

Supplier Code of Conduct

SOCIETATEA NAȚIONALĂ DE GAZE NATURALE “ROMGAZ” S.A.

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Introduction

SOCIETATEA NAȚIONALĂ DE GAZE NATURALE “ROMGAZ” S.A. (hereinafter referred to as “ROMGAZ” or the “Company”) is aware that the economic success of our company is closely linked to our environmental and social responsibility.

We assume the responsibility of treating the employees, suppliers, and other business partners with respect and integrity, as well the obligation to respect the environment and use resources responsibly in line with the sustainability standards.

ROMGAZ suppliers are required to adopt, enforce, and comply with all applicable laws, rules, and regulations, such as but not limited to the following:

- Law No. 99/2016 on sectorial procurement;
- Government Decision (GD) No. 394 of June 02, 2016 on approving the Implementing Rules of the provisions on sectoral contract award/frame agreement under Law No. 99/2016 on Sectoral Procurement;
- Law No. 100/2016 on concession of works and concession of services;
- ANAP Order No. 2395/2023 on approving the environmental criteria applicable to product categories impacting the environment throughout the entire life cycle, as provided in Annex No. 2 to the Enforcement Guidelines;
- Directive 2014/24/EU on public procurement;
- SR ISO 20400:2021 Sustainable Procurements. Guidelines.

Our Supplier Code of Conduct is based on the principles of the following worldwide recognized standards:

- ILO (International Labor Organization) Declaration on Principles and Fundamental Rights at Work;
- Universal Declaration of Human Rights;
- European Convention for the Protection of Human Rights and Fundamental Freedoms;
- Incidental legislation.

Scope

ROMGAZ Supplier Code of Conduct shall apply to all our business partners including, but not limited to suppliers, distributors, collaborators, consultants, brokers, subcontractors, shareholders. Our business partners are expected to comply with and implement our values and standards incorporated in this Code of Conduct, and we thank them all for joining us in promoting an ethical and responsible behavior in business.

Integrity and Ethics in Business

We consider that integrity is an important prerequisite for a good interaction at work, from the perspectives of both the supplier and the customer. Acting with integrity creates an open and positive work environment and builds strong and resilient businesses.

A responsible and law-abiding behavior is an integral part of our corporate philosophy, and that is why our suppliers are required to consult ROMGAZ Code of Ethics and Conduct in Business, and to comply with its applicable provisions, and to act in accordance with all applicable national and international laws and regulations, especially the antitrust and anticorruption laws.

ROMGAZ acts in accordance with the following principles:

- **Compliance with Law on Free Competition between Companies, Law on Combating Unfair Competition, and Law on Preventing, Discovering and Sanctioning Corruption.**

Bribery, corruption, embezzlement, and unfair competition are prohibited in ROMGAZ. Prohibited are any arrangements that may interfere with free competition on the market, causing infringement of Law on Combating Unfair Competition.

Our suppliers are expected not to offer to ROMGAZ personnel any gifts/presents, services, favors, invitations, donations, sponsorships, or any other advantages which are intended for them personally, for their families, parents, etc., and which may influence the impartiality in exercising the position held. ROMGAZ management and personnel, without any exceptions, are prohibited from offering and/or accepting any gifts/presents, services, favors, invitations, donations, sponsorships, or any other advantages to initiate or interrupt an economic activity.

Excepted from the above-mentioned provisions are ROMGAZ management and personnel who have received goods free of charge as part of protocol activities, in exercising their mandate or position. According to law, such individuals have to declare such goods to the Ethics Advisor, no later than thirty days of receiving such. In this respect, they shall fill in the form provided in Annex 3 of the Code of Ethics and Conduct in Business - Reporting gifts/services and other benefits from third parties.

- **Fair Competition**

ROMGAZ supports fair competition and undertakes to comply with the provisions of law on competition and the antitrust legislation. Therefore, the adopted commercial strategies will not infringe the law on competition.

- **Financial Integrity**

Suppliers have to maintain accurate accounting records in accordance with legal requirements and the accounting principles applicable in the country of origin and/or Romania. All transactions, assets and liabilities shall be duly documented and recorded in accordance with the legal requirements and shall not knowingly include any incorrect or misleading records.

- **Involvement in Local Communities**

ROMGAZ strives to anticipate and avoid the negative impact on local communities whenever possible. Our suppliers are encouraged to monitor and support the local economy by employing local sub-suppliers and offering inclusive businesses through partnerships with other companies.

