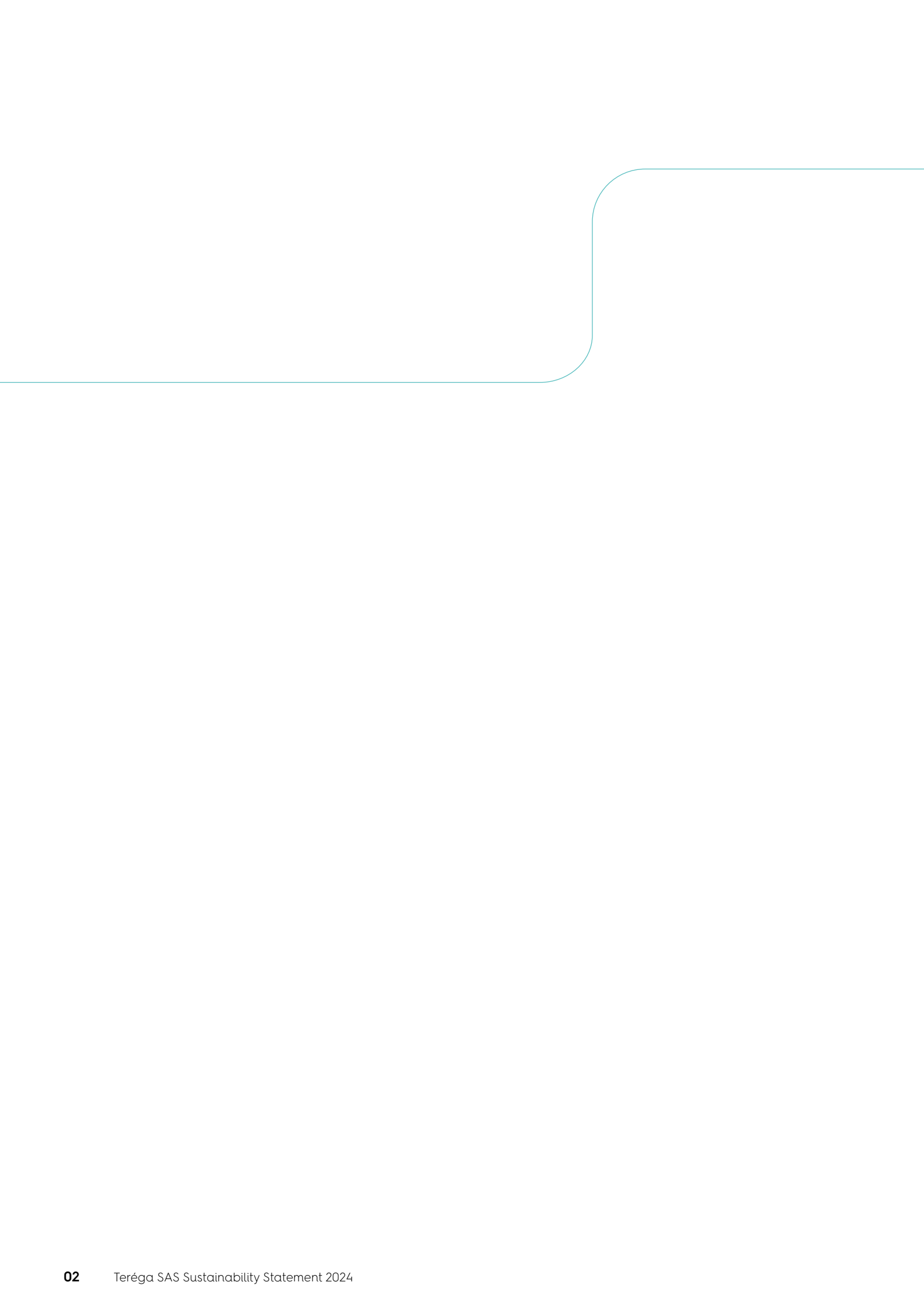


SUSTAINABILITY STATEMENT TERÉGA SAS 2024



COMMITTED TO ENERGIES OF THE FUTURE

“To achieve the shared goal of net zero greenhouse gas emissions by 2050, our ecosystems must transition towards more sustainable models. We have realigned our objectives and developed a new strategic plan to help decarbonise all areas of activity across our regions in support of this transition. The publication of our first two sustainability statements reflects this same commitment: to provide greater transparency on the sustainability of our business model, the impact of our activities on society and the environment, and the action plans we are implementing in support of a more sustainable and desirable future.”

DOMINIQUE MOCKLY, PRESIDENT AND CEO OF TERÉGA SAS

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1. GENERAL INTRODUCTION

1.1. GENERAL BASIS FOR PREPARATION OF SUSTAINABILITY STATEMENTS

The Teréga Group, comprising Teréga SAS – the lead holding company overseeing the Group’s operational subsidiaries, namely Teréga SA and Teréga Solutions – is responsible for the development, management, and implementation of gas transport and storage infrastructure, as well as innovative solutions, tools, and methods for optimising infrastructure and logistics systems using gas, hydrogen, and CO₂ in the South-West of France.

Throughout this report, the term “Teréga SAS Group” refers to Teréga SAS and the entities it controls.

Teréga SA focuses its activities on the transport and storage of natural gas. In addition, through dedicated Business Units, it is developing new infrastructure projects for hydrogen (H2med-BarMar and HySow) (see *ESRS 2 – 3.1.1*), as well as for the transport, storage, and utilisation of CO₂ (PYCASSO) (see *ESRS 2 – 3.1.1*). Teréga plays a central role, acting as a key link between energy producers and consumers, with a focus on security of supply, ecological transition, and decarbonisation.

Teréga Solutions aims to promote renewable energies, industrial performance, and decarbonisation projects that serve local ecosystems. It operates through four Business Units – the Biomethane and Gas Mobility BU, Hydrogen BU, Multi-Energies and Digital BU, and CO₂ BU – which are designed to support the infrastructure developed by Teréga SA.

The Biomethane and Gas Mobility BU works to accelerate the development of the methanisation sector and GNV-bioGNV mobility (GNV: Natural Gas for Vehicles; bioGNV: combines a renewable gas source with refuelling infrastructure and a full range of compatible vehicles offered by manufacturers).

The Hydrogen BU supports the deployment of low-carbon hydrogen by contributing to the development of high-performance storage, transport, compression, and distribution solutions.

The Multi-Energies and Digital BU supports Industry 4.0 by offering secure data collection systems and industrial cloud data management solutions, accelerating the adoption of smart services (AI, Machine Learning, Analytics, etc.).

The CO₂ BU provides commercial carbon logistics chains designed to meet client needs in the transport, storage, capture, and distribution of carbon dioxide.

Teréga SAS is a wholly owned subsidiary of Teréga Holding. Due to the issuance of public bonds loans, certain debt securities issued by Teréga SAS are admitted for trading on a regulated market (Article L. 22-10-36 of the French Commercial Code). As a result, Teréga SAS qualifies as a Public Interest Entity (PIE). This means thresholds are assessed on a consolidated basis rather than at the individual level of Teréga SAS. Consequently, it is subject to the requirement to publish a sustainability report in 2025 for the 2024 financial year.

It should be noted that Teréga SA, subsidiary of the Teréga SAS Group, will publish its sustainability report in 2025 for the 2024 financial year.

However, due to its structure (fewer than 750 employees), the Teréga SAS Group benefits from phased-in measures. This report therefore complies with the mandatory disclosure requirements and, to ensure continuity with previous publications (DPEF: Non-Financial Performance Statement), information on phased-in standards is also included. Furthermore, the Teréga SAS Group also publishes voluntary and supplementary data (both qualitative and quantitative) that is specific to the Teréga SAS Group (see *ESRS G1 – 5*).

The Teréga SAS Group has taken into account the upstream and downstream elements of its operations’ value chain in its sustainability report (see *ESRS 2 – 3.1.4*).

The scope of Teréga SAS Group sustainability reporting is identical to its financial reporting perimeter.

The sustainability information has been prepared in the context of the first application of legal requirements resulting from the transposition of the European directive on corporate sustainability reporting. This initial year of applying the directive – and the double materiality analyses that it requires – is marked by uncertainties regarding the interpretation of the texts, the absence of established practices or comparative data, and difficulties in data collection, particularly within the value chain.

In this context, the Teréga SAS Group has endeavoured to apply the normative requirements set by the ESRS (European Sustainability Reporting Standards), as applicable at the date of preparing the sustainability statement, based on the information available within the reporting deadlines.

Moreover, to take into account best practices and local recommendations, as well as a better understanding of these new regulatory and standard requirements, the Teréga SAS Group may develop certain reporting and communication practices if necessary, along with the internal control system related to the production of sustainability information, as part of a continuous improvement approach.

The Teréga SAS Group excludes category 3.11 (use of sold products) from Scope 3, as Teréga SA provides gas transportation and storage services to its clients and does not own the gas molecules.

1.2. DISCLOSURES IN RELATION TO SPECIFIC CIRCUMSTANCES

Time horizons

Within the framework of the CSRD, the Teréga SAS Group complies with the requirements of the standard regarding the time intervals used. The time intervals applied for the publication of financial statements also comply with the expectations of the standard: 1 year (short term), 2–5 years (medium term), and over 5 years (long term). However, the time horizon expected by the standard for the greenhouse gas (GHG) reduction trajectory across Scopes 1, 2, and 3 is set at five-year intervals up to 2050. To date, the Teréga SAS Group has a committed GHG reduction pathway aligned with the 2015 Paris Agreement, with targets set for 2025 and a milestone at 2030.

Estimations and sources of uncertainty

Scope 3

The Teréga SAS Group uses estimates in calculating its Scope 3 carbon footprint. To compile these data, the Teréga SAS Group employs a service provider whose methodology is based on the framework developed by the French Environment and Energy Management Agency (ADEME), notably using monetary ratios with an uncertainty margin of around 60%, as well as information provided by suppliers. The resulting uncertainties are monitored and taken into account in the Teréga SAS Group carbon footprint calculations.

The Teréga SAS Group collaborates with its suppliers to increase the amount of measured data in order to improve calculation reliability.

To verify the robustness of the historical greenhouse gas emissions data (particularly Scope 3) for 2021, 2022, and 2023, the audit firm EY conducted specific assurance work on these elements.

Scope 1, 2, and 3 trajectories

The Teréga SAS Group establishes trajectories for Scopes 1, 2, and 3 that are inherently uncertain, as they are based on future assumptions. However, these assumptions are based on clearly defined and well-supported foundations.

The reduction trajectory for Scopes 1 and 2 is primarily built upon a series of decarbonisation projects studied and evaluated by the technical teams. The associated investment amounts for these projects are included in the Long-Term Plan (PLT) and will be subject to validation by the Board of Directors (for investments over €2 million).

Drawing on its analysis of historical data, the Scope 3 emissions reduction trajectory was established by a specialised third party, considering assumptions regarding the use of existing and emerging technologies as well as consultations with Teréga SAS Group suppliers.

The Net Zero Assessment (NZA), conducted by Moody's in 2024 on the greenhouse gas (GHG) reduction trajectory towards 2030, confirms: *"The robust implementation by Teréga SA is driven by the company's clear and credible action plan for Scopes 1 and 2 emissions, based on proven and easily deployable technology."* Regarding Scope 3, *"most of the progress will depend on the ability to influence suppliers and subcontractors to gain access to low-carbon products and services that would enable the reduction of indirect emissions."* In its report, Moody's confirms that *"Teréga SA is not facing significant external dependencies, nor changes to its business model, in order to achieve these objectives."*⁽¹⁾.

Contractors and temporary staff

Concerning the internal workforce (see *ESRS S1*), the Teréga SAS Group voluntarily discloses the Lost Time Injury Frequency Rate (LTIFR) indicator for its own employees, temporary staff, and employees of contracting companies over which the Teréga SAS Group is able to exert influence in terms of safety prevention measures.

This calculation is based on internal data and controlled data for temporary staff, as well as external data provided by contracting companies (accident reports and hours worked). These reports are monitored and reviewed, with joint actions implemented in collaboration with contracting companies to improve the reliability and accuracy of the data.

(1) Consult Moody's report on Teréga SAS [here](#).

Use of phased-in provisions

The Teréga SAS Group has identified the following sustainability matters for which it will apply phased-in measures this year. As a result, the present report does not cover the standards listed below.

ESRS TOPICS / MATERIAL ISSUES	RELEVANT TOPICS	RELEVANT SUB-TOPICS	MATERIALITY
ESRS E4 - Biodiversity and ecosystems		Phased-in standard	
Consideration of biodiversity in Teréga's internal activities	Biodiversity and ecosystems	Direct drivers of biodiversity loss / Impacts on species status / Impacts on the extent and condition of ecosystems /	Yes
Consideration of biodiversity in the value chain	Biodiversity and ecosystems	Impacts and dependencies on ecosystem services	Yes
ESRS S2 - Workers in the value chain		Phased-in standard	
Health, safety, and working conditions in the value chain	Value chain workers	Working conditions	Yes
Respect for human rights and fundamental freedoms of value chain workers	Value chain workers	Working conditions / Equal treatment and equal opportunities for all / Other work-related rights	Yes

ESRS E4 – Biodiversity and ecosystems

The Teréga SAS Group has decided to apply the phased-in principle on the ESRS E4 – Biodiversity and ecosystems, as indicated in the table above.

For the Teréga SAS Group, the preservation of ecosystems is important due to the routing of its pipelines and the activities of its value chain through natural areas. The Teréga SAS Group systematically applies the MERCI methodology (Monitor, Avoid, Reduce and Offset Impacts) to manage the impacts of its operations principally carried out by its subsidiary Teréga SA. This approach is embedded in its BE POSITIF programme (see *ESRS E1*), which aims to reduce the environmental footprint of its activities, contribute to achieving France's carbon neutrality, and advance the development of sustainable, renewable, and responsible energy management in line with climate challenges and the broader energy transition.

At every project stage, biodiversity issues are identified, and a pre-diagnosis of fauna and flora is conducted using the MERCI method to determine the optimal route and the avoidance, reduction, or compensation measures required, in line with the French Environmental Code, to ensure no net loss of biodiversity. During operations, pipeline easement maintenance is carried out mechanically, with minimal use of phytosanitary products, preferably in the autumn to reduce impacts on wildlife and vegetation. Marker posts are gradually being replaced with beacons to reduce maintenance frequency. In 2023, the Teréga SAS Group tested various alternative solutions at its gas delivery and distribution stations – where phytosanitary products are still used – to

determine the most effective ones, including capillary break mineralisation, low-height plant species, and biocontrol product use.

To manage its significant impacts, risks, and opportunities related to biodiversity and ecosystems, the Teréga SAS Group adopted a Biodiversity Charter in 2018.

At present, the Teréga SAS Group does not have defined targets or metrics for the identified impacts, risks, and opportunities. The Teréga SAS Group has set an objective to develop a biodiversity policy by 2026.

ESRS S2 – Value chain workers

The Teréga SAS Group has decided to apply the phased-in principle for the ESRS S2 – workers in the value chain, as indicated in the table above.

The Teréga SAS Group, as a responsible operator, follows a structured, systematic approach to manage all risks associated with its activities. Risk management includes safeguarding health and safety in the workplace and ensuring respect for fundamental rights for workers across the value chain, including personnel operating on construction sites.

The Teréga SAS Group is implementing an ambitious programme for Accident and Industrial Risk Prevention, known as PARI 2035, which strengthens risk management and promotes an embedded safety culture through concrete measures, actions, and objectives. This programme is led by the Teréga SAS Group Health and Safety Department. Most accidents affect employees of subcontracting companies;

therefore, the Teréga SAS Group is focusing its efforts on increasing the accountability and engagement of its suppliers and service providers in order to reinforce a shared culture of safety. This programme is based on legislative texts applicable in France, including the Universal Declaration of Human Rights, the French Labour Code, the International Labour Organization (ILO), the Organisation for Economic Co-operation and Development (OECD), and the United Nations.

The Teréga SAS Group also implements a Responsible Purchasing Charter, which requires tier-1 suppliers to respect, and ensure that any subcontractors also respect, human rights as well as the principles set out in the Code of Ethics. By requiring suppliers to sign this Charter, the Teréga SAS Group ensures that its contractors demonstrate strong Corporate Social Responsibility (CSR) and are committed to responsible practices in terms of personal safety, environmental protection, respect for human rights, compliance with applicable laws and regulations, business ethics, and social development. Since 2024, this document has become an integral part of the supplier qualification process. Aware of the challenges in managing working conditions (health and safety) and ensuring respect for fundamental rights among distant-tier suppliers, the Teréga SAS Group strives to promote best practices.

The Teréga SAS Group has implemented and adopted a whistle-blowing system that allows all employees (both internal and contractors) to confidentially report any breaches or illicit behaviours, or actions contrary to the ethical values of the Teréga SAS Group. Reports can be made either through the Ethics Committee or via an external alert platform.

The Teréga SAS Group targets aim for “Zero accidents”. To achieve this, the Teréga SAS Group monitors indicators such as the Lost Time Accident Frequency Rate (TFAA) for its own employees, temporary workers, and contractors.

2. GOVERNANCE

2.1. THE ROLE OF THE ADMINISTRATIVE, MANAGEMENT, AND SUPERVISORY BODIES

Since 2016, the Teréga SAS Group has been led by its President, Dominique Mockly.

A graduate of École Polytechnique, ENSTA Paris, and the Executive MBA at HEC Paris (École des Hautes Études Commerciales), Dominique Mockly has held senior management positions since 1994. These include roles at the Directorate of Naval Construction, within the Economy and Defence division of the General Secretariat for National Defence (SGDN) – now the General Secretariat for Defence and National Security (SGDSN) – at the French Defence Procurement Agency (DGA), and later at Sagem. He joined the Areva Group in 2003, successively holding the positions of President of TechnicAtome (nuclear propulsion and research reactors), Executive Director responsible for Areva’s international development in 2009, and Executive Director responsible for the Downstream Business Group (spent fuel recycling, dismantling, logistics of nuclear materials and waste) in 2011.

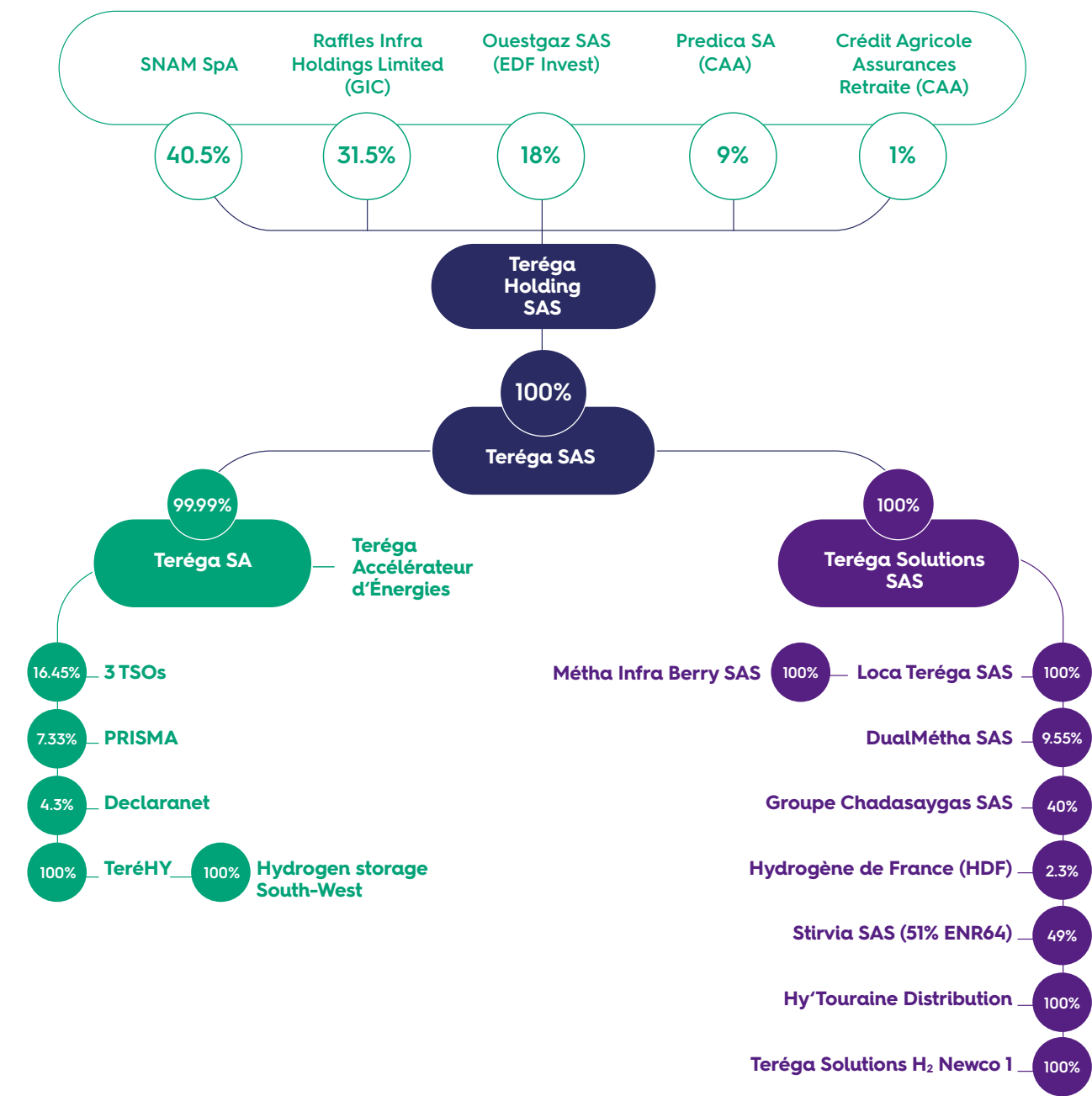
At the Teréga SAS Group, he relies on a strong and dependable governance framework, enabling the Group to secure its core gas transport and storage operations while actively driving forward the development of next-generation energy models and infrastructure for new gases.

