



SUSTAINABILITY PLAN

2021-2024

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1. INTRODUCTION

The MIBGAS Group¹ (hereinafter MIBGAS) is aligned with sustainability policies that are more in keeping with the global context in order to adapt its actions and bring them into line with the Sustainable Development Goals (SDG) framed within the 2030 Agenda to promote and create values that have a positive impact on society.

Over the coming years, MIBGAS is committed to putting all its efforts into adapting its actions, interactions and behaviour to ensure that they meet the most advanced sustainability guidelines, introducing them into all areas of the company in accordance with the group's responsible and ethical culture.

To this end, MIBGAS has equipped itself with a *2021-2024 Sustainability Plan*, in order to demonstrate its commitment to the creation of values and guidelines that help and contribute to the generation and preservation of the environment, generating an impact in all its areas of relationships and in all the policies applicable to its areas of action.

MIBGAS seeks to ensure that its actions, to a large extent, generate a positive impact that results in the creation of social, economic and environmental value. And, in order to achieve this, the commitment of everyone, of its internal structure and all its stakeholders is necessary; a commitment that this document will attempt to reflect.

2. PRINCIPLES AND VALUES OF MIBGAS.

MIBGAS is the Operator of the Organised Gas Market in Spain and Portugal, it is responsible for its operation and the financial management of its services, always under the principles of efficiency, effectiveness, transparency, objectivity, non-discrimination and independence. MIBGAS is also responsible for managing guarantees in the Spanish gas system.

Thus, the clearly defined MIBGAS principles are a core value on which to support the companies' sustainability strategy and policies.



¹ Made up of the companies MIBGAS S.A. and MIBGAS Derivatives S.A.

These principles are included in Article 21 of Royal Decree 984/2015, of 30 October, which regulates the organised gas market and third-party access to the natural gas system facilities. This legal status commits MIBGAS, even more so if possible, to the development of sustainable actions in which these six founding principles are embedded.

3. MIBGAS MISSION.

The MIBGAS group manages the organised gas markets on the Iberian Peninsula, following the European criteria included in the Gas Target Model and governed by the founding principles of MIBGAS, which guarantee ethical and transparent operation in the management of the market and the guarantees.

On MIBGAS, regulated natural gas products are traded (spot and prompt market) in Spain and Portugal, in accordance with these principles; and MIBGAS Derivatives manages the negotiation of future products (with physical delivery over the following month, quarterly, six-monthly and annually), of LNG in the virtual balancing tank (TVB) and of NG in underground storage (AVB or virtual balancing storage). It also offers the OTC bilateral operations registration service.

MIBGAS has the following objectives:

- Increase competitiveness within the sector with sustainable criteria.
- Contribute to the harmonisation and rationalisation of the Iberian gas market.
- Promote liquidity and transparency with trading under conditions of equality, transparency and objectivity for all participating agents.

In summary, MIBGAS's mission is:

- Committing to the Sustainable Development Goals (SDGs) and the Global Compact.
- The search for new growth opportunities that contribute to providing maximum transparency to the gas market on the Iberian Peninsula.
- The systematic pursuit of excellence in management based on ethics and sustainability, as well as the development of its human team.
- Providing its agents with exclusive services that stimulate and reinforce their decision to operate on MIBGAS.

4. SUSTAINABILITY POLICY.

The sustainability policy of the MIBGAS group - which is included to a greater extent in this *2021-2024 Sustainability Plan* - aims to reinforce the group's commitment - and translate it through actions in different areas - with the principles of respect, awareness and sensitisation towards the sustainable values that should mark the priorities of every company in the 21st century.

MIBGAS has, in this manner, thus established its commitment to defending the Sustainable Development Goals, some of which have been embedded in the group's actions, reinforcing its commitment to sustainability, the company and its human capital, thus enabling them to become ethically committed, responsible citizens.

MIBGAS is committed to adopting environmentally sound and efficient behaviours marked by the SDGs that it must follow and make its own. This attitude must be translated into the adoption of responsible corporate practices that are constantly evolving and adapting.

4.1 Contribution to the SDGs.

The United Nations 2030 Agenda for Sustainable Development led to the establishment of 17 sustainable development goals (SDGs) as an exercise in commitment so that companies and citizens can contribute in a more direct and efficient way to the transformation and creation of an environmentally sustainable world.



SDG 3: GOOD HEALTH & WELL-BEING.

[“Ensuring healthy lives and promoting well-being at all ages is essential for sustainable development.”](#)

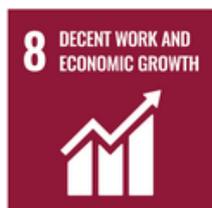
MIBGAS is committed to the health, safety and well-being of its entire human team and to improving and promoting healthy habits, which has been reinforced after the health crisis caused by COVID-19.



SDG 5: GENDER EQUALITY.

[“Gender equality is not only a fundamental human right, but it is one of the essential foundations for building a peaceful, prosperous and sustainable world.”](#)

MIBGAS considers inclusion essential in all aspects. Both in its boards of directors, as well as in its management and technical team, it is committed to gender equality and equal opportunities. MIBGAS does not allow, nor does it tolerate, a lack of respect for human rights.



