



# Code of Ethics for Suppliers



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# 1.

## Purpose

Gas Natural Fenosa considers its suppliers, contractors and external collaborators to be essential for the company to achieve its growth and service quality improvement goals, and it seeks to establish relationships with them that are based on trust and mutual benefit.

The Code of Ethics for Suppliers of Gas Natural Fenosa (the “Code”) is deemed to be an extension of the Code of Ethics of Gas Natural Fenosa and its purpose is to establish minimum behavior standards for suppliers, contractors and external collaborators. In preparing these standards, consideration has been given to the business culture and Regulatory System of Gas Natural Fenosa, as well as the regulations and prevailing set of cultural values of each of the countries where Gas Natural Fenosa develops its activities. Furthermore, the Code also contains the commitments deriving from the UN Global Compact (see Annex I) and the following

Gas Natural Fenosa codes and policies: Code of Ethics, Human Rights Policy, Corporate Responsibility Policy and Anti-Corruption Policy.

This Code of Ethics for Suppliers reflects the due diligence principle that suppliers, contractors and external collaborators must apply in order to prevent, identify and eliminate irregularities related to breaches of the Code and internal rules, including in relation to illegal actions. More specifically, all legislation on the criminal liability of legal persons must be complied with.

Gas Natural Fenosa is committed to fostering among its suppliers, contractors and external collaborator companies practices that are in line with the standards of conduct contained in this Code, without prejudice to their obligation to comply with contractual conditions, under the premise of respect for management authority.

Gas Natural Fenosa will make its best efforts to ensure that suppliers, contractors and external collaborators are familiar with, understand and are able to follow this Code.

On the basis of the foregoing, we now present the Code of Ethics for Suppliers of Gas Natural Fenosa as a tool that will help our suppliers, contractors and external collaborators strengthen their ethical behavior in their job and their relationship with Gas Natural Fenosa, customers and third parties.

## 2.

### **Scope of application**

This Code is intended for all suppliers, contractors and external collaborators doing business with any of the investee companies in which Gas Natural Fenosa has a controlling interest.

Compliance with this Code is independent of where suppliers, contractors and collaborator companies operate, without prejudice to their obligation to comply with domestic legal and institutional frameworks.

The standards of conduct included in this Code have not been designed to cover all of the situations and circumstances that Gas Natural Fenosa suppliers, contractors and external collaborators might encounter. Its aim is to establish general guidelines for suppliers, contractors and external collaborators to apply when they are conducting their professional activities.

# 3.

## **Governing principles of conduct at Gas Natural Fenosa**

Gas Natural Fenosa considers that the trust of its shareholders, customers, suppliers, contractors and external collaborator companies and of the social environment in which it conducts its business activity is based on the integrity and responsibility with which each one of its employees performs their work.

Integrity is defined as ethical and honorable actions carried out in good faith. Professional responsibility is defined as proactive, efficient actions centered on excellence, quality and good service.

Gas Natural Fenosa expects all its employees to perform their duties with integrity and responsibility. Gas Natural Fenosa also expects its suppliers, contractors and external collaborator companies to behave in accordance with these principles.

All suppliers, contractors and external collaborator companies of Gas Natural Fenosa wishing to report a violation of the Code they may have observed while performing their duties can contact the Code of Ethics Committee ([codigoetico@gasnaturalfenosa.com](mailto:codigoetico@gasnaturalfenosa.com)) confidentially, in good faith and without fear of reprisal.

Violations reported to the Code of Ethics Committee will be dealt with in confidence and in accordance with the provisions set forth in the domestic data protection regulations in force at the countries where Gas Natural Fenosa develops its activities.

# 4.

## Standards of conduct

This Code of Ethics for Suppliers determines specific behavior standards in the following areas:

- > Social and labor standards.
- > Ethical and good governance standards.
- > Health and safety standards.
- > Environmental and quality standards.

## Social and labor standards

### 4.1.

#### Respect for the law, human rights and ethical values

Gas Natural Fenosa is committed to acting at all times in accordance with the applicable legislation and the internal Regulatory System, which is based on internationally accepted ethical practices, with full respect for human rights and civil liberties.

All suppliers, contractors and external collaborators must comply with the laws that may be in force in the countries where they conduct business, obeying their spirit and purpose and behaving ethically in all their actions.

Suppliers, contractors and external collaborators must also avoid behaviors that, while not being illegal, might harm Gas Natural Fenosa's reputation among the community, national Governments or other organizations and negatively affect the group's interests.