The organisational and legal structure of the Teréga SAS Group is based on a three-tiered corporate model.

Teréga Holding SAS holds 100% of Teréga SAS, which in turn is both:

- the majority shareholder of Teréga SA, which focuses on the transport and storage of natural gas and is developing new infrastructure dedicated to hydrogen (see ESRS 2 - 3.1.1), as well as the transport, storage, and utilisation of CO₂ (see ESRS 2 - 3.1.1);
- and the sole shareholder of Teréga Solutions SAS, which is dedicated to new activities supporting the development of renewable energy ecosystems and decarbonisation within regional ecosystems.

Legal structure of the Teréga Group



2.1.1 Governance Bodies and Steering Committees of Teréga SAS

2.1.1.1 The Board of Directors of Teréga SAS

Composition

As of 31 December 2024, Teréga SAS is governed by a Board of Directors composed of ten members, including four women (i.e. 40%). Members are appointed by the sole shareholder for a renewable three-year term. The Board is composed as follows:

- Four representatives from the shareholder SNAM:
 - Gianluca Poi, Director of International Assets Management & Business Development at SNAM, serving as President of the Board of Directors;
 - Licia Aversano, Head of Regulatory and Institutional Legal Affairs at SNAM;
 - Paola Bonandrini, Executive Director Plants at SNAM;
 - Paolo Ventrella, Senior Manager Planning & Control at SNAM.
- Three representatives of the shareholder GIC (Raffles Infra Holdings Limited):
 - Rhys Phillip, Senior Portfolio Director at GIC;
 - Nicolas Machtou, Director of the New Nuclear Programme for the EDF Group.
- One representative from the shareholder Predica (Crédit Agricole Assurances):
 - Abdelhamid Lazaar, Investment Manager at Predica.
- Two independent board members:
 - Stéphanie Thomazeau, Chief Financial Officer of the Frans Bonhomme Group;
 - Adamo Screnci, Vice President at NextChem.

The composition of the Board of Directors of Teréga SAS is characterised by a diversity of profiles, complementary technical expertise, and the presence of independent directors.

The shareholder SNAM is represented by four employees with distinct backgrounds. Their deep understanding of the operations business and, more broadly, of the energy sector, is an undeniable asset in addressing the Teréga SAS Group's challenges, business model, and strategic direction. Specifically:

- Paola Bonandrini, an engineer graduated from the University of Pavia (Italy), also holds a Master's degree in Energy and Environmental Management and Economics from the Scuola Superiore Enrico Mattei in Milan. She is currently Executive Director of Storage Facilities and Compressor Stations at SNAM;
- Paolo Ventrella, a graduate of the University of Bergamo (Italy) in Management, Finance and International Business, currently serves as Senior Manager for Planning & Control in the International Asset Management & Business Development Business Unit at SNAM. As a financial expert, he has strong expertise in asset planning, control, and development activities;

- Licia Aversano, a lawyer with law degrees from Sapienza University of Rome (Italy), is currently Head of Legal, Regulatory, and Institutional Affairs and Sustainable Development at SNAM;
- Gianluca Poi, an engineer who graduated from the University of Pisa (Italy), has extensive international experience in investment management and is currently Director of International Asset Management and Business Development for Europe and Southeast Asia at SNAM.

The shareholder GIC is represented by two of its employees:

- Camille Depoutot, a graduate in Law from Paris-Sorbonne University and holder of a Master's in Management Science from ESCP Business School, currently Managing Director at GIC;
- Rhys Phillip, a Law graduate from the University of Cambridge (UK), brings solid experience in investment and asset management, and currently serves as Senior Portfolio Director.

And also by a specialist in the French energy market:

- Nicolas Machtou, who holds a DEA in Public Economic Law from Panthéon-Assas University and a Master's in Public Policy from Columbia University (USA). He has strong expertise in energy, the environment, and sustainable development, particularly gained through his advisory roles, including within the Prime Minister's Office (2012–2014) and the Presidency of the Republic (2015–2017). As of 2024, he holds the position of Director of Nuclear Programmes at EDF.

Lastly, the appointment of two independent directors to the Board of Directors of Teréga SAS further enhances the diversity of expertise within the Board and contributes to the quality of its deliberations. Both independent directors were appointed in 2022.

Adamo Screnci, a graduate engineer of the Grenoble Institute of Technology and INSEAD (European Institute of Business Administration), began his career at Elf Atochem before joining Air Liquide. In 2009, he co-founded McPhy Energy, a company specialising in hydrogen production and valorisation solutions. He later joined the German group Thyssenkrupp, where he was responsible for global business development in green hydrogen and green chemistry. He is currently Vice President of NextChem, a global leader in green chemistry and the circular economy.

Stéphanie Thomazeau, a graduate of Reims Management School, began her career in audit and financial consulting at Arthur Andersen, and then joined EY, where she became Partner in 2006. In 2010, she joined the Saur Group, serving as Deputy Chief Financial Officer. Currently Chief Financial Officer at the Frans Bonhomme Group, she brings additional financial expertise to the Board of Directors of Teréga SAS, thanks to her deep knowledge of financial challenges and the dynamics of transformation and growth in large corporations.

Missions

The Board of Directors of Teréga SAS defines the strategic direction of the Teréga SAS Group, which comprises Teréga SAS as the lead holding company, along with the companies it owns (Teréga SA, Teréga Solutions, and their respective subsidiaries). The Board also ensures the implementation of these strategic directions and addresses all matters and issues essential to the smooth operation and effective management of the Teréga SAS Group.

In this context, it holds the authority to review and approve a number of key matters, including: the strategic plan, including those concerning material sustainability issues; capital expenditure; the disposal of assets; the taking on of debt; and the signing or termination of commercial contracts where such actions exceed or involve a payment commitment above a threshold specified in the company's articles of association.

Evaluation of the competencies of the members of the Board of Directors

Each year, the members of the Board of Directors of the Teréga SAS Group, as well as the members of the Audit, Risk and Sustainability Committee (see *ESRS 2 - 2.1.1.2*) and the Remuneration and Nominations Committee (see *ESRS 2 - 2.1.1.3*), are invited to self-assess the functioning of the governance body to which they belong by answering questions relating to the following topics: roles and responsibilities, competencies of the members, quality of interactions and discussions, organisation, and preparation of meetings. Among the questions asked are specifically those related to competencies linked to sustainability issues, in particular concerning areas such as health, safety, human resources, sustainability reporting, and so on.

To complement these self-assessments, an external audit was carried out in 2022 with the support of the PwC firm. This audit highlighted opportunities for improvement, notably regarding the strengthening of the Board of Directors' competencies in sustainability matters. As a result, a training session on sustainability issues and the CSRD was held in June 2024, following an invitation to the directors to participate in a "2 tonnes" workshop in 2023, to better address climate challenges and greenhouse gas reduction targets, both at the individual and collective level. Since 2023, the directors have regularly received information aimed at raising their awareness and improving their understanding of the double materiality matrix and the associated impacts, risks, and opportunities.

Information provided and sustainability issues addressed by the Board of Directors

Sustainability issues, embedded at the heart of the Térega SAS Group strategy and business model, receive particular attention from the members of the Board of Directors.

Major projects for developing new infrastructure to accommodate emerging gases are reviewed and approved by the Board.

In addition, strategies relating to workplace safety, reducing environmental impact, and social, societal, and governance matters of the Térega SAS Group are reviewed annually by the Board of Directors.

Workplace safety, as an absolute priority, is systematically included as a standing item on the Board's agenda. Moreover, each quarter, a report is presented to the Board of Directors covering the CSR objectives, actions, and indicators set for the current year, across social, environmental, safety, and governance areas.

Furthermore, the Board ensures that all projects and initiatives carried out by individuals and communities working with the Térega SAS Group are conducted in strict accordance with the values, codes of conduct, and ethics set out in the Térega SAS Group's Code of Ethics. To this end, the Board receives an annual report from the Ethics Committee – the body responsible for ensuring compliance with the Térega SAS Group's values – summarising the activities undertaken during the past year.

In 2024, the Board addressed a number of specific topics related to sustainability issues, including:

CSR GOVERNANCE

- Quarterly reporting on CSR indicators;
- Presentation of the 2024 DPEF audit report;
- Progress update on actions for the preparation of sustainability reporting;
- Review of the double materiality matrix and associated issues, impacts, risks, and opportunities;
- Review of the 2023 endowment fund's activities, 2024 outlook, and a mid-year progress report;
- Information regarding governance evaluation methods, and the upcoming launch of a governance self-assessment in 2025.

BUSINESS CONDUCT, INFLUENCE, AND REGULATORY COMPLIANCE

- Information on the launch of a public consultation as part of the Multiannual Energy Programme (PPE) and the National Low Carbon Strategy (SNBC);
- Information on the scope and implications of the 4th Gas Package, outlining the regulatory framework for hydrogen and decarbonised gases.

GREENHOUSE GAS EMISSIONS REDUCTION

- Approval of the greenhouse gas emissions (GHG) reduction trajectory for 2030.

ENERGY TRANSITION

- Approval of two requests to create Special Purpose Vehicles (SPVs) within the framework of a project to deploy hydrogen storage in the South-West;
- Updates on the progress of major infrastructure projects related to hydrogen and CO₂ contributing to the energy transition (application for Project of Common Interest status).

for PYCASSO, development of the BarMar and HySoW projects, grants awarded by the French Environment and Energy Management Agency – ADEME – for the deployment of Low-Carbon Industrial Zones, or ZIBACs, etc.);

- Updates on the biomethane marketing strategy led by the Biomethane and Gas Mobility Business Unit.

TEREGA SAS	2024
% of CSR and energy transition subjects addressed by the Board of Directors	36 %

2.1.1.2 The Audit, Risk and Sustainability Committee (ARSC)

Composition

This Committee reports directly to the Board of Directors of Teréga SAS and addresses matters relating to the activities of the Teréga SAS Group. Diverse in terms of representation, it consists of one independent director, Stéphanie Thomazeau, acting as President, appointed for a three-year term, and three directors each representing a shareholder (Paolo Ventrella for SNAM, Nicolas Machtou for GIC, and Abdelhamid Lazaar for Predica), making a total of four members, including one woman (25%).

Missions

In accordance with the provisions of the Charter governing its operation and applicable regulations, the ARSC's principal mission is to oversee and supervise all matters relating to the production and dissemination of financial and non-financial information concerning the Teréga SAS Group. It is therefore responsible for ensuring the accuracy, reliability, and robustness of the data production processes contained within the financial and sustainability reports prior to their publication and dissemination to stakeholders.

Information provided and sustainability issues addressed by the Audit, Risk and Sustainability Committee

At each Committee meeting, members are informed of the progress of actions related to sustainability topics through systematic ESG reporting.

The double materiality analysis, finalised in April 2024, was submitted to the Audit, Risk and Sustainability Committee before being presented to the Board of Directors of the Teréga SAS Group.

Stéphanie Thomazeau, President of the Committee and Independent Director of the Teréga SAS company, systematically reports to the Board of Directors on the subjects and discussions held within the ARSC, notably including the results of sustainability audits conducted by external auditors.

2.1.1.3 The Remuneration and Nominations Committee (REMCO)

Composition

Delegated by the Teréga SAS Board of Directors, this Committee deals with matters related to the remuneration and appointment of corporate officers, directors, and executives within the scope of both Teréga SA and Teréga SAS. It currently comprises two directors representing the shareholder SNAM (Gianluca Poi and Paola Bonandrini) and two directors representing the shareholder GIC (Camille Depoutot and Rhys Phillip), appointed upon the shareholders' proposal.

Missions

The Remuneration and Nominations Committee is responsible for proposing to the Board of Directors of the Teréga SAS Group:

1. the appointment of directors and executive officers of the Teréga SAS Group, and members of the Executive Committee of Teréga SAS and the Management Committee of Teréga SA. It is also responsible for unanimously approving any decisions involving their replacement or dismissal;
2. the remuneration conditions [including short- and long-term incentive measures incorporating sustainability indicators, (see *ESRS 2 - 2.2*)] for executive officers of the Teréga SAS Group and members of the Executive Committee of Teréga SAS and Management Committee (Codir) of Teréga SA;
3. the amount of attendance fees granted to the directors of Teréga SAS and Teréga SA. The overall budget for these attendance fees, after approval by the Board of Directors, is ratified by the General Meeting of Teréga SAS shareholders.

2.1.1.4 The Executive Committee (Comex) of Teréga SAS

Composition

As of 31 December 2024, the Executive Committee is led by the President of Teréga SAS, Dominique Mockly. It is composed of ten Directors, including five women (i.e. 50%), each representing a constituent entity of the Group, and meets at least once a month:

- Dominique Mockly, President of Teréga SAS, President and CEO of Teréga SA;
- Carolle Foissaud, Deputy Chief Executive Officer of Teréga SA;
- Michel Boche, Director of Operations, Studies and Projects;
- Dominique Boquillon, Communications Director;
- Aurélie Oyharcabal, Interim Director of Finance, Procurement, Legal and Sustainability;
- Gilles Doyhamboure, Director of Sales and Gas System Regulation;
- Patrick Hamou, Director of Health, Safety and Operational Support;
- Giacomo Matarazzo, Director of Development and Strategy;
- Nathalie Parent-Zucconi, Director of Human Resources and Transformation;
- Marie-Claire Aoun, Director of Strategy and Institutional Relations.

The Executive Committee (Comex) has the following responsibilities:

- to define the overall policy of the Teréga SAS Group, including its strategic and sustainability objectives as approved by the Teréga SAS Board of Directors;
- to establish the management framework for the Teréga SAS Group and each of its subsidiaries;
- to allocate the necessary managerial and financial resources to the entities within the Teréga SAS Group to enable effective management;
- to oversee the strategic, financial, non-financial (ESG), and legal management of the Teréga SAS Group in order to achieve the objectives set by its Board of Directors.

The Comex also holds internal approval authority over certain decisions that may impact the Teréga SAS Group's strategy, in compliance with the powers of the President of Teréga SAS and decisions made by the Teréga SAS Board of Directors.

Information provided and sustainability issues addressed by the Comex

Regarding sustainability, the members of the Comex were kept informed throughout 2024 about the work related to the identification of sustainability issues and their assessment in terms of impacts, risks, and opportunities. These issues, along with their associated impacts, risks, and opportunities, were formally validated in April 2024 by the Comex and subsequently by the Board of Directors.

To support and oversee this identification process, sponsors were appointed within the Comex to monitor the key deliverables of the double materiality assessment process and ensure the effective adoption of the results by their respective Divisions (see *ESRS 2 - 4.1*).

Moreover, for each CSR programme (see *ESRS 2 - 3.1.2*), a member of the Comex has been appointed to lead sustainability issues and ensure the proper management of the associated impacts, risks, and opportunities.

Each member of the Comex, within the scope of their roles and responsibilities, also plays a key role in upholding ethical principles and codes of conduct: essential factors that contribute to the effectiveness, reliability, reputation, and success of the Teréga SAS Group.

2.1.2 The Management Committee (Codir) of Teréga SA

Composition

The Management Committee is led by the President and Chief Executive Officer, Dominique Mockly. Since 2024, he has been assisted by Carolle Foissaud, Deputy Chief Executive Officer, herself appointed by the Board of Directors, to ensure the executive coordination of the company. She has extensive experience in the energy industry.

As of 31 December 2024, the Codir comprises ten Directors, including five women (50 %), thus representing each division of the company:

- Dominique Mockly, President and Chief Executive Officer;
- Carolle Foissaud, Deputy Chief Executive Officer;
- Michel Boche, Director of Operations, Studies and Projects;
- Dominique Boquillon, Communications Director;
- Aurélie Oyharcabal, Interim Director of Finance, Procurement, Legal and Sustainability;
- Gilles Doyhamboure, Director of Sales and Gas System Regulation;
- Patrick Hamou, Director of Health, Safety and Operational Support;
- Nathalie Parent-Zucconi, Director of Human Resources and Transformation;
- Marie-Claire Aoun, Director of Strategy and Institutional Relations.

Missions

The Codir contributes to the definition of the Teréga SA company strategy, which is then approved at the level of its Board of Directors. It supports the President and Chief Executive Officer in the development, implementation, and monitoring of major decisions (financial, commercial, operational, and societal) that bring these strategic directions to life. It also ensures cross-functionality, coordination, and synergy between the various Divisions to successfully carry out the company's work and activities, manage its operations, and achieve the set objectives. It meets at least once a month.

The Codir has internal approval authority over certain decisions affecting the company, in compliance with the powers of the Chief Executive Officer of Teréga SA, who remains responsible for managing the business and the decisions taken by the Board of Directors of Teréga SA.

Information provided and sustainability issues addressed by the Codir

Regarding sustainability, the members of the Codir were kept informed throughout 2024 about the work related to the identification of sustainability issues and their assessment in terms of impacts, risks, and opportunities. These issues, along with the associated impacts, risks, and opportunities, were definitively approved by all members of the Codir in April 2024.

To support and oversee this identification process, sponsors were appointed within the Codir to monitor the key deliverables of the double materiality assessment process and ensure the effective adoption of the results by their respective Divisions (see *ESRS 2 - 4.1*).

Moreover, for each CSR programme (see *ESRS 2 - 3.1.2*), a member of the Codir has been appointed to lead sustainability issues and ensure the proper management of the associated impacts, risks, and opportunities.

Each member of the Codir, within the scope of their roles and responsibilities, also plays a key role in upholding ethical

principles and codes of conduct: essential factors that contribute to the effectiveness, reliability, reputation, and success of Teréga SA.

2.1.3 The Management Committee (Codir) of Teréga Solutions

The activities related to the development of ecosystems and innovative solutions in renewable energy and the decarbonisation of energy use – serving industrial players, local authorities, and businesses (see *ESRS 2 - 3.1.3.2*) – are managed by Teréga Solutions, a simplified joint-stock company (société par actions simplifiée), represented by its President, Dominique Mockly. He is granted the broadest powers to act on behalf of the company in all circumstances; subject, however, to certain decision-making powers which, in 2022, were conferred upon its sole shareholder, Teréga SAS.