Avoidance of Conflicts of Interests

Conflicts of Interests within the supplier's organization or in relation with ROMGAZ should be avoided as much as possible, and disclosed, if such could affect the business relation. Business decisions between supplier and ROMGAZ are made exclusively on an objective basis, and by complying with the applicable legal provisions.

ROMGAZ acts in accordance with the following principles:

- **Anti-money laundering**

The Supplier undertakes to comply with all legal obligations on money laundering prevention and to minimize the general risk of money laundering by conducting due diligence on all business partners.

- **Control of Commerce**

Our suppliers are expected to comply with all applicable import and export laws and regulations. Export control is generally applicable to transfer of goods, services, hardware, software, or technology over certain national frontiers. Existing sanctions and embargoes shall be complied with in all business activities.

Data Confidentiality and Protection

The way we are handling information at ROMGAZ, the way we communicate, what we are talking and writing about, shall always be in an adequate manner to reflect the high level of integrity we are supporting. Confidential information is used and protected in a conscientious and careful manner, in accordance with applicable legal provisions.

ROMGAZ acts in accordance with the following principles:

- **Confidentiality and protection of intellectual property**

Our suppliers should take adequate measures to keep ROMGAZ information and/or intellectual property confidential and protect such information along the entire supply chain. Such rule also

applies to ROMGAZ material property that needs to be protected against theft, deterioration, loss or other damage. In cases where exchange of confidential information is needed with ROMGAZ, the suppliers shall sign a Confidentiality Agreement. Unauthorized usage, disclosure, or loss of ROMGAZ confidential information shall be promptly reported to the Ethics Advisor in accordance with our Code of Ethics and Conduct in Business.

- **Data Confidentiality and Protection**

Our suppliers may process personal data only in accordance with applicable legislation on data protection. Personal data may be collected, processed, or used only to the extent necessary for defined, clear and legal purposes. Any personal data shall be stored safely and protected against unauthorized access.

Environmental and Climate Protection

For ROMGAZ, environmental management means more than compliance with and adherence to the applicable environmental laws; it is an integral part of the day-to-day operation of the Company. We undertake to maintain environmentally friendly and clean operations along the entire supply chain by reducing to the minimum emissions, waste and pollution, while maximizing efficiency.

ROMGAZ acts in accordance with the following principles:

- **Generalities**

Our suppliers are expected to continuously identify, assess, and minimize the negative impacts on the environment and climate resulting from their business activities. Our suppliers should comply with the applicable national and international environmental standards and laws.

- **Materials, Chemicals and Waste Management**

Our suppliers are encouraged to operate efficiently and in accordance with a certified environment management system to continuously monitor and reduce their environmental footprint. Our partners are encouraged to use natural resources in an environmentally friendly manner.

Our suppliers should ensure a responsible handling of chemicals and hazardous substances in terms of environmental protection. The suppliers should take all necessary precautions to ensure handling, transfer, storage, use or recycling and safe disposal of waste.

- **Energy Efficiency and GHG Emissions**

Our suppliers are encouraged to measure their carbon footprint in accordance with the Protocol on Greenhouse Gas Emissions (GHG) and have a control system implemented to monitor and document the energy consumption and GHG emissions. Our suppliers should promote implementation of energy efficiency measures in all their business activities and to reduce emissions from such into the air, water and soil.

- **Water Management and Biodiversity**

Our suppliers are expected to reduce to a minimum the adverse impact on biodiversity, climate changes and water deficit.

Supply Chain Sustainable Management

As part of our sustainable procurement policy, the same high moral standards should be applied by our suppliers to their business partners and subcontractors along the supply chain. Therefore, our suppliers are encouraged to implement clear management practices within their respective organizations, issue appropriate guidelines, define supplier selection criteria, keep evidence of suppliers and perform a supplier risk assessment.

Our suppliers are also assessed on ESG criteria and performance, making sure that procurement decisions support ROMGAZ undertaking towards sustainability and achievement of sustainability goals and targets.

- **Material Supply in Conflict Zones**

Our suppliers are required to support our efforts to take appropriate measures to determine the origin of component materials and minerals, respectively, used in products, and to obtain information from suppliers on materials used in the products finally supplied to ROMGAZ, so that such shall not originate from zones officially declared as conflict zones.

Human Rights and Working Conditions

Human rights and work legislation is a priority for us, so does ensuring diversity and nondiscrimination. ROMGAZ complies with and guarantees equal and nondiscriminatory treatment in the relationship with its personnel, partners, and collaborators. ROMGAZ undertakes to comply with equality of opportunity and treatment and prohibits its management and personnel from any form of harassment in the exercise of service duties or in connection with the quality of ROMGAZ employee, and abuse, intimidation or threat shall not be tolerated. We expect our suppliers to undertake to comply with all applicable national and international laws on ethical business practices.