Suppliers, contractors and external collaborators must act with honesty and integrity in all their engagements and transactions with the authorities and public officials, and they must ensure that all information and certificates they provide and all the statements they make are true.

All suppliers, contractors and external collaborators must be familiar with and abide by the laws pertaining to their work.

No supplier, contractor or external collaborator will deliberately collaborate with third parties in order to violate any laws or participate in any actions that might compromise the principle of legality.

Suppliers, contractors and external collaborators will make sure that their employees are always aware of the external and internal regulations they must comply with when performing their duties, and establish internal control frameworks to ensure compliance with the law and ethical values.

Suppliers, contractors and external collaborators must always observe and protect human rights, particularly in relation to:

- Eliminating all forms or modalities of forced or compulsory labor. Suppliers, contractors and external collaborators must promote and take all necessary measures within their companies to eliminate all forms or modalities of forced or compulsory labor. They must also acknowledge the right of their employees to resign from their jobs with reasonable notice.
- Not permitting child labor. Suppliers, contractors and external collaborators must expressly reject child labor within their companies, respecting the minimum working age established in the applicable legislation and making means available in order to guarantee compliance therewith. Gas Natural Fenosa considers the minimum working age to be that defined in the ILO Minimum Age Convention (No. 138).
- Respecting indigenous communities and their traditional ways of life. Suppliers, contractors and external collaborators must respect the rights of the communities, including indigenous communities, living in the places where they are engaged in business, and make their best efforts to prevent their activities from negatively affecting the traditional ways of life and work of the persons living in the areas where they operate.



## 4.2.

### **Respect for people**

#### > Professional respect.

Gas Natural Fenosa rejects any manifestation of physical, psychological or moral harassment, abuses of authority and any other conduct that could create an intimidating or offensive environment in relation to the rights of individuals, in particular, ethnic minorities. Suppliers, contractors and external collaborators must treat their employees with dignity and respect, thereby favoring cordial relations and a pleasant, healthy and safe working environment. Under no circumstances will any form of harassment or intimidation be tolerated. Relations between the group's employees and the employees of suppliers, contractors and external collaborators must be based on professional respect and mutual cooperation.

#### > Respect for the right to peaceful association and collective bargaining.

Suppliers, contractors and external collaborators must respect the right to peaceful association and collective bargaining of their employees,

subject to the rules applicable in each case and without fear of reprisal.

Workers' representatives will not suffer any type of discrimination and will be able to freely fulfill their duties as workers' representatives at their workplace.

## 4.3.

### **Professional development and equal opportunities**

Gas Natural Fenosa does not accept any type of employment or professional discrimination on the grounds of age, race, color, sex, religion, political opinion, nationality, social origin or disability. Gas Natural Fenosa further supports and is committed to the implementation of public policies aimed at promoting more equal opportunities and fostering a corporate culture based on merit.

Like Gas Natural Fenosa, suppliers, contractors and external collaborators, as well as their subcontractors, must promote equal opportunities in selection processes, payment policies,

access to training and promotions, professional development, equal opportunities, contract termination and retirement.

#### 4.4.

##### **Decent employment**

Gas Natural Fenosa guarantees decent employment for all its employees.

Like Gas Natural Fenosa, suppliers, contractors and external collaborators must pay decent salaries to their employees, according to their skills, obligations and roles, in line with applicable laws and market conditions where they conduct their business.

They must guarantee the right of their employees to rest and comply with the labor regulations in force governing working hours and the right to rest where they develop their activities.

## **Ethical and good governance standards**

#### 4.5.

##### **Use and protection of assets**

Gas Natural Fenosa provides its employees with all the resources they need to perform their professional activity and undertakes to facilitate all means required for protecting and safeguarding employees. This commitment extends to suppliers, contractors and external collaborators who need to use the assets of Gas Natural Fenosa in their business with Gas Natural Fenosa.

Like all employees, suppliers, contractors and external collaborators must use the company's resources responsibly, efficiently and appropriately in their professional activity. They must also protect said resources and avoid any inappropriate use that could harm the interests of Gas Natural Fenosa.

Suppliers, contractors and external collaborators must not use any computer programs or applications that may be illegal or may harm the company's image or reputation in any equipment provided by Gas Natural Fenosa or use any such equipment for accessing, downloading or distributing illegal or offensive content.

Regarding the personnel of companies responsible for asset security at Gas Natural Fenosa, the Voluntary Principles on Security and Human Rights and commitment 9 of Gas Natural Fenosa's Human Rights Policy will be used as a benchmark in all countries.