Teréga Solutions SAS also has a Management Committee (Codir of Teréga Solutions) responsible for overseeing and managing its day-to-day operations.

This Committee is primarily tasked with:

- making strategic decisions related to activities contributing to the energy transition;
- reviewing commercial and strategic performance;
- reviewing and approving the internal resources (both human and financial) required for the company's proper functioning.

It is composed of:

- Dominique Mockly, President and CEO of the Teréga Solutions company;
- Carole Foissaud, Deputy Chief Executive Officer of Teréga SA;
- Aurélie Oyharcabal, Interim Director of Finance, Procurement, Legal and Sustainability;
- Marie-Claire Aoun, Director of Strategy and Institutional Relations;
- Giacomo Matarazzo, Director of Development and Strategy;
- Nathalie Parent-Zucconi, Director of Human Resources and Transformation;
- Hind Lammari, Director of the Hydrogen Business Unit;
- Émilie Bouquier, Director of the Multi-Energies and Digital Business Unit;
- Antoine Charbonnier, Director of the CO₂ Business Unit;
- Jérémy Perrot, Director of the Biomethane and Gas Mobility Business Unit.

2.2. INTEGRATION OF SUSTAINABILITY-RELATED PERFORMANCE IN INCENTIVE SCHEMES

Incentive mechanisms are based on a variable component linked to the achievement of individual and collective objectives, applicable to the President of Teréga SAS and the members of the Comex.

For the President of Teréga SAS, annual short-term incentive measures (STI) are implemented covering the entire scope of the Teréga SAS Group's activities, including objectives designed to measure the performance of its operations.

These objectives are determined by the Comex, reviewed by the Remuneration and Nominations Committee, and validated by the Board of Directors of Teréga SAS.

For the year 2024, the STI is based on financial, investment, and business development objectives relating to efficiency, sustainability, and the energy transition. Sustainability objectives account for 20% of the STI and were established as follows in 2024:

- a target on the Lost Time Accident Frequency Rate (LTAFR), corresponding with the number of accidents causing work stoppage divided by the number of hours worked, multiplied by one million, set at 2.4 (10%);
- a target to reduce methane emissions aligned with the trajectory defined by the company (5%);
- a target relating to the improvement of scores assigned by ESG rating agencies (5%).

Additionally, the President and Chief Executive Officer is assigned long-term objectives (LTIP, Long Term Incentive Plan) on a three-year basis. This LTIP is defined annually according to set priorities, then submitted for approval by the Teréga SAS Group through REMCO.

Since 2023, ESG criteria have been progressively integrated into the LTIP, and account for 20% of the plan defined in 2024 for the 2024–2026 period.

The ESG targets set are:

- a reduction of greenhouse gas emissions in Scopes 1 and 2 by 26% in 2026 compared to 2021 (10%);
- a target relating to the improvement of scores assigned by rating agencies (10%).

Achieving the targets set within the STI and LTIP frameworks entitles beneficiaries to a variable bonus, the amount of which depends on the percentage of target attainment. Progress towards these targets is regularly reviewed by REMCO and approved by the Board of Directors of the Teréga SAS Group. For 2024, all CSR targets set for the STI were met.

Members of the Comex each have individual objectives in addition to common objectives, which may include ESG criteria depending on their Division and the associated issues.

2.3. STATEMENT ON DUE DILIGENCE

The Teréga SAS Group is not subject to Law No. 2017-399 of 27 March 2017 relating to the duty of vigilance for parent companies and ordering companies, which requires French companies with more than 5,000 employees to publish a vigilance plan to prevent serious infringements of human rights, fundamental freedoms, health, and safety.

However, the Teréga SAS Group expresses its commitment to uphold these fundamental principles through a general statement of principles set out in its Code of Ethics, which promotes the following values among all employees of the Teréga SAS Group as well as its stakeholders:

- comply with laws and regulations;
- encourage constructive dialogue with stakeholders on sustainable development issues;
- uphold human rights and fundamental freedoms by referring to the UN and OECD guiding principles, as well as the core conventions of the ILO;
- reject all forms of discrimination, violence, and corruption;
- ensure the health and safety of its employees;
- protect the environment and biodiversity, and promote energy sobriety;
- foster relationships among employees based on honesty, fairness, cooperation, loyalty, and mutual respect.

The Teréga SAS Group reinforces its commitment to these fundamental principles and values by implementing an ambitious CSR programme aligned with the company's challenges and addressing each of the sustainability pillars (see ESRS 2 - 3.1.2).

See Annex 1: Key elements on due diligence.

2.4. RISK MANAGEMENT AND INTERNAL CONTROLS OVER SUSTAINABILITY REPORTING

The Teréga SAS Group has a comprehensive risk management and internal control system, overseen by the Risk Management Division, which reports to the Health, Safety and Operational Support Department. This ongoing system comprises a range of resources, procedures, and actions, tailored to the specific characteristics of each entity (Divisions, Centres, Departments, Services). Under the responsibility of each of these entities, it contributes to the control of activities, operational efficiency, and ensures appropriate consideration of all risks or events that could jeopardise the achievement of the Teréga SAS Group strategic and operational objectives.

This overall risk management system is structured around three lines of defence:

1. Operational management (first line). This first line of activity control is made up of operational staff and managers.

They are responsible for risk assessment and control, particularly through the implementation of control measures over the processes under their responsibility. Day-to-day operational controls are fully embedded in business operations and are carried out either by the operators themselves (first-level control, known as self-assessment), or by their line management (second-level control, known as supervision).

2. Functional departments (second line). These departments are responsible for areas of expertise such as regulatory compliance, human resources, finance, IT, cybersecurity, safety, health, security, the environment, etc. Their objective is to provide operational staff with the tools, methods, and controls they need to manage day-to-day risks. These departments are supported in the deployment and supervision of this system by a member of the Risk Management Division, who develops, promotes, and oversees its implementation within the Teréga SAS Group.
3. The internal audit function, integrated within the Risk Management Division, is an independent and objective activity that provides the Teréga SAS Group with assurance regarding the effectiveness of its operations, offers advice for their improvement, and contributes to the protection of its assets and the creation of added value.

It helps the Teréga SAS Group achieve its objectives by systematically and methodically evaluating its risk management, internal control, and governance processes, and by making recommendations to enhance their effectiveness.

Sustainability-related risks are addressed within the Group's Enterprise Risk Management (ERM) framework:

- first line: This involves the appointment, on the one hand, of stakeholders and subject-matter experts for the relevant risk areas – individuals responsible for producing the expected sustainability data and associated performance indicators – and, on the other hand, an owner tasked with overseeing and verifying the information produced by these stakeholders, as well as ensuring accurate and appropriate reporting;
- second line: The ESG Reporting and Projects Officer, whose role is to support first-line actors by providing tools, methods, and controls to address the risks associated with data production. This Reporting Officer also ensures that the data produced is accompanied by the contextual information necessary for its proper understanding.

Each quarter, all monitoring indicators linked to the Teréga SA sustainability commitments are presented to the Audit, Risk and Sustainability Committee and to the Board of Directors of Teréga SA. This presentation includes explanations for any variances from targets and an update on the progress of the action plan.

To enhance the quality of sustainability information to be published, the Teréga SAS Group will progressively implement

a robust process for the production and collection of sustainability data.

This process will gradually incorporate:

- documentation outlining the methods for preparing various qualitative and quantitative information;
- coordination of the different functions involved within the organisation;
- deployment of tools for data collection;
- progressive implementation of internal control and audit mechanisms to improve the reliability and quality of the information produced;
- establishment of a regular reporting process to governance bodies regarding the outcomes of Internal Control over sustainability data.

3. STRATEGY

3.1. STRATEGY, BUSINESS MODEL, AND VALUE CHAIN

The strategic priorities implemented by the Teréga SAS Group pursue two main objectives: to secure its position as a leading operator of gas infrastructure, and to strengthen its role as a driver of the energy transition. New forward-looking solutions are emerging, and the Teréga SAS Group aims to foster their development: biomethane, hydrogen, CCUS (CO₂ Capture, Utilisation and Storage), NGV (Natural Gas for Vehicles), and multi-energy systems. Innovation in the sector is of critical strategic importance, as it is through innovation that the diversified energy network of tomorrow will be built. The Teréga SAS Group therefore reaffirms its commitment to adapting and operating renewable and low-carbon gas infrastructure in order to contribute to carbon neutrality and the reindustrialisation of local ecosystems.

As for its subsidiary Teréga SA:

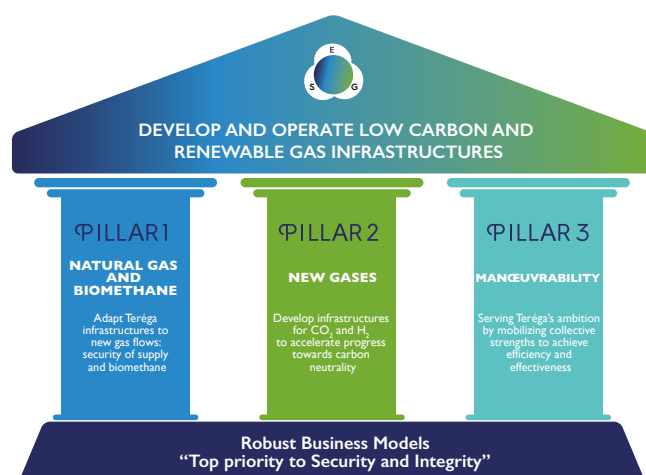
Teréga SA is a key player in gas transport and storage in France. As such, the company is subject to certain public service obligations, in accordance with the legislation applicable to businesses in the gas sector. Article L. 121-32 of the French Energy Code outlines these obligations. For over 80 years, the company has provided its customers with a safe and efficient network to supply them with gas, supported by a regional grid of over 5,000 kilometres of pipelines and two underground storage sites, strategically positioned at the crossroads of major gas flows and at the heart of Europe's energy system. As of 2024, its infrastructure accounts for nearly 16% of France's gas pipeline network. Teréga SA also operates two underground natural gas storage sites in Lussagnet (40) and Izaute (32), which represent 27 % of France's total gas storage capacity in 2024.

Almost all of the natural gas consumed in France today is imported. Natural gas enters France and is transported over long distances via the natural gas transmission network. This network is made up of gas pipelines, which directly supply industrial sites or feed into distribution networks. Natural gas

can also be transported to underground storage facilities. In 2024, 98% of revenue remained dependent on fossil fuels. This dependency is linked to gas consumption and usage across industrial sectors, residential households, and the tertiary sector.

A study on the future of gas infrastructure in 2030 and 2050, published by the French Energy Regulatory Commission (CRE) on 4 April 2023, shows that despite an expected long-term structural decline in gas consumption, the gas transmission network will remain largely necessary. The current tariff regulation framework set by the French Energy Regulatory Commission (CRE) ensures the long-term economic sustainability of the gas system. It also enables gas infrastructure operators to meet key objectives relating to network security, system integrity, and the integration of renewable gases.

3.1.1. Energy transition at the heart of the Teréga SAS Group strategy



At the heart of its new strategic business plan, GAIA 2035, the Teréga SAS Group aims to transform its network into a decarbonised infrastructure hub for the transport and storage of future energies such as biomethane and hydrogen, thereby contributing to carbon neutrality by 2050.

GAIA 2035 addresses new sectoral challenges and seizes the opportunities associated with the energy transition. Based on an investment plan of €3 billion over the next ten years, this strategy aims to secure and adapt existing infrastructure to emerging needs and to develop biomethane, as well as solutions for new gases contributing to decarbonisation, such as hydrogen and carbon dioxide.

The Teréga SAS Group is actively supporting the growth of local biomethane production by leveraging a flexible and high-performance network. In 2024, ten biomethane production sites were connected to the Teréga SA network, generating a total output of 219 GWh. This means that 4.1% of the gas consumed on its network was of renewable origin (based on the 2024 average Renewable Gas Index, or IGR).

In the South-West region of France, the total volume of biomethane injected into the gas networks reached 877 GWh in 2024, representing 8% of national production. Of this, 658 GWh were injected into distribution networks connected to the Teréga SA transmission system. While part of this production can be consumed locally in a “closed loop” system on these networks, there are instances where local production exceeds local demand. To absorb all the green gas produced via methanisation in the South-West region, Teréga SA is developing reverse flow (rebours) projects in collaboration with gas distribution network operators. These reverse flow units are designed to compress unused biomethane from a distribution network and inject it into a higher-pressure transmission network such as that operated by Teréga SA. This maximises the valorisation of locally produced renewable gas by directing it to consumers located further from the production site. In 2024, around fifteen reverse flow projects were under review.

Every day, the Teréga SAS Group works to ensure its network is ready to accommodate new decarbonised gases such as hydrogen produced from renewable or low-carbon electricity. The Teréga SAS Group is involved in the creation of innovative European infrastructure to enhance hydrogen transport and promote its uses, aiming to contribute to the decarbonisation of the European, national, and local economies. Accordingly, in 2024, Teréga SA conducted feasibility studies on two flagship infrastructure projects dedicated to hydrogen:

- **H2med-BarMar:** One of the cornerstones of the future European hydrogen backbone, the BarMar offshore hydrogen pipeline will connect Barcelona to Marseille, providing a key link between Southern and Northern Europe. This transport infrastructure is expected to carry 2 million tonnes of hydrogen per year, representing 10% of Europe's consumption. Since 8 April 2024, H2med has been officially recognised as a Project of Common Interest (PCI) by the European Union. The Teréga SAS Group is developing this project jointly with other gas transmission system operators: Enagás in Spain and NaTran (formerly GRTgaz) in France, in cooperation with OGE (Open Grid Europe) in Germany. A Joint Development Agreement (JDA) was signed in June 2024, with the Teréga SAS Group holding a 16.7% stake in the project. The project will also benefit from European funding under the Connecting Europe Facility (CEF) mechanism. The Call for Expressions of Interest (CEI), conducted between November 2024 and January 2025, revealed significant hydrogen production potential in the Iberian Peninsula and confirmed demand in consumption areas in France and Germany. Nearly 130 companies participated in this market consultation.
- **HySoW:** This 650-kilometre hydrogen infrastructure will supply the industrial centres of Bordeaux, Toulouse, and Lacq, as well as the ports of Bordeaux, Bayonne, and Port-la-Nouvelle. The HySoW project also includes a storage component, with a site in Nouvelle-Aquitaine having a capacity of 500 GWh. HySoW will be connected to the H2med-BarMar backbone via the MidHY pipeline operated by

NaTran. The development and commissioning of the three projects – HySoW, MidHY, and H2med – are fully coordinated among the various operators involved.

To boost the industrial transition of the Pyrenean foothills (South-West France and North-East Spain), Teréga SA is the developer of the PYCASSO project, which aims to cover the entire CCUS chain (Carbon Capture, Utilisation and Storage). The Teréga SAS Group is developing the transport and geological storage infrastructures for CO₂ as part of this project, which targets achieving carbon neutrality for the Pyrenean territories by 2040. PYCASSO addresses the treatment of incompressible CO₂ emissions produced by industrial processes, after all measures for energy sobriety, efficiency, and renewable energy integration have been implemented. The infrastructures put in place will also valorise the significant biogenic CO₂ reservoir in the South-West region, notably generated by paper mills. This biogenic CO₂ can then be valorised as e-fuels or other products derived from green chemistry, through pipeline connections between CO₂ emitters and consumers.

To support these developments, pillar 3 of the GAÏA 2035 plan mobilises the company's collective strengths with a focus on efficiency and effectiveness. In 2024, the establishment of a new organisational structure marked a key step in rolling out the GAÏA 2035 plan: it aims to make the Teréga SAS Group more efficient in order to create room to meet the company's targets.

3.1.2. Corporate social responsibility, a cornerstone of the GAÏA 2035 strategic plan

A pioneer in safety, environmental and societal commitments – especially through its endowment fund Teréga Energy Accelerator –, the Teréga SAS Group has enshrined CSR as a fundamental principle of its GAÏA 2035 strategy. Corporate Social Responsibility has long been embedded in the Teréga SAS Group's DNA, initially through its commitments to safety, and subsequently on the environmental front with a priority to contribute to carbon neutrality by 2050. These commitments are now implemented through four flagship programmes led by the company's various Departments, as well as through its endowment fund, Teréga Accélérateur d'Énergies. They cover all areas of CSR – environmental, social, and governance – to steer the company towards a responsible and sustainable model.



This societal and environmental responsibility is supported by appropriate policies, notably:

- **A workplace safety policy**, embodied in its “PARI 2035” programme, which aims to ensure:
 - safety at work by protecting the physical and mental integrity of employees and external contractors throughout their activities across all sites and worksites;
 - industrial safety: protecting its infrastructures from incidents, accidents, or natural disasters and anticipating the impacts of climate change;
 - security and cybersecurity: Ensuring the integrity of physical infrastructure and information systems to protect Teréga SA from malicious acts.
- **a social and territorial policy**, through the “ENERGIZ MOUV” programme, organised around five main pillars:
 - contributing to the inclusion of people who are distant from employment and those with disabilities;
 - guaranteeing gender equality in treatment and promoting diversity by increasing the proportion of women in roles related to ecological and technological transition;
 - ensuring effective skills development to meet the company's ambitions in the energy transition;
 - strengthening employee engagement;
 - supporting the development of territorial ecosystems by assisting them in the energy transition, fostering local industrial ecosystems, and stimulating their growth through numerous initiatives, notably via actions from the Teréga Accélérateur d'Énergies endowment fund.

An independent endowment fund to accelerate collective energy initiatives.

The Teréga Accélérateur d'Énergies endowment fund is an independent, non-profit sponsorship scheme aimed at carrying out or financing actions of general interest. These actions, aligned with the Teréga SA values, extend its societal and environmental commitment to territorial ecosystems.

Teréga Accélérateur d'Énergies supports talents and initiatives engaged within the regions through four key areas of action:

- supporting the economic and social development of the greater South-West region;
- preserving biodiversity;
- fostering social inclusion;
- promoting and disseminating French scientific and cultural heritage.

- **An environmental policy**, through the “BE POSITIF” programme, aimed at accelerating the reduction of the company's environmental footprint across all natural ecosystems (air, water, soil, landscapes, biodiversity), with the following priority commitments:

- contributing to carbon neutrality by 2050 through an intermediate target of reducing greenhouse gas emissions by 34% by 2030 compared to 2021;
- strengthening actions to preserve biodiversity.

This programme foresees the deployment of committed and structured actions covering all the company's activities, following the principle: Monitor, Avoid, Reduce, and Offset Impacts.

- **A governance framework ensuring that decisions are made and implemented responsibly, integrating stakeholder expectations**, through the “CADRE” which aims to:

- strengthen the consideration of sustainability issues at all levels of the company;
- ensure ethical business conduct and foster a culture of zero tolerance;
- reinforce responsible practices with its suppliers (Responsible Purchasing Charter);
- maintain constructive dialogue with its stakeholders within the framework of implementing its strategy.

3.1.3. Strategy implemented through the Teréga SAS Group's subsidiaries

The Teréga SAS Group operates through two subsidiaries:

- Teréga SA, responsible for the Group's core activities of gas transportation and storage;
- Teréga Solutions, tasked with developing practical solutions to support energy efficiency and the decarbonisation of end uses.

3.1.3.1. Activities of Teréga SA

The Teréga SA business model

DNA

OUR MISSION

- To develop and operate gas infrastructures
- Safety and integrity** are at the heart of our action.

OUR VALUES

- Responsibility
- Cooperation
- Innovation
- Ambition

OUR STRATEGY

- The strategic roadmap, GAÏA 2035, is built around three pillars.
- Natural gas and biomethane
 - Emerging gases
 - System flexibility

RESULTS

Financial results

- €517 M in revenue

Industrial results

- 93.1 TWh of gas transported
- 21.9 TWh consumed within the Teréga zone (industrial users + public distributions)
- 34,000 GWh of contracted storage capacity - representing 100% of available capacity

Human results

- 42 new hires (permanent and fixed-term contracts)
- 97.8% of employees received at least one training session
- LTIFR (Lost Time Injury Frequency Rate): 0.6

Intellectual results

- Around 50 R&I projects underway

Environmental results

- 0.58 teqCO₂/GWh transported*
- * Calculated using a Global Warming Potential (GWP) for methane = 34.

