95 out of 5 (4.8 in 2023).

Enagás monitors the activities and assesses their effectiveness by sending questionnaires to associations, institutions, and other relevant parties to gauge the impact of various initiatives on the affected communities.

In 2025, Enagás plans to maintain its volunteer activities in line with those carried out in the previous year.

Metrics and targets

S3-5

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Creation of direct and indirect employment

For 2024, Enagás has not set measurable, outcome-oriented targets related to enhancing the positive impact of ‘Contribution to the development of the local economy through the creation of direct and indirect employment in the communities where it operates’.

This is because the company already prioritises maintaining stable, quality employment and creating direct jobs, as well as hiring local suppliers and small to medium-sized enterprises to boost indirect employment in the regions where it is active. Enagás believes that indicators for direct local hiring and the generation of indirect employment through local supplier engagement adequately reflect the achievement of these goals.

Commitments to affected communities

In 2024, construction activities related to new infrastructures have not been significant, presenting only a potential impact and medium- to long-term risk. When construction activities for renewable gas infrastructures reach more advanced stages, Enagás will set specific goals to ensure full compliance with requirements concerning potential effects on local communities during construction projects, thereby also mitigating identified risks.

Social action

To foster a positive impact beyond its core activities, under the initiative ‘Helping society by promoting social action initiatives and implementing volunteer programmes’, the company has laid out the following annual objectives in the Enagás 2023-2030 Social Action Strategy. These are applicable to the entire Enagás Group for the 2024 financial year⁸⁸. These goals are aligned with the commitments set out in the Code of Ethics to contribute to the socio-economic development of local communities in the places where it operates through initiatives that boost positive impacts and contribute to meeting the needs of society, and to support the participation of Enagás Group professionals in volunteer activities.

In accordance with the procedure for managing sponsorships, patronage, collaborations, and donations, progress towards these objectives is monitored semi-annually and reported to the Executive Committee.

Through the initiatives we support we seek to contribute to economic and social development with a special focus on security of supply and decarbonisation, both from the point of view of knowledge dissemination and research and implementation of initiatives to contribute to the energy transition. We also support projects in the fields of education, culture, protecting children and young people, and improving the quality of life of vulnerable groups.

The company has set the following measurable goals:

- Allocate at least 0.4% of the Enagás Group’s current net profit (1.2 million euros in 2024⁸⁹) to financial social action contributions (sponsorships, donations, collaborations, patronage and volunteer work). In 2024, Enagás met this target with an amount in excess of 1.7 million euros.
- To earmark around 60% of the total amount of financial contributions (740 thousands of euros) to collaborations related to security of supply, decarbonisation and a just energy transition through socio-economic development initiatives. Enagás met this target with 60% of its contributions (743 thousands of euros in 2024) earmarked for the socio-economic development of the region.
- To allocate at least 15% of the financial contributions (185 thousands of euros) for local actions, giving priority to municipalities where Enagás is present with infrastructures or projects, and especially to areas in ‘hollowed-out’ Spain. In 2024, this target was significantly exceeded, with 26% (329 thousands of euros) of the total allocated to this type of action.
- To use 20% of the total amount of financial contributions (247 thousands of euros) for actions in the areas of education, culture, health and disadvantaged groups to contribute to a just transition and social welfare. In 2024, the target was exceeded by 23% (286 thousands of euros)
- To carry out at least 10 corporate volunteering initiatives per year, aligned with the scenarios envisaged in the Social Action Strategy and Agenda 2030. In 2024, Enagás met this target with 33 initiatives during the year.

These objectives included in the 2023-2030 Enagás Social Action Strategy will also be applicable for the coming years until 2030.

⁸⁸Stakeholders have not been explicitly involved in the definition of targets, monitoring of target results or future learning from target results. Furthermore, no methodologies or meaningful assumptions have been used to establish the targets.

⁸⁹ In 2024, given the negative nature of net profit, net profit without the impact of asset rotation was taken as a reference.

GOVERNANCE INFORMATION



G1 Business conduct

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G1. BUSINESS CONDUCT

Governance

GOV-1

The role of administrative, management and supervisory bodies

Board of Directors

The Enagás Board of Directors is tasked with drafting and approving the Internal Code of Conduct and setting the corporate governance policy for both the Company and the Group. The Board is also responsible for defining the Company's general policies and strategies, proposed by Senior Management, and ensuring their implementation. This includes the sustainability policy concerning environmental and social issues, as well as the risk control and management policy, which must identify at least legal risks and those related to corruption. For more information, please refer to the [Rules and Regulations of the Board of Directors](#)⁹⁰ on the corporate website.

In addition, the Board of Directors of Enagás, via the Board's Committees, has been assigned further responsibilities related to business conduct, with particular focus on:

Audit and Compliance Committee

Pursuant to the provisions of the [Regulations of the Audit and Compliance Committee, this Committee](#)⁹⁰ has the following responsibilities:

- Legal compliance:
 - Receiving and analysing information regarding the Company's tax practices.
- Company risk control and management:
 - Overseeing and assessing the effectiveness of the control and management systems for financial and non-financial risks relating to the Company and its Group, including legal, social, environmental, political, tax and reputational risks or corruption related risks, so that any such risks are adequately mitigated within the framework of the Company's internal policy.
- Corporate governance, internal codes and compliance:
 - Overseeing compliance with corporate governance rules and with the Internal Codes of Conduct, ensuring that the corporate culture is aligned with its purpose and values, and, in particular, with the Internal Code of Conduct in matters relating to the Securities Markets in force at any given time

and with the Regulations of the Audit and Compliance Committee.

- Overseeing a mechanism that allows employees and other persons related to the Company to report potentially significant irregularities, concerning the Company and which may come to light within the Company or its Group. These mechanisms must guarantee confidentiality and, invariably, cover situations where cases may be reported anonymously, respecting the rights of the whistleblower and the accused, providing regular information about how the mechanisms function, being able to propose appropriate actions to improve them and reduce the risk of irregularities in the future.
- Compliance function:
 - Ensuring that the compliance unit performs its mission and duties with regard to regulatory compliance and the prevention and correction of behaviour that is illegal or fraudulent or otherwise breaches the Enagás Group Code of Ethics.

Sustainability and Appointments Committee

Pursuant to the provisions of the [Regulations of the Sustainability and Appointments Committee](#)⁹⁰, this Committee has the following responsibilities:

- Company's corporate governance and sustainability:
 - Ensure that sustainability policies addressing environmental and social issues clearly outline principles, commitments, targets, and strategies related to respecting human rights and preventing illegal conduct. Also, ensure the implementation of mechanisms to monitor non-financial risks.

To effectively meet these responsibilities, the Board of Directors includes members with professional experience, expertise, and knowledge in business conduct (for more information, see disclosure requirement GOV-1).

Ethical Compliance Committee

The Board of Directors of the company entrusts the exercise of the Compliance Function to the Ethical Compliance Committee, a chartered, high-level body with autonomous initiative and control powers of an executive and decision-oriented nature. This body has a Chief Compliance Officer (CCO) who holds executive powers.

The Board of Directors ensures that the members of the Ethical Compliance Committee, as well as the Head of the Compliance Function and their team, are always suitable for their roles. The Ethical Compliance Committee holds independent powers for both initiative and control, which all Enagás employees must

⁹⁰ This external link refers to unverified information within the framework of the review of the Non-Financial Information and Sustainability Information Statement.

respect. The Compliance Function operates separately from the business areas of the Enagás Group. In addition, the members of the Ethical Compliance Committee remain distant from the company's day-to-day operations, meaning they are not exposed to the organisation's key business risks. This separation supports both the suitability and independence of its members.

The Ethical Compliance Committee has the following responsibilities:

- Reporting regularly to the Board of Directors through the Audit and Compliance Committee regarding the effectiveness of the Company's Ethics and Compliance Model and the periodic reviews conducted to assess its performance.
- Overseeing the management procedure for handling notifications and enquiries about irregularities or breaches of the Ethics and Compliance Model, as well as the overall Internal Reporting System. This includes protecting the identity of whistleblowers, maintaining the confidentiality of information, ensuring there is no retaliation, and safeguarding individuals' rights to honour, all while complying with data protection laws.
- Deciding how to handle received communications to coordinate their resolution in line with the established procedure, and track these communications diligently until closure, recording data in the Information Register as detailed in the management procedure for notifications and queries about irregularities or breaches of the Ethics and Compliance Model.
- Preparing the report required under article 63, section 4(d) of the Hydrocarbons Sector Act, with its content and submission requirements set out in the Code of Conduct for the Technical Manager of the Spanish Gas System and the management procedure for notifications and queries regarding irregularities or breaches of the Ethics and Compliance Model. For this report's preparation, the Ethical Compliance Committee may consult the Chief Executive Officer of Enagás GTS.
- Supervising the Corruption Prevention Programme as stipulated by the General Corruption Prevention Regulations.
- Fostering a commitment to ethics and compliance among employees of Enagás, its stakeholders, and other external third parties.

The composition, responsibilities, and operations of the Ethical Compliance Committee are outlined in the Ethical Compliance Committee's Operating Procedure. The current members of the Ethical Compliance Committee are:

- General Secretary⁹¹ (Chairperson).
- Legal and Compliance Manager (Secretary).
- Members:
 - People and Transformation General Manager⁹¹.
 - Communication, Public Affairs & Investor Relations General Manager⁹¹.
 - People and Diversity Manager.
 - Audit, Control and Risk Manager.

In carrying out their duties, each member of the Ethical Compliance Committee acts with the diligence and loyalty required by their role.

Members may encounter a conflict of interest if, through the process for handling notifications and queries about irregularities or breaches of the Ethics and Compliance Model, any queries or notifications involve themselves or someone from their unit.

⁹¹ Members of the Executive Committee.

Management of impacts, risks, and opportunities

IRO-1

Description of the processes to identify and assess material impacts, risks, and opportunities

Enagás has conducted a materiality analysis to identify and evaluate significant impacts, risks, and opportunities related to business conduct, as detailed in the IRO-1 disclosure requirement.⁹² This analysis encompasses all activities and infrastructure locations of companies under financial control, including both upstream and downstream stages of the value chain.

The material impacts identified from this analysis are outlined below:

Table of impacts

Topic	Sub-topic	Impact	Nature
Ethics and integrity	Corruption and bribery	Implementation of corporate policies and procedures to prevent and deter corruption and bribery.	Positive - Current
	Protection of whistle-blowers	Effective management and handling of complaints and issues reported through the whistleblowing channel.	Positive - Current
Sustainable value chain	Supply chain management	Enhancing sustainability performance and culture among suppliers by setting sustainability criteria and focusing on development and training in sustainability.	Positive - Current

Table of risks and opportunities

Topic	Sub-topic	Risk / Opportunity	Nature
Good Corporate Governance	Management of relationships with suppliers including payment practices	Risk of reputational damage and sanctions due to poor management of supplier payments.	Risk
	Corruption and bribery	Risk associated with fraud or unauthorised activities by employees or external parties acting with malice, excluding damage to assets.	Risk
Ethics and integrity	Political engagement and lobbying activities	Actively engage in developing new industry initiatives and staying informed about new trends and regulations by participating in industry associations and initiatives.	Opportunity

G1-1

Corporate culture and business conduct policies

Corporate culture

Enagás' corporate culture is defined by several key elements that embody its purpose, vision, and values, alongside the company's policies and strategy. These are regularly reviewed and approved by the Board of Directors.

- Purpose

Our purpose is twofold: to contribute to ensuring the security of energy supply, an essential service for the well-being of society, and driving innovation, accelerating the

decarbonisation process and thus creating value for our stakeholders.

- 2030 Vision:
 - To be the benchmark operator in the decarbonisation of gas infrastructure and to contribute to the security of supply in Spain and Europe.
 - To become the future operator of dedicated hydrogen transmission infrastructure.
 - To promote the deployment of renewable gases throughout the entire value chain.
 - All this, developing innovative solutions in work organisation and technologies that will be key in a context of emission neutrality.

⁹² The sub-topic of 'Animal Welfare' was not included in the materiality analysis, as it is not relevant to the company's business model.

• Values:



Efficiency



Transparency



Innovation



Integrity



Sustainability



Safety



Teamwork

Enagás also fosters its corporate culture through leadership, communication, continuous training, and talent development among its professionals. The Enagás Corporate University is instrumental in this effort, offering access to training resources and aiding in the identification and retention of essential knowledge.

With a results-driven approach and a focus on people, the company cultivates a culture marked by its commitment to ethics and compliance, ensuring all actions and decisions meet the highest ethical standards.

Enagás conducts a formal evaluation of its corporate culture every two years through an opinion survey, covering four areas: people, hierarchy and procedures, results orientation, and innovation and adaptability to change. In the most recent assessment in 2024, Enagás improved by three points in the evaluation of its corporate culture compared to the previous one.

Code of Ethics and policies

The company has a Code of Ethics and related policies that outline commitments addressing the significant impacts, risks, and opportunities identified:

Link between significant impacts, risks, and opportunities and corporate policies

Topic	Sub-topic	Impact, risk or opportunity	Nature	Policy that covers the impact, risk or opportunity
Ethics and integrity	Corruption and bribery	Implementation of corporate policies and procedures to prevent and deter corruption and bribery.	Impact	Code of Ethics Compliance Policy Anti-fraud, Corruption and Bribery Policy Corporate Defence Policy
	Protection of whistle-blowers	Effective management and handling of complaints and issues reported through the whistleblowing channel.	Impact	Code of Ethics Compliance Policy Anti-fraud, Corruption and Bribery Policy Corporate Defence Policy Internal Reporting System Policy
Sustainable value chain	Supply chain management	Enhancing sustainability performance and culture among suppliers by setting sustainability criteria and focusing on development and training in sustainability.	Impact	Code of Ethics Sustainability and Good Governance Policy Principles and guidelines of conduct applicable to Enagás' suppliers and contractors General contracting conditions
Good Corporate Governance	Management of relationships with suppliers including payment practices	Risk of reputational damage and sanctions due to poor management of supplier payments.	Risk	Code of Ethics Sustainability and Good Governance Policy Principles and guidelines of conduct applicable to Enagás' suppliers and contractors General contracting conditions
Ethics and integrity	Corruption and bribery	Risk associated with fraud or unauthorised activities by employees or external parties acting with malice, excluding damage to assets.	Risk	Code of Ethics Compliance Policy Anti-fraud, Corruption and Bribery Policy Corporate Defence Policy
	Political engagement and lobbying activities	Actively engage in developing new industry initiatives and staying informed about new trends and regulations by participating in industry associations and initiatives.	Opportunity	Code of Ethics Sustainability and Good Governance Policy

Enagás has a corporate Code of Ethics and various policies, applicable to the entirety of the Enagás Group, related to business conduct issues and which encourage professionals to behave in line with its corporate culture. All such policies have been approved by the Board of Directors.

- [Enagás Group's Code of Ethics](#): establishes the conduct that is expected from all the professionals in the company, irrespective of their responsibilities and their geographic or functional location. It is structured in accordance with the company's values and includes Enagás' principles in matters related to each of its values.

Following the 2023 update of the Code of Ethics, all Enagás employees were asked to sign a declaration confirming they have read, understand, and are familiar with the contents of the new Enagás Group Code of Ethics. By the end of 2024, 97.55% of professionals had signed this declaration. In 2025, efforts will be made to increase this percentage to ensure all professionals are covered.

The Enagás Group's Code of Ethics is developed through policies, guidelines, standards and procedures. As for the corporate policy management model, the Board of Directors is responsible for approving said policies, while the organisational units involved in the different matters are responsible for ensuring the implementation of the various commitments and their integration into internal procedures.

The Ethical Compliance Committee, responsible for overseeing the Code of Ethics, directly reports to the Audit and Compliance Committee of the Board of Directors.

The Code of Ethics of the Enagás Group sets out commitments that align with corporate values, including:

- Crime prevention: Enagás stands firmly against committing any criminal offences and is dedicated to mitigating and preventing criminal risks, adhering to a policy of 'zero tolerance' for such acts.
- Anti-fraud, corruption, and bribery: consistent with the 'zero tolerance' approach, the Group is committed to understanding and following its rules against fraud, corruption, and bribery. There is a strong stance against illegal or improper activities, with a clear commitment to their prevention and eradication.
- Supply chain management: the Group is committed to choosing suppliers based on quality, cost, and punctuality, while also encouraging sustainable and local procurement practices to foster local development and economic integration.
- Lobbying: when representing interests to public or private entities, commonly referred to as lobbying, Enagás pledges to adhere to current laws and disclose required information in the European Union Transparency Register.
- [Compliance Policy](#): includes commitments related to compliance, including the following:
 - Develop a Compliance Model and regulatory framework with a corporate focus to effectively implement the commitments listed below. The Company has established a Compliance Model that incorporates all rules, formal procedures, and practical actions designed to ensure it operates according to ethical principles, current laws, and internal regulations. This model also aims to prevent, manage, and reduce the risk of regulatory and ethical breaches by directors, workforce, or suppliers within the organisation (for more information on the Compliance Model, see 'Additional information for Enagás').
 - Uphold conduct that complies with the regulations, and ethical standards and internal procedures of Enagás.
 - Foster a culture of compliance at Enagás by guiding directors and senior managers to lead by example and respond swiftly and decisively to any risks or breaches of rules or ethical standards.

- [Anti-Fraud, Corruption and Bribery Policy](#): this Policy reflects the vehement opposition to the committing of illicit or unlawful acts and its firm will to combat and prevent them, for the purpose of fulfilling its 'zero tolerance' principles. This policy is aligned with the United Nations Convention against Corruption.

- [Corporate Defence Policy](#): this Policy includes commitments on crime prevention that reflect the company's resolute opposition to the commission of any criminal offences and its will to combat such acts, in line with the company's principle of 'zero tolerance' towards the commission of crimes as established on the Company's Code of Ethics.

- [Internal Reporting System Policy](#): This policy adheres to the requirements of Law 2/2023, which governs the protection of individuals who report regulatory breaches and efforts against corruption. It was enacted following the implementation of Directive (EU) 2019/1937 of the European Parliament and the Council, concerning the protection of persons who report infringements of EU law. This Policy forms a central part of the Enagás Internal Reporting System. Alongside the Whistleblowing Line Management Procedure, it aims to equip Enagás with the necessary resources and guiding principles to encourage use of the Line and to protect the rights of all parties involved. This includes ensuring confidentiality, prohibiting retaliation, and upholding the presumption of innocence for those implicated in the reports.

- [Sustainability and Corporate Good Governance Policy](#): this policy outlines the commitments required to ensure due diligence in sustainability and corporate governance. These commitments are designed to create value for shareholders, customers, suppliers, and other stakeholders over the short, medium, and long term, while enhancing the company's control environment, reputation, and credibility with external parties. Key commitments include:

- Enhancing Enagás' systems for managing and controlling both financial and non-financial risks by adopting responsible practices in crucial areas such as preventing illegal activities, tax compliance, respecting human rights, protecting the environment, and fostering diversity. The aim is to achieve excellence and improve outcomes for stakeholders.
- Extending the company's sustainability commitments to its supply chain by implementing contracting requirements, evaluation procedures, and other management and control practices that focus on continuous improvement.
- Adhering to principles of responsible business conduct in dealings with commercial partners like customers and suppliers.

In 2024, this policy was revised to update its sustainability commitments, aligning them with those in other corporate policies approved later, and with the latest edition of the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (2023).