#### 4.6.

##### **Corruption and bribery**

The fight against corruption and bribery is among the principles of the UN Global Compact (to which Gas Natural Fenosa adhered in 2002 and is attached to this Code as Annex I).

Corruption and bribery appear when employees, suppliers, contractors and external collaborators make use of unethical practices to obtain a benefit for the company or themselves. Corruption and bribery are categorized as fraud.

Gas Natural Fenosa has an Anti-Corruption Policy that defines the principles to be followed for preventing this type of risk. Annex II details the principles on which Gas Natural Fenosa's Anti-Corruption Policy is based. Gas Natural Fenosa expects its suppliers, contractors and external collaborators to commit to and guarantee compliance with the principles of its Anti-Corruption Policy.

In their relations with third parties and, in particular, with the public authorities and institutions of the different countries where they develop their business activities, suppliers, contractors and external collaborators must act in accordance with national and international provisions on the prevention of corruption and bribery, including the Criminal Code of Spain and the regulations applicable in other

countries where Gas Natural Fenosa operates, as well as the OECD Guidelines for Multinational Enterprises.

Gas Natural Fenosa opposes any attempt to influence the will of third parties in order to obtain an advantage through the use of unethical practices and does not permit that other people or entities use such practices with their employees.

Suppliers, contractors and external collaborators will not accept, offer or provide, either directly or indirectly, any gifts or compensation, the purpose of which is to improperly influence their commercial, professional or administrative relations with Gas Natural Fenosa or public and private entities.

Similarly, suppliers, contractors and external collaborators will not give, either directly or indirectly, any payment, gifts or compensation that is considered inappropriate within the normal context of business, the purpose of which is to improperly

influence commercial, professional or administrative relations with Gas Natural Fenosa or public and private entities.

For transparency purposes, suppliers, contractors and external collaborators agree to use formal communication channels with Gas Natural Fenosa, as determined by Acquisitions, during tender procedures. In tender procedures, bidding suppliers, contractors and external collaborators may not extend invitations to events or lunches, hold meetings or have informal contacts with Gas Natural Fenosa personnel involved in the tender procedure, limiting their communications to the formal channels of communication determined by Acquisitions.

#### 4.7.

#### **Irregular payments and money laundering**

Gas Natural Fenosa has policies in place to prevent and avoid irregular payments or money laundering in the course of its operations, which may arise from illicit or criminal activities.

For this reason, Gas Natural Fenosa cooperates with the local authorities to fight against money laundering and the financing of criminal activities, by providing the authorities with all such information as they may request in accordance with the applicable regulations in force and by reporting suspicious operations.

Suppliers, contractors and external collaborators must take measures to prevent money laundering in economic transactions, including collections and payments, and remain alert to cases in which there might be signs of a lack of integrity on the part of the individuals or entities with which business is conducted.

#### 4.8.

#### **Corporate image and reputation**

Gas Natural Fenosa considers its corporate image and reputation to be among its most valuable assets for maintaining the trust of its shareholders, customers, employees, suppliers, authorities and society as a whole.

Suppliers, contractors and external collaborators must make their best efforts to protect the image and reputation of Gas Natural Fenosa

in the course of their professional activities. They must also ensure that Gas Natural Fenosa's corporate image and reputation are respected and used correctly and appropriately by their employees and the personnel of subcontractors.

Suppliers, contractors and external collaborators must apply due diligence procedures to ensure the respectability of the organizations and causes they support.

#### 4.9.

#### **Conflicts of interest**

Conflicts of interest arise in circumstances in which the personal interests of Gas Natural Fenosa employees or the employees of its suppliers, contractors or external collaborators go directly or indirectly against or come into conflict with the interests of Gas Natural Fenosa, interfere with the honest fulfillment of their professional duties and responsibilities or personally involve them in Gas Natural Fenosa's financial operations or transactions.

Situations that can cause a conflict of interest include the participation of employees, relatives or close relations of suppliers, contractors or external collaborators in the Governing Bodies or organizational structure of Gas Natural Fenosa.

Gas Natural Fenosa considers that relations with its employees, suppliers, contractors or external collaborators must be based on loyalty arising from their shared interests.

Suppliers, contractors and external collaborators must avoid situations that may give rise to conflicts between the personal interests of their employees and the interests of Gas Natural Fenosa. They must have mechanisms in place that ensure supplier's independence and full compliance with the applicable laws in the event of potential conflicts of interest by their employees.

