

# Code of conduct for suppliers

MADRILEÑA RED DE GAS is committed to respecting and promoting ethical and sustainability values in all areas of its organization and activity, in accordance with the values and commitments adopted in its **Sustainability Policy**. This Code of Conduct is established and is mandatory for its suppliers.

## 1. OBJECT

MADRILEÑA RED DE GAS considers its suppliers, providers, contractors, collaborating companies and external collaborators (hereinafter, suppliers) as indispensable to achieve its sustainability objectives, seeking, with this document, to establish a relationship of trust and mutual benefit.

The purpose of this document is to establish the basic guidelines and criteria that must govern the ethical behavior of suppliers in accordance with applicable legal and technical regulations, as well as with the policies and commitments adopted by MADRILEÑA RED DE GAS.

This document assumes and applies the principle of due diligence, which suppliers must apply in the prevention, identification and elimination of irregularities related to non-compliance with its principles.

MADRILEÑA RED DE GAS is committed to promoting and encouraging the adoption of best practices in accordance with this code, always within the framework of contractual conditions and the limits established by law. To this regard, MADRILEÑA RED DE GAS provides the necessary means and resources to ensure that suppliers are aware of, understand, and adhere to this code of conduct.

## 2. SCOPE OF APPLICATION

This Code applies to all suppliers involved in or participating in the business processes of MADRILEÑA RED DE GAS.

The criteria and guidelines for conduct included in this document are not intended to cover all possible situations or circumstances that a supplier may encounter in the course of their activities, but are intended to be a guide with general guidelines, providing guidance on how to act and deal with situations in the course of carrying out their activities.

## 3. GUIDING PRINCIPLES

MADRILEÑA RED DE GAS believes that the foundation of trust in the company, and therefore of its shareholders, customers and suppliers, is based on integrity, professional responsibility and compliance of each of its employees and suppliers. Considering:

- **Integrity** as acting honestly, ethically, and in good faith.
- **Professional responsibility** as efficient, proactive, and improvement-oriented performance the quality and excellence of the service.
- **Compliance**, such as strict adherence to current regulations and legislation, internal policies, as well as the prevention of risks and illegal conduct.

MADRILEÑA RED DE GAS expects its suppliers to maintain behavior consistent with these principles in all their actions, including those related to their contractual relationships, as well as in their interactions with MADRILEÑA RED DE GAS employees and customers.

All suppliers, and their employees, have the possibility and the obligation to contact MADRILEÑA RED DE GAS confidentially, without fear of leaks or retaliation, to report any breaches of policies, legal requirements, and this code of conduct that they detect in the performance of their activities. All communications will be treated with strict confidentiality and in accordance with the requirements established by the applicable legal regulations in each case.

## 4. GUIDELINES FOR CONDUCT

This code of conduct is structured around the following guidelines:

- Ethics and good governance
- Work placements
- Safety and health
- Quality
- Environment
- Information Security

### 4.1. Ethics and good governance

- **Corruption and bribery**

Suppliers, in their relations with third parties and with public administrations, institutions and representatives, must act in accordance with national and international regulations and provisions for the prevention of corruption and bribery, in accordance with the commitment acquired by MADRILEÑA RED DE GAS in its **Anti-Corruption Policy**.

Suppliers may not accept, offer, or grant, either directly or indirectly, any type of gift or compensation intended to improperly influence their professional, administrative, or commercial relationships with MADRILEÑA RED DE GAS or with other public or private entities. Exceptionally, gifts or courtesies of negligible or symbolic economic value may be permitted..

Suppliers agree to comply with transparency and communication commitments during the contracting processes with MADRILEÑA RED DE GAS. During these processes, suppliers may not extend any invitations or gifts, nor maintain informal contact with those responsible for contracting, limiting communication to the channels established with MADRILEÑA RED DE GAS during the purchasing process.

Suppliers agree to inform MADRILEÑA RED DE GAS of any situation they detect that may involve corruption and/or bribery. This information will be treated as strictly confidential by the company at all times. In any investigation, the rights to privacy, defense, and the presumption of innocence of those investigated or affected will be guaranteed, and all necessary measures will be taken to prevent any type of retaliation against the informant.