The Code of Ethics and all other policies are applicable and communicated to all employees and directors within the Enagás Group, including those of affiliates over which it has effective control, subject to the constraints of the relevant regulations. Therefore, these policies apply to all activities undertaken by Enagás Group companies across all the regions where they operate.

In affiliates where Enagás does not have effective control, the Board of Directors recommends promoting principles and guidelines that are consistent with those outlined in the Code of Ethics and the previously mentioned policies. The company also seeks to encourage, as much as possible, the adoption of the Code of Ethics and related policies by temporary joint ventures, joint ventures, and other comparable associations or entities. The company also emphasises principles and commitments aligned with the Code of Ethics and company policies with contractors, suppliers, and collaborators, particularly regarding the supply chain.

The Code of Ethics and all policies are accessible to stakeholders on the company's [corporate website](#), as well as on the corporate Intranet for all employees.

While the policies outlined above also apply to suppliers and contractors, they are additionally subject to the [Ethical Principles and Guidelines for Suppliers](#), which are available to all stakeholders on the corporate website. This document specifies the principles and conduct guidelines for Enagás suppliers and contractors, aligning with the company's Code of Ethics. These commitments particularly address:

- Anti-fraud, corruption and bribery.
- Supply chain management.
- Human rights.

In 2024, an irregularity was identified in the purchasing process of a start-up within the Enagás Group. This came to light through a communication from a supplier who had unsuccessfully bid for a contract⁹³. Following a thorough analysis, the Ethical Compliance Committee initiated an investigation to gather more information. It was concluded that the start-up's supplier selection process lacked rigour, as the unsuccessful supplier was provided with an inaccurate and incomplete explanation regarding the reason for not being selected, failing to include a detailed and precise technical rationale. In accordance with the above, the Ethical Compliance Committee agreed to adopt the following measures: recommend the implementation of a purchasing process managed by appropriate professionals, specialists in this area of the Enagás Group, following up with the organisation area to promote the implementation of the aforementioned purchasing

process; and inform the governing body of the start-up to take the necessary supervisory measures.

- General terms and conditions for contracting: Enagás has established a set of terms that govern its contracts with suppliers and contractors. These include conditions related to invoicing and payment, quality and environmental standards, sustainability criteria, and measures to prevent corruption, among others. These terms are accessible to all stakeholders on the corporate website, and suppliers and contractors are notified of them when orders are placed.

Whistleblowing Line

Enagás facilitates its employees, as well as its suppliers, contractors and those who collaborate with it or act on its behalf including business partners, to resolve any doubts or to report any irregularities or breaches through the Whistleblowing Line or any other means the company may set up in the future. The complainant receives updated information of the status of their report at all times. Beyond the previously mentioned Internal Reporting System Policy, the company has implemented a Management Procedure for handling notifications and queries about irregularities or breaches of the Ethics and Compliance Model. This procedure aims to organise the handling of notifications and queries submitted to the Whistleblowing Line and, when necessary, conduct investigations.

Communications to the Line can be made anonymously and are handled confidentially. This means they cannot be disclosed to the person reported or any third party without the informant's consent, ensuring the protection of the whistleblower's identity. Enagás will not tolerate any form of retaliation against individuals who, in good faith, use the Whistleblowing Line to raise concerns or report potential breaches of the Code of Ethics or relevant regulations, nor against those who assist in investigations into alleged misconduct.

Whistleblowing Line contact channels



Electronic mailbox: canal.etico@enagas.es

Post addressed to the Chairman of the Ethical Compliance Committee, sent to Paseo de los Olmos 19, 28005 - Madrid, Spain

Form available on the corporate Intranet and on the corporate website

Besides the formal channels mentioned, Enagás employees can always reach out to their immediate supervisor, the person responsible for specific compliance tasks in their area, or directly to the Compliance team (compliance@enagas.es).

⁹³ No other breaches of the Code of Ethics have been identified. Specifically, there have been no incidents related to corruption or bribery (for more information, see disclosure requirement G1-4), discrimination or harassment,

privacy of customer or stakeholder information, conflicts of interest, money laundering, insider trading, or other areas.

Handling notifications and queries

The Ethical Compliance Committee is tasked with managing communications and queries received through the Whistleblowing Line. It may seek assistance from relevant Enagás departments as needed for each situation (for more information, refer to disclosure requirement [GOV-1](#)).

If a communication implicates a member of the Ethical Compliance Committee, that individual will not be involved in the handling process.

The Committee will ensure independence, so that any potential conflicts of interest or personal or professional ties that might compromise the impartiality or credibility of the people handling the communications are effectively negated.

Members of the Ethical Compliance Committee, as part of the company, undergo the same training as all other Enagás employees regarding the Whistleblowing Line (for more details, see the 'Training and communication in ethics and business conduct' section of this disclosure requirement). However, they are briefed first and ahead of time on any legislative changes, as the Committee is responsible for analysing and evaluating the impact of any regulatory updates or modifications in this area. Moreover, any communication or training activity related to the Whistleblowing Line is reviewed and assessed by the Committee members before implementation.

Enagás has an Internal Reporting System Policy, which sets out the principles and commitments in this area in accordance with Law 2/2023, of February 20, regulating the protection of persons who report breaches of regulations and the fight against corruption.

Managing and investigating notifications will follow the guidelines set out in the Procedure for handling notifications and queries concerning irregularities or breaches of the Ethics and Compliance Model. This Procedure details the steps involved in managing the communications received:

- Receipt of report: all reports are received by the Secretary and the Chairman of the Ethical Compliance Committee simultaneously.
- Prior analysis of the report and study of the information provided: the Secretary and Chairman of the Ethical Compliance Committee shall assess whether the report is to be accepted or rejected.
- Deliberation on notification and information to the reporter: the Secretary and Chairman of the Ethics Compliance Committee shall respond to the reporter within the legally established time frame on the decision taken on the report.
- Analysis and assessment of the message: carried out by the Ethical Compliance Committee, together with the Enagás managements or bodies that it considers appropriate in each case. It may be supported by third parties.
- Resolution and notification: The Ethical Compliance Committee will take the relevant decisions regarding the notified case. The Secretary and/or Chairman of the committee will communicate the conclusions to the reporter.

As set out in the procedure, this management will focus on objectivity, independence, and promptness.

Enagás is committed to resolving all reports received. In 2024, as in 2023, the average time for handling notifications submitted to the Whistleblowing Line, from the time the reporter sends the report to the time the reporter is notified of the agreed resolution and the conclusions and actions reached, was less than 50 days.

Any non-compliance with the Code of Ethics and with the regulations that implement it shall be analysed by the Ethical Compliance Committee. When it is found that a person has contravened the Code of Ethics, the Ethical Compliance Committee, together with the People and Transformation General Management, will propose the corresponding disciplinary measures based on the regulations in force and the applicable labour framework.

Analysis of specific risks in professionals

To tailor its actions to the inherent risks associated with various positions, the company has pinpointed roles that are particularly vulnerable to corruption. This identification, analysis, and assessment of corruption risks take into account areas that face more than a low risk, as specified in the Enagás Corruption Prevention Programme (for more details on the Programme, see disclosure requirement G1-3).

Besides the members of the Board of Directors, certain roles within these areas are deemed 'especially exposed to the risk of corruption' due to the nature of their management duties and/or their capacity to represent the company.

These positions are as follows:

- General Managers of the identified areas
- Managers of the identified areas
- Professionals in these areas not listed above who have the authority to represent the company.

For these roles, the company implements necessary measures to provide adequate protection against potential acts of corruption. These measures focus on enhancing knowledge and training related to commitments in preventing fraud, corruption, and bribery.

Training and communication in ethics and business conduct

Training is a key pillar of the Compliance Function at Enagás. Each year, the company organises training and awareness activities for all employees, as well as tailored programmes for specific groups where particular compliance-related risks have been identified.

Training begins when employees join Enagás, as the Welcome Plan includes online modules on the Code of Ethics, the Corporate Defence Programme, and the Corruption Prevention Programme, all of which are mandatory for all professionals.

- Code of Ethics: Training on the Code of Ethics aligns with the company's core values:
 - Integrity: focuses on crime prevention; fighting fraud, corruption, and bribery; managing conflicts of interest; separating activities; ensuring free competition; complying with international sanctions regulations; maintaining political neutrality; protecting the company's reputation; and managing the supply chain.
 - Transparency: addresses the reliability of information, communication with shareholders and investors, money laundering prevention, and tax responsibilities.
 - Safety: covers the protection of human rights, health and safety, and respect for individuals.
 - Sustainability: includes topics such as the energy transition, environmental protection, and commitment to the environment.
 - Efficiency: explores the use of company assets, artificial intelligence and other disruptive technologies, and information confidentiality.
 - Teamwork: focuses on collaboration, equal opportunities, work-life balance, and diversity and inclusion.
 - Innovation: emphasises entrepreneurship development.

The training was updated in 2024 with an online module on the Code of Ethics, following its 2023 revision. A total of 99.2% of professionals have completed corporate training on the Code of Ethics, up from 98.2% in 2023. This training seeks to prevent irregularities, including those that are more serious and that could lead to the commission of crimes.

- Corporate Defence Programme: this training has been completed by 98.6% of employees (96.5 % in 2023). The course provides an overview of the framework for corporate criminal liability under Spanish law and Enagás' Corporate Defence Programme. It includes practical scenarios to illustrate the most relevant potential offences related to the company's operations and situations that company professionals might encounter in their work.
- Corruption Prevention Programme (for more information, see disclosure requirement [G1-3](#)).
- Antitrust Programme: starting in 2023 and 2024, Enagás has launched an annual training campaign focused on this model. It targets all professionals involved in market practices subject to competition laws, aiming to prevent actions that violate antitrust regulations. In 2024, the total number of trained professionals amounts to 17 professionals (31 in 2023).

Enagás also regularly carries out awareness campaigns on matters related to ethics and compliance, such as the company's own values and principles of action, management of the acceptance and offering of gifts (in accordance with the provisions of the Procedure for Managing the Offering and Acceptance of Gifts) and Whistleblowing Line contact information and channels of communication. Awareness and information are shared using a variety of internal communication tools and channels, selecting the most effective ones for each situation.

In 2024, a direct message was sent to all professionals about the Whistleblowing Line, detailing how it works and its key features. The communication highlighted the Whistleblowing Line as a platform to support adherence to Enagás' ethical values. All communications and awareness initiatives related to ethics and compliance also remind the workforce of the Whistleblowing Line's availability and functionality.

Additionally, compliance roadshows are organised, where members of the Compliance Function visit various facilities to present and reinforce the Group's Compliance Model, stressing the importance of a strong culture of business ethics and encouraging responsible behaviour across the organisation. The goal is to cultivate a culture of open communication, reinforcing the commitment to the Group's ethical standards and ensuring the organisation remains ethical, transparent, and trustworthy.

G1-2

Management of supplier relations

Our supply chain

In order to manage the supply chain with a risk-based approach, critical suppliers are considered to be those belonging to families of products or services whose failure or malfunction would have a high economic impact, or those that are of high criticality for the business (critical components or services) that have a low number of suppliers (difficulty of substitution). Enagás has 310 approved critical suppliers (265 in 2023), comprising 16.9% of all approved suppliers (15.5% in 2023) and 27.7% of purchases made (26.5% in 2023). We have also identified more than 70 critical indirect suppliers (77 in 2023).

In 2024, work began with 92 new approved suppliers (84 in 2023), of which 100% have undergone an approval process and meet the established social and environmental criteria. Enagás has also discontinued relationships with 104 suppliers (49 in 2023) due to their failure to meet the company's approval criteria, their status as high-risk companies, or having had no commercial dealings with them in recent years. These decisions were not based on social or environmental criteria⁹⁴.

⁹⁴ Of the suppliers identified as having significant negative environmental and/or social impacts, no relationships with the same have been terminated as a result of social or environmental criteria.

Payment policy

As established by the legislation in force in Spain, the payment policy established in Enagás is to pay, in general, sixty days from the date of delivery or provision of the service. No particular payment policy for small and medium enterprises has been defined. For more information on the company's supplier payment policy, see disclosure requirement [G1-6](#).

Supply chain risk management

Enagás has identified the areas of supply chain management in which there may be risks to the business and to the Company's stakeholders (risks identified in its ESG risk assessment, classified according to Enagás' taxonomy as reputational, strategic and business, criminal liability, compliance and model, and operational and technological. These areas, which cover both economic, ethical, environmental and social aspects, form the basis for the assessments we perform on our suppliers in the different procurement processes. The areas analysed are:

- Product and/or service quality.
- Financial situation, civil liability, economic dependence on Enagás.
- Health and safety.
- Ethics and compliance: criminal risks, ethical compliance, legal compliance, responsible tax practice.
- Human rights: labour rights (diversity, work-life balance, gender equality), respect for the principles of the United Nations Global Compact and the Universal Declaration of Human Rights, human rights compliance in the supply chain (for more information, see disclosure requirement S2).
- Environment: emission intensity, environmental impact (resource consumption, waste generation, noise emissions, gas emissions, etc.), environmental safety (discharges, spills, pollution, etc.).
- Cybersecurity: information security and cybersecurity.

To ensure that sustainability targets are met in supply chain management, procurement management professionals receive regular training in this area.

The Board of Directors, through the Sustainability and Appointments Committee, is the body with the highest level of responsibility for sustainable supply chain management.

Approval process

Enagás has a supplier management model that takes into account the inherent risks for each supplier according to their nature. Enagás therefore establishes approval requirements depending on the level of risk in the economic, ethical, compliance, social and environmental aspects of the family of products and services to which each supplier belongs.

The requirements established in the supplier approval process are:

• For all suppliers:

- Capacity and resources to meet the quality, ethics and compliance, financial, labour, environmental, safety and technical requirements established by Enagás; as well as the long-term maintenance of these requirements within the satisfactory levels defined by Enagás.
- Acceptance of the Enagás Code of Ethics.

The company's Code of Ethics establishes Enagás' ethical culture and is applicable in its corresponding areas of relation with the company, for contractors, suppliers and for those who collaborate with Enagás or act on its behalf. This Code incorporates guidelines for behaviour in the areas of integrity, transparency, safety, respect for people and diversity, and the environment, among others.

All Enagás suppliers and contractors are bound by the Code and expressly confirm their commitment to be familiar with it, comply with it and enforce it through acceptance of the general contracting conditions. For more information, see the [Ethical Principles and Guidelines for Suppliers](#) on the corporate website.

- Respect the principles of the United Nations Global Compact and the Universal Declaration of Human Rights.
- Compliance with the quotas set out in the Spanish Rights of Persons with Disabilities Act⁹⁵.
- Implementation of a Gender Equality Plan⁴⁷.

• For suppliers of specific families of products or services:

- Quality, environmental and/or occupational risk prevention certification requirements for suppliers (required from 80.8%, 15.6% and 35.6% of Enagás suppliers, respectively).
- Policies or measures to promote work-life balance of professionals or Family-Friendly Company certificate.

Supplier assessment

- For approved suppliers: a systematic public information analysis of potential sustainability risks based on the inherent risk level of the country, the sector and other similar companies. This is done by taking into account public financial information and consulting on human rights, ESG, ethics and compliance matters via reputational analysis platforms.
- During the approval process: Enagás evaluates its suppliers in the areas of human rights, ethics, social and environmental matters in line with the company's material topics through a questionnaire and documentary review. In 2024, Enagás updated this questionnaire in order to produce an ESG score that is taken into account during the approval process and in subsequent supplier assessments. The company will also evaluate, through pilot tests, its use in procurement, so that ESG performance will be one of the decision variables when selecting suppliers.

⁹⁵ Requisite set for companies with a workforce greater than that indicated by the applicable laws.

- During the execution of the contract: Enagás evaluates its suppliers in the aforementioned areas through
 - different evaluation methodologies, taking into account criteria such as criticality, sustainability risks (environmental, social and governance) and turnover, among others.
 - After the end of the contract: once the main and critical contracts are finalised, a quality assessment of the supplier and the associated contract is carried out.

Supplier assessments

Methodology and areas of evaluation			Number of suppliers assessed		Definition of high risk	Number of suppliers identified as high risk	
			2023	2024		2023	2024
To identify suppliers	External assessment (by an independent third party)	Predictive sustainability risk assessment	1,321	1,333	Suppliers with a score less than 50/100	62	188
		During the approval process	External assessment (by an independent third party)	Evaluation in the areas of human rights, ethics, social, cybersecurity and environmental matters ⁽²⁾ (systematic assessment with documentation review)	N.D. ⁽⁴⁾	988	Suppliers with a score less than 30/100
During the execution of the contract	Internal assessment	Evaluation on climate action ^{(1) (2)} (systematic assessment with review of documentation)	191	155	Suppliers that do not measure or report their emissions	69	53
		Documentary and on-site safety audits carried out by company professionals or external consultants on suppliers carrying out work at company facilities ⁽¹⁾	102	111	Suppliers with unfavourable audits	19	33
	External assessment (by an independent third party)	Consultation on human rights, ethics and compliance on reputational analysis platforms ⁽³⁾	2,152	2,316	Suppliers involved in legal non-compliance	61	42
		On-site audits on ethical, environmental and social aspects ^{(1) (2)}	107	135	Suppliers with non-conformities	77	76
		Cybersecurity scoring	995	989	Suppliers with high or very high risk of non-compliance and/or financial losses	374	364
		Financial, reputational, ethical, environmental and social assessment ⁽²⁾	995	991	Suppliers scoring C or lower	296	251
After the end of the contract	Internal assessment	Reliability assessment ⁽¹⁾ (systematic assessment with documentation review)	119	174	Suppliers with a score less than 50/100	5	3

(1) The results of the assessments are considered to have a validity of two years.
 (2) For 100% of the assessed suppliers identified as high ESG risk, action plans have been established to mitigate these risks. Guidance for the implementation of these areas is included in these plans.
 (3) This assessment also includes non-approved suppliers that are in the process of being approved and suppliers that have been stripped of approval.
 (4) In 2024, Enagás updated this questionnaire during its homologation process, modifying the questions and including new ones. It now produces an ESG score that is taken into account during the approval process and in subsequent supplier assessments. For this reason, the previously reported data for 2023 are not comparable with those for this year.
 N.D. Not available

The results of these assessments allow monitoring of the degree by which suppliers meet the target scores, audit results and legal compliance established for each assessment area, and to identify suppliers that pose a high risk to sustainability or with significant social or environmental impacts (risks related mainly to the management of its value chain, climate action, health and safety, and waste management).

For 100% of the assessed suppliers identified as having a high sustainability risk, action plans have been established to mitigate these risks, and support and follow-up is provided. Guidance for the implementation of these areas is included in these plans. In case of non-compliance with certain ESG criteria, a period of 12 months is provided to implement corrective actions, after which they lose their approved status until such time as they pass the approval procedure again.

Supplier training

In order to reinforce the culture of sustainability as a key lever for driving its actions and those of its suppliers, Enagás is committed to the development and training of third parties in sustainability. For this reason, the company has joined the Global Compact's 'Sustainable Supplier' training programme as one of the driving forces.

Through this initiative, some of Enagás' small and medium-sized suppliers - and those of other large companies - have received training in sustainability matters based on the Ten Principles of the UN Global Compact and the SDG. In the campaign launched in 2023 and continued in 2024, 77 small and medium-sized Enagás suppliers have been trained.

G1-3

Prevention and detection of corruption and bribery

Enagás has an [Anti-Fraud, Corruption and Bribery Policy](#) in place which reflects the company's vehement opposition to the committing of illicit or unlawful acts and its firm will to combat and prevent them, for the purpose of fulfilling its zero tolerance principles. It is the Board of Directors that approves the Anti-Fraud, Corruption and Bribery Policy, and therefore 100% of the Board members are informed about the commitments set out in the Policy and the rules and procedures that implement it.