SDG 8: DECENT WORK AND ECONOMIC GROWTH.

[“Sustained and inclusive economic growth can drive progress, create decent jobs for all, and improve living standards.”](#)

MIBGAS undertakes to adopt all measures, within its competencies and possibilities, that are committed to the training of talent, creativity and innovation.



SDG 9: WATER, INDUSTRY, INNOVATION AND INFRASTRUCTURE.

[“Inclusive and sustainable industrialisation, together with innovation and infrastructure, can unleash the dynamic and competitive economic forces that generate employment and income. They play a key role in introducing and promoting new technologies, facilitating international trade and enabling efficient use of resources.”](#)

MIBGAS is committed to excellence in all its procedures based on innovation and the digitalisation of its services. Thus, its main priority is to maintain a technological leadership that implies its permanent adaptation to the new challenges that arise in the digital and communications field in a globalised environment.



SDG 13. CLIMATE ACTION.

[“Climate change is affecting every country on every continent. It is disrupting national economies and affecting lives. Weather patterns are changing, sea levels are rising and weather events are becoming more extreme.”](#)

MIBGAS is committed to the ecological transition and is committed to energy efficiency. Natural gas is an important bridge to facilitate this transition, which is why the MIBGAS group seeks to contribute to increasing the security of supply and strengthening the Iberian interconnections with Europe.



SDG 17: PARTNERSHIPS FOR THE GOALS.

[“The SDGs can only be achieved with strong global partnerships and cooperation.”](#)

Likewise, one of its essential objectives is the monitoring of and active participation in the construction of the energy transition process, understood as a structural change in the energy systems giving rise to new modes of production and consumption.

5. AREAS OF ACTION.

MIBGAS has defined a series of areas of action in which to generate positive impact and, in this way, contribute to the generation of social, economic and environmental value. The *2021-2024 Sustainability Plan* aims to collect and unite all the efforts by MIBGAS and its human capital to contribute to a sustainable future.

MIBGAS, as a business group, is configured as a responsible company and, its human team, as responsible citizens. The best way to achieve this sustainability goal is engagement, cooperation, sensitisation and awareness, and of course, action.

To this end, MIBGAS is committed to giving a corporate and integrated approach to all its actions encompassed in these areas in order, together with everyone, to become and configure itself as a sustainable and socially committed company.

The areas of action defined by MIBGAS are detailed below:

5.1 Good governance.

A safe and transparent environment creates the basis of MIBGAS's work and corporate culture. The actions of MIBGAS and its human team must at all times be respectful of the legal system, regulations, procedures and regulations related to the sector in which they operate and, in particular, responsible for the resources available to them to fulfil their tasks.

MIBGAS has instruments to ensure that corporate governance is established at all levels.

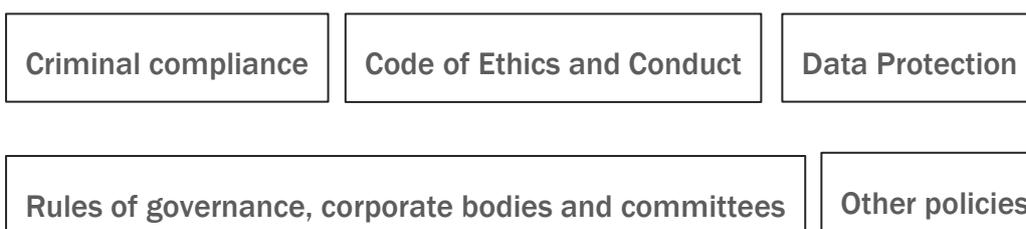
The group's **Code of Ethics and Conduct**, published on its website, is the basis for responsible action, and is binding on everyone. Corporate governance is a key factor in the good work done by companies, and companies are committed to maintaining the highest standards both in the quality of the services they provide and in terms of who they are and the way they operate. The latest revision of the code was approved at the Board of Directors meeting held on 14 November 2019.

With the firm commitment to ensure compliance with ethical principles, good corporate governance and transparency, quality and excellence, customer orientation and the integrity of its services, MIBGAS's priority objective is to implement, in an environment that is increasingly global and changing, a solid corporate culture of integrity and transparency, in which ethical values and regulatory compliance are established as central elements of its business model and decision-making. Together with the Code of Ethics and Conduct, the group also has a series of **Corporate Defence procedures** that reinforce and accommodate the demands that society in the 21st century presents in this matter.

Thus, the policy of compliance and prevention of criminal risks is centred on monitoring and establishes the pillars of a corporate culture based on ethics and transparency, thus making it the central axis of the model of compliance and prevention of criminal risks, with mandatory compliance for all the group's directors, managers and employees.

Both the Code of Ethics and Conduct and the Corporate Defence procedures are embedded within the group's corporate governance policies as follows:

CORPORATE GOVERNANCE POLICIES



Diversity and gender.

MIBGAS does not allow - or tolerate - a lack of respect for human rights, or specifically, discrimination based on sex, sexual orientation, ideology or religion. Likewise, it promotes gender equality and rejects any conduct that creates a work environment which is intimidating or offensive for the personal rights of individuals.