Directors and employees of suppliers, contractors and external collaborators must inform Gas Natural Fenosa if they or any of their close relatives are also employees of Gas Natural Fenosa.

#### 4.10.

#### **Treatment of information and knowledge**

Gas Natural Fenosa considers information and knowledge to be one of its main assets, as well as an essential element for business management. That is why information and knowledge must be given special protection.

Suppliers, contractors and external collaborators agree that true and accurate information must be the guiding principle in all their actions. Therefore, any information they must provide, both internally and externally, must be true and accurate, and in no case should they knowingly provide incorrect or inaccurate information that may be misleading.

All suppliers, contractors and external collaborators who enter information of any type into Gas Natural Fenosa computer systems must ensure its accuracy and truthfulness.

Suppliers, contractors and external collaborators must preserve the integrity and confidentiality of the information they receive as a result of their business relations with Gas Natural Fenosa.

Suppliers, contractors and external collaborators who have access to restricted information about the company or material aspects regarding the company's strategy, policy, plans or assets must keep such information confidential in order to prevent any improper use of the same. They must also refrain from using such information unduly for their own benefit or the benefit of third parties.

Furthermore, communication with Gas Natural Fenosa officials must be clear, and any information suppliers provide to Gas Natural Fenosa as part of their relationship must be accurate and true.

This confidentiality obligation will survive the termination of their relationship with Gas Natural Fenosa and includes the obligation to return any materials related to the company, which may be in possession of the manufacturer or supplier.

Employees must not share any commercially sensitive information among group companies, if the existing laws so establish.

Suppliers, contractors and external collaborators must comply with domestic data protection regulations, respecting the right to privacy and protecting the personal information provided by third parties.

Suppliers, contractors and external collaborators must protect the intellectual property of Gas Natural Fenosa and third parties, which includes, among others, patents, trademarks, domain names, reproduction rights (including software reproduction rights), design rights, database extraction rights and rights over specialized technical knowledge. In their relations with third parties, suppliers, contractors and external

collaborators must carefully follow data protection rules and procedures in order to prevent infringements of third-party rights.

#### 4.11.

##### **Customer relations**

Gas Natural Fenosa competes in the market fairly and does not allow any kind of deceitful, fraudulent or malicious conduct that seeks to obtain undue advantages.

Suppliers, contractors and external collaborators must act with integrity in their relations with Gas Natural Fenosa customers.

Information or advice provided by suppliers, contractors and external collaborators to Gas Natural Fenosa customers must always be sufficient, true, timely and appropriate. Under no circumstances may customers be provided with incorrect, ambiguous or careless information that could lead to errors or poor decision-making.

## **Health and safety standards**

#### 4.12.

##### **Occupational health and safety**

Gas Natural Fenosa promotes the adoption of occupational health and safety policies, and takes all the preventive measures established in the applicable domestic legislation in force, always ensuring regulatory compliance in this area.

Gas Natural Fenosa also promotes and encourages the application by its collaborating companies and suppliers of its occupational health and safety rules and policies.

Gas Natural Fenosa deems safety to be an individual responsibility and a condition of employment, which is why it will not allow any unsafe behaviors that may cause serious injury to persons and/or serious damage to facilities.



Suppliers, contractors and external collaborators must endorse the occupational health and safety commitments assumed by Gas Natural Fenosa, with a view to preventing accidents and injuries within their organizations and subcontractor companies. Occupational health and safety commitments include:

1. Guaranteeing that health and safety obligations are not delegated. These obligations must be led by the senior management through a visible commitment, and actively assumed and mainstreamed across the organization, our suppliers and our collaborator companies
2. Considering health and safety as an individual responsibility that is a condition of employment at Gas Natural Fenosa and its collaborator companies.
3. Ensuring that any potential risks that may affect the employees, customers, the general public and the safety of the facilities are reported, assessed and managed in an appropriate manner.
4. Establishing training as a driver of change towards a culture of safety through continuing training, the assessment of accidents and events, and the dissemination of lessons learned.
5. Mainstreaming high health and safety standards into business processes, new projects, activities, facilities, goods and services, and the selection and assessment of suppliers and collaborator companies, making the start or continuation of activities conditional upon the fulfillment of said standards.
6. Providing resources and means that make it possible to comply with the safety standards that may be established from time to time.

## Environmental and quality standards

### 4.13.

#### Respect for the environment

Environmental conservation is one of the basic principles of action of Gas Natural Fenosa. Accordingly, Gas Natural Fenosa has defined an environmental policy and implemented an environmental management system.