This policy, as well as all other Company's policies, applies to professionals, senior managers and directors of all companies that make up the Enagás Group, including those affiliates over which it holds effective control, within the limits set out under applicable regulations. For those affiliates in which the Enagás Group does not hold effective control, the company shall encourage principles and guidelines that are consistent with those set out in the policy. All Enagás personnel, partners, and other third parties engaged in business with the company are expected to understand and adhere to this Policy and the relevant anti-corruption laws.

The policy is accessible to stakeholders on the company's [corporate website](#) as well as on the corporate Intranet for all employees.

All Enagás Group activities have been analysed for potential corruption risks and the company has put in place a framework of controls in order to prevent and mitigate them. In particular, the risk of corruption in relations with public officials or other third parties with which Enagás has dealings. In this context, Enagás has established clear guidelines for action: to accurately record all payments to third parties and not to accept or make inappropriate payments, such as facilitation payments, payments in kind or commissions, or advantages or privileges of any kind for unethical purposes. These measures also contribute to the prevention of potentially more serious acts, such as money laundering. Of course, in order to avoid any appearance of money laundering, both the offer and the acceptance of payments in cash or equivalent are expressly prohibited. Enagás pays special attention to suspicious payments from third parties, such as payments by bearer cheques, payments in currencies other than agreed currencies, payments from persons or entities domiciled in tax havens, payments from entities where it is not possible to identify the parties or the final beneficiaries, among others.

Enagás also collaborates with the authorities if they require help to investigate possible cases in the markets in which Enagás operates. It also provides the information they may request in a transparent manner.

The Enagás Corruption Prevention Programme is based on the ISO 37001 standard on anti-bribery management systems, and is laid out in the Enagás Anti-Fraud, Corruption and Bribery Policy, and the internal regulations which implement it.

In 2024, the Company has externally certified its Corruption Prevention Programme based on ISO 37001, the anti-bribery management system standard.

An anti-corruption risk reassessment was also carried out in 2024, reviewing the corruption risk events that may affect the different areas of the company, as well as the controls in place to prevent the materialisation of such risks.

Furthermore, the established anti-corruption principles have been extended to our suppliers by expressly communicating the Anti-Fraud, Anti-Corruption and Anti-Bribery Policy to them.

Enagás provides the Whistleblowing Line to all its employees and third parties it engages with, helping to report any reasonable indications of irregularities, legal violations, or behaviours that conflict with the commitments in the Code of Ethics or the Anti-Fraud, Corruption, and Bribery Policy (for more details on the Whistleblowing Line or the process for managing notifications and queries, see disclosure requirement G1-1).

The Compliance Function submits a quarterly report to the Audit and Compliance Committee on the status, follow-up, and outcomes of notifications received via the Whistleblowing Line, as well as any ongoing investigations.

Training

In recent years, Enagás has introduced an online course focused on the Corruption Prevention Programme.

This one-hour course is part of the mandatory training programme for all new employees. It covers topics such as the Compliance Model, a detailed understanding of corruption and the potential ‘red flags’ to watch for to prevent it, relevant regulations (such as the Spanish Criminal Code, FCPA, UK Bribery Act, and ISO 37001), Enagás’ internal policies, and the professional conduct expected while performing their duties. The course also includes practical examples based on real cases.

In 2024, 97.9% of employees completed this training (93.6% in 2023). Specifically, it was undertaken by 100% of the Executive Committee, 100% of the Ethical Compliance Committee, and 100% of the professionals in roles identified as especially at risk of corruption.

In addition, in 2024, specific training sessions on market abuse, management of insider and confidential information, and corruption prevention were conducted for senior secretarial workforce. These sessions aimed to prevent actions that violate capital market regulations and combat corruption, fraud, and bribery. The training was delivered in person.

In December 2023, specific training on corruption prevention was provided to members of the Audit and Compliance Committee of the Board of Directors, covering 60% of the Board.

Enagás regularly conducts training in this area for the Board to ensure all members are equipped with the necessary knowledge.

The Code of Ethics training received by employees (for more information, see disclosure requirement [G1-1](#)) also includes a section on preventing corruption and bribery, outlining key guidelines for professionals to follow in this area.

Metrics and targets

G1-4

Confirmed incidents of corruption or bribery

In the last three years, Enagás has had no confirmed incidents of corruption or bribery, nor has it had any conviction or fine for violating the laws that apply to it in terms of corruption prevention and anti-bribery.

G1-5

Political influence and lobbying activities

The company is registered in the [European Transparency Register](#) (Name of the organisation: Enagás S.A.; REG Number: 905001612275-82), to which it periodically reports information on its activities and resources in order to contribute to the improvement and progress of European Union legislative and regulatory frameworks, especially in those developments that have a direct or indirect impact on the gas transmission and storage business, liquefied natural gas, renewable gases and the Spanish and European gas industry in general. Enagás has adhered to the Code of Conduct of the European Transparency Register, compliance with which is mandatory in order to be included in the register. It is the responsibility of the Board of Directors to oversee these activities, and at the operational level the responsibility of the Energy Transition General Manager who sits on the company's Executive Committee.

Enagás has five professionals participating part-time in different activities related to the transparency register, including a permanent representative in Brussels. Annual costs in 2024 were between 200 and 300 thousands of euros (in line with 2023), (information included in note 2.1 'Operating profit' to the Consolidated Annual Accounts) distributed as follows: personnel expenses (74%), membership fees (10%), consultancy costs (9%), representation, public relations and travel costs (4%), office and administrative costs (2%) and operating costs (<1%).

Similarly, Enagás is a member of and participates in commercial associations, business associations and groups such as chambers of commerce and think tanks. In 2024, the amount allocated was over 220 thousands of euros, up from 200 thousands of euros in 2023. This information is included in note '2.1 Operating profit' of the Consolidated Annual Accounts.

In relation to lobbying at a European level, the main associations in which Enagás participates and which carry out this activity are:

- GIE (Gas Infrastructure Europe): Gas Infrastructure Europe is a European association of gas infrastructure operators. It advocates for supportive European policy regulations to facilitate the use and deployment of gas infrastructure in Europe, including the transport and management of natural gas, hydrogen, biomethane, and CO₂. GIE also promotes the development of renewable and low-carbon gases. In 2024, the total contribution amounted to 102,310 euros, with approximately 5,500 euros allocated for lobbying activities.

In 2024, GIE integrated the European Hydrogen Backbone (EHB) initiative. EHB is a consortium of 33 European TSOs working towards establishing a continent-wide hydrogen network.

- Hydrogen Europe: Association representing companies and organisations with an interest in different parts of the hydrogen value chain, dedicated to promoting policies and initiatives at European level for the better development of the hydrogen sector (total contribution of 18,000 euros, of which approximately 4,500 euros are earmarked for lobbying).
- ENTSO: European TSO Network that aims to facilitate and enhance cooperation between national gas transmission system operators across Europe, fulfilling the tasks entrusted to them by European regulation, and ensuring the development of a pan-European Gas System aligned with European energy and climate targets. Enagás is obliged to participate in this association in accordance with European Regulation 2024/1789 (637,000 euros total contribution, with approximately 9,800 euros allocated for lobbying activities).

Enagás also contributes actively to other European associations such as EASEE-gas, AIB, GERG, CEOE, the Spanish Chamber of Commerce, AIB and Sedigas, among others. The missions and positions of these associations are consistent with the company's vision and interests. Enagás regularly engages in the activities, working groups, and governing bodies of these associations to maintain this alignment.

The European associations in which Enagás participates work to ensure that the major gas transmission, storage, liquefaction and regasification infrastructures play their part in achieving the European Union's energy and climate objectives. From different perspectives and areas, these associations promote an appropriate regulatory and legislative framework that enables the Europe-wide deployment of renewable and low-emission gases, including hydrogen and biomethane, to achieve cost-efficient decarbonisation and an integrated energy system. Some of these partnerships are also focusing their efforts on the development of CO₂ networks and storage facilities, which will boost the business of CO₂ capture, storage and reuse across the EU.

Regarding financial or in-kind political contributions, the Enagás Group expressly prohibits the funding of political parties, as stated in the Enagás Group's Code of Ethics, in line with current regulations. In the last three years, Enagás did not make political contributions of any kind.

In 2024, four directors were re-elected for another four-year term. Three are independent, while one represents the Sociedad Estatal de Participaciones Industriales, with Mr Bartolomé Lora Toro, the Vice-Chairman of this entity, as its representative on the Enagás Board of Directors. He is the only director currently classified as a 'politically exposed person', under Directive (EU) 2015/849 and Law 10/2010, which aim to prevent money laundering and the financing of terrorism.

G1-6

Payment practices

In line with Spanish legislation and Enagás' general contract terms (for more details, see disclosure requirement [G1-1](#)), the company's policy is to make payments within sixty days from the delivery date or service provision. Enagás employs reverse factoring, allowing suppliers to receive payment in advance of the invoice due date. A [Supplier Portal](#) is available for suppliers to track invoice status and address any issues that might delay processing and payment. For certain services, the company also makes advance and cash payments. In 2024, 92% of supplier payments were made within the specified timeframes (92% in 2023).

The average payment period to trade creditors for amounts owed to suppliers of goods or services was 20 days⁹⁶ (17 days in 2023). This includes items under 'Suppliers', 'Suppliers to group and associated companies', and 'Sundry creditors', calculated according to the average payment period methodology set by the Spanish Accounting and Audit Institute's Resolution of January 29, 2016. For further details on the average payment period, refer to [Note 2.3](#) Trade and other payables in the Enagás Group's Consolidated Annual Accounts.

Enagás has no pending legal actions concerning late payments.

⁹⁶ This average period considers all payments made during the year.

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Regulatory compliance

Governance

The Company's Board of Directors entrusts the exercise of the Compliance Function to the Ethical Compliance Committee (for more information, see disclosure requirement [GOV-1](#) in chapter G1). This body has a Chief Compliance Officer (CCO) who holds executive powers.

The governance processes, controls, and procedures established to oversee and manage information privacy issues are aligned with the '[Governance](#)' disclosure requirements outlined in chapter 2.

Strategy

The management of the identified risks related to regulatory compliance are key to serve as the basis for a solid and resilient strategy and business model, for more information see the '[Strategy](#)' section of chapter 2.

Management of impacts, risks, and opportunities

Enagás has conducted an analysis to identify impacts, risks, and opportunities and to assess which of these are material concerning sustainability matters, as outlined in disclosure requirement [IRO-1](#) in chapter 2. This analysis encompasses all activities and infrastructure locations of companies under financial control, including both upstream and downstream stages of the value chain.

The materiality risks identified as a result of the analysis of sub-topic 'Regulatory compliance' are detailed below:

Table of Risks

Topic	Sub-topic	Impact / Risk / Opportunity	Nature
Good Corporate Governance	Regulatory compliance	Non-compliance with current legislation and internal regulations (gas, environmental, antitrust, labour and safety regulations, accounting and tax rules, Protection of Personal Data Act ('LOPD'), confidentiality, diversity and equality, etc.)	Risk
		Criminal liability for offences committed by employees or managers against workers' rights, public health, natural resources and the environment.	Risk

Related policies

The company establishes commitments that cover the risks identified as material through its [Code of Ethics](#) (for more information, see disclosure requirement [G1-1](#)), following policies approved by the Board of Directors.

- [Compliance Policy](#): includes commitments related to compliance, including the following:

- Develop a Compliance Model and regulatory framework with a corporate focus to effectively implement the commitments listed below. The Company has established a Compliance Model that incorporates all rules, formal procedures, and practical actions designed to ensure it operates according to ethical principles, current laws, and internal regulations. This model also aims to prevent, manage, and reduce the risk of regulatory and ethical breaches by directors, workforce, or suppliers within the organisation.
- Uphold conduct that complies with the regulations, and ethical standards and internal procedures of Enagás.
- [Corporate Defence Policy](#): this Policy includes commitments on crime prevention that reflect the company's resolute opposition to the commission of any criminal offences and its will to combat such acts, in line with the company's principle of 'zero tolerance' towards the commission of crimes as established on the Company's Code of Ethics.
- [Antitrust Policy](#): it establishes the bases and mechanisms to promote a culture of business ethics that is conscious and respectful of the principles of free competition, and sets out the essential guidelines for corporate and employee behaviour in this regard.

The Code of Ethics and all these policies are applicable and have been communicated to all employees and directors within the Enagás Group, including those of subsidiaries over which it has effective control, subject to the constraints of the relevant regulations. Therefore, these policies apply to all activities undertaken by Enagás Group companies across all the regions where they operate.

In affiliates where Enagás does not have effective control, the Board of Directors recommends promoting principles and guidelines that are consistent with those outlined in the Code of Ethics and the previously mentioned policies. The company also seeks to encourage the adoption of the Code of Ethics and related policies by temporary joint ventures, joint ventures, and other comparable associations or entities. The company also emphasises principles and commitments aligned with the Code of Ethics and company policies with contractors, suppliers, and collaborators, particularly regarding the supply chain.

The Code of Ethics and policies are accessible to stakeholders on the company's [corporate website](#), as well as on the corporate Intranet for all employees.

These procedures assign the Board of Directors, through the Audit and Compliance Committee, the responsibility for guiding, supervising and controlling strategy, policies, risks and public information regarding related matters covered by said procedures (mainly compliance, crime prevention and antitrust). They also set out the responsibilities of the Compliance Function in relation to the effective operation of the Compliance Model and reporting to the Audit and Compliance Committee of the Board of Directors

Related actions and resources

Enagás has a Compliance Model that is overseen by a specific functional area, which is supported by synergistic functions and other corporate support areas.

The Compliance Function is in charge of managing the Compliance Model in accordance with the provisions of the Policy and the General Compliance Standard, also identifying those responsible for other synergistic areas or areas that may regulate matters subject to monitoring on its part, in order to coordinate with these managers the prevention, detection and management of any non-compliance risks associated with their activities.

The General Compliance Standard establishes a sanctions procedure to implement the most important aspects of external due diligence at Enagás with regard to the rules on embargoes and sanctions imposed by international bodies that may be imposed on third parties with which Enagás has a relationship.

Within this Compliance Model are:

- Corporate Defence Programme, which acts as the core of the company's criminal compliance, notwithstanding the existence of policies, procedures and controls that illustrate its content and contribute to preventing crimes being committed by any person who is part of Enagás as well as, in their respective areas of relation, by contractors, suppliers, business partners and any third party that collaborates with or acts on their behalf.

The Corporate Defence Programme in Spain also includes the following components: criminal risks; roles and responsibilities aligned with a governance structure as per art. 31 bis 2 1 and 2 of the Criminal Code; and a mapping of criminal risks and activities susceptible to these risks.

- Antitrust Programme, the purpose of which is not only to avoid or reduce any possible administrative sanctions in this issue, but also to promote a corporate culture of ethics and compliance that respects the regulations that defend free competition.

In 2024, a communication campaign was launched in order to strengthen the culture of integrity, ethics, and compliance within Enagás. As part of this campaign, the following stand out:

- The inaugural Enagás Compliance Day aimed at further promoting the corporate ethical culture among its professionals.
- Compliance Roadshows at different company's facilities to present and reinforce the Enagás Group Compliance Model, stressing the importance of a strong culture of business ethics and encouraging responsible behaviour across the organisation. Visits to locations such as the Paterna compressor station, the Valladolid and Cordoba transmission centres, the Huelva LNG regasification terminal, and the Gaviota underground storage facility.
- Appointment of professionals from various General Management Departments as Compliance ambassadors. These ambassadors, working alongside the Ethical Compliance

Committee, have played a crucial role in advancing compliance initiatives across the company with their enthusiasm and dedication.

Regarding the resources available to the Compliance Function, there is an annual Compliance Plan approved by the Audit and Compliance Committee. This plan includes the assignment of an appropriately sized budget, endorsed by the committee.

Looking to the future, a key initiative is updating the internal regulations of the Whistleblowing Line to accommodate the forthcoming appointment of an Independent Authority. The goal is to ensure Enagás' Compliance Model remains current, thereby strengthening controls and preventative measures against actions that violate the company's regulations and ethical standards.

Metrics and targets

Related parameters

Enagás continuously tracks the number of breaches of the Code of Ethics, which serves as a key performance indicator for the Compliance Model. The Ethical Compliance Committee is responsible for overseeing this indicator.

Data for calculating this measure is sourced from communications received via the Whistleblowing Line and from any breaches or sanctions under applicable legislation that align with the commitments outlined in the Code of Ethics.

In 2024, a breach was identified concerning an irregularity in the procurement process of a start-up within the Enagás Group (for more information, see disclosure requirement [G1-1](#))⁹⁷.

Related goals

This year, Enagás has embedded a zero-tolerance policy towards crime, fraud, corruption, and bribery in its Code of Ethics. In line with this commitment, no violations in these areas were found within the Enagás Group during 2024.

Information security

Governance

It is the Board of Directors, through the Audit and Compliance Committee, which has been assigned the responsibility and leadership in the approval of risk management measures and continuous monitoring of the level of cybersecurity. Therefore periodically reports to this Committee on the established cyber risk indicators and other relevant matters. Enagás also has a Cybersecurity and IA Committee chaired by a member of the Executive Committee, which reports quarterly to the Audit and Compliance Committee and the Executive Committee on the actions taken to mitigate risk.

The governance processes, controls, and procedures established to oversee and manage information privacy issues are aligned with the 'Governance' disclosure requirements outlined in chapter 2.

Strategy

The management of the negative impact and identified risks related to information security are key to serve as the basis for a solid and resilient strategy and business model. For more information see the 'Strategy' section within chapter 2.

Management of impacts, risks and opportunities

Enagás has conducted an analysis to identify impacts, risks, and opportunities and to assess which are material concerning sustainability matters, as outlined in disclosure requirement [IRO-1](#) of chapter 2. This analysis encompasses all activities and infrastructure locations of companies under financial control, including both upstream and downstream stages of the value chain.

The impact and risk identified as material in the analysis of the sub-topic 'Cybersecurity and data privacy' are detailed below:

Table of impacts and risks

Topic	Sub-topic	Impact / Risk / Opportunity	Nature
Operational excellence	Cybersecurity and data privacy	Impacts on stakeholders due to incidents in infrastructure, equipment, and systems caused by operational failures related to cyber-attacks.	Negative Impact - Potential and linked to specific cases
		Fines and reputational damage may result from cybersecurity breaches or leaks of sensitive stakeholder data due to inadequate management.	Risk

Related policies

The company establishes commitments to cover the potential negative impact and risk identified as material through the following policies approved by the Board of Directors:

Cybersecurity

- Enagás has a [Cybersecurity and Data Governance Policy](#) approved by the Board of Directors and targeted at efficiently managing the security of information processed by the company's IT systems, as well as the assets involved in these processes. This policy is implemented at the company through internal procedures and controls.

Key commitments in this policy include:

- All employees must contribute to the effective implementation of cybersecurity. This involves participating in necessary training and awareness programmes, being proactive in preventing cyber-attacks, identifying and reporting any incidents they become aware of, and responding promptly to any cybersecurity breaches.
- Cybersecurity management will rely on the continuous assessment and management of risks, with control measures being defined and adjusted to ensure the risk level remains acceptable or manageable for the company.

In 2024, this policy was updated to include measures stemming from the inclusion of Artificial Intelligence and data governance in the company's digitalisation processes.