MIBGAS defends the participation of women at all levels and the equality of leadership opportunities between men and women. Thus, the percentage presence of women in the group is:

- MIBGAS Board of Directors: 35%
- MIBGAS Derivatives Board of Directors: 44%
- Management team: 33%
- Technicians: 77%

5.2 People and talent.

People are the most important asset of MIBGAS, with the aim that they become responsible citizens who adapt their behaviour and guide their actions towards the path of sustainability. MIBGAS is also a responsible company and it is in its hands to carry out continuous actions to preserve the organisation's talent and improve the work environment, as well as to implement protection measures to guarantee people's safety.

The global health crisis caused by COVID-19 has tested the resilience of business and social organisations. During the global health emergency, prevention and protection measures to safeguard the health of people have been adopted, reflected in a contingency plan, called the *Coronavirus Outbreak Action Plan*, which was updated - even daily - as required by the situation and, if necessary, this will continue to be done, both in relation to the hygiene and organisational measures.

Likewise, MIBGAS periodically conducts prevention courses and awareness campaigns on vaccination through its commitment to the promotion of healthy lifestyle habits.

To promote a responsible culture that is implemented in actions with environmental impacts, there is a good practice guide in relation to the measures to be adopted in the work environment that result in and improve:

a) energy efficiency:

- low consumption equipment
- lighting adapted to the spaces and needs of people
- recycling of highly polluting elements such as lamps and printing consumables
- recycling of plastics, glass, paper and cardboard

b) responsible consumption committed to the environment:

- behaviour that promotes responsible saving and lower energy consumption included in the employee manual: measures for energy saving and efficiency, rational use of paper and plastic.

5.3 Stakeholders.

MIBGAS has the following stakeholders to influence so that its sustainability policies are aimed at the highest degree of excellence possible and can generate positive impact, both social and economic.

a) Public administrations and regulatory bodies.

MIBGAS maintains a relationship, within the framework of the group's daily management, with public administrations and, especially, with regulatory bodies. The professional relationships established by MIBGAS with any public or official body, authorities or representatives thereof - both national and international - must be governed by the principle of institutional respect, transparency, integrity, collaboration, and ethical compliance.

The Group encourages maximum collaboration and diligence by all its personnel in any inspections, requirements or interventions deemed necessary by public administrations or regulatory bodies.

b) Customers of MIBGAS.

The participants in MIBGAS (agents, users and market operators) are the main customers of the Group for which they constitute a unique asset. Therefore, all professional relationships established with them by employees must be based on mutual trust and respect.

To this end, actions and decisions will be taken in accordance with the procedural requirements, standards and objective criteria, always acting impartially and with integrity, avoiding the adoption of unjustified or arbitrary decisions that threaten equal opportunities. To this end, MIBGAS must act in accordance with honest dealings that are respectful of the laws and regulations in force.

c) Service providers.

Within the framework of MIBGAS's commitment to its suppliers, relations with this group are based on mutual conditions of respect and equal opportunities. For this reason, contracting external services must always be carried out under the umbrella of excellence and the principle of execution at the lowest possible cost, in accordance with the standards and quality criteria prevailing in the market.

5.4 Innovation and decarbonisation.

The future lies in sustainable measures and MIBGAS wants to contribute its knowledge to push forward proposals and projects - whether on its own or jointly with other organisations - that advocate decarbonisation, such as issues related to, among others, guarantees of origin or hydrogen.

Sustainable mobility is another of MIBGAS's commitments and one that it is trying to translate into its actions and corporate policies by promoting, for example, the use of public transport by its human team. To do this, it finances a transport pass for its employees.

6. INTEGRATION OF THE SUSTAINABILITY PLAN 2021-2024.

The *Sustainability Plan 2021-2024* is a living document that will be implemented through measures and actions aimed at meeting the commitment objectives to contribute, as far as possible, to sustainable development and a sustainable future.

In the coming years, MIBGAS will continue to define its actions linked to the social commitment that it demonstrates through this plan. A series of measures and next steps the group will implement through its sustainability plan are detailed below:

- Adherence to the United Nations Global Compact.
- Incorporation of the culture of sustainability in all strata of the group and publicity relating to the issue through different communication channels (public website).
- Training actions.
- Internal training plan.
- Performance evaluations.
- Social action.
- Application of sustainability criteria in the relationship with stakeholders, especially with service providers.
- Participation in innovative projects that promote decarbonisation.
- Practical policies:
 - ✓ replacement and reduction in the consumption of plastic containers.
 - ✓ signposted recycling.
 - ✓ professional recycling of polluting elements (printing consumables, computer equipment, lights).
 - ✓ rational use of paper.
 - ✓ energy efficiency.
 - ✓ replacement of lighting with more efficient models.
 - ✓ energy saving.
 - ✓ promoting sustainable mobility among staff with transport subsidies.
 - ✓ reduction in consumption.

IBERIAN GAS MARKET

Alfonso XI, 6, 28014 Madrid, Spain
www.mibgas.es | Tel. (+34) 91 268 26 01