Suppliers, contractors and external collaborators must have an ongoing commitment to protecting the environment and meeting the standards and requirements established in the domestic and international laws of application. Suppliers, contractors and external collaborators must also commit to meeting the environmental standards established by Gas Natural Fenosa, including impact mitigation and offsetting, as appropriate, in order to apply said standards.

Suppliers, contractors and external collaborators will assume Gas Natural Fenosa's environmental commitments:

1. Contributing to sustainable development through eco-efficiency, the rational use of natural and energy resources, the minimization of the environmental impact, the promotion of innovation, and the use of the best technologies and processes available.
2. Contributing to the mitigation of climate change through low-carbon and renewable energies, the promotion of energy savings and efficiency, the application of new technologies, and carbon capture.
3. Mainstreaming environmental criteria into business processes, new projects, activities, goods and services, and the selection and assessment of suppliers.
4. Minimizing adverse effects on eco-systems and promoting the preservation of biodiversity.
5. Guaranteeing the prevention of pollution and continued improvement by optimizing environmental management, minimizing environmental risks and encouraging the active participation of employees.

4.14.

**Quality and safety of goods and services**

Gas Natural Fenosa strives to understand and meet the needs of its customers. Therefore, the company works throughout the value chain to continuously improve the quality and safety of its goods and services.

The goods and services delivered by suppliers, contractors and external collaborators must meet the quality and safety standards and benchmarks set out in the applicable laws, particularly in relation to prices and delivery times.

In order to carry out their activities and produce the goods under contract, suppliers, contractors and external collaborators must have and/or use the right facilities and machinery. In this sense, the machinery and equipment used by suppliers must comply with the applicable laws and regulations in force, particularly in relation to quality, safety and the environment.

# 5.

## **Acceptance of, adhesion to and compliance with the Code**

### **Awareness and adhesion**

Gas Natural Fenosa will communicate the contents of this Code of Ethics and disseminate it among its suppliers, contractors and external collaborators.

Suppliers, contractors and external collaborators must formally agree to comply with this Code upon being hired by Gas Natural Fenosa, whenever their contracts are modified, and in all other circumstances determined by Gas Natural Fenosa.

Suppliers, contractors and external collaborators must establish appropriate mechanisms to effectively disseminate this Code among their employees and, more particularly, among those providing services to Gas Natural Fenosa.

Suppliers, contractors and external collaborators must also cause their suppliers and subcontractors to follow behavior standards that are equivalent to those established in this Code of Ethics for Suppliers.

### **Compliance**

Compliance with this Code is mandatory for all suppliers, contractors and collaborator companies of Gas Natural Fenosa.

Gas Natural Fenosa expects a high level of commitment from its suppliers, contractors and external collaborators in complying with this Code of Ethics for Suppliers.

Breaches of the Code will be dealt with in accordance with applicable internal rules, legal regulations and any arrangements in force, and the appropriate penalties will be applied, as appropriate.

Gas Natural Fenosa will put an end to any and all business with suppliers, contractors and external collaborators failing to meet the behavior standards established in this Code and more particularly, those related to human rights, corruption and child labor. If the nature and seriousness of the breach so allow, Gas Natural Fenosa will examine the causes of the breach together with the non-complying suppliers, contractors and external collaborators and promote the implementation of corrective actions in order to help them better handle these issues and avoid the termination of the contract.

Any doubts that may arise with regard to the interpretation or application of this Code of Ethics must be addressed to the Acquisitions Unit through normal communication channels

## 6.

### **Validity and approval**

This Code of Ethics for Suppliers is approved by the Management Committee of Gas Natural Fenosa and will take effect on the date it is distributed to all suppliers, contractors and external collaborators. The Code will remain in force until it is cancelled.

The Code will be periodically reviewed and updated by the Management Committee on the basis of proposals submitted by the Code of Ethics Committee and the internal Acquisitions, Environment and CSR areas, which will take into account the suggestions and proposals put forward by suppliers, contractors and external collaborators and the commitments assumed by Gas Natural Fenosa in terms of social responsibility and good governance.

# Annex I.

## UN Global Compact



Red Pacto Mundial España  
WE SUPPORT

Universal Principles in the areas of human rights, labor regulations and the environment.

### Human rights:

1. Support and respect the protection of internationally proclaimed, fundamental human rights, within its area of influence.
2. Make sure that they are not complicit in human rights abuses.