This policy assigns the responsibility and leadership for approving risk management measures and continuously monitoring cybersecurity levels to the Board of Directors, through the Audit and Compliance Committee. This committee is also tasked with ensuring that the necessary resources are available to implement and maintain appropriate security measures, which are regularly reviewed and updated to address evolving threats.

- As enhanced protection for the critical infrastructures operated by Enagás, a [Policy on Comprehensive Security at Strategic Infrastructures](#) has been defined in which the processes of physical and logical security have been combined for compliance with Law 8/2011 governing the Protection of Critical Infrastructure (LPIC) and Royal Decree-Law 12/2018 on the security of network and information systems (NIS). Enagás is working towards the full adoption of the requirements of EU Directive 2022/2555 on measures for a high common level of cybersecurity across the Union, as well as the Good Cybersecurity Governance Code published by the National Securities Market Commission (CNMV).

Key commitments in this policy include:

- Protection of vital services related to gas transmission and technical management, as well as of the Strategic and Critical Infrastructures that support these services and the persons affected by these, protecting their integrity and the availability of the gas supply.

- Strategic management of security pursuant to the corporate Risks Policy, with the capability of integrating the different areas involved and founded on proper management of the security risks related to the Strategic and Critical Infrastructures.

This policy assigns the Board of Directors the responsibility for guiding, overseeing, and monitoring strategy, policies, risks, objectives, and performance concerning the different sustainability areas. Likewise, the Health and Safety, Environment and Quality Integrated Management System Committee is responsible for setting the basic guidelines for the development, control, monitoring and coordination of various actions related to critical infrastructures, as well as for reporting to the Executive Committee

These policies apply and have been communicated to all employees and managers of all companies making up the Enagás Group, including any affiliates effectively controlled by it, within the limitations established in the regulations applicable. Therefore, these policies apply to all activities undertaken by Enagás Group companies across all the regions where they operate.

In affiliates where Enagás does not have effective control, it is recommended that their Boards promote principles aligned with these policies. The company also promotes the application of these policies' principles, wherever possible, to temporary joint ventures, joint ventures, and other similar partnerships or entities. The company also emphasises these principles and commitments with contractors, suppliers, and collaborators, particularly regarding the supply chain.

These policies are accessible to stakeholders on the company's [corporate website](#), as well as on the corporate Intranet for all employees.

Privacy of Information

- Enagás has an [Internal Reporting System Policy](#), approved by the Board of Directors, which ensures that customer data is used solely for its intended purposes and only with the prior consent of the individuals concerned. This policy complies with the General Data Protection Regulation (GDPR). The Policy forms the core of the Enagás Internal Reporting System (hereinafter, the 'IRS').

Key commitments in this policy include:

- The processing of personal data arising from the application of Law 2/2023 shall be governed by the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 (GDPR), Spanish Organic Law 3/2018 of December 5 on the Protection of Personal Data and guarantee of digital rights (LOPD GDD), Spanish Organic Law 7/2021 of May 26 relating to processing of personal data for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal offences, and Title VI of Law 2/2023.

- Personal data shall not be collected where it is clearly not relevant for the processing of specific information or, if collected by accident, shall be deleted without undue delay.
- The IRS will not collect data allowing the identification of the reporting person, and there are adequate technical and organisational measures in place to ensure the confidentiality of the identity and data relating to the persons concerned and to any third party mentioned in the information provided, particularly the identity of the reporting person in the event that they disclosed their identity.

This policy applies and is communicated to all employees and managers of all companies making up the Enagás Group, including any affiliates effectively controlled by it, within the limitations established in the regulations applicable. Consequently, it covers all activities of Enagás Group companies globally.

In affiliates where Enagás does not have effective control, it is recommended that their Boards promote principles aligned with this policy. The company also promotes the application of the policy's principles, wherever possible, to temporary joint ventures, joint ventures, and other similar partnerships or entities. The company also emphasises these principles and commitments with contractors, suppliers, and collaborators, particularly regarding the supply chain.

The policy is accessible to stakeholders on the company's [corporate website](#), as well as on the corporate Intranet for all employees.

In compliance with its obligations in relation to the supervision and promotion of the IRS, the Enagás governing body appointed in this policy the Ethics Compliance Committee (ECC) as Head of the IRS, which, in turn, appoints the Committee Secretary as the person ultimately responsible for the ordinary management of the IRS and the processing of investigation files.

- In addition, Enagás has a [Privacy Policy](#) which provides information about how Enagás processes the personal data it collects, in compliance with the principle of transparency established by personal data protection regulations. The policy is accessible to stakeholders on the company's corporate website, as well as on the corporate Intranet for all employees.

Related actions and resources

Cybersecurity

The Enagás information security management model is applicable to cybersecurity, based on international and national regulations and the continued assessment of cyber risk. This provides, through all means within its reach and in proportion to the threats detected, the resources required so that the organisation has an environment that is aligned with business targets and the cybersecurity targets established.

In 2022, Enagás approved its 2022-2024 Strategic Cybersecurity Plan, which establishes the policies to be followed to help ensure a secure, reliable cyberspace, using a 360° approach throughout the Enagás Group. The Plan included various initiatives, notably a specific training programme on cybersecurity, enhancements to the security infrastructure of the Third Party Network Access Logistics System (SL-ATR), and updates to the access control policy, among others. Enagás has successfully completed its 2022-2024 strategic cybersecurity plan, achieving a high level of project completion with no significant incidents.

The company has developed a new Enagás Group Strategic Cybersecurity Plan for the 2025-2027 period, focusing primarily on the full implementation of EU Directive 2022/2555 on measures for a high common level of cybersecurity across the Union and its legislative developments. The plan also emphasises cyber risk management and the enhancement of cybersecurity resilience and culture. This Plan is designed to allocate resources to maintain the investment ratio throughout this period.

Enagás has a cybersecurity management model with segregation of duties between government and operation, as well as a Strategic Cybersecurity Plan with a three-year scope that is reviewed annually. This plan has been updated in accordance with the requirements of Royal Decree 43/2021; it has designated a Chief Information Security Officer (CISO) with the relevant administrative body.

This Plan is based on the results of the risk analysis and focuses on improving the resilience of Enagás' information systems. It also facilitates secure teleworking without affecting the company's normal operations, discusses the inertia towards digitalisation and the growing migration to cloud solutions.

In 2023, Enagás launched a Cyber Awareness platform to make cybersecurity content even more familiar to our professionals. Awareness-raising through this mandatory training space continued in 2024, training Enagás professionals to protect their digital lives, both professionally and personally. By 2024, cybersecurity training and awareness had been delivered at all levels within the company. This included more than 12,000 individual awareness modules through the Cyber Awareness platform and over 20 in-person sessions with participants such as the Board of Directors and the Executive Committee.

Enagás has a reporting procedure that professionals can follow if they encounter any suspicious situation. Additionally, Enagás carries out periodic phishing simulation exercises to assess its professionals' awareness levels and tailor training measures as needed.

Currently, Enagás is ISO 27001:2013-certified for its logistics and commercial systems, gas pipeline control systems and industrial control systems for each type of infrastructure that it operates. In 2024, Enagás updated its management system to the latest version, ISO 27001:2022, with plans to renew the certification in 2025.

Enagás has implemented procedures to prevent incidents in its technological infrastructure; likewise, it has implemented continuity plans to guarantee the continuity of normal systems operation in the event of changes and incidents and to guarantee rapid recovery. These plans have been tested on an ongoing basis throughout the year.

In 2024, Enagás also took a series of other actions to ensure the soundness of its information security management systems and IT infrastructures, such as the simulation of cyber-attacks and vulnerability analysis by third parties, audits of the control environment of the information systems that support important processes during the audit of the company's accounts, and so on.

Enagás also manages cyber risks in the life cycle of its suppliers on an ongoing basis. This enables it to enhance cybersecurity measures in industrial information systems.

In 2024, Enagás invested 1.8 million euros in cybersecurity for its corporate and industrial information systems (CapEx). This information is included in note '2.4. Property, plant and equipment' in the Consolidated Annual Accounts. In 2025, the necessary resources will be allocated to implement the new Strategic Cybersecurity Plan.

Privacy of information

Enagás has integrated the principles outlined in its Information Privacy Policy consistently across all areas where information is processed, ensuring compliance with Data Protection standards. Enagás has a Data Protection Delegate registered with the Spanish Data Protection Agency.

In the same year, Enagás conducted an internal audit of its Data Protection Management System, receiving an 'Acceptable' rating.

Additionally, during this financial year, Enagás updated the data protection clauses in its contracts to address the impact of Artificial Intelligence on data processing.

Metrics and targets

Related parameters

Cybersecurity

Enagás has a Security Operations Centre which serves to detect, analyse, report and resolve actual and potential cybersecurity incidents without interruption, 24/7. As in previous years, Enagás' IT systems were not subjected to any successful attacks in 2024⁹⁸.

This parameter is monitored by the National Cybersecurity Institute (INCIBE) through the leading security incident response

⁹⁸ A successful attack is considered to be one that significantly affects all or part of Enagás' information systems for more than 24 hours. Enagás has not based this parameter on significant methodologies or assumptions.

centre for citizens and private law entities in Spain (INCIBE-CERT), as well as by the Cybersecurity Coordination Office (CCO).

Privacy of information

In 2024, Enagás did not receive any complaints from the Spanish Data Protection Agency related to privacy or loss of customers' personal data (nor did it receive any complaints in this area in 2023 and 2022). Enagás has responded properly and in a timely fashion to 100% of the rights complaints received in 2024⁹⁹.

Related goals

Cybersecurity

Enagás has set a target¹⁰⁰ for 2024 to manage and report all cybersecurity incidents reported to the Enagás Group in full compliance with EU Directive 2022/2555 and other relevant legislation, adhering to the timelines and procedures outlined in the national Guide to Cyber Incident Reporting and Management. In 2024, no successful attacks on its information systems were made, thus meeting the target set.

This target displays the company's performance against the commitment set out in the Cybersecurity and Data Governance Policy that all professionals must help to ensure that cybersecurity is properly implemented by being willing to prevent cyber-attacks, identifying and reporting incidents of which they are aware, as well as providing an early response to any cybersecurity breach.

Privacy of information

For 2024, Enagás has also set the following goals for the Enagás Group¹⁰¹:

- To respond to all requests to exercise rights within the timeframes and according to the procedures required by current legislation. In 2024, two requests for the exercise of the right to rectify and delete data were received and dealt with in a proper and timely fashion, in accordance with the provisions of Organic Law 3/2018 on the Protection of Personal Data and the guarantee of digital rights, thus fulfilling the established objective.
- To maintain zero complaints from the Spanish Data Protection Agency. In 2024, none were received, thus meeting the established target.

These goals are aligned with the data protection commitments regarding the processing of personal data set out in the Internal Reporting System Policy.

⁹⁹Enagás has not based this parameter on significant methodologies or assumptions. This parameter has only been verified by the verification provider and not validated by any other external body.

¹⁰⁰ No stakeholders were involved in setting this target, nor were any significant methodologies or assumptions used.

¹⁰¹ No stakeholders were involved in setting these goals, nor were any significant methodologies or assumptions used.

Customers

Enagás' business model is primarily based on providing services to other companies (Business-to-Business), which means it does not have consumers and end users as defined by EFRAG. For more details, refer to disclosure requirement SBM-3. As a result, Enagás has not identified any impacts, risks, or opportunities related to the sustainability issue of 'consumers and end users'. However, it has identified such aspects for a sustainability issue specific to its 'customers'. Nevertheless, due to the synergies between these two stakeholder groups, Enagás has chosen to use the disclosure requirements of the European Sustainability Reporting Standard S4 as the foundation for reporting additional relevant information about customers.

Governance

The governance processes, controls, and procedures established to oversee and manage customer sustainability issues are aligned with the 'Governance' disclosure requirements outlined in chapter 2.

Strategy

Interests and views of stakeholders

In its materiality analysis (for more details, see the [IRO-1](#) disclosure requirement within chapter 2), Enagás has considered the views of various stakeholders, including customers, when determining the relative importance of impacts, risks and opportunities related to sustainability issues. This feedback was collected through targeted surveys conducted for this materiality analysis, as well as other mechanisms the company uses to capture customer opinions and interests. For more information, refer to disclosure requirement [S1-2](#).

The analysis identified the significant impacts, risks, and opportunities related to the customer stakeholder group. This has laid the groundwork for setting and pursuing related actions and objectives, using a continuous improvement approach.

Material impacts, risks, and opportunities and their interaction with the strategy and business model

Enagás' customers affected by its value chain and operations include those who receive logistical services or are involved in operations within the gas system¹⁰².

- As a Transmission System Operator (TSO) Enagás' customers include transmission companies, shippers, distributors, and direct market consumers (those connecting directly to its facilities), to whom it provides logistical services for the transport and/or storage of Liquefied Natural Gas (LNG) or natural gas at its facilities.
- In its role as a Technical Manager of the System (GTS), Enagás' customers include the transmission companies, shippers, distributors, and direct market consumers who take part in capacity allocation processes or hold an active access contract within one of the gas system facilities, or maintain an

authorised and valid balancing portfolio in one of the system's balancing areas.

- Network operators: gas system parties authorised to manage any transmission, liquefaction, LNG regasification, storage or distribution facility, in accordance with Law 34/1998 of October 7 on the hydrocarbons sector.
- Shipper: a company that accesses third-party facilities to acquire natural gas or LNG for resale to end consumers, other shippers, or for international transit.
- Direct market consumers: companies that access third-party facilities to acquire natural gas or LNG for its own use.

For more information on Enagás' value chain and the logistics services offered, see [disclosure requirement SBM-1](#) within chapter 2.

Management of impacts, risks, and opportunities

Enagás has conducted an analysis to identify impacts, risks, and opportunities, assessing which are materially significant concerning all its customers, as detailed in the IRO-1 disclosure requirement in chapter 2. This analysis encompasses all activities and infrastructure locations of companies under financial control, including both upstream and downstream stages of the value chain.

From this analysis, the following material impacts have been identified, which support and contribute to adapting the business model and may affect all customers:

Table of impacts

Topic	Sub-topic	Impact	Nature
Customers	Customer safety	Failing to ensure proper supervision and quality of services	Negative - Potential. This is linked to individual cases and could affect all customers.
	Transparent communication	Developing and implementing business and commercial transparency strategies	Positive - Current and consistent (affects all customers)

¹⁰² Enagás has not identified any particularly vulnerable or marginalised groups among its customers, in accordance with the impacts, risks, and opportunities identified as material during the year. Additionally, it has not identified any

customers who require precise and accessible information related to the services to avoid potentially harmful use.

Regarding the material risks and opportunities related to customer impacts and dependencies, Enagás has not identified any significant risks. However, it has identified a significant opportunity:

Table of risks and opportunities

Topic	Sub-topic	Risk / Opportunity	Nature
Customers	Customer safety	Enhancing the quality of services and transparent communication by increasing the ability to react and identify areas for improvement, thanks to customer satisfaction evaluation processes and supervision and assurance systems.	Opportunity

Related policies

Enagás has policies in place to manage the material impacts and opportunities of its services on customers. All these policies have been approved by the Board of Directors and align with the recommendations in the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

Through these policies, the company establishes commitments to address the impacts and opportunities identified as material.

Link between significant impacts, risks, and opportunities and corporate policies

Topic	Sub-topic	Impact, risk or opportunity	Nature	Policy that covers the impact, risk or opportunity
Customers	Customer safety	Failing to ensure proper supervision and quality of services	Impact	Quality and Operational Excellence Policy Code of Conduct of the Technical Manager of the Spanish Gas System
	Transparent communication	Developing and implementing business and commercial transparency strategies	Impact	Code of Ethics Quality and Operational Excellence Policy Sustainability and Good Governance Policy Human Rights Policy Code of Conduct of the Technical Manager of the Spanish Gas System
	Customer safety	Enhancing the quality of services and transparent communication by increasing the ability to react and identify areas for improvement, thanks to customer satisfaction evaluation processes and supervision and assurance systems.	Opportunity	Code of Ethics Quality and Operational Excellence Policy Sustainability and Good Governance Policy Human Rights Policy Code of Conduct of the Technical Manager of the Spanish Gas System

- [Enagás Code of Ethics](#): Among others, this code outlines Enagás' commitment to transparency and reliability of information. It encourages professionals to act clearly and transparently, ensuring none of their actions can be seen as misleading. Enagás professionals must disclose information in a truthful and complete manner and not deliberately provide Enagás with incorrect or inaccurate information, or imprecise information that could mislead the person receiving it. Employees must not conceal information to avoid fulfilling Enagás' obligations to third parties, nor use deceptive or falsified information to obtain subsidies, tax breaks, or other benefits. Additionally, they must not withhold information that could be of interest to the organisation for personal gain.

The Ethical Compliance Committee, responsible for overseeing the Code of Ethics, directly reports to the Audit and Compliance Committee of the Board of Directors. For further details on the Code of Ethics, refer to disclosure requirement G1-1).

- [Quality and Operational Excellence Policy](#): approved by the Board of Directors, this policy outlines key commitments towards promoting efficient management, continuous improvement, and innovation, with a particular focus on meeting stakeholder needs. It also addresses the Quality

Management System and Operational Excellence. These commitments include those related to quality of services and transparent communication, identified as key issues for Enagás, with the following highlights:

- Improving both internal and external customer satisfaction by meeting or exceeding their expectations.
- Ensuring the transparency of information given to stakeholders by applying internal processes, controls, and protocols that ensure its reliability and rigour.
- Promoting continuous improvement by adopting principles from internationally recognised models and implementing best practices to boost competitiveness and create value for all stakeholders.
- Conducting regular internal and external audits to assess the proper functioning of implementation plans, determine compliance levels, and recommend corrective actions, thereby fostering continuous improvement.
- Implementing processes for the purposes of prior information, participation, dialogue, consultation and collaboration with stakeholders, in order to guarantee that

their needs and expectations are known to the company and, where appropriate, added to its management.

In 2024, this policy was revised following a corporate decision to split the current the Health and Safety, Environment, and Quality Policy into three distinct policies. This change enables more effective implementation of commitments related to these crucial aspects of the business.

• [Sustainability and Good Governance Policy](#): this policy, approved by the Board of Directors, outlines the commitments required to ensure due diligence in sustainability and corporate governance. These commitments are designed to create value for shareholders, customers, suppliers, and other stakeholders over the short, medium, and long term, while enhancing the company’s control environment, reputation, and credibility with external parties. These commitments include one related to quality of services and transparent communication:

- Adhering to principles of responsible business conduct in dealings with commercial partners like customers and suppliers.

In 2024, this policy was revised to update its sustainability commitments, aligning them with those in other corporate policies approved later, and with the latest edition of the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (2023).

• [Human Rights Policy](#): this policy, approved by the Board of Directors, outlines Enagás’ commitments to ensuring due diligence in human rights matters and aligns with relevant internationally recognised instruments.

- The United Nations Guiding Principles on Business and Human Rights.
- United Nations International Charter of Human Rights.
- The OECD Due Diligence Guidance for Responsible Business Conduct.
- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.
- The International Labour Organisation (ILO) Declaration.
- The Universal Declaration of Human Rights.

The policy specifically addresses respecting human rights concerning customers, particularly regarding the right to privacy of information. It ensures the handling of personal information of employees, customers, and suppliers with the utmost respect for privacy and in full legal compliance.

The policy also commits to developing and maintaining a due diligence system aimed at anticipating, preventing, mitigating, and/or remedying negative impacts on people (both its own workforce and those in the value chain), the environment, society, and customers.