- **Conflicts of interest**

Suppliers must avoid situations that could lead to conflicts of interest between their employees and the staff of MADRILEÑA RED DE GAS, as well as establish mechanisms for the detection of possible conflicts of interest (direct or indirect) and measures to guarantee the independence of the supplier's actions in the face of a potential conflict of interest.

Suppliers must report any cases in which their employees are close relatives or individuals affiliated with MADRILEÑA RED DE GAS staff. Suppliers are obligated to report any potential conflicts of interest as soon as possible, and in any case, prior to carrying out the transaction or providing the services. To this end, they must send a written notification to the contracting unit and the Purchasing Unit for internal review.

- **Irregular payments and money laundering**

MADRILEÑA RED DE GAS, in compliance with its legal obligations, collaborates with the competent authorities in the fight against money laundering and the financing of illicit activities, reporting any suspicious operation or movement.

Suppliers will need to take measures to prevent money laundering in their transaction's economic matters, including both collections and payments, as well as establishing the means to identify possible indications and/or risks of a lack of integrity of persons or entities with whom they maintain relationships institutional and commercial.

- **Corporate image and reputation**

Suppliers must establish the necessary means and measures to protect the image and reputation of MADRILEÑA RED DE GAS in the course of their professional activities carried out within the framework of their commercial and contractual relationship with the company. They will also monitor the correct and appropriate use of MADRILEÑA RED DE GAS's corporate image and reputation by their employees and subcontractors, in accordance with the instructions established in each case.

- **Customer relations**

Suppliers agree to act with integrity in their dealings with MADRILEÑA RED DE GAS customers and to avoid deceptive, fraudulent, or malicious conduct. All information or advice provided by suppliers to MADRILEÑA RED DE GAS customers must be truthful, timely, and appropriate to the customer's needs.

Under no circumstances will the client be provided with ambiguous, misleading, inaccurate or with the ability to induce errors in the customer's perception or decisions.

- **Proper use and protection of assets**

When necessary, MADRILEÑA RED DE GAS provides its suppliers with the resources required for their operations and commits to ensuring their protection and safeguarding. Suppliers agree to use these resources responsibly, appropriately, and in accordance with the environment and activities for which they were provided. Suppliers must protect and preserve these resources from any improper or unauthorized use that could harm MADRILEÑA RED DE GAS or its interests.

In the equipment and resources that the company provides to its suppliers, the use of illegal software or applications is strictly prohibited, as is any use that could lead to illegal actions or damage the image and reputation of MADRILEÑA RED DE GAS.

- **Truthfulness, rigor and treatment of information**

Suppliers declare the truthfulness and authenticity of the information as a fundamental principle of their activity within their relationship with MADRILEÑA RED DE GAS. In accordance with this principle, they must transmit truthfully and completely all information necessary for the performance of their activities and that they are required to communicate, both internally and externally. Under no circumstances will they knowingly provide incorrect or inaccurate information that could mislead the recipient.

All information recorded by suppliers in MADRILEÑA RED DE GAS's systems and applications, in the course of their activities, must be accurate and reliable. Suppliers must take measures to ensure the accuracy of the information and minimize any risk.

Suppliers are obligated to preserve the confidentiality, integrity, and authenticity of the information provided by MADRILEÑA RED DE GAS for the development of their activities, within the framework of their commercial and contractual relationships with the company. Likewise, suppliers are obligated to maintain, and ensure the maintenance of, the confidentiality, secrecy, and duty of secrecy regarding any information so identified by MADRILEÑA RED DE GAS, as well as to refrain from any misuse of it and prevent its unauthorized use by third parties.

The obligation of confidentiality and duty of secrecy will remain in effect once the contractual and/or commercial relationship with MADRILEÑA RED DE GAS has ended, and you must return and/or destroy the information provided by it, in accordance with the instructions or contractual clauses established in each case.

Suppliers protect and take the necessary measures to protect the industrial and intellectual property of MADRILEÑA RED DE GAS, including trademarks and distinctive signs, domain names, rights to use and reproduce intellectual property assets (including software), designs, or any other asset, in accordance with the terms established in contracts and commercial relationships with MADRILEÑA RED DE GAS. Suppliers undertake to strictly follow legal rules and procedures, as well as those established by MADRILEÑA RED DE GAS in each case, to avoid infringements of the industrial and intellectual property rights of third parties.