A REGULATED SECTOR

The Commission de Régulation de l'Énergie (CRE), France's energy regulator, oversees the efficient operation of the national gas market

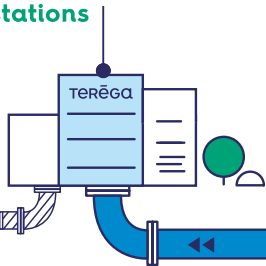
ENERGY TRANSITION

New uses for gas, new production methods, new networks, and more

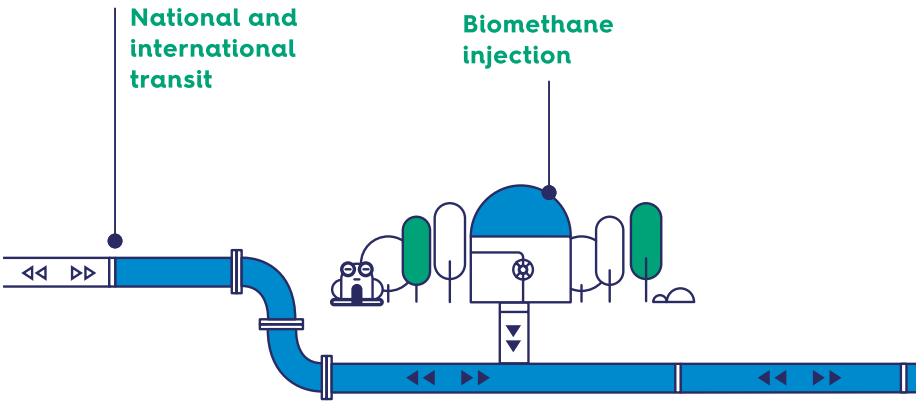
Public distribution systems



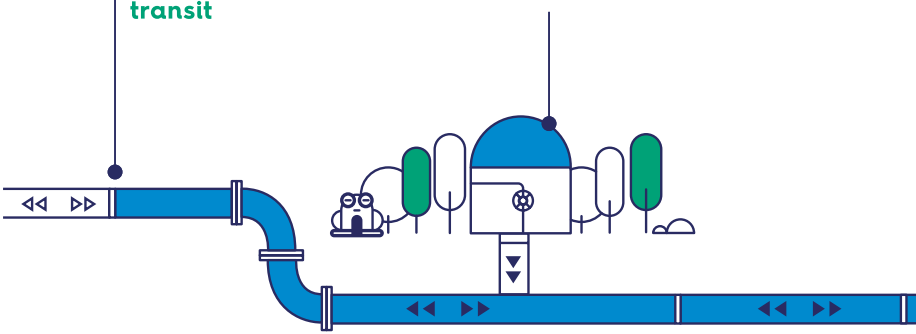
Delivery stations



National and international transit



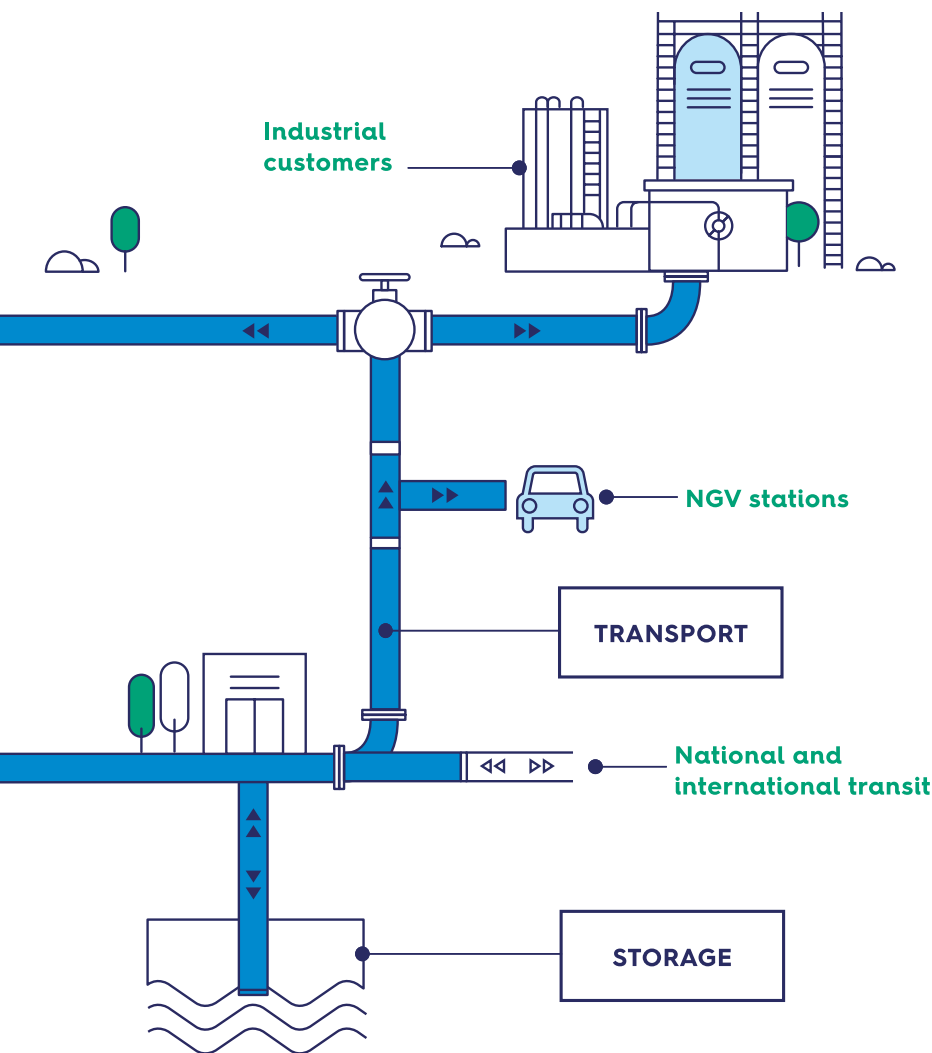
Biomethane injection



- Teréga network
- ▨ Distribution network
- Transport network (excluding Teréga)

PUBLIC SERVICE OBLIGATIONS

In accordance with
Articles L.431-3 (transport)
and L.421-3 (storage)
of the French Energy Code



RESOURCES

FINANCIAL RESOURCES

Shareholders:

- SNAM **(40.5%)**
- Raffles Infra Holdings Limited (GIC) **(31.5%)**
- Ovestgaz **(18%)**
- Predica **(9%)**
- Crédit Agricole Assurances Retraite **(1%)**

Investments: €154 M

INDUSTRIAL RESOURCES

- **5,095 km** of gas transmission pipelines
- **6.4 billion m³** of total gas storage capacity

HUMAN RESOURCES

- **647** employees

CLIENTS

- **82** Transport shippers
- **37** Storage shippers
- **153** public distribution networks
- **115** industrial clients, including 4 NGV (Natural Gas for Vehicles)
- **10** biomethane injection points

INTELLECTUAL RESOURCES

- **50** employees involved in the R&I network
- Average annual R&I budget: **€4.5 M**

ENVIRONMENTAL RESOURCES

- Renewal of certifications: ISO9001, ISO50001, ISO14001 et ISO45001

Own operations - regulated activities

The transport and storage of natural gas are activities regulated by the CRE (Energy Regulatory Commission). The provisions of Articles L. 452-2 and L. 452-3 of the Energy Code empower the CRE to set the methodology for establishing tariffs for the use of natural gas transport networks and underground storage facilities. According to Article L. 452-3 of the Energy Code, the CRE may make “adjustments to the level and structure of tariffs that it deems justified, notably based on the analysis of operators’ accounts and the foreseeable evolution of operating and investment costs.” The tariff framework is set for a four-year period. The current tariff period began in 2024 and will end in 2027. Access tariffs for these infrastructures are then revised annually and apply to all users of these networks, regardless of their energy supplier.

Gas transport by Teréga SA

The Teréga SA transport network covers the greater South-West region of France, interfacing with the Spanish gas network. The network connects major North-South and South-North flows and plays a key role in addressing national and European energy challenges. It consists of two parts: the main network and the regional network.

The main network provides connections – in both directions – with neighbouring transporters’ networks in France and Spain. Additionally, it provides access to the storage sites at Lussagnet and Izaute. It is designed to meet flow requirements at the European level.

The regional network is sized according to local consumption needs. It transports gas from the main network to connected consumers. These are often industrial sites with high consumption. It also transports gas to distribution networks, supplying consumers in urban and suburban areas.

Teréga network map



As a national and European gas operator, Teréga SA is responsible, beyond ensuring smooth transportation, for fulfilling a public service mission: guaranteeing continuity of operations, and maintaining the safety, reliability, and availability of the facilities.

Teréga SA must, in particular, ensure:

- the safety of people and facilities upstream of the connection to end consumers;
- the continuity of natural gas supply;
- the security of supply;
- the quality and price of the products and services provided;
- the protection of the environment, particularly through the implementation of energy-saving measures;
- energy efficiency;
- the valorisation of biogas;
- the balanced development of territorial ecosystems;
- the provision of last-resort natural gas to non-domestic clients performing public interest missions.

Gas Storage at Teréga SA

Located at the crossroads of European gas exchanges, the Teréga SA storage infrastructures offer numerous advantages. These facilities enable clients to play a strategic balancing role by adjusting stored volumes.

Storage plays a crucial role in the country's and Europe's supply security, a role that has been reinforced since the Russo-Ukrainian crisis. Teréga SA is subject to European regulations (Regulation 2017/1938), which set out measures to guarantee the security of natural gas supply to Member States, thereby introducing a principle of solidarity between states. Teréga SA, along with other French storage operators, ensures compliance with the measures imposed by European regulations, such as the annual natural gas storage filling trajectory. Teréga SA thus contributes to achieving the filling target of 90% by 1 November, applicable annually since 2023 for all European Union (EU) Member States, as well as the targets set for France for the 2024-2025 gas year, namely 41% by 1 February, 11% by 1 May, 39% by 1 July, and 81% by 1 September.

Teréga SA regularly reports the storage filling levels to the competent authorities (CRE, DGEC: Directorate General for Energy and Climate). On the French legislative and regulatory fronts, the reference texts include the Energy Code, the law on measures to protect purchasing power, and decrees concerning the securing of natural gas infrastructure filling, which provide for the obligation to build safety stocks if filling thresholds are not met.

The storage sites therefore ensure the continuity of supply by providing the additional gas needed to meet consumer demand at all times. The two historic sites of Lussagnet and Izaute are undergoing continuous improvements to remain competitive and to meet the performance and energy transition requirements.

The Lussagnet and Izaute sites are classified as "Seveso upper-tier" establishments due to the quantities of natural gas stored.

To successfully carry out all its missions, Teréga SA relies on the skills of its 647 employees [permanent contracts (CDI) and fixed-term contracts (CDD)] based exclusively in France.

3.1.3.2. Activities of Teréga Solutions

A subsidiary of the Teréga SAS Group, a key player in France's gas infrastructure sector, Teréga Solutions was established in 2018 with the ambition of accelerating the energy transition within local ecosystems, building on the ongoing efforts of Teréga SA in this area.

Continually on the lookout for opportunities to develop new renewable energy ecosystems and decarbonised energy use, this subsidiary of the Group channels its innovation to serve industrial players, local authorities, and businesses, helping them combine economic performance with environmental responsibility, and thereby contribute to the energy transition of regional ecosystems.

Biomethane and Gas Mobility Business Unit

As part of its energy transition strategy, Teréga Solutions launched a specialised Biomethane and Gas Mobility Business Unit (BMG BU), further establishing its role in the decarbonisation of energy systems.

The decision to promote biomethane arises from the firm conviction that it provides a sustainable alternative by replacing part of the natural gas supply, contributing significantly to the reduction of greenhouse gas emissions within the energy system. As such, biomethane is a key strategic priority for the Teréga SAS Group.

Teréga Solutions promotes a "French" methanisation model: namely, agricultural methanisation on a small to medium scale, well integrated within its local area, delivering direct benefits to farmers, and exemplary in terms of safety for people and the environment.

Concretely, Teréga Solutions supports farmers wishing to embark on methanisation projects throughout the entire lifecycle, from the initial idea through to construction and operation.

Teréga Solutions is involved in all stages of the project:

- prospecting: the team of developers identify interested farmers and partners;
- inception: feasibility studies are carried out for farmers with the help of strategic partners;
- development: handling of regulatory, administrative, and technical procedures;
- ready-to-build: culmination of the development phase, enabling the start of construction.

To simplify and facilitate access to methanisation, Teréga Solutions has developed an innovative model based on two commercial offers for farmers: a "success-based" development offer and a leasing offer.

The first, as its name suggests, is based on success-based payment, ensuring farmers face minimal financial risk during a phase prone to uncertainty and challenges.

Following the development phase, the leasing offer can take over for a period of fifteen years, offering project holders access to a ready-to-use unit without having to bear the cost of construction.

Key figures:

- First biomethane unit in France built and commissioned under the leasing model.
- 20 prospects identified.
- 11 projects currently in feasibility study phase.

CO₂ Business Unit

The Teréga SAS Group positions itself as a key player in developing CO₂ capture, transport, utilisation, and storage (CCUS) technologies. To this end, Teréga Solutions has established a Business Unit focused on building logistic infrastructure for capturing, transporting, and storing CO₂, with the aim of providing a long-term solution for residual emissions from French industries. This initiative aligns with EU policy, including carbon pricing and the creation of a carbon market (ETS – European Trading Scheme).

Currently, the BU is looking to develop a linear infrastructure serving three types of outlets:

- Valorisation units for producing “green” molecules and/or biofuels;
- Export units for offshore storage or valorisation;
- Long-term underground storage sites.

All of these solutions, currently under review, will be co-developed with industrial partners and operators.

The BU’s project process is divided into several phases: Capture: CO₂ is collected via dedicated capture units. Transport: development of linear infrastructure enables CO₂ to be conveyed. Outlet: CO₂ is either valorised, stored, or exported, depending on the chosen outlet.

All of these technological components follow the same process in terms of studies and public consultation: namely, a feasibility study phase, followed by design and engineering phases, the preparation of authorisation applications including stakeholder dialogue stages, and the obtaining of regulatory approvals. The implementation of this process also includes a commercial phase.

The CO₂ BU’s key figures:

- 4 committed clients;
- Around ten potential storage sites under review;
- A projected flow of 6 Mt CO₂ per year by 2032;
- A potential of 40% biogenic CO₂ for valorisation in the Greater South-West region.

Hydrogen Business Unit

The Teréga SAS Group is committed to two major areas to accelerate the energy transition: developing transport and storage infrastructure, and structuring hydrogen ecosystems for mobility and industry.

As a renewable, flexible, adaptable energy carrier,

hydrogen is seen as a key solution for decarbonising energy use. Thanks to its gas infrastructure expertise, the Group positions itself as a central actor across the entire value chain of low-carbon hydrogen, produced from renewable or low-carbon electricity.

Teréga Solutions is involved in developing hydrogen ecosystems by supporting two strategic sectors: mobility, with distribution solutions adapted to transport needs; and industry, by providing infrastructure and logistics solutions to support the decarbonisation of industrial operations.

The Hydrogen Business Unit (H₂ BU) focuses on the “mid-stream” logistics stage, between upstream production and downstream consumption.

The H₂ BU develops ecosystems and infrastructure by designing, engineering, investing in, building, and operating logistical infrastructure for hydrogen, including H₂ treatment, transport, storage, and distribution.

The H₂ BU follows a structured project process similar to that of other Teréga Group entities: Firstly, identifying and developing end-uses to be decarbonised; Secondly, logistics – or distribution – may begin thanks to the development of infrastructures for transport (via pipelines or trucks), storage, and distribution to end users; Lastly, H₂ may be valorised, either through combustion or electricity production (e.g., in events).

Multi-Energies and Digital Business Unit

The Multi-Energies and Digital Business Unit (MED BU) operates at the crossroads of Industry 4.0 and the energy transition. By tackling challenges such as cybersecurity, data access, and industrial data valorisation, its solutions accelerate digitalisation in the industry.

Its core offer includes:

- **IO-Base®**: a cloud-based data historian that collects and centralises real-time industrial data. It makes use of cloud scalability and performance to deal with the exponential growth of the data collected. It enables intelligent services (AI, machine learning, analytics, etc.) to improve operational efficiency and meet the environmental ambitions of modern industry.
- **L’Indabox®**: a patented device offering the highest level of security for industrial data collection, thanks to a physical barrier that ensures one-way data flows. Compact and easy to install, Indabox can be deployed directly on top of a process control unit using standard industrial protocols without requiring additional IT infrastructure. In its pursuit of professionalism and continuous improvement, the MED BU has been ISO 27001 certified since 2024. This approach is consistent with the quality of service that the BU offers its clients, remaining attentive to their needs and integrating their feedback into the product roadmap. The MED BU is responsible for the design of products, as well as their development, implementation, and commercialisation. It relies on a network of technology partners – for the cloud services behind IO-Base and for the manufacturing of the Indabox, as well as commercial partners – to support the sales and integration of the solutions.

To carry out all its missions, the Teréga SAS Group draws on the skills of its 682 employees (on permanent and fixed-term contracts), exclusively based in France.

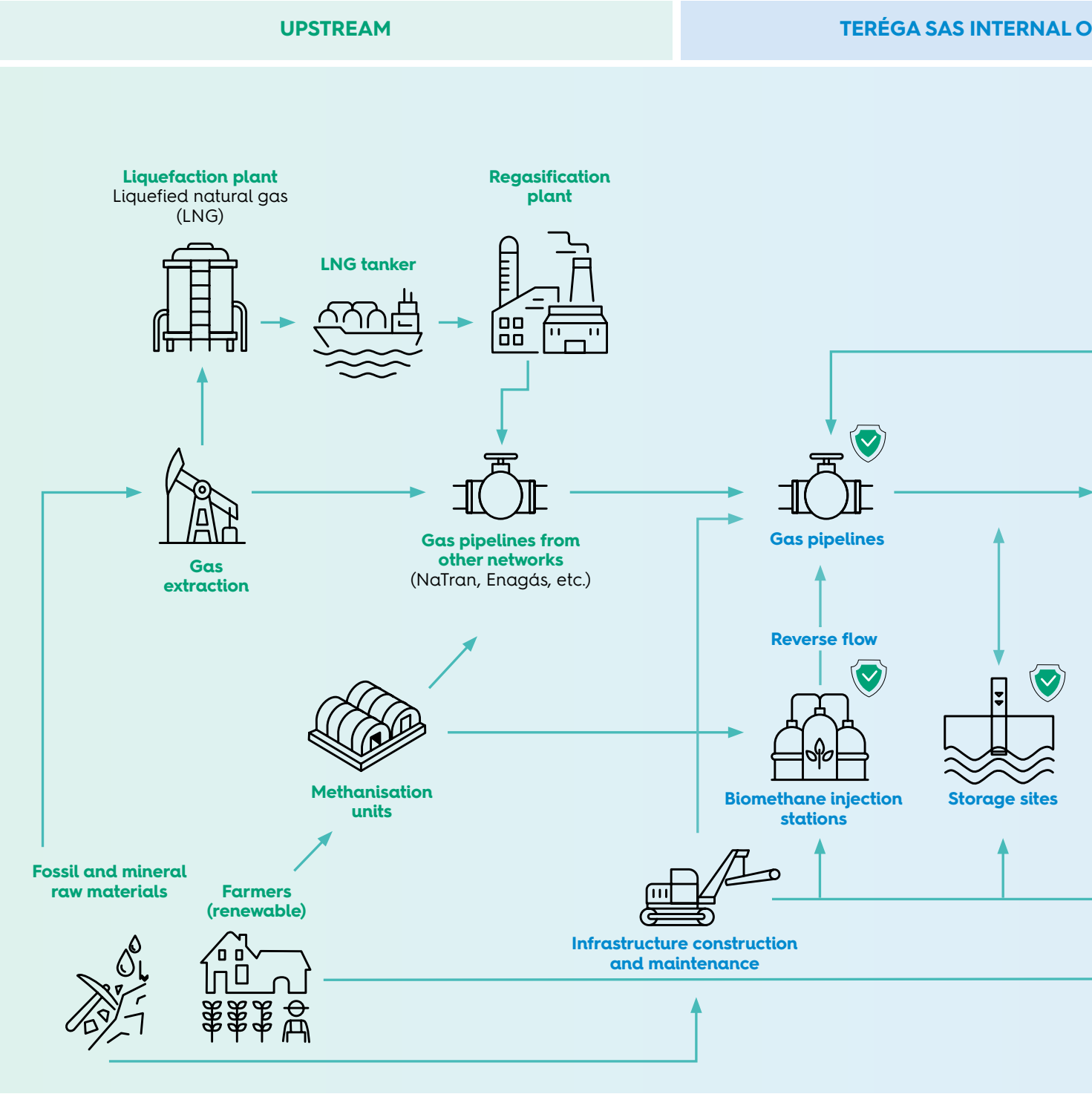
3.1.4. Description of the value chain

The activities of the Teréga SAS Group include operations carried out through its subsidiaries.