It also sets out the commitment to implement processes for the purpose of prior information, participation, dialogue, consultation and collaboration with stakeholders (including customers), in order to guarantee that their needs and expectations are known to the company and, where appropriate, added to its management.

In 2024, this policy was updated to strengthen the company’s commitment to developing and maintaining a human rights due diligence system, as outlined in the European Sustainability Reporting Standards developed by EFRAG, the proposed Sustainability Due Diligence Directive, and the OECD Due Diligence Guidance for Responsible Business Conduct.

- [Code of Conduct of the Technical Manager of the Spanish Gas System](#): the purpose of this Code of Conduct is to guarantee that the functions of the Technical Manager of the System are carried out independently from the other activities of the Group, in compliance with the legally established criteria in the Hydrocarbons Sector Law 34/1998 of October 7.

This update to the Code of Conduct was approved by the Board of Directors in 2024, taking into account best practices in ethics and compliance, and the Cybersecurity and Artificial Intelligence policies approved by the Enagás Group.

These policies and the company Code of Ethics are all applicable and communicated to all employees and directors within the Enagás Group, including those of subsidiaries over which it has effective control, subject to the constraints of the relevant regulations. Therefore, these policies apply to all activities undertaken by Enagás Group companies across all the regions where they operate. In affiliates where Enagás does not have effective control, it is recommended that their Boards promote principles aligned with the aforementioned policies. The company also promotes the application of the policies’ principles, wherever possible, to temporary joint ventures, joint ventures, and other similar partnerships or entities. The company also emphasises these principles and commitments with contractors, suppliers, and collaborators, particularly regarding the supply chain.

The Code of Conduct for the Technical Manager of the Spanish Gas System applies to members of the Board of Directors, the Executive Committee, and workforce at Enagás GTS, S.A.U., as well as to any other personnel from the Enagás Group providing corporate services to Enagás GTS, S.A.U.

All policies are accessible to stakeholders through the company’s corporate website, as well as on the corporate Intranet for all employees.

This policy assigns the Board of Directors the responsibility for guiding, overseeing, and monitoring strategy, policies, risks, objectives, and performance concerning the subject matter of each policy (human rights, sustainability and quality). When it comes to human rights and sustainability matters, it is also the responsibility of the Sustainability Committee to control and monitor these aspects, reporting to the Sustainability and Appointments Committee, which is established at the Board level. On the other hand, in the area of Quality, the Health and Safety, Environment, and Quality Integrated Management System Committee is tasked with setting the basic guidelines for developing and monitoring the integrated management system. It is also responsible for coordinating relevant actions and reporting to the Executive Committee. In addition, various departments within the company are tasked with setting up action plans, goals, and monitoring indicators.

Over the past three years, Enagás has not identified any instances of non-compliance involving its customers with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises.

Processes for engaging with customers about impacts

Enagás aims to meet customer needs¹⁰³ with transparency, non-discrimination, and efficiency, always maintaining a commitment to quality and excellence in services provided. To enhance collaboration and communication, Enagás offers its customers various channels for quick and easy access to the company, allowing them to communicate their needs and expectations in any area of their relationship with the company. The main channels are:

- Customer Service Manager (CSM): Both the TSO¹⁰⁴ and the GTS operate independent platforms to manage customer relations and to centralise the management, monitoring, and traceability of incidents within business systems and processes, as well as to handle enquiries about these systems or their operations. For more information on incidents, see the section on [‘Processes to remediate negative impacts and channels for customers to raise concerns’](#).

The CSM is an innovative digital tool for customers. Through this platform, they can register all queries or requests about the provided services, information systems, or any other aspect of their relationship with the company. The process starts when customers submit a query on the platform, which is then assigned a criticality level. The TSO and GTS areas responsible for the tool review this criticality and assign the appropriate business area to manage and follow up on the query. Once resolved, customers are informed of the outcome, and the query is closed.

This tool enhances query management by offering:

- Autonomy in management: Customers can perform certain actions on their queries without relying on Enagás, streamlining the process and giving them more control over their requests.
- Transparency in the process: Each case is monitored in detail, providing customers with up-to-date visibility of its status and next steps. This ensures clear and constant communication, as well as traceability throughout the process.

- Immediate access: from any device – be it a computer, tablet, or mobile – allowing customers to interact with Enagás whenever and wherever suits them best.
- Improved efficiency: the centralisation of services through the portal and digitalisation speeds up responses and improves efficiency in meeting customer needs.

This tool enables Enagás to monitor the number of queries received, helping us assess its effectiveness and functionality. Enagás also gauges customer knowledge and satisfaction with the tool through an annual satisfaction survey. Insights from both analyses help us develop action plans and improvements when necessary.

- Regular meetings are held with customers, to discuss their market position and review their activities. These meetings cover any issues that could be in customers’ interests and are also used to present new options and new business opportunities for them to consider.
- Telephone support and corporate mailboxes.
- Enagás corporate website: The Enagás corporate website provides up-to-date information essential for managing the Spanish Gas System and facilitating interaction among various customers, including shippers, transporters, distributors, and direct market customers. It also includes information about infrastructures, the services offered and how to contract these. There are specific sections for both [TSO](#) and [GTS](#), as well as corporate information about the company. The GTS’s [Energy Data](#) section centralises access to all public information about the system, making it easier to access and download published data.
- Customer satisfaction surveys and associated improvement plans Enagás conducts annual satisfaction surveys through both TSO and GTS to systematically assess customer satisfaction, aiming to enhance understanding of their needs and expectations. Customers are asked to rate the service attributes and commercial processes. In the case of the GTS, the survey must follow the guidelines of the National Commission on Markets and Competition (CNMC) established in the Incentives Circular (Circular 6/2021, June 30). The remuneration received by the Technical System Manager is linked to the participation rate and the satisfaction valuation obtained from customers in the survey.

Recognising the importance of communication channels for customers to raise concerns and needs, Enagás uses these surveys to assess the level of awareness and trust in these channels for further analysis.

¹⁰³ Enagás has not identified any particularly vulnerable or marginalised groups among its customers, in accordance with the impacts, risks, and opportunities identified as material during the year.

¹⁰⁴ Developed and set to be launched by the end of 2024.

The results from the 2024 Customer Satisfaction Survey were as follows:

Results of customer satisfaction surveys

	Services	Customer	2023		2024	
			Number of responses out of the total	Assessment of services rendered (out of 10)	Number of responses out of the total	Assessment of services rendered (out of 10)
Business operation	Enagás as transmission company	Shippers	23 / 54	8.7	26 / 67	9.2
		System operators (transmission and distribution companies)	2 / 8	9.9	3 / 8	9.1
	Enagás as Technical Manager of the System	Shippers	68 / 173	8.9	54 / 194	8.6
		System operators	10 / 16	8.8	18 / 18	8.7

Once the survey responses are received, they are analysed by the relevant departments, and the identified improvements are incorporated into the Annual Action Plan (for more information, see the section on ['Adoption of measures related to material impacts on customers, strategies to mitigate significant risks, and capitalise on opportunities concerning customers, as well as the effectiveness of these actions'](#)).

- SL-ATR (Third-party access Logistics System): a real-time, reliable communication tool facilitates seamless interaction between the various entities within the Gas System. This tool supports the entire commercial cycle management of natural gas, including capacity requests, contracts, guarantees, authorisations, scheduling and nominations, measurements, allocations, balancing, settlement of imbalances at the Virtual Balancing Point, and billing support.
- Gas System Monitoring Committee (CSSG): body whose purpose is to monitor the operation of the system, coordination between different parties that act in the system, the presentation of information on operational plans of temporal scope (winter periods) and any other topic of interest for the monitoring of the system.
- Technical Management of the Gas System Regulations Working Group: Gas System Monitoring Committee working group for updating, reviewing and amending gas system technical management regulations and protocols. For the purpose of updating, reviewing and amending the regulations and technical management protocols of the gas system, the Technical Manager of the System will coordinate a specific working group within the Gas System Monitoring Committee.
- Workshops: meetings with various stakeholders in the system, such as marketers, transporters, and distributors, to update them on new functionalities being introduced into the information systems. These workshops are designed to be informative, presenting new developments and addressing any related queries.

- Various publications and regular reports: Gas System report, Gas Statistical Bulletin, and other reports covering demand, operations and maintenance, markets and balances, gas quality, and capacities.
- Roadshows and external site visits: part of the commercial service, featuring technical visits to facilities where the operational excellence of these sites is showcased. These visits offer a detailed insight into site management, the complexity of processes undertaken, and the outstanding maintenance management of equipment. They emphasise the technical quality of the company's facilities, ensuring safety and reliability in delivering contracted services, and play a crucial role in the country's security of supply. This initiative not only strengthens the trust of Enagás' customers but also enables the exchange of technical knowledge and suggestions for day-to-day improvements.

Enagás has two Customer Service¹⁰⁵ procedures, both as TSO and GTS, which outline the processes for managing customer relationships, including communication channels, tools used, involved departments, satisfaction evaluation, and incident or query management.

Enagás collaborates with its customers throughout all service phases, from identifying new services that meet customer needs to development, implementation, and service improvement. To ensure effective collaboration, Enagás tailors the frequency and type of interaction to suit the specifics of each service and its stage.

Under the company's management systems, with a commitment to continuous improvement, Enagás analyses customer expectations, needs, and complaints arising from these interactions. This ensures that necessary actions are taken to resolve issues and improve the system. Enagás assesses the effectiveness of these interactions through informal customer communications and satisfaction survey results (for more

¹⁰⁵ As a TSO, Enagás has a specific customer service procedure, while as a GTS, it has procedures for customer satisfaction and process monitoring, incident and intervention management, and query handling.

information, see the section on [‘Processes to remediate negative impacts and channels for customers to raise concerns’](#)).

It is important to highlight that the responsibility for ensuring effective collaboration, and therefore the proper involvement of Enagás customers as TSO and GTS, rests with Executive Committee members. They are responsible for the areas that manage Enagás’ functions as TSO and GTS (Gas Assets General Manager and Technical Management of the System General Manager, respectively).

These mechanisms form the foundation for understanding the needs, expectations, and perspectives of customers. This understanding is crucial in collaborating with them to manage material impacts related to service quality and ensuring adequate business and commercial transparency (for more information on identified material impacts, see disclosure requirement SBM-3 in this chapter).

Processes to remediate negative impacts and channels for customers to raise concerns

Customers of both Enagás TSO and Enagás GTS have access to specific communication channels to express any complaints or report negative impacts. These channels are managed according to principles of accessibility, listening, collaboration, transparency, and non-retaliation.

- Customer Service Manager (CSM): both TSO¹⁰⁶ and GTS operate independent platforms to manage customer relationships, ensuring effective management, monitoring, and traceability of incidents within business systems and processes, as well as handling queries about these systems and their operation (for more information on incidents, refer to the section on [‘Processes for engaging with customers about impacts’](#)).

The CSM is an innovative digital tool designed for customers to log any incidents related to the services provided, information systems, or other aspects of their relationship with the company. The process starts with customers reporting the incident on the platform and assigning a criticality level. Then, the TSO and GTS teams responsible for managing the tool review the criticality and assign the incident to the appropriate business area for management and follow-up. Once the issue is resolved, customers are informed of the outcome, and the incident is closed.

This tool enhances the management of incidents by allowing:

- Autonomy in management: customers to take certain actions regarding their incidents independently of Enagás, which speeds up the process and gives them more control over their requests.
- Transparency in the process: detailed, up-to-date tracking of each case, giving customers insight into the status and next steps, ensuring clear, consistent communication and full traceability of the process.

- Immediate access: from any device – be it a computer, tablet, or mobile – allowing customers to interact with Enagás whenever and wherever suits them best.
- Improved efficiency: the centralisation of services through the portal and digitalisation speeds up responses and improves efficiency in meeting customer needs.

The tool also enables Enagás to monitor the number of incidents received, allowing for segmentation and data analysis to measure the resolution rate of complaints and the time taken to address them. This analysis shows its effectiveness and functionality. Enagás also gauges customer knowledge and satisfaction with the tool through an annual satisfaction survey. Insights from both analyses help us develop action plans and improvements when necessary. Enagás monitors these discrepancies through the CSM tool.

If customers disagree with the response to their incident and all other customer service channels (e.g. meetings) have been exhausted, they can file a dispute with the relevant regulatory body, as per current legislation. The regulatory body is responsible for resolving the claim after reviewing the submitted information and consulting with the parties involved.

- Regular meetings are held with customers, to discuss their market position and review their activities. These meetings cover any issues that could be in customers’ interests and are also used to present new options and new business opportunities for them to consider.
- Telephone support and corporate mailboxes.
- Reviews and Complaints Module in SL-ATR: Enagás GTS has a specialised tool for managing complaints on the SL-ATR Platform, which is also employed by the TSO to fulfil its regulatory obligations.
- Whistleblowing Line (for more information on the line, management process, and anti-retaliation policy, see disclosure requirement G1-1).
 - Electronic mailbox: canal.etico@enagas.es.
 - Post addressed to the Chairman of the Ethical Compliance Committee, sent to Paseo de los Olmos 19, 28005 - Madrid, Spain.
 - Form available on the corporate intranet and on the corporate website.

Enagás evaluates how well its customers understand and trust these channels and procedures through informal communications and satisfaction survey results (for more information, see the section on [‘Processes for engaging with customers about impacts’](#)).

¹⁰⁶ Developed and set to be launched by the end of 2024.

In keeping with this commitment to addressing grievances, Enagás supports these reporting and resolution channels within its value chain. This is also one of the criteria used to assess the sustainability risk of its suppliers (for more information, see disclosure requirement G1-2).

Measures related to material impacts on customers, approaches to managing material risks and opportunities related to customers, and the effectiveness of such actions

Enagás’ primary goal is to meet its customers’ needs through a commitment to quality, service excellence, and transparent operations. To achieve this, the company undertakes various initiatives designed to enhance positive impacts and reduce negative ones for its customers by mitigating risks and seizing opportunities for improvement¹⁰⁷.

In determining appropriate actions for managing significant impacts and opportunities, the company considers:

- both general and specific strategies to address significant negative impacts,
- initiatives directed at generating significant positive impacts,
- progress made during the year in these efforts, and
- objectives for continuous improvement.

Enagás also employs analysis, control, and communication mechanisms to ensure its activities do not lead to significant negative impacts on customers.

Quality

To address the potential negative impact of failing to ensure proper supervision and service quality, Enagás has developed a Quality Management and Operational Excellence framework. This framework is certified to international standards, specifically ISO 9001 - Quality Management, and aims to ensure efficient management, continuous improvement, and innovation, with a strong focus on meeting the needs of various stakeholders. To promote a culture of excellence and professional involvement through teamwork, internal communication, knowledge management, talent development, equal opportunity, and the recognition of achievements in a constant search for excellence.

The Quality system is part of the Integrated Management System for Health & Safety, Environment, and Quality, providing a unified approach to managing these critical areas for the company. Management conducts internal and external audits and reviews within this system to ensure ongoing service improvement and to assess the effectiveness of the actions taken under the management system.

Enagás, is also recognised with the ISO 55001 asset management certification. This accreditation represents recognition under an international standard for the company’s infrastructure asset management model in accordance with the practices identified during the audit process. Among the most significant aspects of

the standard are a holistic vision of the asset’s life cycle, consolidated management of operational risk, alignment of the model with the 2025-2030 Asset Management Strategic Update and the use of technical methodologies to support decision-making. All this is within a framework that guarantees total asset cost and the availability and quality of customer service.

In 2024, Enagás allocated more than 27 thousands of euros to quality management and asset management systems relating to internal and external audits (OpEx) (information included in note 2.1 ‘Operating profit’ to the Consolidated Annual Accounts).

In relation to the materialisation of the identified potential negative impact, Enagás resolved 98.4% of the 123 formal complaints it received from customers in 2024 (177 in 2023). These complaints were received in connection with Enagás’ activity as Technical Manager of the System. Their quantity falls within normal bounds given its processes and nature, as well as the regulatory changes of the last few years.

Pipeline integrity

Enagás conducts inspections and maintenance to ensure the integrity and proper condition of its gas infrastructure, thereby minimising the risk of compromising service quality in its role as TSO. The company sets out integrity plans each year based on the risk involved in the activities to be carried out in the gas pipelines. These activities include:

- Pipeline inspections:
 - Internal inspections with smart tools to find potential anomalies
 - Indirect external inspections to locate defects in the anti-corrosive coating
 - External indirect inspections on undersea pipelines (undersea inspections) to detect suspended areas, possible damage and harmful objects next to pipelines, as well as to assess the condition of the cathodic protection system

During 2024, more than 11.2% of Enagás’ gas pipeline network was inspected internally by means of the three types of inspections described above (11.0% in 2023).

- Excavations (test pits) for the direct evaluation of anomalies identified through inspections (internal and/or external indirect).
- Complementary safety activities to detect incidents within the gas pipeline right-of-way (observation by car, observation by foot, aerial observation and leak detection).

¹⁰⁷ For more information on the absence of identified human rights issues or severe cases related to customers, refer to the ‘Related Policies’ section concerning Customer sustainability.

- In 2024, more than 86,000 kilometres of gas pipelines were inspected and monitored (more than 82,000 kilometres in 2023).

As a consequence of a cut-off low weather event in Valencia, which caused very heavy rainfall, the Paterna and Agullent gas pipelines were suspended for a stretch of approximately 40 and 60 metres, respectively. Enagás carried out various analyses to rule out damage to welds and plastic deformations, among other issues, carrying out the necessary measures to mitigate the stress on the pipelines.

In 2024 Enagás has allocated more than 6.3 million euros (OpEx) to these activities (see note '2.1 Operating profit' of the Consolidated Annual Accounts for details). In 2025, expenditure is expected to be approximately 2.7 million euros. This change is mainly explained by the three-yearly periodicity of the underwater inspections of the Strait of Gibraltar and Balearic Islands gas pipelines and an increase in the cost of monitoring due to the implementation of a strategy based on increasing the number of kilometres monitored by 56% and reducing the monitoring cost per kilometre.

Transparency

To enhance the positive impact of its business and commercial transparency strategies, Enagás maintains effective communication channels with its customers to ensure collaboration, dialogue, and transparency. For more details, refer to the sections on '[Processes for engaging with customers about impacts](#)' and '[Processes to remediate negative impacts and channels for customers to raise concerns](#)'.

Moreover, the distinct role of Enagás GTS, which operates entirely independently from other Enagás functions, has prompted it to adopt commitments that ensure high standards of transparency, coherence, reliability, and accessibility in publishing and disseminating information. The [GTS Good Practice Guide](#) contains these commitments, which include the creation of a Transparency Committee. This Committee consists of industry representatives and is responsible for ensuring adherence to the guide, suggesting possible improvements, and reviewing requests from agents regarding new publications or changes to existing ones. Requests for further publications and amendments to current publications should be submitted to Enagás GTS for evaluation using a form.

To facilitate access to published information, and in line with the Good Practice Guide, GTS has developed [Energy Data](#), a section on the corporate website and an app that centralises access to the System's public information. Customers can view both physical and commercial data about the gas system, along with various publications and regular reports such as the Annual Report of the Gas System, the Statistical Gas Bulletin, and other documents on demand, operations and maintenance, markets and balances, gas quality, and capacities. This section, in continuous development, aims to improve the usability of the published data, allow the information to be accessed and downloaded and enable automatic query functionalities.