ROMGAZ expects its suppliers to act in accordance with the following principles:

- **Prohibition of child labor and protection of young people at work**

Our suppliers should prohibit within their activities all forms of child labor and closely monitor the age of their employees. We also expect our suppliers to pay wages in accordance with law to all young workers under the age of 18 (including pupils, students at work, trainees, and apprentices), and offer them support and proper training.

- **Forced Labor**

Our suppliers are expected to prohibit any form of forced labor, use of forced labor or human trafficking within their organization and along their supply chain.

- **Fair and Just Working Conditions**

In accordance with the legislation in force, our suppliers are expected to allow their employees the right to form and join trade unions of their choice, collectively negotiate and organize peaceful meetings on combating unfair competition. Our suppliers should not disadvantage the employees acting as union representatives.

Our suppliers are expected to pay wages and practice, as the case may be, other forms of additional remuneration, in accordance with the right to a decent living wage and the applicable legislation in force.

- **Diversity and Equal Opportunities**

Our suppliers are expected to promote, for their employees, an organization climate based on diversity and equal opportunities as regards age, gender, disabilities, race/ethnicity, religion/faith and culture, sexual orientation, balance between working hours and free time, so that all are treated in a correct and dignified manner, without prejudice or harassment, in order to eliminate any risk of violating the rights on diversity and equal opportunities.

- **Anti-Discrimination and Anti-Harassment**

Suppliers should offer to their employees a working place without discrimination or harassment and should not accept any form of discrimination relating to race, gender, sexual orientation, religion, ethnic origin, social statute, disabilities, or any other features protected by law.

Health and Safety at Work

Health and safety at work of our employees is one of our central pillars integrated in our policy on Human Resource Management. ROMGAZ builds on the principle of prevention and offers its employees a healthy and safe working environment in accordance with the industry standards and the applicable laws and regulations.

All ROMGAZ suppliers are expected to comply with the standards and the national and international regulations applicable in the field of health and safety at work. Our suppliers are encouraged to integrate an efficient Health and Safety Management System to minimize continuously the health and safety risks at work and to enhance the working conditions for its human resource, including for the human resource of their subcontractors.

ROMGAZ is expecting its suppliers to act in accordance with the following principles:

- **Health and Safety at Work**

Suppliers should ensure that all workplaces, including equipment and devices employed in the production process are safe and pose no major risk to health and safety at work. The employees of

the suppliers performing their activity in hazardous workplaces are instructed on a regular basis in accordance with the safety measures to be followed. Our suppliers are expected to take all reasonable measures to maintain a safe and healthy operating and working environment to prevent accidents and injuries at work.

- **Health and Safety Training**

Suppliers should ensure their employees periodical occupational health controls, safe work procedures, implementation of preventive and protective measures necessary to mitigate the risks of infringement of the rules relating to health and safety at work.

Suppliers are expected to provide training and formation sessions, in accordance with the legislation in force to reduce the risks of occupational diseases and accidents at work.

Compliance with ROMGAZ Supplier Code of Conduct

ROMGAZ Supplier Code of Conduct establishes a set of values, principles and rules of conduct intended to contribute to the promotion of fair-trade relations between ROMGAZ and suppliers due to compliance with law, applicable legal rules and regulations, in accordance with best national and international practices on responsible and ethical behavior in business. Suppliers should consider all aspects included in ROMGAZ Supplier Code of Conduct and meet all expectations and requirements specified in this Code of Conduct for the benefit of all interested parties and sustainable development in general.

ROMGAZ Supplier Code of Conduct has been prepared by ROMGAZ and is applicable to all ROMGAZ Suppliers.

ROMGAZ Suppliers are recommended to consult the Code of Ethics and Conduit in Business, available on the company's official webpage www.romgaz.ro, under the Sustainability/Ethics and Integrity section. Contact details: [Public Interest Whistleblowing Form](#), consilierdeetică@romgaz.ro, phone: +4 0374 401 020.

Validity Period

ROMGAZ Supplier Code of Conduct shall enter into force upon publication on ROMGAZ official webpage www.romgaz.ro, and will be reviewed and amended whenever necessary. Subsequent revisions of such Code shall be highlighted as such and published in the continuation of the original edition of the Code.

**Chief Executive Officer
Răzvan POPESCU**