The value chain description below concerns Teréga SA, whose turnover represents 99% of the Teréga SAS Group's total turnover. As such, the value chain of the subsidiary Teréga Solutions will not be presented.

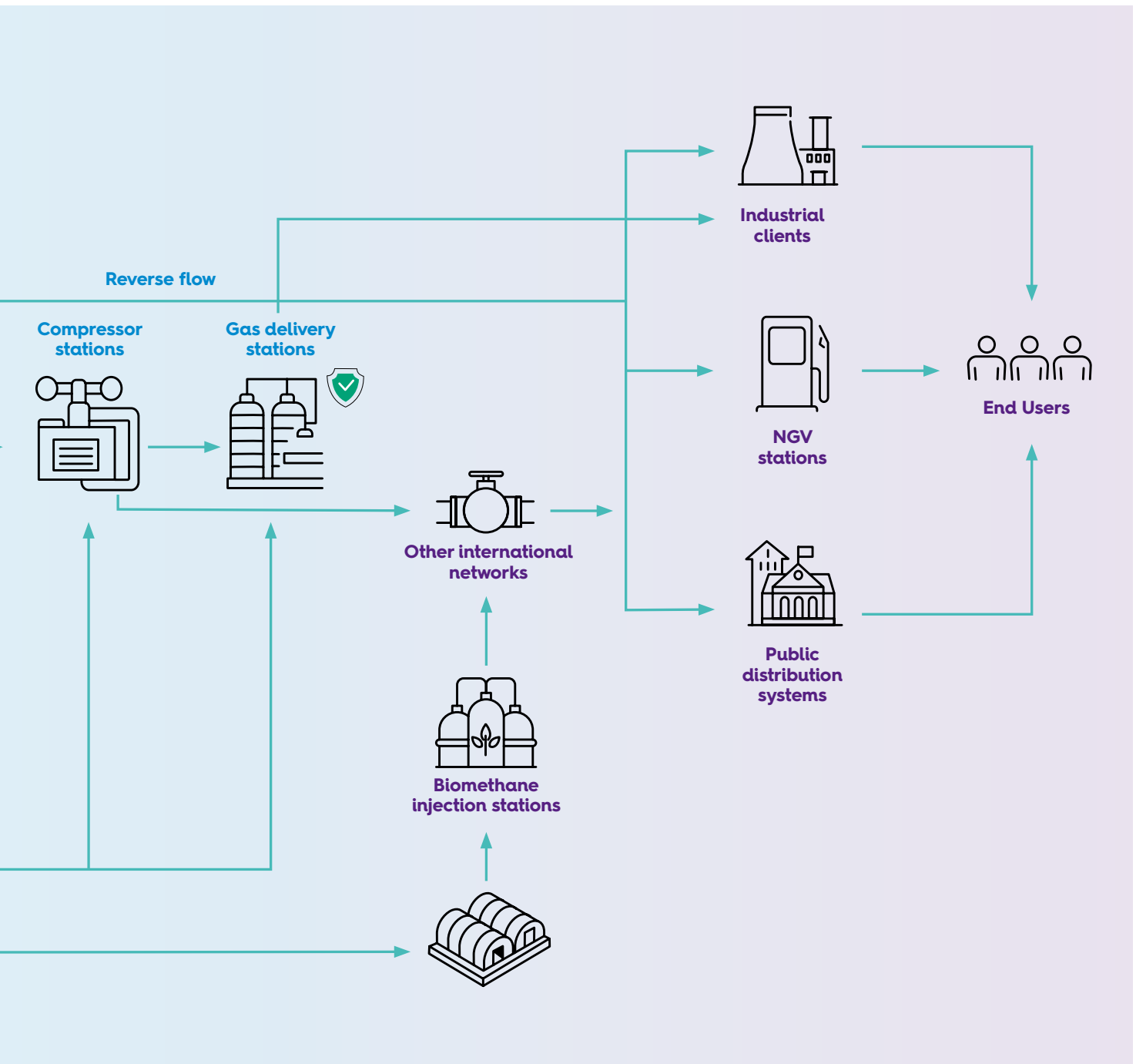
- **Upstream:** through its relationships with suppliers, Teréga SA uses natural raw materials (mining extraction) for the needs of its pipeline construction and maintenance activities. Teréga SA is integrated into the natural gas value chain; indeed, it transports and stores conventional natural gas sourced directly from drilling or resulting from the regasification of LNG (Liquefied Natural Gas). Regarding the biomethane value chain, farmers and industrial players exploit the raw materials used as inputs (agricultural waste) in methanisation units. Teréga SA does not own the gas molecules it transports and stores, whether natural or renewable.
- **Own operations:** Teréga SA ensures the continuity of natural gas transport and storage activities throughout the entire South-West quarter of France by operating a transport and storage network, as well as several compression and delivery stations. Teréga SA relies on subcontracting for construction works and manages the maintenance and operation of infrastructures internally. Teréga SA sells storage capacity and natural gas transit flow to other operators in the sector, industrial clients, mass-market distributors, and Teréga SA Natural Gas for Vehicles (NGV) distribution stations.
- **Downstream:** Teréga SA is positioned as the preferred interface between gas suppliers (upstream) and industrial clients as well as gas distributors in the South-West of France (downstream). The end users identified in the Teréga SA value chain are primarily residential customers supplied through the mass-market distribution network.

The value chain



OPERATIONS

DOWNSTREAM



Infrastructure awaiting official government authorisation

3.2. INTERESTS AND VIEWS OF STAKEHOLDERS

The Teréga SAS Group is convinced that everyone's unwavering commitment to respecting the company's values and ethical principles contributes to its reputation and value creation. This shared foundation helps to build trusting relationships with its various stakeholders, such as its shareholders (see *ESRS 2 - 2.1.1.1*), institutions – including the Energy Regulatory Commission, Regional Energy Committees, regional Conferences of the Parties (COP), Regional Directorate for the Environment, Planning and Housing (DREAL), Regional Energy and Climate Agencies (AREC), and regional elected officials – as well as associations, trade unions, local communities (residents, operators), clients (shippers, industrial users, and public distributors), suppliers (service providers, manufacturers, distributors), the seven departments (operational and support), and employees. The Teréga SAS Group also takes into account the concerns and worries of silent stakeholders such as nature.

To engage with its various stakeholders, the Teréga SAS Group implements several initiatives such as distributing surveys and questionnaires, participating in trade fairs, and holding regular email exchanges, interviews and meetings, consultations, and providing services, among others.

For the development of the local biomethane sector, the Teréga SAS Group relies on a close relationship with the different stakeholders involved in the emergence of this sector. At the national level, the Teréga SAS Group has taken part in the joint work to establish the regulatory framework for biomethane injection, alongside the regulator (CRE) and other gas infrastructure operators (transporters and distributors). At the local level, the Teréga SAS Group works closely with methanisation project leaders to ensure competitive access to its network and to support the growth of this sector within local ecosystems.

The Teréga SAS Group maintains an ongoing dialogue with local authorities to build trusting relationships and successfully carry out its projects. All these matters are reported to and addressed by the company's governing and management bodies (see *ESRS 2 - 2.1*).

In this context, the Teréga SAS Group launched a Call for Expressions of Interest (AMI) in 2023 via its subsidiary Teréga SA to better understand the expectations and needs of local stakeholders regarding decarbonised gases (H₂ and CO₂). With 125 expressions of interest and 61 projects identified, the initiative confirmed strong interest both in decarbonised hydrogen and in CO₂ capture. The results reflect significant mobilisation from actors in the hydrogen sector, highlighting the importance of a collective hydrogen transport network as an essential element for the development of a mature and competitive hydrogen industry. For the CCUS sector, the results are similar and confirm the relevance of developing a shared regional CO₂ infrastructure. Responses to the AMI

highlighted that such infrastructure would both enable the valorisation of CO₂ from local biomass (biogenic CO₂) and contribute to the decarbonisation of the regional industrial fabric, which has no other decarbonisation solutions than the permanent sequestration of their incompressible "residual" emissions.

At the European and national levels, the Teréga SAS Group is actively involved in the establishment of ENNOH (European Network of Network Operators for Hydrogen), the European grouping of hydrogen infrastructure operators, and it participates in the development of the future French regulatory framework for hydrogen and CO₂ infrastructures alongside the French regulator (CRE), the DGEC, and other gas infrastructure operators, notably within the framework of transposing the gas and hydrogen decarbonisation package into French law, published in the EU Official Journal (OJ) in July 2024.

In accordance with the Environmental Code, Teréga SA organises public consultations under the supervision of the National Commission for Public Debate (CNDP), to gather input from all stakeholders regarding major energy infrastructure development projects that are significant both regionally and nationally.

The Teréga SAS Group has a robust organisation to achieve its energy transition and decarbonisation objectives, maintaining a balanced financial structure and the support of its shareholders (see *ESRS 2 - 2.1.1.1*). In order to finance the development of its decarbonised infrastructures, Teréga SA is working on designing new business models for hydrogen and CO₂ in coordination with the CRE and other operators, while engaging its financial stakeholders (grants, banks, etc.).

4. IMPACT, RISK AND OPPORTUNITY MANAGEMENT

4.1. DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

At the end of 2023, the Teréga SAS Group began identifying impacts, risks, and opportunities through an analysis of the double materiality matrix, which was reviewed by the Teréga SAS Group Board of Directors in April 2024.

This analysis helped identify the key sustainability issues as well as the material impacts, risks, and opportunities for the Teréga SAS Group from two perspectives: the impact of the company's activities on people, society, and the environment (impact materiality), and a financial perspective (financial materiality).

Methodology

The double materiality analysis is based on assessing environmental, social, and governance (ESG) issues from two perspectives:

- an “impact” perspective, meaning the negative or positive, potential or actual impacts of the company and its activities on the environment, people, and society. The evaluation of this perspective is based on considering the severity and likelihood of the impact occurring;

- a “financial” perspective, meaning the risks or opportunities arising from environmental, social, and business conduct issues that may have a positive or negative effect on the company’s performance, development, or business model. The evaluation of this perspective is based on considering the probability of occurrence and the potential magnitude of financial impacts.

THE MATERIALITY ANALYSIS WAS CONDUCTED IN FOUR PHASES:

PHASE 1	PHASE 2	PHASE 3	PHASE 4
DEVELOP THE FRAMING ELEMENTS FOR THE DOUBLE MATERIALITY APPROACH	IDENTIFY THE IMPACTS, RISKS, AND OPPORTUNITIES (IROs)	EVALUATE THE IMPACTS, RISKS, AND OPPORTUNITIES (IROs)	PRESENT THE MATERIAL ISSUES TO GOVERNANCE BODIES FOR VALIDATION.
Contents 1. Construction of the value chain of the Teréga SAS Group. 2. Development of the sustainability issues list. 3. Definition of the evaluation methodology (identification of business contributors, definition of scoring grids, determination of consultation methods). Contributors 1. Project team: • CSR team; • Risk Management division. 2. External consulting firm. Validation 1. Presentation of the identified sustainability issues to the Comex.	Contents 1. Identification of the impacts (positive or negative), risks, and opportunities associated with each sustainability issue. Contributors 1. Project team: • CSR team; • Risk Management division. 2. External consulting firm. 3. Contributors/Subject matter experts (= 15 people – Strategy, HR, Safety, Purchasing, Operations). Validation 1. Presentation of the identified impacts, risks, and opportunities to the Comex for validation.	Contents 1. Evaluation of the impacts of Teréga SAS Group activities, as well as the risks and opportunities for the Teréga SAS Group. 2. Individual pre-evaluation by experts within their area of expertise. 3. Collective review and evaluation through four thematic workshops (Environment, Social and Safety, Social and HR, Governance). Contributors 1. Project team: • CSR team; • Risk Management division. 2. External consulting firm. 3. Contributors/Subject matter experts (= 15 people – Environment, Strategy, HR, Safety, Purchasing, Operations). Validation 1. Presentation of the evaluated impacts, risks, and opportunities to the Comex for validation.	Contents 1. Final validation of sustainability issues and the associated impacts, risks, and opportunities (IRO). 2. Determination and validation of the materiality threshold. Contributors 1. Project team: • CSR team; • Risk Management division. 2. External consulting firm. 3. Steering Committee (Environmental/Safety Director, HR Director, Sustainable Development Director, Deputy Director). Validation 1. Preliminary review of the materiality threshold by the Steering Committee. 2. Presentation of the double materiality matrix to the Comex for validation. 3. Presentation of risks and sustainable development to the Audit Committee for validation.

Phase 1: Develop the framing elements for the double materiality approach

In order to identify its sustainability issues, the Teréga SAS Group first mapped its activities and stakeholders, as well as upstream and downstream activities (see ESRS 2 - 3.1.4) with which it is connected.

This value chain mapping enabled the project team – composed of the CSR team, the Risk Management division, and an external consulting firm – to draw up an initial list of sustainability issues. This list was established taking into account the sustainability topics covered by the ESRS topics of ESRS 1(Annex - ARI6) and was supplemented by the work

of Teréga SA within the framework of the Non-Financial Performance Statement (DPEF) and the risk analysis of the Teréga SAS Group.

In addition to the sustainability topics determined by the CSRD directive, the Teréga SAS Group identified an additional issue linked to the regulated sector.

Following this exercise, the project team compiled a list of dependencies on the natural, human, and/or social resources of the Teréga SAS Group. Today, the Group’s main dependency is on natural gas. Indeed, its storage and transportation activities are intrinsically linked to this natural resource.

Beyond this dependency on gas, the consideration of dependencies within Teréga SAS Group activities is addressed through the lens of risk assessment by the Risk Management division, through market and development opportunities by the Strategy Department, as well as through work on materiality matrices (Non-Financial Performance Statement – DPEF) and double materiality (CSRD) by the CSR Department.

Aware of these dependencies, the Teréga SAS Group must now deepen its analysis to develop a better understanding of dependencies arising from its value chain.

Established for nearly 80 years in the South-West of France, the Teréga SAS Group operates exclusively within the French territory through its subsidiary, Teréga SA , with the majority of its business relationships being European.

In developing the double materiality analysis, the Teréga SAS Group has duly considered its geographical location, its activity, and its business relationships, without any exclusions or areas of concern.

This phase also enabled the project team to define the evaluation methodology to be applied for identifying, rating, and validating these issues as well as the associated impacts, risks, and opportunities.

Phases 2 and 3: Identify and assess impacts, risks, and opportunities (IROs)

The project team called upon its subject-matter experts to identify and then evaluate the impacts, risks, and opportunities associated with each issue.

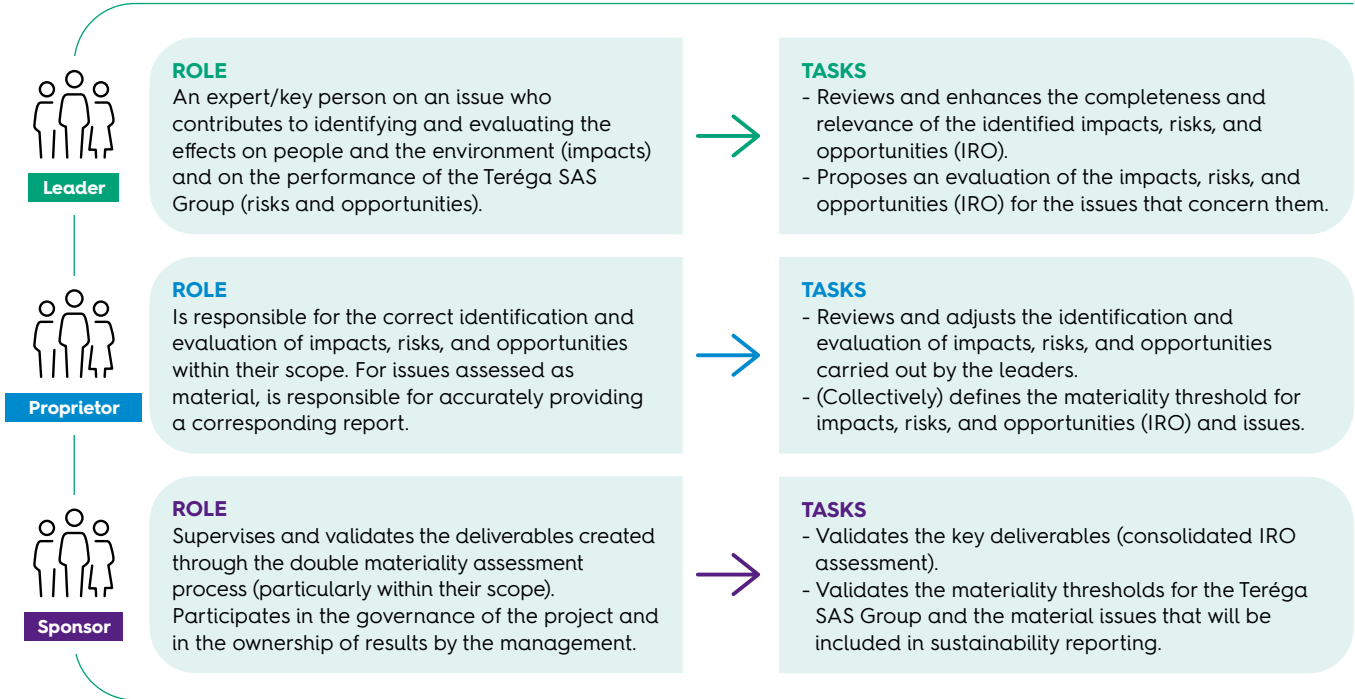
During this exercise, the Teréga SAS Group did not directly consult its stakeholders; however, their viewpoints were taken into account through the involvement of internal experts responsible for ongoing and regular dialogue channels with the impacted stakeholders.

In 2022, the Teréga SAS Group updated its materiality analysis and at that time directly solicited its internal (employees) and external stakeholders (suppliers, service providers, press, institutions, banks, etc.), via an email questionnaire covering all sustainability issues across the three ESG pillars to assess their importance.

These issues were identified following a robust risk analysis conducted by the Teréga SAS Group, a sector benchmark, the ISO 26000 standard, the SDGs (Sustainable Development Goals), and the NFRD (Non-Financial Reporting Directive) regulations. This consultation, which received over 55% response rate from external stakeholders, was reviewed and validated by the Executive Committee.

As described in Phase 1, the list of sustainability issues takes this simple materiality analysis into account. The definition of sustainability issues and the identification of associated impacts, risks, and opportunities were partly inspired by these results.

To ensure the comprehensiveness of impacts, risks, and opportunities, the project team identified three types of contributors: issue holders, issue owners, and sponsors.



The departments involved in identifying and assessing the impacts, risks, and opportunities include Environment, Safety, Industrial Safety, Human Resources, Strategy, Procurement, Institutional Relations, and Risk Management, totalling around thirty people, independently of the project team. In addition to the subject-matter experts, the project team conducted its double materiality analysis by drawing on a benchmark carried out among energy sector players. This benchmark is based on the DPEF and NFRD reports of French and foreign (European) actors, as well as their publications to organisations such as the Carbon Disclosure Project (CDP).