Through a dedicated section on the corporate website, [Enagás TSO](#) provides customers with information about infrastructure, the services offered and how to access them, as well as essential details for interacting with various agents. Customers can check the available capacities in each infrastructure, access key information about different services, use the connection request platform for injecting renewable gases, and find forms for requesting traditional natural gas connections. Additionally, the results of the customer satisfaction survey and the Improvement Plan are available, and a Commercial Service Portal has been developed¹⁰⁸.

Enagás regularly assesses the effectiveness of its actions aimed at developing and implementing business and commercial transparency strategies, in its roles as both TSO and GTS. This assessment is mainly based on the information gathered from the sections on '[Processes for engaging with customers about impacts](#)' and '[Processes to remediate negative impacts and channels for customers to raise concerns](#)', along with other transparency requirements.

In 2024, 50 thousands of euros were invested (CapEx) in the project to develop the Commercial Service Manager portal (CSM Portal) for Enagás in its activity as TSO (information included in note 2.4. Property, plant and equipment' in the Consolidated Annual Accounts).

Action plans

Aligned with the identified material opportunities and potential negative impacts, Enagás drafts annual action plans that incorporate the improvement and remediation actions identified through the collaboration and remediation mechanisms related to customers. For more details, see the sections on '[Processes for engaging with customers about impacts](#)' and '[Processes to remediate negative impacts and channels for customers to raise concerns](#)'. Each area responsible for these actions regularly monitors their effectiveness and compliance. These action plans are shared with all interested parties via the [corporate website](#).

As an example, some of the actions included in these plans in 2024 were:

- Enagás as TSO:
 - Development of a customer service portal to manage and follow up with questions, queries and incidents.
 - Review, update and publication of the criteria for the vetting service at Enagás Transporte terminals, a process that ensures that ships unloading at Enagás plants are suitable for operation.
 - Promotion of the adaptations needed to bring regulations into line with the current needs of the sector, proposing, among others, mechanisms to facilitate the bunkering service that take into account the particular needs of this sector, as well as changes to the management of the flexibilities of ship operations in accordance with customer needs and interests.

¹⁰⁸ Pending launch.

- Plan to promote the use of bundled notes in invoice payment, identifying the best way to coordinate the process between customers and Enagás Transporte. In this way, we can improve the follow-up on collections and reduce the number of incidents in the payment process.
- Enagás, as GTS, has identified as an area for improvement the modernisation in the coming years of the Logistics System for Third Party Access to the Grid (SL-ATR), an initiative considered critical and therefore included in the company's 2024-2026 Transformation Plan. This initiative is made up of the following projects: obsolescence improvement, user experience, cloud and containerisation and a new governance model. Customers will be kept informed of the progress of this initiative via the following forums: Spanish Gas System Monitoring Committee, Technical Management of the Gas System Regulations Working Group and specific workshops.

Enagás carries out these actions as part of its usual dynamic of continuous improvement, and does not allocate significant specific funds to do so.

Metrics and targets

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Enagás has set goals for measuring customer satisfaction through surveys conducted by the TSO and GTS (for more information, refer to the section on '[Processes for engaging with customers about impacts](#)'). These goals are linked to the identified material impacts and opportunities, as the surveys assess service quality, transparency, and continuous improvement.

Moreover, these targets align with the commitment outlined in the Quality and Operational Excellence Policy to 'Improve internal and external customer satisfaction in a way that meets or exceeds their expectations'.

- For the TSO, an annual overall satisfaction target has been set, with a critical threshold of 7.7 out of 10 on the satisfaction scale and a separate target of 8.5 out of 10 for the 2024 survey in the shippers' domain. These targets are determined based on historical survey results and reviewed annually. This target was met in 2024, achieving a satisfaction level of 9.2 out of 10 for shippers and 9.1 out of 10 for system operators (transmission and distribution companies). For more information on the results of satisfaction surveys¹⁰⁹, see section '[Processes for engaging with customers on impacts](#)'.
- For the GTS, the survey must adhere to the guidelines set by the National Markets and Competition Commission (CNMC) in Circular 6/2021, dated June 30, which outlines the GTS's incentives that impact its remuneration. This Circular specifies a set of performance indicators related to their operational functions, including a 'Performance indicator concerning the quality of support to system agents', evaluated via the survey. A minimum participation rate of 30% of active users is required, and the GTS's remuneration is linked to the survey results. Due to these specific circumstances, no measurable targets are set for customer satisfaction, although there is a commitment to continuous improvement in this area. Enagás, in its capacity as GTS, continuously tracks policies and actions to ensure their effectiveness, aiming to enhance customer satisfaction.

These results are published on the [corporate website](#), providing customers with access to the survey data and related action plans.

¹⁰⁹ The methodology used for satisfaction surveys involves calculating the average of all customer responses for the respective campaign to gauge the level of customer satisfaction.

Non-financial and diversity reporting requirements (Law 11/2018)

Tax information

Public subsidies received

In 2024, 604 thousands of euros of public subsidies corresponding to gas infrastructure investments were received, 1,592 thousands of euros in 2023 and 156 thousands of euros in 2022 (in all three years, 100% were received in Spain).

Profits obtained by country

In 2024, -299.3 million euros net profit, which includes the result of investments accounted for using the equity method, which is recorded net of tax effect. The breakdown of net profit per country is as follows: Spain -78 million euros; Germany -2.5 million euros; Greece 11.1 million euros; Mexico 10 million euros; Peru 56.2 million euros; Switzerland 63.4 million euros; USA: -359.5 million euros.

In 2023, 342.5 million euros net profit, which includes the result of investments accounted for using the equity method, which is recorded net of tax effect. The breakdown of net profit per country is as follows: Spain at 250.4 million euros; Peru at 60.3 million euros; Switzerland at 53.6 million euros; Greece at 17.8 million euros; Germany at -0.6 million euros; Chile at -0.9 million euros; Mexico at -18.6 million euros; and the USA at -19.6 million euros.

Finally, in 2022, 375.8 million euros net profit, which includes the result of investments accounted for using the equity method, which is recorded net of tax effect. The breakdown of net profit per country is as follows: Chile at 200.2 million euros; Spain at 190.0 million euros; Peru at 56.2 million euros; Switzerland at 46.9 million euros; Mexico at 9.6 million euros; Greece at 8.1 million euros; the United Kingdom at -0.1 million euros; and the USA at -135.1 million euros.

Tax paid on profits

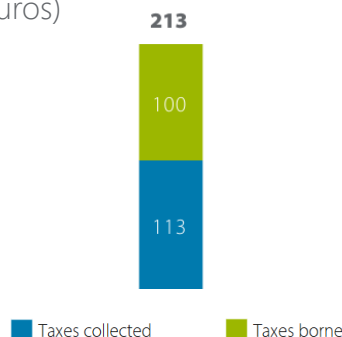
Total tax contribution

The total tax contribution made by Enagás in 2024 amounted to 213 million euros (361 million euros in 2023), of which 47% corresponded to input taxes¹¹⁰ (100 million euros) and 53% to taxes collected¹¹¹ (113 million euros) (in 2023, 248 and 113 million euros, respectively). Of the taxes paid, 93 million euros relate to Spain¹¹².

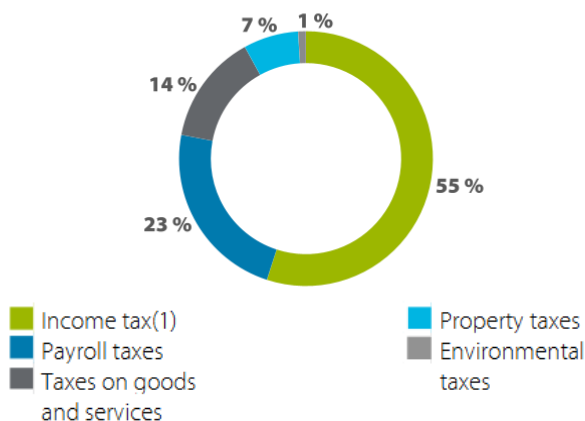
The total tax contribution is calculated using the cash method and taking into account the globally integrated entities and joint

operations (see the '[Consolidation principles, a\) Consolidation methods](#)' section of the Consolidated Annual Accounts).

Total tax contribution of the Enagás Group (million euros)

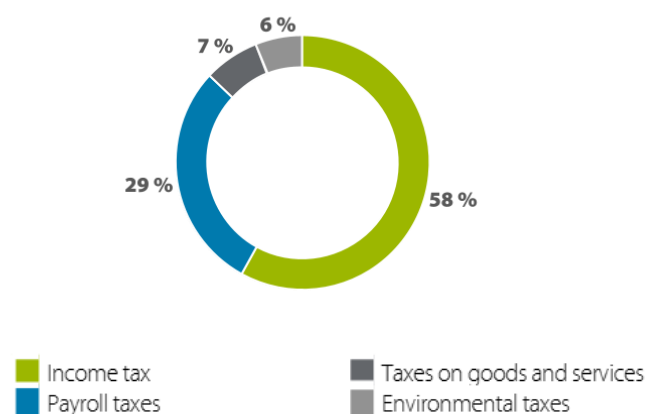


Taxes borne



(1) Including the following items: Corporate income tax, Tax on Economic Activities and movable capital income retentions.

Taxes collected



¹¹⁰ Input taxes are those taxes that the company has paid to Public Administrations of the different states in which it operates. These taxes are those that have entailed an effective cost for Enagás, such as corporate income tax and environmental taxes.

¹¹¹ Taxes collected are those that have been paid on behalf of other taxpayers as a result of Enagás' economic activity, without entailing a cost to the Company other than its management.

¹¹² The additional contribution of national and international affiliates accounted for using the equity method was 109 million euros, of which input tax was 86 million euros and tax collected was 23 million euros.

Country-by-country contribution

Below is a breakdown of the Enagás Group's tax contribution country by country in 2024, including the tax jurisdictions of Spain, Mexico, Peru, Chile and the United States, companies that are fully consolidated (see the '[Consolidation principles, a](#) [Consolidation methods](#)' section of the Consolidated Annual Accounts).

Tax contribution by country in 2024 (euros)

Jurisdiction	Average number of employees ⁽³⁾	Foreign intercompany income	Domestic third-party income	Foreign third-party income									Profit before corporate income tax ⁽²⁾	Corporate Income Tax paid and withholding tax paid (cash basis)	Corporate income tax accrued in the current year ⁽¹⁾⁽²⁾	Tangible assets other than cash and cash-equivalent instruments
				Germany	Belgium	France	Gibraltar	Greece	Italy	Morocco	United Kingdom	Switzerland				
Spain	1,390	0	906,126,295	3,333,287	185,361	64,521	360,537	218,128	42,072	2,130,758	324,129	248,553	-172,076,095	44,000,725	-16,433,290	3,841,491,495
Mexico	0	0	0	0	0	0	0	0	0	0	0	0	-36,347	0	0	0
Peru	0	184,391	0	0	0	0	0	0	0	0	0	0	-96,266	4,143	-46,744	0
United States	0	0	0	0	0	0	0	0	0	0	0	0	60,561,631	5,794,750	2,537,727	0
Chile	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

(1) In Spain, the difference between the effective rate vs. the nominal rate is mainly due to the limitation of the dividends and capital gains exemption for the transfer of shareholdings to 95%. In the other jurisdictions (Mexico, Chile, Peru and United States), this difference is mainly due to i) their status as holding companies, with exempt income (dividends); ii) companies with an immaterial level of income; and iii) consolidation adjustments. Taxation in these jurisdictions is carried out through equity-accounted affiliates, the details of which are not included in this scope.

(2) The profit before tax and the accrued corporate income tax cannot be compared to previous years due to exceptional operations in 2024 (such as the sale of TGE and the GSP award).

(3) In line with the disclosure requirement BP-1 within chapter 2 on the scope of financial and non-financial information, the financial information of this company is included.

APPENDICES



Non-financial and diversity reporting requirements (Law 11/2018) and the EU taxonomy for sustainable activities Regulation.....	224
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NON-FINANCIAL AND DIVERSITY REPORTING REQUIREMENTS (LAW 11/2018) AND THE EU TAXONOMY FOR SUSTAINABLE ACTIVITIES REGULATION

The following are the requirements established by Law 11/2018 and the EU Taxonomy Regulation that are responded to in the Statement of consolidated non-financial and sustainability information and in the Annual Corporate Governance Report included in the Consolidated Management Report:

Requirements of Law 11/2018 and Taxonomy Regulation of the European Union	Reporting framework		Page number
	European Sustainability Reporting Standards	Others	
General information			
Description of the business model: business environment, its organisation and structure	(ESRS 2) SBM-1		31-40
The markets in which it operates	(ESRS 2) SBM-1		31-40
Its goals and strategies	(ESRS 2) GOV-3, SBM-1, MDR-T		27-28, 31-40, 99-101, 113, 118, 128, 131, 157-159, 178, 189, 207, 211, 220
The main factors and trends that may affect its future evolution	(ESRS 2) SBM-2, SBM-3		40-57
Reporting framework used	(ESRS 2) BP-1		21
Materiality analysis	(ESRS 2) SBM-2, SBM-3, IRO-1, IRO-2		40-66
Information on environmental issues			
Management approach: Description of the Group's policies with respect to environmental and social issues	E1-2, E1-3, E2-1, E2-2, E3-1, E3-2, E4-2, E4-3, E5-1, E5-2		93-98, 111-112, 116-117, 125-127, 129-130
Detailed general information			
Detailed information on the current and foreseeable effects of the company's activities on the environment and, as the case may be, on health and safety	(ESRS 2) SBM-3, IRO-1, SBM-3 in E1, IRO-1 in E1, E1-1, IRO-1 in E2, IRO-1 in E3, SBM-3 in E4, IRO-1 in E4, IRO-1 in E5		41-59, 90-93, 111, 116, 120-125, 129
Environmental assessment or certification procedures	E1-3, E2-2, E3-2, E4-2, E5-2	ISO:14001 Standard, EMAS Regulation	94-98, 112, 117, 125, 130
Resources dedicated to the prevention of environmental risks	E1-3, E1-9, E2-5, E3-5, E4-6, E5-6		94-98, 108-110, 114, 119, 128, 133
Application of the precautionary principle	(ESRS 2) SBM-3, E1-9, E2-5, E3-5, E4-6, E5-6		41-57, 108-110, 114, 119, 128, 133
The amount of provisions and guarantees for environmental risks	E1-9, E2-6, E3-5, E4-6, E5-6		108-110, 114, 119, 128, 133-134

Requirements of Law 11/2018 and Taxonomy Regulation of the European Union	Reporting framework		Page number
	European Sustainability Reporting Standards	Others	
Pollution			
Measures to prevent, reduce or rectify carbon emissions that seriously harm the environment; taking into account any activity-specific form of air pollution	E2-2		112
Including noise and light pollution	Not applicable	Internal reporting framework: qualitative information	115
Circular economy and waste prevention and management			
Circular economy and waste prevention and management	E5-5		131-133
Measures of prevention, recycling, reuse and other forms of recovery and elimination of waste	E5-2, E5-5		130-133
Actions to combat food waste	E5-2		130, 134
Sustainable use of resources			
Sustainable use of resources: water consumption and supply according to local restrictions	E3-2, E3-4		118-119
Consumption of raw materials and the measures adopted to improve efficiency in their use	E5-2, E5-4		130-134
Direct and indirect consumption of energy	E1-5		101-102
Measures taken to improve energy efficiency	E1-3		93-98
Use of renewable energy	E1-5		101-102
Climate change			
Climate change: the important elements of greenhouse gas emissions generated as the result of the company's activities, including the use of the goods and services produced	E1-6		102-107
The measures adopted in order to adapt to the consequences of climate change	E1-1, SBM-3 in E1, E1-3		89-91, 94-98
The voluntarily established long and short-term emission reduction targets to reduce greenhouse gas emissions and the measures implemented for this purpose	E1-1, E1-4		89-90, 99-101
Biodiversity protection			
Biodiversity protection: measures taken to preserve or restore biodiversity	E4-1, E4-3, E4-5		120, 126-128
Impacts caused by activities or operations in protected areas	SBM-3 in E4, IRO-1 in E4, E4-3, E4-5		120-128
Information on social and personnel-related issues			
Management approach: Description of the Group's policies with respect to social and personnel-related issues	S1-1, S1-2		139-142, 145-156
Employment			
Total number and distribution of professionals by gender, age, country and professional group	S1-6, S1-9 * The distribution by occupational classification is not included in the ESRs.	GRI 405-1	159-164, 168

Requirements of Law 11/2018 and Taxonomy Regulation of the European Union	Reporting framework		Page number
	European Sustainability Reporting Standards	Others	
Total number and distribution of work contract modalities, yearly average of permanent contracts, temporary contracts and part-time contracts by gender, age and professional group	Not applicable	GRI 2-7	168-169
Number of dismissals by gender, age and professional group	Not applicable	GRI 2-7	169
Average remuneration and its evolution by gender, age and professional group or equivalent	Not applicable	GRI 405-2	169-170
Gender pay gap, remuneration for work of equal value or average for the company	S1-16		167
The average remuneration of directors and managers, including variable remuneration, expenses, compensation, payments to long-term savings plans and any other item by gender	Not applicable	GRI 2-19, GRI 2-20, GRI 405-2	170
Implementation of policies related to the disconnecting from work	S1-1		139-142, 170
Employees with disabilities	S1-12		165
Organisation of work			
Organisation of work hours	S1-1, S1-8, S1-11, S1-15		139-142, 162, 164, 166
Number of hours lost to absenteeism	Not applicable	Internal reporting framework: Number of hours of absenteeism including common sickness and occupational accident hours	170
Measures aimed at providing work-life balance and promoting their shared use by both parents	S1-4, S1-15		145-156, 166
Health and safety			
Health and safety conditions in the workplace	S1-1, S1-4, S1-14		139-142, 145-156, 165-166
Work-related accidents, frequency and severity and occupational illnesses, by gender	S1-14 *The frequency and severity rate, and the breakdown of accidents by gender is not included in the ESRs.	GRI 403-9	165-166, 170-171
Social relations			
Organisation of social dialogue, including procedures for notifying and consulting employees and negotiating with them	S1-2, S1-3		142-144
Percentage of employees covered by collective bargaining agreements by country	S1-8		162-163
Results of collective bargaining agreements, particularly in relation to occupational health and safety	S1-8, S1-14		162-163, 165-166
Mechanisms and procedures that the company has in place to promote the involvement of workers in the management of the company, in terms of information, consultation and participation	S1-2, S1-3		142-144
Training			
Training policies implemented	S1-1, S1-4		139-142, 145-156

