

Human Rights Policy

Madrileña RED DE GAS is committed to respecting and promoting Human Rights, in all its operations, its value chain and in all the communities where it operates, with special attention to vulnerable groups, as set out in its [Code of Ethics](#). This commitment is reinforced by the general commitments contained in the **Sustainability Policy** and the rights recognized in:

- The United Nations Universal Declaration of Human Rights.
- The United Nations Global Compact.
- The United Nations International Covenant on Economic, Social and Cultural Rights.
- The United Nations International Covenant on Civil and Political Rights.
- The fundamental conventions of the International Labour Organization (ILO).
- The United Nations Convention on the Elimination of Discrimination against Women.
- The Guide to the UN Guiding Principles on Business and Human Rights.
- The United Nations Convention on the Rights of the Child.
- United Nations Convention on the Rights of Persons with Disabilities.
- The European Directive on Business Due Diligence and Corporate Responsibility.
- The 2030 Agenda for Sustainable Development.

With the approval and publication of this Policy, Madrileña RED DE GAS seeks to ensure respect for and protection of Human Rights in all its activities, as well as to avoid situations that risk human rights violations, whether by action or omission, and to use its influence to promote compliance with and respect for human rights among its Stakeholders.

This policy applies to all employees, managers, and the Board of Directors of Madrileña RED DE GAS. With the aim of extending the principles of corporate responsibility throughout the supply chain, this commitment is extended to suppliers through the **Sustainable Purchasing Policy** and the [Supplier Code of Conduct](#), as well as the contractual specifications regarding working conditions and human rights.

PRINCIPLES AND COMMITMENTS

With the development and implementation of this Policy, Madrileña RED DE GAS establishes the following principles and commitments to respect Human Rights:

1. Respect for the Law

Madrileña RED DE GAS assumes compliance with, and enforces, current legal regulations regarding human rights.

2. Work placements

Madrileña RED DE GAS establishes the scrupulous respect for the Human and Labor Rights of its employees, in accordance with the following principles:

- Rejection of any form of abuse, harassment or discrimination in the workplace, and establishing reporting channels for this purpose.
- Right to non-discrimination and diversity in the workplace, guaranteeing equal opportunities, regardless of race, sex, maternity/ paternity, beliefs, ideology, sexual orientation, nationality, social origin, health, age, disability or other personal characteristics.
- Right to accessible environments, promoting work environments and jobs considering universal accessibility criteria.
- Right to fair and equitable remuneration: providing a favorable compensation system, linked to professional category, performance and achievement of company objectives.
- Right to rest and free time, promoting work-life balance and well-being initiatives among its employees and their families, including the right to digital disconnection.
- The right of our employees to freedom of association and to be represented to defend their interests, ensuring controls and nondiscriminatory policies against workers' representatives, respecting the exercise of their activity during the working day.
- Right to and respect for collective bargaining, as this is the vehicle for regulating relations between the company and the employees.
- Right to conditions that respect the health, safety, well-being and dignity of worker, with safety being one of the fundamental pillars.
- Right to privacy of information and worker privacy, through the application of policies, processes and security systems for information security and protection of their personal data.

3. Purchases and suppliers

MADRILEÑA RED DE GAS has established a **Sustainable Procurement Policy**, through which it collaborates with its suppliers and subcontractors to guarantee respect for Human Rights throughout the Supply Chain. This commitment is embodied in the **Supplier Code of Conduct** and managed through contracts and mechanisms for monitoring the activity of suppliers and contractors.

4. Customer relations

MADRILEÑA RED DE GAS establishes a framework for respecting the rights of its customers, in accordance with the following principles:

- Equal and respectful treatment of its clients, regardless of their profile and without prejudice related to their gender, nationality, ethnicity, age, family responsibilities or any other characteristics thereof.
- Respect for the rights of the client and the consumer derived from contractual commitments and current legal regulations.
- Recognition of the right to privacy of information and data reliability of all its stakeholders, implementing and ensuring an information security management system and protection of personal data, and maintaining strict compliance with the various European and national regulations and laws.

5. Commitment to society, communities and the around

MADRILEÑA RED DE GAS is committed to generating a positive and sustainable impact on the social spheres and communities in which it operates, in accordance with the following principles:

- Act with honesty and integrity, both in business processes and in relationships with suppliers and customers.
- To pursue and combat corruption in all its forms, through the implementation of procedures and mechanisms for monitoring and controlling activity.
- Manage natural capital, and control and minimize the resulting environmental risks and impacts of the activities.
- Establishment of collaboration mechanisms with social agents, associations and public entities, to work together in mitigating existing risks to Human Rights.
- Respect for the social, cultural and economic rights of the communities in which they operate develops the activity, establishing collaborative and trusting relationships.
- Establishment of measures to mitigate the potential impacts on commitments made and human rights, with special attention to access to energy by vulnerable people and groups.
- Creation of channels and mechanisms for listening and dialogue with stakeholders, to identify, understand and respond to their expectations.

DUE DILIGENCE

MADRILEÑA RED DE GAS has developed a Due Diligence Model that incorporates Human Rights based on carrying out and maintaining a risk analysis to identify potential impacts on compliance with the principles of respect for Human Rights defined in this Policy.

This Model is based on the principles of protection, respect and remediation, aimed at fulfilling the commitments established in this policy and the behaviors established in its Code of Ethics, minimizing the risks and impacts on the principles of this policy:

- The Board of Directors is responsible for approving and overseeing the Company's overall Due Diligence strategy.
- The Audit and Risk Committee is periodically informed about the implementation and performance of this Policy and the **Code of Ethics** by the entire Organization, with the aim of monitoring and evaluating the degree of implementation and effectiveness of the Policy for managing the protection of Human Rights.
- MADRILEÑA RED DE GAS has implemented communication and reporting channels to ensure the handling and remediation of any irregularities, including human rights violations or abuses. Any employee, supplier, customer, or stakeholder can submit their questions, inquiries, or complaints. All communications received through this channel are handled in accordance with the principles of confidentiality, secrecy, and security.

REVIEW AND COMMUNICATION

This Policy is reviewed annually, taking into account organizational, legal, operational or any other changes that may affect its development, with the aim of maintaining its relevance, efficiency and effectiveness.

In Pozuelo de Alarcón, December 12th, 2025

Alejandro Lafarga Ibran

Chief Executive Officer