To carry out the scoring of impacts, risks, and opportunities, the project team provided dedicated scoring grids to the issue holders.

The scores were considered based on the “gross” risk and/or impact, meaning without taking into account all the existing control and management measures (documentation, organisation, various controls, etc.).

The scoring was conducted within the scope of the current Teréga SAS Group activities, taking into account the projected evolution of activities of the BMG, MED, H₂ and CO₂ Business Units in the short, medium, and long term.

The double materiality analysis was conducted concurrently with the update of the Teréga SAS Group risk mapping, involving the Risk Management Department from the outset of the double materiality analysis.

The scoring grid used for assessing impact materiality was specifically designed for this double materiality exercise.

The scoring criteria applied for financial materiality correspond with those used in the Teréga SAS Group risk mapping. This collaboration enabled the pooling of information and the identification of common risks and impacts; consequently, a harmonised action plan was developed to ensure that material and priority issues are addressed in parallel.

- Impact materiality assessment grid:

Impact materiality allows for the evaluation of both negative and positive impacts of the Teréga SAS Group.

It results from the product of:

- the severity of the impact, which itself results from the product of the gravity, extent, and irreversibility of the impact (for negative impacts only). Each criterion is assessed on four levels (1-low, 2-medium, 3-high, 4-major);
- the likelihood of occurrence, also assessed on four probability levels ranging from unlikely to likely.

- Financial materiality assessment grid:

Financial materiality evaluates the risks and opportunities for the Teréga SAS Group.

It results from the product of:

- the magnitude of the effect, assessed across five dimensions: strategic, financial, human, legal, and reputational, and rated on four levels of importance (1-low, 2-moderate, 3-major, 4-critical);
- the likelihood of occurrence, also assessed on four probability levels ranging from unlikely to likely.

The assessments were initially conducted individually by the stakeholders before being consolidated during four thematic workshops: environment, social-HR, social-safety, and governance. A harmonisation of the ratings was necessary at the end of these workshops, during which the project team engaged with the stakeholders and owners.

See Annex 2: Summary of impacts, risks, and opportunities

Phase 4: Present the material issues to the governing authorities for validation

Various governance bodies were consulted throughout the project and during the validation phase of the double materiality analysis.

The Steering Committee (Copil) – made up of sponsoring Directors – pre-approved the thresholds, issues, and associated impacts, risks, and opportunities during working meetings with the project team throughout the project.

The Executive Committee (Comex) was kept informed throughout the project of the identified issues and the assessments of impacts, risks, and opportunities, which they had the opportunity to question. During this final phase, the threshold, issues, and associated impacts, risks, and opportunities were definitively validated during a Comex meeting.

A materiality threshold of 9 (out of 16) was adopted by approval of the Comex, based on the recommendation of the project team and the Copil.

This threshold takes into account the existing situation (ambitions, alignment with the Teréga SAS Group strategy and key risks), the specific expectations of Teréga SAS Group stakeholders – such as regulatory matters –, and benchmarking elements. The Teréga SAS Group also examined various scenarios based on industry best practices known to the company following the involvement of a consultant.

This materiality threshold of 9 covers over 50% of the sustainability issues; this level of coverage is considered reasonable.

This choice therefore reflects the Codir’s perspective on the sustainability issues and the material impacts, risks, and opportunities for the Teréga SAS Group.

The finalised double materiality analysis was subsequently presented to the Audit, Risk and Sustainability Committee, before being presented to the Board of Directors of the Teréga SAS Group.

4.2 DISCLOSURE REQUIREMENTS IN ESRS COVERED BY THE UNDERTAKING'S

In total, 28 sustainability issues were identified, comprising 100 impacts, risks, and opportunities. From both an impact perspective and a financial perspective (double materiality), 18 sustainability issues – representing 22 impacts, risks, and opportunities – were assessed as material sustainability issues and material impacts, risks, and opportunities for the Teréga SAS Group.

Below is the list of identified impacts, risks, and opportunities.

ESRS TOPICS / MATERIAL ISSUES	ASSOCIATED IMPACTS, RISKS, AND OPPORTUNITIES	IROs
ESRS EI - CLIMATE CHANGE		
Adaptation to climate change	Climatic hazards impacting Teréga's business continuity	Risk
Greenhouse gas emissions from Teréga's internal activities (Scopes 1 & 2)	Greenhouse gas emissions linked to Teréga's internal activities	Impact (-)
Greenhouse gas emissions related to value chain operations (Scope 3 including downstream gas consumption)	Greenhouse gas emissions from operations of the value chain	Impact (-)
Energy transition	Contribution to the energy transition of the sector	Impact (+)
	Market opportunities related to decarbonised energies	Opportunity
ESRS E2 - POLLUTION		
Pollution from the value chain	Pollution (of all types) resulting from upstream value chain activities	Impact (-)
ESRS E4 - BIODIVERSITY AND ECOSYSTEMS		
Consideration of biodiversity in Teréga's internal activities	Teréga's action plan in favour of biodiversity deemed insufficient	Risk
Consideration of biodiversity in the value chain	Degradation of ecosystems due to upstream value chain activities	Impact (-)
ESRS SI - INTERNAL WORKFORCE		
Working conditions of internal workforce	Deterioration of Teréga employees' well-being due to working conditions	Impact (-)
Health and safety	Workplace safety incident and loss of employee engagement at Teréga	Impact (-)
Labour relations and social dialogue	Positive social climate favourable to the development of employees and the company	Opportunity
Skill development	Failure to support skill development impacting Teréga's strategic ambitions	Risk

ESRS TOPICS / MATERIAL ISSUES	ASSOCIATED IMPACTS, RISKS, AND OPPORTUNITIES	IROs
ESRS S2 - VALUE CHAIN WORKERS		
Health, safety, and working conditions in the value chain	Inappropriate working environment for workers in the value chain	Impact (-)
Respect for human rights and fundamental freedoms of value chain workers	Violation of human rights of workers in the value chain	Impact (-)
ESRS S3 - IMPACTED COMMUNITIES		
Local communities (Teréga)	Failure of dialogue and poor consideration of local communities by Teréga	Risk
	Non-acceptance of Teréga projects by local residents	Impact (-)
ESRS S4 - CONSUMERS AND END-USERS		
Infrastructure security	Operational and financial consequences due to a failure in infrastructure security	Risk
	Infrastructure failure or operational accident on the Teréga network	Impact (-)
	Temporary energy insecurity for end users in the event of infrastructure failure	Impact (-)
ESRS G1 - BUSINESS CONDUCT		
Political commitment and influence	Strategic development of activities in new markets	Opportunity
Business ethics	Legal, financial, and reputational consequences for Teréga due to failure to adhere to business ethics practices	Risk
Regulatory compliance	Legal, financial, and reputational consequences for Teréga due to non-compliance with energy regulation obligations	Risk

The Teréga SAS Group must continuously adapt to the impacts, risks, and opportunities within its ecosystem. The identified material impacts, risks, and opportunities hold strategic importance for the Teréga SAS Group. The connections to the company's strategy and business model are detailed in the thematic standards.

ESRS E1 - Climate change
(see ESRS E1)

ESRS E2 - Pollution
(see ESRS E2)

ESRS G1 - Business conduct
(see ESRS G1)

Regarding standards E3 – Water and Marine Resources – and E5 – Resource Use and Circular Economy –, the double materiality analysis carried out allows these two standards to be considered as non-material.

See Annex 3: Disclosure requirements under the ESRS covered by the company's sustainability statements.

See Annex 4: Disclosure requirements and associated data points, taken from Annex B (ESRS 1)

1. INTRODUCTION

The Teréga SAS Group implements a sustainable development policy across all its activities, committing to an ambitious and environmentally responsible approach.

The energy sector is undergoing profound change: making energy cleaner and more local, and ensuring that its production, transmission, and use are sustainable for the planet. Through its GAÏA 2035 plan, the Teréga SAS Group aims to transform its network into a decarbonised infrastructure hub to transport and store the energies of the future – biomethane and hydrogen –, contributing to carbon neutrality by 2050.

The Teréga SAS Group continuously strives to minimise the environmental impact of its services while strengthening its resilience to environmental changes. To achieve this, the Teréga SAS Group focuses on two key priorities: adaptation to and mitigation of climate change.

2. IDENTIFICATION OF IMPACTS, RISKS AND OPPORTUNITIES

The Teréga SAS Group's double materiality analysis has enabled the identification and assessment of material climate-related impacts, risks, and opportunities (see ESRS 2 - 4.1):

	SUSTAINABILITY ISSUES	IROs	DESCRIPTION OF IMPACT, RISK, OR OPPORTUNITY	DESCRIPTION
ENVIRONMENT	Climate change adaptation	Risks	Climate hazards affecting the continuity of Teréga's operations	Disruption to business continuity due to climate hazards that may affect Teréga's operations (such as access issues, infrastructure degradation, gas supply, etc.) or the value chain (availability and costs of raw materials), resulting in financial impacts (delivery delays, infrastructure repairs, adaptation costs, etc.).
	Greenhouse gas emissions from Teréga's internal activities (Scopes 1 & 2)	Impact (-)	Greenhouse gas emissions related to Teréga's internal activities.	Contribution to climate change from greenhouse gas emissions associated with Teréga's industrial infrastructure activities (construction or maintenance: methane emissions, CO ₂ emissions from gas and fuel combustion, energy consumption, etc.) as well as tertiary activities.
	Greenhouse gas emissions from the value chain (Scope 3)	Impact (-)	Greenhouse gas emissions related to value chain operations	Contribution to climate change from GHG emissions associated with upstream value chain operations (emissions from raw material extraction, goods production, outsourced infrastructure construction, upstream transport) and downstream operations (gas consumption, transport, waste management, methane emissions, etc.).
	Energy transition	Impact (+)	Contribution to the energy transition of the sector	Contribution to the energy sector's transition through the development and promotion of low-carbon energy infrastructures (e.g., hydrogen, biomethane, CO ₂ capture) and by bringing innovative transport solutions to market.
		Opportunity	Market opportunities related to decarbonised energies	Market opportunities related to the development of decarbonised energy transport solutions (Teréga Solutions).

As the Teréga SAS Group's activities involve the transport and storage of natural gas, the various sources of greenhouse gas emissions (primarily from direct natural gas emissions or its combustion) are considered environmental impacts of the company. These impacts are identified, assessed, and prioritised in the environmental analysis. Action plans, such as the transition plan, have been developed accordingly (see *ESRS EI - 4.2*).

Regarding physical climate risks associated with its own operations, the Teréga SAS Group has conducted a climate resilience analysis across all its gas assets, including the entire underground pipeline network (5,340 kilometres), six compressor stations, all delivery and sectionalising stations, and two storage sites. The Teréga SAS Group, together with an external consultant, has identified the following hazards for study:

- chronic hazards: changes in air temperature, thermal stress, changes in precipitation patterns, sea level rise, and water stress;
- acute hazards: heatwaves and cold spells, wildfires, windstorms, droughts, extreme rainfall, flooding, landslides, and subsidence.

This vulnerability study and the consideration of significant hazards are detailed in the report (see *ESRS EI - 4.3*).

Given its role in gas infrastructure and the necessary energy transition ahead, market opportunities related to decarbonised energies are a major priority for the Teréga SAS Group.

As a key player in the French and European energy system, the Teréga SAS Group has initiated strategic reflections to identify and anticipate major changes associated with the need to pursue the energy transition in the short, medium, and long term, in line with the objectives of the Paris Agreement and the National Low-Carbon Strategy (SNBC). The strategy aims to ensure the long-term energy supply for local ecosystems while addressing the major energy challenges of tomorrow. To contribute to the collective effort of decarbonising the economy, the Teréga SAS Group has leveraged its expertise as a historic gas infrastructure operator, focusing its contribution on the development of renewable and low-carbon gases at territorial, national, and European levels. In its GAÏA 2035 corporate plan, launched in 2024, the Teréga SAS Group aims to become a decarbonised hub by 2050 based on three strategic pillars: the first, to secure and adapt existing infrastructure to emerging needs and encourage biomethane injection; the second, to develop solutions for hydrogen and CO₂; and the third, to promote efficiency and excellence. GAÏA 2035 thus addresses new sectoral challenges and seizes opportunities linked to the energy transition.

This strategy aligns perfectly with public policies, which assign a significant role to renewable gases. They are indeed considered essential elements for a rapid and competitive energy transition. For example, in the context of the 2024 consultation on the French Energy and Climate Strategy (SFEC), the proposed national targets include:

- 44 TWh of biomethane injection by 2030 (supported by public aid mechanisms, including guaranteed purchase tariffs and investment subsidies);
- deployment of 6.5 GW of hydrogen production capacity via electrolysis on French soil by 2030 (based on the National Hydrogen Strategy published in 2020).

The National Low-Carbon Strategy (SNBC) also identifies CCUS (Carbon Capture, Utilisation, and Storage) as the primary option for decarbonising residual emissions, underpinning its development with an ambitious strategy targeting between 4 and 8 MtCO₂ captured per year by 2030, and up to 30 to 50 MtCO₂ per year by 2050.

It is important to note that the development of hydrogen and CO₂ infrastructure depends on territorial decarbonisation dynamics, whether to decarbonise existing heavy industry or to decarbonise heavy mobility, particularly maritime and aviation sectors. E-fuels represent significant development opportunities for new sectors based on the use of hydrogen. There is a strong concentration of these projects in the South-West of France, linked to the substantial potential of locally available biomass and the paper industry. E-fuel projects in the South-West region account for approximately 35% of national e-kerosene volumes and around 29% of national e-methanol volumes (source: *SIA Partners, French E-Fuels Observatory, 2024*).

However, the Teréga SAS Group acknowledges the uncertainties associated with this strategy, which also depends on multiple external factors. Indeed, the acceleration of climate disruption, geopolitical instability, and the unprecedented global configuration of gas supply can have significant impacts on its operations and development strategy. While the ecological transition enjoys a generally positive public image, an increasing number of environmentally focused projects now face growing resistance, and sometimes well-organised opposition (for example, tensions over biomass sourcing, impacts on water resources, potential pollution, etc.). As a result, many projects are delayed or even cancelled despite their environmental, social, and economic benefits for local ecosystems. This risk may delay the actual emergence of decarbonised ecosystems that could benefit from the low-carbon energy infrastructures the Teréga SAS Group is developing, directly impacting their effective commissioning dates. To address these concerns, the Teréga SAS Group collaborates with project sponsors and local stakeholders to assess the potential local economic, social, and environmental benefits generated by these projects.

In this uncertain context, financiers remain relatively cautious about investing in the highly capital-intensive gas infrastructure projects. However, it is observed that such projects become fundable once these uncertainties are resolved (for example, Fluxys reached the Final Investment Decision (FID) stage in early 2025 for the first section of its future hydrogen network).

The energy transition therefore represents more of an opportunity than a risk for the Teréga SAS Group.

The Teréga SAS Group has implemented an environmental management system based on the ISO 14001 standard and has been certified since 2006. A systematic review of activities is conducted to identify their environmental impact. This environmental analysis, updated annually, makes it possible to:

- identify and prioritise environmental risks;
- set clear objectives to reduce the main impacts;
- and mitigate associated risks through the definition of specific actions.

3. GOVERNANCE - INTEGRATION OF SUSTAINABILITY PERFORMANCE INTO INCENTIVE MECHANISMS

The Teréga SAS Group incorporates climate change considerations into the remuneration of its executive management. A short-term incentive (STI) and a long-term incentive (LTI) scheme are in place, and are updated annually. These schemes include targets to measure The Teréga SAS Group's performance, particularly regarding the reduction of greenhouse gas emissions.

The short-term incentive plan for executive remuneration and the long-term incentive plan are detailed in the general information section of this report (see *ESRS 2 - 2.2*).

4. CLIMATE STRATEGY AND ASSOCIATED POLICIES

As a responsible player in the energy sector, ecological and energy transition challenges are integral to the Teréga SAS Group strategy. The Teréga SAS Group climate strategy is built on three pillars: contributing to the decarbonisation of the energy sector, decarbonising its own operations, and adapting its assets to future climate hazards.

The Teréga SAS Group strategic plan, GAÏA 2035, aims to accelerate the transition to renewable energies and promote innovative solutions for gas networks, in light of the declining trend of fossil fuels. This strategic plan is founded on the robustness of its business models and its commitments to corporate social responsibility (CSR), particularly the reduction of greenhouse gas emissions from its activities to achieve carbon neutrality by 2050. The transition plan for climate change mitigation is thus an integral part of the GAÏA 2035 strategic plan and is reflected in the long-term financial plan.

4.1. DECARBONISING THE ENERGY SECTOR

Aware that the climate challenge requires a complete decarbonisation of the energy mix, the Teréga SAS Group, fully committed to the energy transition, is determined to accelerate the decarbonisation of its territorial ecosystems and the development of renewable gases. This ambition lies at the

heart of its new corporate plan, GAÏA 2035, which aims to make its network a regional decarbonised hub for the energies of the future by 2050. GAÏA 2035 is thus committed to addressing new sectoral challenges and is fully aligned with the energy transition at local, regional, national, and European levels (see *ESRS 2 - 3.1.1*).

From a technological standpoint, the development of new infrastructure requires changes to the equipment of new gas networks (biomethane injection into the existing transmission network, hydrogen and CO₂ transmission pipelines, compressors, carbon capture and storage technologies, hydrogen storage, etc.). The Teréga SAS Group works closely with developers of these technologies to meet the needs of territorial ecosystems.

Biomethane development

The Teréga SAS Group's approach is based on the conviction that biomethane is a key element in diversifying the gas mix. Resources from agriculture constitute the primary source of this future energy, enhancing local territories and supporting the continuation of agricultural activity. In France, 80% of biomethane producers come from the agricultural sector.

In 2024, ten biomethane production sites were connected to the Teréga SAS Group network, representing a total injection capacity of 591 GWh per year and a production of 219 GWh. In other words, 4.1% of the gas consumed on its network was of renewable origin (Average Renewable Gas Index, IGR, 2024). This rate differs from that used for taxonomy purposes, as the latter is calculated on a national scale to align with market practices.

In the South-West region of France, the total volume of biomethane injected into the gas networks reached 877 GWh in 2024, representing 8% of national production. Of this, 658 GWh were injected into distribution networks connected to the Teréga SAS Group transmission system. A portion may be consumed locally within these networks, but there are times when production locally exceeds consumption.

To absorb all the green gas produced via methanisation in the South-West region, the Teréga SAS Group is developing reverse flow (rebours) projects in collaboration with gas distribution network operators. These reverse flow units are designed to compress unused biomethane from a distribution network and inject it into a higher-pressure transmission network such as that operated by the Teréga SAS Group. This maximises the valorisation of locally produced renewable gas by directing it to consumers located further from the production site. In 2024, around fifteen reverse flow projects were under review.

This development axis contributes to the decarbonisation of the French energy sector by reducing emissions from

stakeholders throughout the Teréga SA value chain (upstream and downstream). However, it does not directly impact the greenhouse gas emissions accounted for by Teréga SA, due to the exclusion of emissions from transported gas within Scope 3.

H₂ and CO₂ development

Every day, the Teréga SAS Group works through its subsidiary, Teréga SA, to ensure its network is ready to accommodate new decarbonised gases such as hydrogen produced from renewable or low-carbon electricity. The Teréga SAS Group is involved in the creation of innovative European infrastructure to enhance hydrogen transport and promote its uses, aiming to contribute to the decarbonisation of the European, national, and local economies.