Requirements of Law 11/2018 and Taxonomy Regulation of the European Union	Reporting framework		Page number
	European Sustainability Reporting Standards	Others	
Total number of hours of training courses by professional group	Not applicable	GRI 404-1	171
Universal accessibility			
Universal accessibility for persons with disabilities	S1-1, S1-4		139-142, 145-156
Equality			
Measures adopted to promote equal treatment and opportunities for men and women	S1-2, S1-3, S1-4		142-156
Equality plans, measures adopted to promote employment and protocol against sexual harassment and harassment on the grounds of sex	S1-1, S1-4		139-142, 145-156
Integration and universal accessibility for persons with disabilities	S1-1, S1-4		139-142, 145-156
Policy against any type of discrimination and, where appropriate, for managing diversity	S1-1, S1-4		139-142, 145-156
Information on respect for human rights			
Management approach: Description of the Group's policies with respect to human rights	S1-1, S2-1, S3-1		139-142, 173-174, 181-182
Information on respect for human rights	(ESRS 2) GOV-4. S1-1, S1-4, S1-17, S2-1, S2-4, S3-1, S3-4.		29, 139-142, 145-156, 169, 173-177, 181-182, 184-188
Application of due diligence procedures in relation to human rights and prevention of the risks of violation of human rights and, where appropriate, measures to mitigate, manage and rectify any possible abuses committed	(NEIS 2) GOV-4. S1-1, S1-2, S1-3, S1-4, S2-1, S2-2, S2-3, S2-4, S3-1, S3-2, S3-3, S3-4.		29, 139-142-156, 173-177, 181-188
Formal complaints for cases of violation of human rights	S1-17, S2-1, S3-4		169, 173-174, 184-188
Promotion of and compliance with the provisions of the fundamental conventions of the International Labour Organisation in relation to respect for freedom of association and the right to collective bargaining	S1-8		162
Elimination of discrimination in employment and occupation	S1-1, S2-1, S3-1		139-142, 173-177, 181-182
The elimination of forced or compulsory labour	S1-1, S2-1, S3-1		139-142, 173-177, 181-182
The effective elimination of child labour	S1-1, S2-1, S3-1		139-142, 173-177, 181-182
Fight against corruption and bribery			
Management approach: description and results of the policies related to these issues as well as the main risks related to these issues linked to the group's activities	G1-1, G1-3		193-198, 201-202
Information relating to the fight against corruption and bribery			
Measures adopted to prevent corruption and bribery	G1-1, G1-3		193-198, 201-202
Measures to combat money laundering	G1-1, G1-3		193-198, 201-202
Contributions to foundations and not-for-profit organisations	S3-4		184-188

Requirements of Law 11/2018 and Taxonomy Regulation of the European Union	Reporting framework		Page number
	European Sustainability Reporting Standards	Others	
Information about the company			
Management approach: description and results of the policies related to these issues as well as the main risks related to these issues linked to the group's activities	S3-1, S3-4		181-182, 184-188
The company's commitment to sustainable development			
The impact of the company's activity on employment and local development	S3-1, S3-2, S3-3, S3-4, S3-5		181-189
The impact of the company's activity on local communities and on the region	S3-1, S3-2, S3-3, S3-4 S3-5		181-189
Relations with key figures of local communities and modalities of dialogue with them	S3-1, S3-2, S3-3, S3-4, S3-5		181-189
Association and sponsorship actions	S3-4		184-188
Subcontracting and suppliers			
Inclusion in the procurement policies regarding social issues, gender equality and environment	S2-1, S2-4, G1-2		173-177, 198-201
Consideration in supplier and subcontractor relations of their social and environmental responsibilities	S2-1, S2-4, G1-2		173-177, 198-201
Systems for supervision and auditing and their results	G1-2		198-201
Consumers			
Measures for the health and safety of consumers	Not applicable	GRI 403-7	213-220
Complaint systems, complaints received and their resolution	Not applicable	GRI 2-6, GRI 418-1	217-220
Tax information			
Profits obtained by country	Not applicable	GRI 207-4	221
Tax paid on profits	Not applicable	GRI 207-4	221-222
Public subsidies received	Not applicable	GRI 201-4	221
Regulation (EU) 2020/852 - Taxonomy			
Qualitative information			
Accounting policy		Regulation (UE) 2020/852, Regulation (UE) 2021/2178	72-80
Assessment of compliance with Regulation (EU) 2020/852		Regulation (UE) 2020/852, Regulation (UE) 2021/2178	72-80
Background information		Regulation (UE) 2020/852, Regulation (UE) 2021/2178	72-80

Requirements of Law 11/2018 and Taxonomy Regulation of the European Union	Reporting framework		Page number
	European Sustainability Reporting Standards	Others	
Quantitative information			
Eligibility and alignment of turnover		Regulation (UE) 2020/852, Regulation (UE) 2021/2178, Regulation (UE) 2021/2139, Regulation (UE) 2023/2486	81-82
Eligibility and alignment of CapEx		Regulation (UE) 2020/852, Regulation (UE) 2021/2178, Regulation (UE) 2021/2139, Regulation (UE) 2023/2486	83-84
Eligibility and alignment of OpEx		Regulation (UE) 2020/852, Regulation (UE) 2021/2178, Regulation (UE) 2021/2139, Regulation (UE) 2023/2486	85-86

EXTERNAL VERIFICATION REPORT

**Independent Limited Assurance Report on
the Consolidated Non-Financial Information Statement and
Sustainability Information for the year ended
December 31, 2024**

ENAGÁS, S.A. AND SUBSIDIARIES



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INDEPENDENT LIMITED ASSURANCE REPORT ON THE CONSOLIDATED NON-FINANCIAL INFORMATION STATEMENT AND SUSTAINABILITY INFORMATION

To the shareholders of
ENAGÁS, S.A.

Conclusion of limited assurance

In accordance with article 49 of the Commercial Code, we have conducted a limited assurance engagement on the Consolidated Non-Financial Information Statement ("NFIS") and sustainability information for the year ended December 31, 2024 of ENAGÁS, S.A. (the "Entity") and subsidiaries (the "Group"), which is part of the Group's consolidated management report.

The content of the NFIS contains information in addition to that required by prevailing company law in respect of non-financial information, specifically the sustainability information prepared by the Group for the year ended December 31, 2024 (the "sustainability information") in accordance with Directive (EU) 2022/2464 of the European Parliament and of the Council, as regards corporate sustainability reporting (the "CSRD"). The sustainability information was also subject to limited assurance.

Based on the procedures applied and the evidence obtained, no matter has come to our attention that would cause us to believe that:

- a) The Group's NFIS for the year ended December 31, 2024 has not been prepared, in all material respects, in accordance with the contents required by prevailing company law and the criteria selected in European Sustainability Reporting Standards ("ESRS"), as well as other criteria described above, as explained for each matter in the Appendices of the table "NON-FINANCIAL AND DIVERSITY REPORTING REQUIREMENTS (LAW 11/2018) AND THE EU TAXONOMY FOR SUSTAINABLE ACTIVITIES REGULATION" of the NFIS.
- b) The sustainability information, taken as a whole, has not been prepared, in all material respects, in accordance with the sustainability reporting framework applied by the Group and identified in the in the General Information chapter, section BP-1 (General Basis for the preparation of the Statement of consolidated non-financial and sustainability information), including:
 - That the description of the process for identifying the sustainability information to be disclosed included in the General Information chapter, section SBM-3 (Impacts, Risks, and Relevant Opportunities and their interaction with the strategy and business model) is consistent with the process implemented and that it enables the identification of the material information to be disclosed in accordance with the requirements of ESRS.
 - Compliance with ESRS.

Domicilio Social: Calle de Raimundo Fernández Villaverde, 65. 28003 Madrid - Inscrita en el Registro Mercantil de Madrid, tomo 9.364 general, 8.130 de la sección 3ª del Libro de Sociedades, folio 68, hoja nº 87.690-1, inscripción 1ª. C.I.F. B-78970506.

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- Compliance with the disclosure requirements included in subsection DISCLOSURE OF INFORMATION UNDER ARTICLE 8 OF REGULATION (EU) 2020/852 (TAXONOMY REGULATION) on the environmental information section in the sustainability information with Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council on the establishment of a framework to facilitate sustainable investment.

Basis of conclusion

We have performed our limited assurance engagement in accordance with generally accepted professional standards applicable in Spain and specifically with the guidelines contained in the Guidelines 47 (revised) and 56 issued by the Spanish Institute of Chartered Auditors on non-financial information assurance engagements and considering the contents of the note issued by the Spanish Accounting and Auditing Institute (ICAC) on December 18, 2024 (the "generally accepted professional standards").

The procedures in a limited assurance engagement are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in limited assurance engagement is lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under those regulations are further described in the *Practitioner's responsibilities* of our report.

We have complied with the independence and other ethics requirements laid down in the International Code of Ethics for Professional Accountants (including international standards on independence) of the International Ethics Standards Board for Accountants (IESBA), which is based on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behavior.

Our firm applies the International Standard on Quality Management (ISQM) 1, which requires the firm to design, implement, and monitor a system of quality management that includes policies and procedures covering compliance with its ethics requirements, professional rules and applicable legal and regulatory requirements.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our conclusion.

Directors' responsibilities

The preparation of the NFIS in the Group's consolidated management report is the responsibility of the directors of ENAGÁS, S.A. The NFIS has been prepared in accordance with the content required by prevailing company law and in conformity with the selected ESRS criteria, as well as other criteria described for each matter in the Appendices of the table "NON-FINANCIAL AND DIVERSITY REPORTING REQUIREMENTS (LAW 11/2018) AND THE EU TAXONOMY FOR SUSTAINABLE ACTIVITIES REGULATION" of the NFIS.

This responsibility also includes the design, implementation, and maintenance of such internal control as considered necessary to ensure that the NFS is free of material misstatement, due to fraud or error.



The directors of ENAGÁS, S.A. are also responsible for defining, implementing, adapting, and maintaining the management systems from which the necessary information for preparing the NFS is obtained.

In relation to the sustainability disclosures, the entity's directors are responsible for developing and implementing a process for identifying the disclosures to be included in the sustainability information in accordance with the CSRD, the ESRS and Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council, of 18 June 2020, and for disclosing information about this process in the sustainability information in the General Information chapter, section SBM-3 (Impacts, Risks, and Relevant Opportunities and their interaction with the strategy and business model). This responsibility includes:

- ▶ Understanding the context in which the Group carries out its activities and business relationships, as well as its stakeholders, in relation to the Group's impact on people and the environment.
- ▶ Identifying the actual and potential impacts (both negative and positive), as well as risks and opportunities that could affect, or could reasonably be expected to affect, the Group's financial position, financial performance, cash flows, access to financing, or cost of capital in the short, medium or long term.
- ▶ Assessing the materiality of the identified impacts, risks and opportunities.
- ▶ Making assumptions and estimates that are reasonable under the circumstances.

The directors are also responsible for the preparation of the sustainability information, which includes the information identified by the process, in accordance with the sustainability reporting framework used, including compliance with the CSRD, the ESRS, and the disclosure requirements, included in subsection DISCLOSURE OF INFORMATION UNDER ARTICLE 8 OF REGULATION (EU) 2020/852 (TAXONOMY REGULATION) on the environmental information section in the sustainability information with Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council on the establishment of a framework to facilitate sustainable investment.

This responsibility includes:

- ▶ Designing, implementing and maintaining such internal control as the directors consider relevant to enable the preparation the sustainability information that is free from material misstatement, whether due to fraud or error.
- ▶ Selecting and applying appropriate methods for the presentation of sustainability information and the basis of assumptions and estimates that are reasonable, considering the circumstances, about specific disclosures.

Inherent limitations in the preparation of the information

In accordance with ESRS, the entity's directors are required to prepare forward-looking information on the basis of assumptions and hypothetical assumptions, which must be included in the sustainability information, about potential future events and possible future actions, if any, that the Group could take. Actual results may differ significantly from estimated results, as the reference is to the future and future events frequently do not occur as expected.



Building a better working world

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In determining the disclosures in the sustainability information, the entity's directors interpret legal and other terms that are not clearly defined and that may be interpreted differently by others, including the legal conformity of such interpretations, which, accordingly, are subject to uncertainty.

Practitioner’s responsibilities

Our objectives are to plan and perform the assurance engagement to obtain limited assurance about whether the NFIS and sustainability information are free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusions. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of this information.

As part of a limited assurance engagement, we exercise professional judgment and maintain professional skepticism throughout the engagement. We also:

- ▶ Design and perform procedures to assess whether the process for identifying the disclosures to be included in the NFIS and sustainability information is consistent with the description of the process followed by the Group and enables, where appropriate, the identification of the material information to be disclosed as required in the ESRS.
- ▶ Perform risk procedures, including obtaining an understanding of internal control relevant to the engagement, to identify disclosures where material misstatements are likely to arise, whether due to fraud or error, but not for the purpose of providing a conclusion on the effectiveness of the Group’s internal control.
- ▶ Design and perform procedures responsive to disclosures in the NFIS and sustainability information where material misstatements are likely to arise. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Summary from the work performed

A limited assurance engagement involves performing procedures to obtain evidence as a basis for our conclusions. The nature, timing and extent of procedures selected depend on professional judgment, including the identification of disclosures where material misstatements are likely to arise, whether due to fraud or error, in the NFIS and sustainability information.

Our work consisted of making inquiries of management and of the Group's various business units and components that participated in the preparation of the NFIS and sustainability information, reviewing the processes used for compiling and validating the information presented in the NFIS and sustainability information, and applying certain analytical procedures and sample review tests as described below:

For assurance of the NFIS:

- ▶ Holding meetings with Group personnel to obtain an understanding of the business model, the policies and management approaches applied, and the main risks related to these matters and to gather the information needed to perform the independent assurance work.



- ▶ Analyzing the scope, relevance and completeness of the content of the 2024 NFIS based on the materiality assessment performed by the Group and described in the General Information chapter, section SBM-3 (Impacts, Risks, and Relevant Opportunities and their interaction with the strategy and business model) of the NFIS, considering the content required in prevailing company law.
- ▶ Analyzing the processes used to compile and validate the data presented in the 2024 NFS.
- ▶ Reviewing the disclosures relating to the risks, policies and management approaches applied with respect to the material matters presented in the 2024 NFIS.
- ▶ Checking, through sample testing, the information underlying the content of the 2024 NFS and whether it has been adequately compiled based on data provided by information sources.

For assurance of the sustainability information:

- ▶ Making inquiries of Group personnel:
 - To understand the business model, the policies and management approaches applied and the main risks related to these matters and to gather the information needed to perform the independent assurance work.
 - To know the source of the information used by management (e.g., interaction with stakeholders, business plans and documents on strategy) and review the Group's internal documentation on its process.
- ▶ Obtaining, through inquiries of Group personnel, insight into the entity's processes for gathering, validation, and presenting relevant information for the preparation of its sustainability information.
- ▶ Assessing whether the evidence obtained in our procedures on the process implemented by the Group for determining the disclosures to be included in the sustainability information is consistent with the description of the process included in that information, as well as assessing whether that process implemented by the Group enables identification of the material information to be disclosed in accordance with the requirements of the ESRS.
- ▶ Assessing whether all the information identified in the process implemented by the Group for determining the disclosures to be included in the sustainability information is effectively included.
- ▶ Evaluating whether the structure and presentation of the sustainability information is consistent with ESRS and the rest of the sustainability reporting framework applied by the Group.
- ▶ Performing inquiries of relevant personnel and analytical procedures on the disclosures in the sustainability information, considering those where material misstatements are likely to arise, whether due to fraud or error.
- ▶ Performing, as appropriate, substantive procedures through sampling of selected disclosures in the sustainability information, considering those where material misstatements are likely to arise, whether due to fraud or error.



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- ▶ Obtaining, as appropriate, reports issued by accredited independent third parties accompanying the consolidated management report in response to the requirements of European regulations and, in relation to such information and in accordance with generally accepted professional standards, verification, exclusively, of the accreditation of the practitioner and that the scope of the report issued corresponds to that required by European regulations.
- ▶ Obtaining, as appropriate, the documents containing the information incorporated by reference, the reports issued by auditors or practitioners on such documents and, in accordance with generally accepted professional standards, verification, exclusively, that in the document to which the information incorporated by reference refers, the requirements described in ESRS for the incorporation by reference of information in the sustainability information are met.
- ▶ Obtaining a representation letter from the directors and management regarding the NFIS and sustainability information.

Other information

The persons in charge of the entity's governance are responsible for other information. Other information comprises the consolidated financial statements and the rest of the information included in the consolidated management report, but does not include either the auditors' report on the consolidated financial statements or the assurance reports issued by accredited independent third parties required by European Union law on specific disclosures contained in the sustainability information and attached to the consolidated management report.

Our assurance report does not cover other information and we do not express any form of assurance conclusion on it.

Our responsibility in connection with our engagement to assure the sustainability information is to read the other information identified and consider whether it is materially inconsistent with the sustainability information or the knowledge we have obtained during the assurance engagement that could indicate material misstatements in the sustainability information.

ERNST & YOUNG, S.L.

José Agustín Rico-Horcajo

February 17, 2025

APPENDICES

2024

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ANNUAL CORPORATE GOVERNANCE REPORT

The 2024 Annual Corporate Governance Report forms part of this Consolidated Management Report. Both documents are available on the [corporate website](#) or on the [CNMV website](#).

ANNUAL REPORT ON DIRECTORS' REMUNERATION

The Annual Report on Directors' Remuneration for fiscal year 2024 forms part of this Consolidated Management Report. Both documents are available on the [corporate website](#) or on the [CNMV website](#).