#### **4.2. Work practices**

MADRILEÑA RED DE GAS assumes the commitment, expressed in its **Human Rights Policy**, to act in accordance with current legal regulations, as well as with the guidelines and commitments assumed in its internal regulations, established in accordance with international practices and agreements, and with full respect for human rights and public and individual freedoms.

Suppliers assume as their own the commitments established by MADRILEÑA RED DE GAS regarding due diligence in said policy.

#### **4.3. Safety and health**

MADRILEÑA RED DE GAS promotes and encourages the adoption of occupational health and safety policies and their implementation by its suppliers. In this regard, MADRILEÑA RED DE GAS will not, under any circumstances, permit unsafe practices that could cause harm to people and/or facilities.

Suppliers accept as their own the commitments established by MADRILEÑA RED DE GAS regarding occupational safety and health in its **Industrial Safety and Occupational Risk Prevention Policy** and its **Serious Accidents Prevention Policy**.

#### 4.4. Quality

MADRILEÑA RED DE GAS, in compliance with its commitments to provide its services with the highest levels of quality, has implemented, maintained and certified a quality management system, working throughout its value chain to maintain and continuously improve the quality and safety of supply.

The products and services provided by suppliers must comply with the established quality and safety standards, requirements, and parameters, both in legislation and in the applicable technical and operational standards, as well as the principles and commitments acquired in the **Quality Policy** of MADRILEÑA RED DE GAS

Suppliers must have the necessary means, facilities, machinery, and competent personnel to carry out their activities in accordance with the provisions of the contracts with MADRILEÑA RED DE GAS..

#### 4.5. Environment

Environmental protection and the fight against climate change are basic pillars of MADRILEÑA RED DE GAS, in accordance with which an environmental management system is defined, implemented, maintained and certified.

Suppliers must maintain an active and constant commitment to environmental protection, with a special focus on decarbonization strategies and the prevention of environmental accidents, as well as the obligation to comply with the requirements established in applicable legislation.

Suppliers will assume the commitments regarding environmental protection than are established in their **Environmental Policy**. They will also commit to complying with current environmental requirements and regulations.

#### 4.6. Information Security

MADRILEÑA RED DE GAS considers information security a fundamental pillar to guarantee the trust of its customers, employees, shareholders and collaborators, establishing its principles and commitments through the **Information Security Policy** aligned with international standards and best practices in the sector.

MADRILEÑA RED DE GAS extends this commitment to its supply chain, in order to ensure that its suppliers manage information with the same level of exigency and risk control, through the **Information Security Policy for Suppliers**.

Suppliers commit to complying with, and enforcing within their organization, current data protection legislation.

### 5. ADHERENCE TO AND COMPLIANCE WITH THE CODE

Suppliers must commit to compliance with this code, either when they are registered as suppliers of MADRILEÑA RED DE GAS, when their contracts are renewed, or in those cases where MADRILEÑA RED DE GAS considers it appropriate.

Suppliers must establish mechanisms to ensure the dissemination of this code among their employees who carry out work for MADRILEÑA RED DE GAS. Likewise, suppliers shall ensure that their own suppliers and subcontractors apply criteria for action equivalent to those indicated in this Code.

MADRILEÑA RED DE GAS establishes the necessary mechanisms for its professionals and third parties to anonymously file complaints or claims regarding possible breaches of the provisions of this document, through its **Complaints Channel**.

MADRILEÑA RED DE GAS expects its suppliers to demonstrate the highest level of commitment to complying with this code of conduct. Any breaches will be analyzed in accordance with contractual requirements, legal regulations, and internal procedures, in case they are subject to sanctions.

MADRILEÑA RED DE GAS will terminate its commercial and contractual relationships with suppliers who violate the guidelines of conduct related to human rights, corrupt practices, and legal compliance requirements. In other cases of possible breaches, MADRILEÑA RED DE GAS undertakes to analyze the situation with the supplier, proposing corrective and improvement actions to prevent future breaches.

Any questions or concerns regarding this code of conduct may be addressed by the supplier through the communication channels established with MADRILEÑA RED DE GAS.

In Pozuelo de Alarcón, December 12<sup>th</sup>, 2025

**Alejandro Lafarga Ibran**

Chief Executive Officer