Accordingly, during 2024, the Teréga SAS Group developed two flagship hydrogen infrastructure projects:

- **H2med-BarMar:** One of the cornerstones of the future European hydrogen backbone, the BarMar offshore hydrogen pipeline will connect Barcelona to Marseille, providing a key link between Southern and Northern Europe. This transport infrastructure is expected to carry 2 million tonnes of hydrogen per year, representing 10% of Europe's consumption, by 2030. Since 8 April 2024, H2med has been officially recognised as a Project of Common Interest (PCI) by the European Union. The Teréga SAS Group is developing this project jointly with other gas transmission system operators: Enagás and NaTran (formerly GRTgaz), in cooperation with OGE, following the signing of a Joint Development Agreement (JDA) in June 2024.
- **HySoW:** Connected to the H2med-BarMar hydrogen backbone, this hydrogen infrastructure, spanning over 650 kilometres, will supply the industrial centres of Bordeaux, Toulouse, and Lacq, as well as the underground storage sites in Nouvelle-Aquitaine and the ports of Bordeaux, Bayonne, and Port-la-Nouvelle.

To boost the industrial transition of the Pyrenean foothills (South-West France and North-East Spain), the Teréga SAS Group is co-developer of the transboundary PYCASSO project, which aims to cover the entire CCUS chain (Carbon Capture, Utilisation and Storage). The Teréga SAS Group is developing the CO₂ transport and storage infrastructure (geological sequestration) for this project, which contributes to achieving carbon neutrality in the Pyrenean regions by 2040.

PYCASSO addresses the treatment of unavoidable emissions produced by industrial processes, after all possible measures for energy efficiency, sobriety, and renewable energy integration have been implemented. The infrastructures put in place will also valorise the significant biogenic CO₂ reservoir in the South-West region, notably generated by paper mills. This biogenic CO₂ can then be valorised as e-fuels or other products derived from green chemistry, through pipeline connections between CO₂ emitters and consumers.

The Teréga SAS Group is a member of the national initiative "Je-décarbène", which aims to bring together stakeholders involved in decarbonisation and energy efficiency to support and facilitate the transition of industrial sectors and help French and European actors achieve this goal. The initiative is structured around a digital platform for exchange and networking, complemented by regional and national workshops.

The Teréga SAS Group firmly believes that Research and Innovation (R&I) offers the most powerful leverage to build a decarbonised future and to address the new challenges facing the energy sector. The Teréga SAS Group develops ambitious and disruptive solutions to tackle the issues of energy sobriety, efficiency, and decarbonisation of energy uses, such as hydrogen, biomethane, and CO₂.

It guides businesses and local authorities through this energy transition with comprehensive and tailored solutions that accelerate the reduction of their carbon emissions. In 2024, the Teréga SAS Group committed €3 million to research and innovation, including €2 million specifically for decarbonising energy uses.

Teréga Solutions aims to promote renewable energy, industrial performance, and decarbonisation projects in support of local ecosystems.

4.2. DECARBONISING THE TERÉGA SAS GROUP'S OPERATIONS – TRANSITION PLAN FOR CLIMATE CHANGE MITIGATION

The Teréga SAS Group transition plan is driven by the BE POSITIF programme, launched in 2017 and now fully integrated into the GAÏA 2035 strategic plan. It aims to reduce the environmental impact of the Teréga SAS Group activities and is committed to contributing to carbon neutrality by 2050.

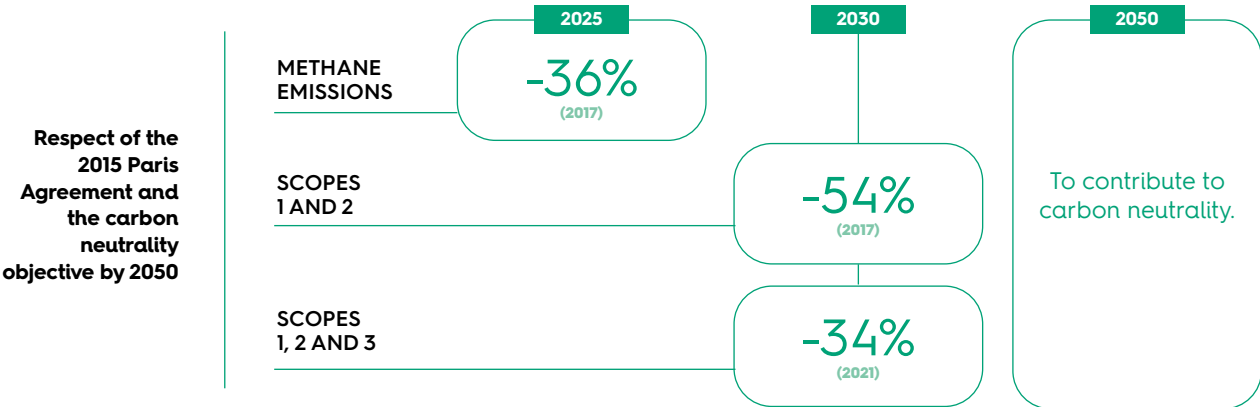
This programme aims to gradually reduce the company’s environmental footprint by applying the MERCI method.

THE BE POSITIF PROGRAMME COVERS ALL THE ASPECTS PRESENTED BELOW.



In particular, it focuses on limiting greenhouse gas (GHG) emissions and improving energy performance. Since 2017, the Teréga SAS Group has committed to using green electricity, either through purchases backed by guarantees of origin or through self-generation.

THE TERÉGA SAS GROUP HAS MADE THE FOLLOWING COMMITMENTS TO REDUCE ITS CARBON FOOTPRINT:



The intermediate targets for 2025 and 2030 have been built upon a rigorous decarbonisation plan, covering both its direct operations and those across its value chain. The commitment to contribute to carbon neutrality by 2050 was determined based on the IAE and SBTi frameworks, taking into account a reduction of GHG emissions to their minimum threshold, which involves a 90% reduction, and compensation of residual emissions through the purchase of carbon credits.

This transition plan, which led to the definition of these reduction targets, was assessed under the NZA framework by Moody's in 2024. The report concluded that the ambition is well below 2°C, i.e. between 1.55°C and 1.8°C, in line with the objectives of the 2015 Paris Agreement, although not aligned with a 1.5°C trajectory. This report is published on the company's website.

ASSESSMENT OF THE TERÉGA SA AMBITION BY MOODY'S

Objectives

Term	Scope	1°C	Well below 2°C	2°C or below	Above 2°C	Well above 2°C	Above 2.5°C
Short (60%)	1 & 2 (75%)						
	3 (25%)						
Long (40%)	1 & 2 (60%)						
	3 (40%)						

This commitment is supported by a set of technical projects aimed at reducing GHG emissions from its industrial facilities, in particular methane emissions – an essential component of natural gas circulating through the infrastructure and representing a significant portion of the Teréga SAS Group GHG emissions – as well as direct CO₂ emissions from combustion facilities (see *ESRS E1 - 6.1*).

Due to its activity in the transport and storage of natural gas, the Teréga SAS Group is excluded from the Paris-Aligned Benchmark (PAB), because of the criterion regarding “companies that derive 50% or more of their revenue from the exploration, extraction, manufacture or distribution of gaseous fuels.”

The decarbonisation programme for the operations of Teréga SA, structured according to the ISO 50001 standard (certified since 2014), outlines the various initiatives aimed at optimising energy consumption and reducing GHG emissions. They relate to:

- facility operation, notably through the deployment and scaling up of the Optimus tool for the optimised use of the compressor fleet for both transport and storage;
- gas combustion, with the electrification of the compressor fleet and the prioritisation of the use of electric compressors over turbo compressors;
- fugitive losses, with the commissioning of the latest three models of electric compressors. Their seal-less technology prevents associated leakage. The Teréga SAS Group is also

developing an R&I project to recover leaks from compressor seals and reinject the gas into the network;

- venting, with the acquisition of its own mobile recompression module for maintenance operations (Mobile Comp). the Teréga SAS Group also has recompression projects for compressor vent gas (RECOMP) at Lussagnet (storage and compression station), Barbaire and Sauveterre;
- buildings, with an Energy Performance Contract (EPC) signed with its service provider Vinci.

Locked emissions

Under standard operating conditions, industrial facilities inevitably generate locked greenhouse gas (GHG) emissions: residual emissions that cannot be eliminated because they are necessary for the natural gas compression activity.

The main examples include: the combustion of natural gas (turbocompressors or other equipment), compressor venting, venting during maintenance works, leaks from compressor seals, and diffuse losses at surface installations.

These essential assets for its operation, sometimes of significant value and adapted to the needs of the Teréga SAS Group's activities with its public service missions, are taken into account in emissions assessments for future years.

The Teréga SAS Group strives to identify as many emission sources as possible through technical projects to gradually reduce the environmental impact of its operations. These projects are included in the GHG emissions reduction plan.

Several projects aim to eliminate or recover the natural gas leaks observed at compressor seals: projects such as CodaDGS, SRGG (Seal Gas Recovery System), etc. Others involve replacing gas-powered equipment with electric equipment, which emit less (compressors, reboilers, etc.).

At the same time, operational teams strive to adapt network management and operations to address this challenge of reducing locked emissions, for example by cutting gas emissions during maintenance operations through shorter purging times.

In 2024, the Teréga SAS Group assessed the proportion of its activity aligned with the European taxonomy. It appears that 2% of revenue, 8% of Capex, and 3% of Opex are aligned with the environmental objectives related to climate change. To date, the Teréga SAS Group investment plan aims to increase the proportions of revenue, Capex, and Opex that are aligned.

The investments supporting the implementation of the transition plan are of several types:

- investments enabling the development of the biomethane sector: installation of stations to feed the gas produced back into the transmission network (metering stations) and connections to methanisation units;
- investments aimed at reducing GHG emissions as previously explained, including larger investments in the coming years linked to methane regulations.

These investments represent an average annual budget of around €15 million for the transmission activity and €3 million for the storage activity over the period 2025-2030, distributed as follows: approximately €8 million annually for investments supporting the development of the biomethane sector, €9 million for following the GHG reduction programme, and €1 million for photovoltaic projects for self-consumption.

At present, there are no specific Capex planned for reducing Scope 3 emissions.

A portion of the maintenance and safety Capex related to renewable gases is also considered as an investment contributing to the integration of low-carbon gases into the pipelines, calculated by applying the percentage of renewable gas injected into the networks relative to the annual national consumption across France for this type of Capex. This proportion is expected to increase due to the ambition of reaching a 15% share of renewable gases in French consumption by 2030.

The commitments made, along with the associated GHG reduction plan, were approved by the Board of Directors in 2024.

The amount of Capex invested in connection with the development and management of gas transmission and storage infrastructures, as presented in the taxonomy, amounts to

€142 million for the year 2024, representing 92% of the total Teréga SAS Group Capex.

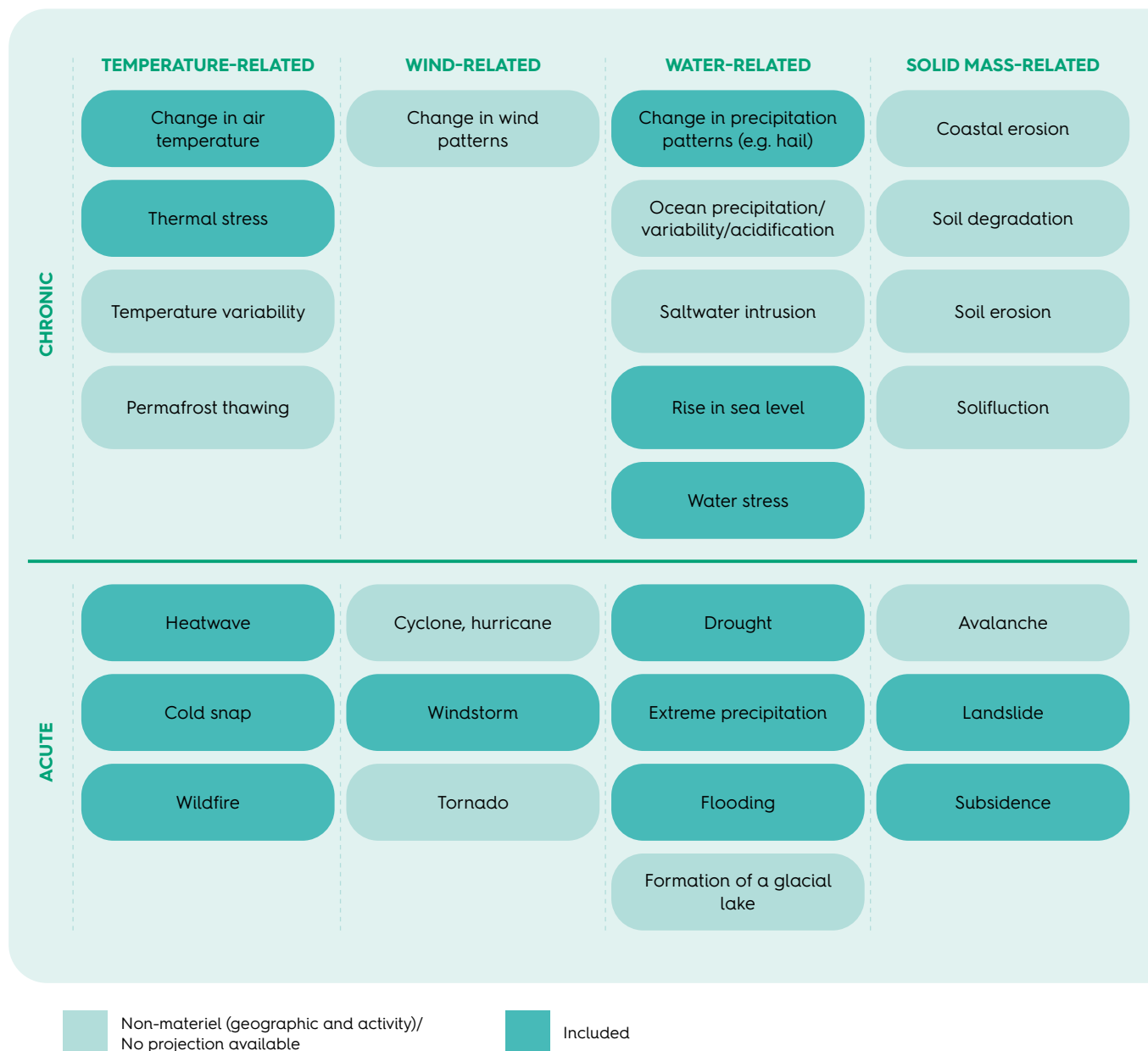
4.3. ADAPTING THE TERÉGA SAS GROUP ASSETS TO FUTURE CLIMATE RISKS

The Teréga SAS Group is committed to building resilience in its facilities against climate risks, aiming to reduce vulnerability by developing capabilities for anticipation, action, and adaptation. The "PARI 2035" programme (see *ESRS 2 - 3.1.2*) oversees the business continuity management system, which integrates its climate adaptation policy.

The Teréga SAS Group has identified all climate risks that could impact its activities and territory. This initiative is led by the Industrial Safety Department and the Operations, Studies, and Projects Directorate.

A preliminary vulnerability study covering these assets was launched in the third quarter of 2023 and delivered in mid-2024. This study was conducted with the support of a recognised external provider (AXA Climate). In the second half of 2024, a more detailed internal analysis helped prioritise the most significant hazards and identify an initial set of potential adaptation measures. The development of a more comprehensive adaptation plan is scheduled for 2025.

Based on the table presenting the classification of chronic and acute hazards, those marked in dark green in the figure below have been studied, as they are considered potentially material for the installations:



The hazards in light green, namely the chronic hazards of temperature variability, permafrost thawing, changes in wind patterns, precipitation and hydrological variability, ocean acidification, saltwater intrusion, coastal erosion, soil degradation, soil erosion, and solifluction, as well as acute hazards such as cyclones and hurricanes, tornadoes, glacial lake formation, and avalanches, have therefore been excluded from the Teréga SAS Group analysis, as they are not deemed relevant to the assets of the Teréga SAS Group at this time.

The Teréga SAS Group is thus potentially confronted with the following physical climate risks: flooding, forest fires, and extreme heat are identified as the most material, and they require further detailed studies to properly characterise the consequences and the most appropriate adaptation measures.

Landslides also represent a hazard to be monitored and followed closely. Windstorms, water stress, and drought are climate hazards to which Teréga SA could also be exposed. Based on current knowledge and the available databases, these hazards have not shown significant changes and remain assessed as moderate risks.

All of these hazards were studied using the SSP2-4.5 and SSP5-8.5 scenarios, recommended by the Intergovernmental Panel on Climate Change (IPCC) and aligned with the taxonomy and CSRD, which are, as a reminder:

- SSP2-4.5 – Intermediate scenario. This scenario is expected to cause warming of 1.6°C to 2.5°C by mid-century compared to pre-industrial levels (1850-1900);
- SSP5-8.5 – High reference scenario (with fossil fuel development). This most pessimistic scenario is expected to lead to warming of 1.9°C to 3°C by mid-century compared to pre-industrial levels (1850-1900).

The time horizons of 2030 and 2050 thus correspond to considering high scenarios adapted to the lifespan of its installations. The Teréga SAS Group also aligns with the trajectories of the French Reference Warming Trajectory for Climate Change Adaptation (TRACC), which recommends considering a global warming scenario of +3°C (equivalent to +4°C in France) by 2100. The findings from this study will be integrated into strategic plans and financing plans once the action plan is established and validated.

The data used to conduct the analysis of the Teréga SAS Group installations were extracted from the global climate models (GCMs) used by the IPCC.

The only uncertainties identified concern hazards for which there is currently no scientific consensus regarding their evolution under known climate change, such as windstorms, earthquakes, or the shrink-swell behaviour of clays. For these, only a currently moderate exposure may not have been fully analysed for the longer term.

5. ACTIONS AND RESOURCES RELATED TO CLIMATE CHANGE POLICIES

5.1. ACTIONS RELATED TO CLIMATE CHANGE MITIGATION

The robustness of the Teréga SAS Group greenhouse gas (GHG) emissions reduction plan across Scopes 1, 2, and 3 was confirmed by Moody's in 2024 (see *ESRS E1 - 4.2*).

Scopes 1 and 2

Since 2017, several actions have been undertaken to reduce the company's direct GHG emissions (scopes 1 and 2). The ambition to reduce emissions continues through new decarbonisation projects.

The main areas of focus for the 2017-2030 period are as follows (see *table on reduction targets for Scopes 1 and 2 from 2017 to 2030 in TeqCO₂*, see *ESRS E1 - 6*):

• Reduction of natural gas leaks and methane emissions

– Reduction of emissions linked to **compressor venting** has been achieved through the implementation of recompression systems (RECOMP) to reinject this gas into the network. Launched in 2020, the progressive deployment of this technology at the Lussagnet storage site as well as at the four main compression stations was completed in 2024.

– Reduction of emissions related to **venting during maintenance**

> on the transport network, a recompression truck designed to recover gas from large-diameter pipelines and reinject it into the network has been operational since 2018. A second mobile recompression solution, suitable for medium-diameter pipelines, will be commissioned in 2025:

> each of the two storage sites will have its own gas recovery and reinjection system by 2030.

– Reduction of **seal leaks on compressors**

When compressors need to be replaced, the new compressors are equipped with seal-less technology. This was the case for two new compressors installed at Lussagnet in 2024, replacing three old compressors with seals. At the Lussagnet storage site and the four main compression stations, other compressors with seals that are not scheduled for short-term replacement will gradually be fitted either with gas leak recovery and reinjection systems or with nitrogen seal systems. Both technologies, which prevent gas emissions from these seals, have been tested, each on one compressor. A deployment programme for these technologies is planned by 2030. Thus, in 2024, the Mont compression station was equipped with the recovery and reinjection technology.

• Reduction of CO₂ emissions from combustion

– Some combustion installations, such as reboilers at the storage site, will be replaced by new electric installations. One electric reboiler was being installed in 2024, and another is planned two years later.

– The elimination of the Lussagnet flare is scheduled before 2030.

• **Regarding energy** (Scope 2), since 2018, The Teréga SAS Group has been sourcing green electricity. Additionally, at the end of 2023, a photovoltaic electricity production station was commissioned at the Lussagnet storage site, covering part of the site's energy needs. Some administrative buildings are also equipped with solar panels (Volta headquarters in Pau, Lussagnet, Cugnaux). These green electricity supply arrangements will be maintained through to 2030.