TCFD CONTENT INDEX

Task Force on Climate-related Disclosures (TCFD) recommendations

Areas	Recommendations	Page numbers, URL and/or direct response
Governance	Describe the board's oversight of climate-related risks and opportunities.	88 See disclosure requirement GOV-3 within chapter E1 on Climate Change, which details the oversight functions of the Board of Directors.
	Describe management's role in assessing and managing climate-related risks and opportunities.	92-93 See disclosure requirement IRO-1 within chapter E1 on Climate Change on Description of the processes to identify and assess material impacts, risks, and opportunities related to climate
Strategy	Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term.	90-91 See disclosure requirement SBM-3 within chapter E1 on Climate Change on Material impacts, risks, and opportunities and their interaction with the strategy and business model
	Describe the impact of climate related risks and opportunities on the organisation's businesses, strategy, and financial planning.	90-91 See disclosure requirement SBM-3 within chapter E1 on Climate Change on Material impacts, risks, and opportunities and their interaction with the strategy and business model
	Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	90-91 See disclosure requirement SBM-3 within chapter E1 on Climate Change on Material impacts, risks, and opportunities and their interaction with the strategy and business model
Risk management	Describe the organisation's processes for identifying and assessing climate-related risks.	90-93 See disclosure requirement IRO-1 within chapter E1 on Climate Change on Description of the processes to identify and assess material impacts, risks, and opportunities related to climate. See disclosure requirement SBM-3 within chapter E1 on Climate Change on Material impacts, risks, and opportunities and their interaction with the strategy and business model, and Business Model of chapter E1 on Climate Change 94-98, 108-109
	Describe the organisation's processes for managing climate-related risks.	See disclosure requirement E1-9 on Anticipated financial effects from material physical and transition risks and potential climate-related opportunities. See disclosure requirement E1-3 on Actions and resources in relation to climate change policies
	Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organisation's overall risk management.	92-93 See disclosure requirement IRO-1 on Description of the processes to identify and assess material impacts, risks, and opportunities related to climate. See disclosure requirement SBM-3 within chapter E1 on Climate Change on Material impacts, risks, and opportunities and their interaction with the strategy and business model.
Metrics and targets	Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process.	99-101 See disclosure requirement E1-4 on Targets related to climate change mitigation and adaptation
	Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	92-93, 102-107 See disclosure requirement E1-6 on Gross Scopes 1, 2, 3 and Total GHG emissions. See disclosure requirement IRO-1 within chapter E1 on Climate Change on Description of the processes to identify and assess material impacts, risks, and opportunities related to climate.
	Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets.	101-102 See disclosure requirement E1-5 on Energy consumption and mix

TNFD CONTENT INDEX

Task Force on Nature-related Disclosures (TNFD) recommendations

Areas	Recommendations	Page numbers, URL and/or direct response
	Describe the board's oversight of nature-related dependencies, impacts, risks and opportunities.	<p>23-27, 30-31, 125</p> <p>See disclosure requirement GOV-1 within chapter 2 General disclosures on The role of administrative, management and supervisory bodies.</p> <p>See disclosure requirement GOV-2 within chapter 2 General disclosures on Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies</p> <p>See disclosure requirement GOV-5 within chapter 2 General disclosures on Risk management and internal controls over sustainability reporting</p> <p>See disclosure requirement E4-2 on Policies related to biodiversity and ecosystems</p>
Governance	Describe the management's role in assessing and managing dependencies, impacts, risks and opportunities	<p>23-27, 125</p> <p>See disclosure requirement GOV-1 within chapter 2 General disclosures on The role of administrative, management and supervisory bodies.</p> <p>See disclosure requirement GOV-2 within chapter 2 General disclosures on Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies</p> <p>See disclosure requirement E4-2 on Policies related to biodiversity and ecosystems</p>
	Describe the organisation's human rights policies engagement and activities, and oversight by the board and management, with respect to Indigenous Peoples, Local Communities, affected and other stakeholders, in the organisation's assessment of and response to, nature-related dependencies, impacts, risks and opportunities.	<p>41-57, 125-127, 181-182, 184-188</p> <p>See disclosure requirement SBM-3 within chapter 2 General disclosures on Climate Change on Material impacts, risks, and opportunities and their interaction with the strategy and business model</p> <p>See disclosure requirement E4-2 on Policies related to biodiversity and ecosystems</p> <p>See disclosure requirement E4-3 on Actions and resources related to biodiversity and ecosystems</p> <p>See disclosure requirement S3-1 on Policies related to biodiversity and ecosystems</p> <p>See disclosure requirement S3-4 on Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions</p>

Areas	Recommendations	Page numbers, URL and/or direct response
Strategy	Describe the nature-related dependencies, impacts, risks and opportunities related to nature that the organisation has identified in the short, medium and long term.	120-125 See disclosure requirement SBM-3 within chapter E4 on Biodiversity and Ecosystems on Material impacts, risks, and opportunities and their interaction with the strategy and business model. See disclosure requirement IRO-1 on chapter E4 on Biodiversity and Ecosystems on Description of the processes to identify and assess material impacts, risks, and opportunities related to biodiversity and ecosystems.
	Describe the effect nature-related dependencies, impacts, risks and opportunities have had on the organisation's business model, value chain, strategy and financial planning, as well as any transition plans or analysis in place.	120-123, 125-128 See disclosure requirement SBM-3 within chapter E4 on Biodiversity and Ecosystems on Material impacts, risks, and opportunities and their interaction with the strategy and business model. See disclosure requirement E4-1 on Transition plan and consideration of biodiversity and ecosystems in strategy and business model See disclosure requirement E4-2 on Policies related to biodiversity and ecosystems See disclosure requirement E4-3 on Actions and resources related to biodiversity and ecosystems See disclosure requirement E4-4 on Targets related to biodiversity and ecosystems See disclosure requirement E4-6 on Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities
	Describe the resilience of the organisation's strategy to nature-related risks and opportunities, taking into account different scenarios.	41-57, 120 See disclosure requirement SBM-3 within chapter 2 General disclosures on Climate Change on Material impacts, risks, and opportunities and their interaction with the strategy and business model See disclosure requirement E4-1 on Transition plan and consideration of biodiversity and ecosystems in strategy and business model
	Disclose the locations of assets and/or activities in the organisation's direct operations and, where possible, upstream and downstream value chain(s) that meet the criteria for priority locations.	41-57, 120-123 See disclosure requirement SBM-3 within chapter E4 on Biodiversity and Ecosystems on Material impacts, risks, and opportunities and their interaction with the strategy and business model. See disclosure requirement IRO-1 in chapter E4 on Biodiversity and Ecosystems on Description of the processes to identify and assess material impacts, risks, and opportunities related to biodiversity and ecosystems.
	Describe the organisation's processes for identifying, assessing and prioritising nature-related dependencies, impacts, risks and opportunities in its direct operations and in its upstream and downstream value chain.	123-125 See disclosure requirement IRO-1 within chapter E4 on Biodiversity and Ecosystems on Description of the processes to identify and assess material impacts, risks, and opportunities related to biodiversity and ecosystems. See disclosure requirement E4-2 on Policies related to biodiversity and ecosystems
Risk management	Describe the organisation's processes for managing nature-related dependencies, impacts, risks and opportunities.	
	Describe how processes for identifying, assessing, prioritising and monitoring nature-related risks are integrated into and inform the organisation's overall risk management processes.	
Metrics and targets	Disclose the metrics used by the organisation to assess and manage material nature-related risks and opportunities in line with its strategy and risk management process.	128 See disclosure requirement E4-6 on Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities
	Disclose the metrics used by the organisation to assess and manage dependencies and impacts on nature	128
	Describe the targets and goals used by the organisation to manage nature-related dependencies, impacts, risks and opportunities and its performance against these.	See disclosure requirement E4-5 on Impact metrics related to biodiversity and ecosystems change See disclosure requirement E4-4 on Targets related to biodiversity and ecosystems

CONTACT

Please address any comments, requests for clarification or suggestions in connection with this report to:

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APMs

The financial information disclosed by Enagás contains figures and measures prepared in line with applicable accounting legislation, in addition to a series of measures prepared in accordance with the reporting standards established and developed internally, known as Alternative Performance Measures (APMs).

These APMs are considered to be adjusted figures with respect to those presented in accordance with International Financial Reporting Standards adopted by the European Union (IFRS-EU), which is the accounting framework applicable to the Enagás Group's consolidated financial statements, and the reader should therefore consider them as supplementary information, not replacements.

APMs are important for users of financial information because they are the measures used by Enagás' Management to assess the Group's financial performance, cash flows or financial position for making operational or strategic decisions. These APMs are consistent with the main indicators used by the investment and analyst community in capital markets.

In this regard, and in accordance with the provisions of the Guideline issued by the European Securities and Markets Authority (ESMA), in force since July 3, 2016 on the transparency of Alternative Performance Measures, Enagás provides the following information relating to those APMs included in the management information for Q4 2024 that it considers significant. Furthermore, in order to comply with ESMA guidelines on direct reference to previously published documents detailing APMs for previous periods, we include a link in which this information can be found: <https://www.enagas.es/en/investor-relations/financial-information/alternative-performance-measures-aptm/>

1. Alternative Performance Measures relating to the Income Statement

EBITDA

EBITDA (Earnings Before Interest, Tax, Depreciation and Amortization) is an indicator that measures the company's operating income before interest, taxes, impairments and amortisation. By stripping out financial and tax figures and accounting costs that do not involve cash outflows, it is used by management to assess results over time, allowing comparisons with other companies in the sector

EBITDA is calculated as operating income plus depreciation and amortisation, impairment losses, if any, and other items that do not represent cash inflows or outflows in Enagás' operations (such as capital gains or losses on divestments, provisions, etc.). The reconciliation based on the Operating Income shown in the Consolidated Financial Statements as at December 31, 2024 is shown below:

	Q4 2024
Operating revenue	913.2
Results from Affiliates	185.8 ^(*)
Operating Expenses	-338.4
EBITDA	760.7

(*) For management purposes, 'Results from affiliates' presented as part of the operating income, in the amount of 185.8 million euros, does not include the impact of the amortisation of the PPAs, for the sum of 39.4 million euros, which is considered to be a higher amortisation expense and is therefore excluded from EBITDA. Considering the two items together, the amount would be 146.5 million euros.

Adjusted EBITDA

Adjusted EBITDA is an indicator that measures the company's margin of operating income before the deduction of interest, taxes, impairment, depreciation and amortisation, and includes both dividends received as well as interest on subordinated debt from associates that are included in the financial statements of the Enagás Group using the equity method.

Management uses this measurement to calculate the leverage ratios described in the section 'Alternative Performance Measures relating to the Balance Sheet and leverage ratios' so they can be compared with the figures of other companies in the sector. Below is the reconciliation of the Adjusted EBITDA of Q4 2024, which is subsequently used in the leverage ratios:

	Q4 2024
EBITDA	760.7
Dividends (*)	161.0
Results from Affiliates (**)	-185.8
EBITDA AJUSTADO	735.9

(*) These are essentially dividends received from companies accounted for using the equity method. Additionally, it includes dividends from subordinated debt collected from companies accounted for using the equity method.

(**) Since dividends received from affiliates are indicated here, the results of these companies must be excluded, but are instead included in EBITDA, as explained in the previous section.

EBIT

EBIT ('Earnings Before Interest and Taxes') is an indicator that measures a company's operating income before the deduction of interest and taxes. Similar to the previous indicator, the company's Management uses this figure to assess the company's earnings over time and compare them with the figures of other companies in its sector.

EBIT is calculated the same way as EBITDA, deducting depreciation and amortisation, impairment, if any, as well as other items that do not involve cash inflows or outflows in Enagás operations (such as capital gains or losses on disposals, provisions, etc.).

EBIT for Q4 2024 amounted to 428.7 million euros. This figure matches the Operating Income for that period.

Pro forma net profit

Since the Group announced its strategic plan, various operations have taken place as part of the asset rotation plan that make the comparability of the net profit between years not straightforward.

In this context, the **Pro forma net profit**, an indicator that measures net profit without including the non-recurring impacts derived from

significant operations, has been included, thus facilitating the comparability of this magnitude between different financial years. This is done on the basis of the net profit and eliminates the non-recurring impacts on the income statement arising from these transactions.

M€	2023 recurrent	Non-recurrent impact	2023	2024 recurrent	Non-recurrent impact	2024	Var 2024/2023 recurrent	Var 2024/2023
Regulated income	896.6	-	896.6	892.5	-	892.5	-4.2	-4.2
Other income	23.0	-	23.0	20.7	-	20.7	-2.3	-2.3
Operated income	919.6	-	919.6	913.2	-	913.2	-6.4	-6.4
Personnel expenses	-137.1	-	-137.1	-142.7	-	-142.7	-5.6	-5.6
Other operated expenses	-201.8	-	-201.8	-195.7	-	-195.7	6.1	6.1
Operating expenses	-338.8	-	-338.8	-338.4	-	-338.4	0.5	0.5
Results from affiliates	175.0	24.4	199.5	185.8	-	185.8	-13.6	-13.6
EBITDA	755.8	24.4	780.3	760.7	-	760.7	-19.6	-19.6
Amortisation	-308.6	-14.8	-323.4	331.9	-	-331.9	-8.6	-8.6
Depreciation and amortisation	-271.2	-	-271.2	-292.6	-	-292.6	-21.4	-21.4
PPA	-37.4	-14.8	-52.1	-39.4	-	-39.4	12.8	12.8
EBIT	447.2	9.7	456.9	428.7	-	428.7	-28.1	-28.1
Financial result	-82.5	46.7	-35.8	-58.9	-682.50	-741.4	23.6	-705.6
Corporate income tax	-73.6	-4.5	-78.1	59.2	73.1	13.9	14.4	92.0
Income attributable to minority interests	-0.5	-	-0.5	-0.6	-	-0.6	-0.1	-0.1
BDI	290.7	51.9	342.5	310,1	-609.40	-299.3	9.7	-641.8

(*) In the Consolidated Financial Statements, these transactions relating to both to the sale of Talgrass Energy, as well as the impairment due to the GSP award, had an impact on the financial result of -682.5 million euros and 73.1 million euros on the "Corporate Income tax" line, totalling an effect on the net result of -609.4 million euros at December 31, 2024.

2. Alternative Performance Measures related to the Balance Sheet and leverage ratios

Net Debt

Net financial debt or **net debt** is the main indicator used by Management to measure the level of the Group's debt. It consists of gross debt less cash.

To calculate gross debt, the Balance Sheet headings 'Debts with credit institutions' and 'Debentures and other marketable securities' measured at amortised cost and in relation to 'Other financial liabilities' are added, including only the sum resulting from the application of IFRS16, as well as the various loans from organisations that are not credit institutions.

The cash amount is taken from the consolidated balance sheet heading 'Cash and cash equivalents'.

The reconciliation between the APM and the figures corresponding to the consolidated balance sheet for the period ending 31 December 2024 are shown below (in millions of euros):

	Q4 2024
Cash and cash equivalents	1,295.7
Bank loans	-341.8
Bonds and other marketable securities	-2,971.9
Other financial liabilities (*)	-386.0
Net debt	-3,347.4

(*) The amount included in this heading relating to the recognition of the financial liability due to the application of IFRS16 amounts to 385.1 million euros. Additionally, the debt granted by organisations that are not credit institutions amounts to 0.9 million euros.

Ratios linked to Net Debt

Management uses two ratios to analyse leverage and the Group's capacity to meet its financial obligations over time, comparing these with other companies in the sector.

The leverage ratio is calculated as Net Debt/Adjusted EBITDA, calculated as shown below:

	Q4 2024
Net debt	2,404.1
Adjusted EBITDA	735.9
Net debt / Adjusted EBITDA	3.3x

The ratio that compares cash flow generation capacity to net debt is calculated as FFO over the last twelve months (LTM)/net debt, as follows:

	Q4 2024
Adjusted FFO	688.8
Net debt	2,404.1
FFO/Net Debt	28.7%

Financial cost of gross debt

The **gross financial cost** is the measure of the effective interest rate of the financial debt. This indicator is used by management to assess its evolution over time, the impact of interest rates and its position in relation to the market.

The gross financial cost is determined by dividing the gross financial expense by the average gross debt multiplied by the number of effective days in the year (360 days) divided by the natural days in the year (366 days), where gross financial expense corresponds to interest on loans and related coverage (Debt-related interest from the Consolidated Income Statement). Further, average gross debt is calculated as the daily average of nominal amounts of gross financial debt.

The reconciliation between the APM and the quantities observable in the Consolidated Income Statement at December 31, 2024 (in millions of euros) is shown below:

	Q4 2024
Gross financial expense (*)	106.2
Average gross debt	4,072.9
Gross financial cost	2.6%

(*) The amount included under this heading corresponds to the interest associated with the debt.

3. Alternative Performance Measures relating to Cash Flow and Investments

Funds from Operations (FFO)

The **FFO** is the main cash flow generation indicator analysed by Enagás Management since it jointly measures cash generation in the regulated and non-regulated domestic business and in the international business in the form of dividends from affiliates or interest charged on subordinated debt extended to these companies, after deducting both the payment of taxes and interest relating to the Group's financial debt.

It is calculated as:

FFO = EBITDA excluding profit (loss) from affiliates +/- taxes received/paid +/- interest received/paid + dividends received from affiliates + interest on subordinated debt charged to affiliates.

The reconciliation between this APM and the figures seen in the Consolidated Financial Statements for the period ending 31 December 2024 is shown below:

	Q4 2024
Operating income	428.7
Depreciation and amortisation (*) (***)	331.9
EBITDA	760.7
Taxes received/(paid) (****)	-46.2
Interest received/paid (**)	-13.5
Dividends (**)	161.0
Other adjustments	12.6
Results from Affiliates (*)	-185.8
FFO	688.8

(*) For management purposes, in addition to the provision for impairment of assets, 'Depreciation and amortisation' also includes the impact of the amortisation of the PPA, which was 39.4 million euros as of 31 December 2024.

(**) Interest on subordinated debt charged to affiliates is included under 'Dividends' for management purposes.

(***) Includes impairment on disposal of fixed assets recorded in the year.

Operating cash flow (OCF)

Operating Cash Flow measures the company's capacity to generate operating cash flow after changes in working capital. The calculation is based on FFO and includes changes in working capital.

The OCF amounted to 615 million euros in Q4 FY 2024. The reconciliation between this APM and the figures seen in the consolidated financial statements for the period ending 31 December 2024 is shown below (in millions of euros):

	Q4 2024
FFO	688.8
Change in working capital	-73.7
OPERATING CASH FLOW (OCF)	615.0

Free cash flow (FCF)

Free cash flow measures cash generation from operating and investment activities and is considered by Enagás to be a key APM since it is the indicator used to assess the funds available to pay dividends to shareholders and to service debt.

The reported **FCF** for Q4 2024 stood at 1.386 billion euros. The reconciliation between this APM and the figures seen in the consolidated financial statements for the period ending 31 December 2024 is shown below (in millions of euros):

	Q4 2024
OPERATING CASH FLOW (OCF)	615.0
Payments for investments	-140.0
Proceeds from divestments	911.0
Free Cash Flow (FCF)	1,386.0

Discretionary cash flow (DCF)

Discretionary cash flow is an APM used by Management to manage existing funding needs. It is defined as Free Cash Flow (FCF) less dividends paid to shareholders and certain exchange rate differences related to net debt.

The reported **DCF** for Q4 2024 stood at 1,040.9 million euros. The reconciliation between this APM and the figures seen in the consolidated financial statements for the period ending 31 December 2024 is shown below (in millions of euros):

	Q4 2024
Free Cash Flow (FCF)	1,386.0
Dividends paid	-378.9
Effect of changes in exchange rates	33.8
Discretionary Cash Flow (DCF)	1,040.9

Available funds/liquidity

This indicator is used by Management to measure the group's financial capacity to meet any short-term liquidity needs.

It corresponds to the 'Cash and cash equivalents' figure plus the total of undrawn credit lines.

The reconciliation between the APM and the figures corresponding to the consolidated balance sheet for the period ending December 31, 2024 are shown below:

	Q4 2024
Cash and cash equivalents	1,295.7
Other available funds	1,956.8
Total available funds	3,252.4

Pursuant to Article 253 of the Corporate Enterprises Act and Article 37 of the Commercial Code, and remaining applicable standards, on February 17, 2025, the Board of Directors of Enagás, S.A. authorised the Consolidated Management Report which, in accordance with the provisions of Law 11/2018 of December 28 on non-financial information and diversity, includes the Statement of consolidated non-financial (and sustainability) information for the year ended December 31, 2024, consisting of the accompanying documents preceding this document.

DECLARATION OF RESPONSIBILITY:

For the purposes of Article 99.2 of Royal Decree 6/2023, of March 17, the directors state that, to the best of their knowledge, the Consolidated Management Report includes a true and fair analysis of the performance and results of the businesses and the situation of the Company, together with the description of the main risks and uncertainties faced, and includes the Statement of consolidated non-financial information (and sustainability) information in accordance with the provisions of Law 11/2018, of December 28, on non-financial information and diversity. They additionally state that, to the best of their knowledge, the directors not signing below did not express dissent with respect to the Consolidated Management Report.

Chairman: Mr Antonio Llardén Carratalá	Chief Executive Officer: Mr Arturo Gonzalo Aizpiri
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Directors: Sociedad Estatal de Participaciones Industriales-SEPI (Represented by Mr Bartolomé Lora Toro)	
Ms Ana Palacio Vallelersundi	Mr José Montilla Aguilera
Ms Eva Patricia Úrbez Sanz	Ms María Teresa Arcos Sánchez
Mr Santiago Ferrer Costa	Ms Natalia Fabra Portela
Mr David Sandalow	Ms Clara Belén García Fernández Muro
Ms María Teresa Costa Campí	Mr José Blanco López
Mr Cristóbal José Gallego Castillo	Mr Manuel Gabriel González Ramos

DILIGENCE to record that, in accordance with the call of the Board of Directors, having been held at the registered office, allowing the directors to participate telematically, the Consolidated Management Report has been drawn up with the agreement of all

members of the Board of Directors, which is certified by the Secretary to the Board with his signature below, and with the signatures of those Directors who have physically participated in the Board of Directors.

Electronic signature of the Secretary to the Board

Secretary to the Board of Directors: Mr Diego Trillo Ruiz