### **Labor standards:**

1. Uphold the freedom of affiliation and the effective recognition of the right to collective bargaining.
2. Uphold the elimination of all forms of forced and compulsory labor.
3. Uphold the effective abolition of child labor.
4. Uphold the elimination of discrimination in respect of employment and occupation.

### **Environment:**

1. Support a precautionary approach to environmental challenges.
2. Undertake initiatives to promote greater environmental responsibility.
3. Encourage the development and diffusion of environmentally friendly technologies.

### **Corruption:**

1. Work against corruption in all its forms, including extortion and bribery.

# Annex II.

## **Principles of the Anti-Corruption Policy of Gas Natural Fenosa**

1. Promotion of integrity. Aware of the importance of preventing and detecting corruption, Gas Natural Fenosa promotes a culture of integrity within the group, as well as with its suppliers and collaborators, through training and the dissemination of ethical behaviors, with a view to preventing and avoiding illicit activities that are inconsistent with the behavior standards established in the Code of Ethics.
2. Guarantee of transparency. Gas Natural Fenosa believes that it is important to provide transparent information to Management Bodies and the market. With a view to gaining the trust of customers, suppliers, commercial partners, investors, regulators and other stakeholders, Gas Natural Fenosa provides true and accurate information.
3. Treatment of confidential information. Gas Natural Fenosa treats the information of customers, commercial partners, shareholders and employees with the utmost discretion and privacy. Said information must be kept strictly confidential and must not be used unduly by employees for their own benefit or the benefit of third parties.



4. Money laundering. Gas Natural Fenosa does not facilitate money laundering or the financing of terrorism. That is why Gas Natural Fenosa collaborates with the relevant local authorities on the fight against money laundering and the suppression of the financing of terrorism, by providing all such information as they may require in accordance with the applicable laws and reporting suspicious operations.
5. Conflicts of interest. Gas Natural Fenosa bases its relationship with its employees on loyalty, as a result of their shared interests. That is why it respects the participation of its employees in activities outside the group, provided that they are performed within the applicable legal frameworks and in accordance with their employment contracts, and they do not compete with or are contrary to their duties as employees of Gas Natural Fenosa or are used in support of corrupt practices.
6. Contributions to political parties. Gas Natural Fenosa does not support or make economic contributions or donations of any kind to politicians and/or political parties.
7. Relations with third parties and intermediaries. Employees and directors of Gas Natural Fenosa base their relationship with their customers, partners and/or suppliers on the highest professional standards. In its contracts, Gas Natural Fenosa establishes commitments related to the fight against corruption.

8. Relations with public officials. Offers to public officials, including hospitality and other business courtesies, must be compliant with the law and the Rules and Regulations of the group, with a view to ensuring effective compliance with the principles of objectivity, impartiality, neutrality and transparency.
9. Commissions, payments or third-party benefits. Employees may not receive, offer or provide, either directly or indirectly, any payments in cash or in kind or any other benefit to any person working at a public or private institution, political parties or public officials for the purposes of illicitly conducting or maintaining investment, disinvestment or financing operations or other businesses or advantages.
10. Sponsorship, donations and contributions to NGOs, foundations, associations, unions and other similar organizations.  
Gas Natural Fenosa may collaborate with non-profit organizations, as long as a clear and documented reciprocal benefit is guaranteed between the parties involved and never as a way of covering up illicit acts of corruption or bribery.
11. Business courtesies. Gifts, courtesies and invitations to events of any kind will be based on the internal regulations of the group. Under no circumstances will such gifts, courtesies and invitations seek to influence the will or objectivity of employees of Gas Natural Fenosa or other companies in order to obtain undue commercial benefits or advantages or businesses. Business courtesies must not go beyond what is deemed to be correct and they must be proportional, reasonable, transparent, legitimate and socially acceptable and, if known, they must not make the provider or the recipient feel uncomfortable.

12. Facilitating payments. Gas Natural Fenosa opposes facilitating payments. These are defined as minor payments illicitly made to official bodies for the purposes of facilitating or expediting administrative or similar processes or actions.
  
13. Register of operations. All operations carried out by the group must be clearly and accurately recorded on appropriate accounting registers reflecting a fair image of all transactions conducted. Gas Natural Fenosa has a good internal control system in place for the preparation of financial information, whose effectiveness is ensured through regular monitoring. All operations are approved, documented and registered in accordance with the regulations of the group and the implemented internal control system.



[www.gasnaturalfenosa.com](http://www.gasnaturalfenosa.com)