Work is underway to identify decarbonisation projects and actions for the 2030-2035 period, to continue the momentum in reducing GHG emissions for scopes 1 and 2.

Scope 3

In 2024, the Teréga SAS Group drafted and signed a Scope 3 procurement policy. This policy aims to reaffirm to suppliers the importance of major environmental issues, notably the reduction of greenhouse gas emissions.

Indeed, as part of the Supplier Forums held every two years, the Teréga SAS Group communicates its expectations to suppliers (environmental requirements, reduction assumptions, reduction pathways, etc.). In 2024, the latest forum was dedicated to “Decarbonisation and Scope 3,” thereby allowing communication of the Teréga SAS Group decarbonisation strategy.

Supporting its ambitions, the Teréga SAS Group has also undertaken the following actions:

- sending a questionnaire to the largest emitters by purchasing category to understand the decarbonisation initiatives underway and their stance on the subject: 50 suppliers responded and were met;
- systematic integration of carbon emissions topics during contract reviews and business reviews;
- creation of a working group with other infrastructure managers to align practices and share experiences;
- business travel: a new Travel Policy is being drafted;
- revision of specifications, notably through eco-design workshops;
- promotion of low-carbon alternatives proposed by suppliers.

These efforts will continue each year and are intended to become increasingly precise and targeted according to the maturity of each supplier. Suppliers and service providers will be fully supported by the Teréga SAS Group; in this regard, an internal cross-functional Scope 3 working group was created in 2021 to manage this project.

In 2024, purchases of goods and services accounted for 80% of Scope 3 emissions. Suppliers therefore represent a key stakeholder for achieving these ambitions, and the Teréga SAS Group is making significant efforts to engage and involve them in meeting its objectives. Details of emissions by category can be found below in section 5.4 Gross GHG emissions of scopes 1, 2, and 3, and total GHG emissions.

5.2. ACTIONS RELATED TO CLIMATE CHANGE ADAPTATION

Actions to reduce vulnerability to certain hazards have already been initiated.

For the risk of uprooting due to severe flooding, the Teréga SAS Group conducted an initial study in 2015-2016, followed by a second one in 2021-2022, to identify installations in zones at risk of uprooting and to assess long-term developments. All sites identified by these studies have been relocated. One pipeline was rerouted, and others have been identified as having more limited risk over time.

A five-year interval was deemed appropriate to schedule a follow-up control study in 2026-2027. An additional analysis based on the latest revision of the study was carried out at the end of 2024, incorporating climate and hydrological data from DRIAS to refine the local vulnerability diagnosis and validate the zones at risk of uprooting in the medium to long term for inclusion in the adaptation plan.

This study will lead to additional actions, which will be prioritized in 2025 and integrated into the overall action plan.

The Teréga SAS Group network has the particularity of passing through the Landes forest. A first series of studies was launched prior to regulatory requirements from the taxonomy, the CSRD, and the national climate risk adaptation plan, to identify the sites most exposed to wildfire risk, initially identifying 116 potentially vulnerable installations in this area.

Several actions have already been initiated since 2023, primarily consisting of clearing operations over a distance of 15 meters around the first 116 identified installations, aiming to maintain a minimum gap free of dense low vegetation and also ensuring vertical discontinuity between trees in these zones. The Teréga SAS Group plans to work on identifying additional effective measures in 2025 to strengthen this approach.

Regarding extreme heat, Teréga SA plans to initiate specific studies on sensitive equipment over the coming years to identify potential issues, subsequently review its specifications accordingly, and schedule the necessary equipment replacements during planned maintenance operations. This risk, identified with a horizon of 2050, has been assigned a priority level 2, with the relevant studies expected to commence at the earliest by the end of 2025, or possibly in 2026.

Depending on the hazards and the adaptation measures already underway, the Teréga SAS Group currently envisages several types of additional measures, which may include modifications to standards, the implementation of new equipment better suited to the hazards and emerging technologies, or even innovative real-time monitoring solutions coupled with new operational intervention methods. If no adaptation measure proves sufficient for certain installations, their relocation may be considered. A more detailed plan will be developed during the 2025 financial year.

Capex for decarbonisation are subject to approval by the CRE. As previously mentioned, an annual budget of approximately €15 million has been included in the Teréga SAS Group long-term plan and approved by the Board of Directors to achieve this ambition.

6. METRICS AND TARGETS

6.1. TARGETS RELATED TO CLIMATE CHANGE MITIGATION

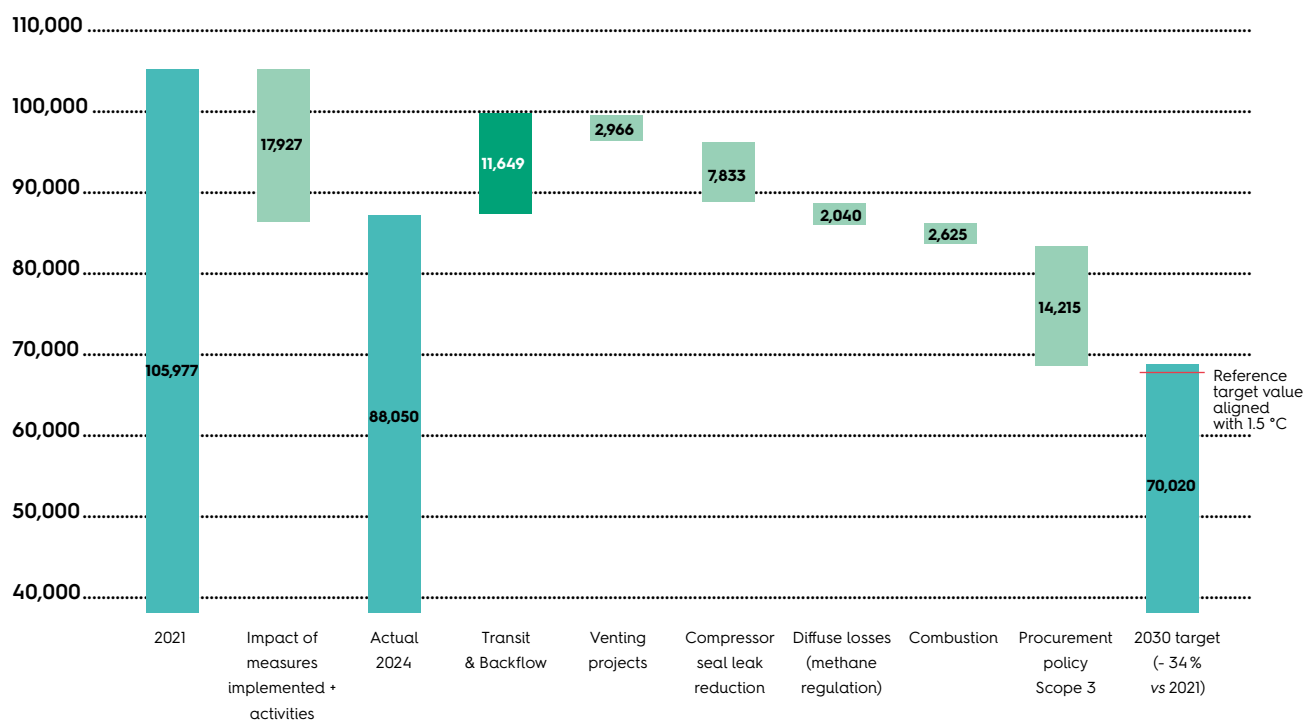
Below are the contributions to the emissions reduction plan from the main decarbonisation pillars, combined with assumptions of transit rates higher than those achieved in 2024 and the anticipated impact on the scopes:

REDUCTION TARGET FOR SCOPES 1 AND 2 FROM 2017 TO 2030 IN TEQCO₂



The calculation of the baseline target value aligned with the 1.5°C scenario is based on a 4.2% annual reduction in GHG emissions starting from the reference year.

REDUCTION TARGET FOR SCOPES 1, 2, AND 3 FROM 2021 TO 2030 IN TEQCO₂



The calculation of the baseline target value aligned with the 1.5°C scenario is based on a 4.2% annual reduction in GHG emissions starting from the reference year.

The Teréga SAS Group has published its GHG emissions reduction targets (in historical activity reports and on its website). For scopes 1 and 2, the commitment is to reduce emissions by 54% by 2030 compared to 2017 (scopes 1 and 2 emissions in 2017: 110,110 TeqCO₂). The year 2017 marks the start of the BE POSITIF programme, one of whose main pillars is the reduction of GHG emissions. As such, this year was used as the baseline for calculating the reduction trajectories for scopes 1 and 2.

For scopes 1, 2, and 3, the commitment is to reduce emissions by 34% by 2030 compared to 2021 (scopes 1, 2, and 3 in 2021: 105,977 TeqCO₂). The reference year is set as 2021 because it is the year in which Scope 3 emissions were calculated more accurately. 2021 is also a suitable reference as it is the first post-COVID-19 year, thus reflecting normal operational activity for the Teréga SAS Group. This target represents an intermediate milestone in the journey towards achieving carbon neutrality by 2050. This trajectory, evaluated as NZA-3 by Moody's agency, confirms that Teréga's ambitions align with the Paris Agreement's goal of keeping warming well below 2 °C, demonstrating a good level of preparedness in both the plan and its implementation.

These reduction targets are gross, meaning that the Teréga SAS Group carbon credits are not deducted. Details are provided in the table "Carbon credits cancelled during the reference year" (see *ESRS EI - 6.5*).

In 2024, the Teréga SAS Group observed the following reductions in GHG emissions:

- 51 % reduction for scopes 1 and 2 compared to 2017;
- 17 % reduction for scopes 1, 2 and 3 compared to 2021;
- 38 % reduction in methane emissions compared to 2017.

In 2024, methane emissions amounted to 1,233 tonnes, representing over 75% of the total emissions from scopes 1 and 2 in CO₂ equivalent.

GHG emissions were 54,256 TeqCO₂ for scopes 1 and 2, and 33,794 TeqCO₂ for scope 3. The total emissions for scopes 1, 2, and 3 in 2024 amounted to 88,050 TeqCO₂.

GHG emissions from scopes 1 and 2 have halved since 2017 thanks to ambitious projects implemented, such as reducing compressor venting (RECOMP), using electrically driven compressors instead of gas-powered ones, and systematically considering environmental impacts when choosing the deployment or gas injection methods during works.

The year 2024 was marked by a significant drop in emissions, due to a particular economic context that impacted the Teréga SAS Group activity levels. Indeed, the volume of gas transit decreased by more than 30% compared to the previous year.

More generally, numerous external and cyclical factors beyond the control of the Teréga SAS Group impacted its operations.

The political and economic situation in Europe (notably the war in Ukraine), as well as energy market prices, impacted the supply of the Teréga SAS Group shipper clients and consequently reduced their need to use gas storage and transport capacities.

Additionally, the winter was mild, overall gas consumption across France declined, and the volumes of gas transited were low.

As a result, the demand for compression was lower than in previous years. Reduced compressor usage naturally leads to lower GHG emissions.

6.2 TARGETS RELATED TO CLIMATE CHANGE ADAPTATION

Regarding adaptation to climate change and the reduction of physical risks, targets derived from the detailed vulnerability assessment are currently being developed. In line with the set priorities and timelines, an initial adaptation plan is expected to be launched by the end of 2025.

Regarding gas, the Teréga SAS Group procures natural gas for the majority of its uses.

The first targets established in 2023 and 2024 concerning the reduction of vulnerability to physical hazards (mainly severe flooding or erosion and forest fires) have been met, contributing to lowering the vulnerability of the assets involved.

6.3. ENERGY CONSUMPTION AND ENERGY MIX

Internal operations information

Regarding electricity, the Teréga SAS Group uses renewable electricity either through self-consumption or contractual agreements:

- green electricity purchase contracts have been in place since 2017;
- since 2023, a photovoltaic park designed to cover part of the industrial needs of the storage centre has been operational;
- some administrative buildings, including the head office, are equipped with photovoltaic panels.

ENERGY CONSUMPTION AND ENERGY MIX	2024
1) Fuel consumption from coal and coal-based products (in MWh)	0
2) Fuel consumption from crude oil and petroleum products (in MWh)	3,771
3) Fuel consumption from natural gas (in MWh)	71,803
4) Fuel consumption from other fossil sources (in MWh)	0
5) Consumption of electricity, heat, steam, and cooling purchased or acquired from fossil sources (in MWh)	0
6) Total fossil energy consumption (in MWh) (sum of lines 1 to 5)	75,574
Share of fossil sources in total energy consumption (in %)	46 %
7) Consumption from nuclear sources (in MWh)	0
Share of nuclear consumption in total energy consumption (in %)	0 %
8) Fuel consumption from renewable sources, including biomass (also includes industrial and municipal biological waste, biogas, renewable hydrogen, etc.) (in MWh)	0
9) Consumption of electricity, heat, steam, and cooling purchased or acquired from renewable sources (in MWh)	83,015
10) Consumption of self-produced non-combustible renewable energy (in MWh)	6,585
11) Total renewable energy consumption (in MWh) (sum of lines 8 to 10)	89,600
Share of renewable sources in total energy consumption (in %)	54 %
Total energy consumption (en MWh) (sum of lines 6 and 11)	165,174

ENERGY INTENSITY PER NET TURNOVER

2024

Total energy consumption from activities in sectors with a high climate impact per net turnover from activities in sectors with a high climate impact (in MWh/turnover in K€)

0.3

This calculation measures the energy intensity emitted per revenue as reported in the Teréga SAS Group's consolidated financial statements under the section "Information relating to items in the consolidated statement of comprehensive income." the Teréga SAS Group considers the revenue from high climate impact activities to be the income directly related to the

natural gas sector (transport and storage).

Investments made in photovoltaics, in particular the SOLUS project (a solar farm on the Lussagnet site enabling self-production of energy), have enabled significant development in solar energy production.

Energy production breakdown

(in MWh)

2024

Renewable energy production

6,635

Non-renewable energy production

0

Almost all of this energy production is self-consumed.

Information relative to the value chain

In order to measure the energy performance of its value chain, the Teréga SAS Group distinguishes between service providers and equipment suppliers. With regard to service providers, the Teréga SAS Group operates in two distinct phases: a forecast phase and a completed phase.

For the forecast phase, during calls for tenders, the Teréga SAS Group has implemented a mandatory "carbon footprint form" designed to define the projected carbon impact. A specific form exists for tenders related to construction sites, in which all possible emissions are requested based on the specific characteristics of each site and/or project. the Teréga SAS Group is working on the implementation of an internal carbon calculator, which would also allow data to be collected on the worksites carried out by the Teréga SAS Group.

For the completed phase, an actual carbon footprint of the activities is requested from the service providers. These actual assessments are then included in the calculation of Scope 3 emissions.

A simplified carbon form has been developed for the equipment component. The latter calculates the carbon footprint of the equipment purchased according to its composition, upstream transport, and delivery to the final customer.

6.4. GROSS SCOPES 1, 2, 3 AND TOTAL GHG EMISSIONS

The calculation methodologies for Scopes 1, 2 and 3 applied by the Teréga SAS Group for its gas transport and storage activities are described below.

Scope 1

The activities of the Teréga SAS Group primarily generate methane emissions (around two thirds), as well as CO₂ emissions (around one third), and, to a lesser extent, N₂O emissions:

- the natural gas transported and stored by the Teréga SAS Group is composed mainly (on average 92%) of methane. The CH₄ content varies depending on the supply sources;
- the combustion of natural gas or fuel directly generates CO₂.

The determination of GHG emissions from the Teréga SAS Group's transport and storage activities covers all of the following sources:

- fixed combustion sources;
- flares (combustion in hot flare);
- venting (intentional venting) and compressor seal leaks;
- diffuse losses;
- accidents, incidents, and emergency situations;
- mobile combustion sources (transport means, generators, etc.).

A single calculation method applicable to the Teréga SAS Group is defined for each emission, in accordance with the requirements of environmental reporting and inspection of classified installations for environmental protection, as well as the Emissions Trading System (ETS) for installations subject to quotas.

Most emissions are calculated using the GHG methodology: GHG – Greenhouse Gas Protocol – is an international protocol providing a framework to measure, account for, and manage GHG emissions from private and public sector activities.

These “unit” emissions, depending on the case, are remotely monitored, measured and declared by the operator, estimated by an expert, or calculated and reported, at time intervals ranging from minutes to months, and are consolidated monthly.

The emission factors used are those from ADEME, updated in 2024.

A fairly large Excel file compiles all source data, intermediate and consolidated calculations, historical data, and allows for the preparation of the GHG reporting. A new tool is currently in development.

Scope 2

Scope 2 emissions are calculated according to the GHG Protocol Market-Based and Location-Based methodologies.

The emission factor used for the Scope 2 calculation reflects the fact that the Teréga SAS Group purchases green electricity certified by guarantees of origin. It is based on the electricity mix purchased at the time the contract was signed, which is adjusted annually, and on the emission factors from the French Environment and Energy Management Agency (ADEME) corresponding to each renewable energy source. In 2024, 100% of the guarantees of origin came from the hydropower sector.

Scope 3

The Teréga SAS Group's methodology began with the calculation for the baseline year 2021: 53% based on monetary ratios, 47% on actual data from the carbon assessments at the end of service delivery by external providers. The Teréga SAS Group's long-term goal is to move towards 100% actual data and to create a reliable internal calculator.

Actual data:

- Data are considered actual when the provider or supplier can supply quantitative carbon emissions data at the end of the service, whether through carbon forms or emission reports. Data entered into the internal calculator (for work-sites) are also considered actual.

Monetary factors:

- Monetary factors come from ADEME databases and are applied to the Teréga SAS Group purchasing categories in order to calculate overall monetary ratios (even though the goal is to obtain as much actual data as possible);

- historical services and/or worksites where averages are made based on invoiced amounts.

All collected data are entered into a calculation file so that the Teréga SAS Group can accurately determine the weight of its emissions.

The company must evaluate the reliability and accuracy of the estimates and explain their margin of uncertainty. The Teréga SAS Group observed an 11.2% variation for the first test worksite between the estimate during the tender phase and the actual data at the end of the worksite.

The margin for actual data is therefore low (11%) compared to calculations based on monetary data, where the uncertainty is around $\pm 60\%$.

Data are compared with those provided ADEME (emission factors, precision of the given factor, uncertainty related to the factor, etc.) through the Emissions Footprint and Carbon databases (freely accessible online).

The Teréga SAS Group excludes from Scope 3:

- Category 3.11 (use of sold products) because the Teréga SAS Group sells a gas transport and storage service to its clients and does not own the gas molecule;
- Category 3.15 (emissions associated with the Teréga SAS Group investments and subsidiaries) due to its insignificant impact compared to total emissions.

GREENHOUSE GAS EMISSIONS

RETROSPECTIVE DATA

	2017 (year of reference)	2021 (year of reference)	2024	2030	2050	Annual target as % / reference year
SCOPE 1 GHG EMISSIONS						
Gross Scope 1 GHG emissions (Teq CO ₂)	109,200	75,731	52,329	-54% vs 2017, scopes 1 and 2 combined		
Percentage of Scope 1 GHG emissions covered by regulated emissions trading schemes (%)	26%	21%	14%	N/A		
SCOPE 2 GHG EMISSIONS						
Gross Scope 2 GHG emissions based on location (Teq CO ₂)	1,668	4,312	3,028	N/A		
Gross Scope 2 GHG emissions based on the market (TeqCO ₂)	909	2,348	1,927	-54% vs 2017 scopes 1 and 2 combined		
TOTAL SCOPES 1 & 2 (TeqCO₂)	110,110	78,079	54,256			- 51%
SIGNIFICANT SCOPE 3 GHG EMISSIONS						
Total gross indirect GHG emissions (Scope 3) (Teq CO ₂)		27,898	33,794			
1 Goods and services purchased		18,659	26,935			
Optional sub-category: Cloud computing and data centre services		-	-			
2 Capital goods		-	-			
3 Fuel- and energy-related activities (not included in Scopes 1 & 2)		6,415	4,030			
4 Upstream transport and distribution		1,272	800			
5 Waste generated in operations		920	1,177			
6 Business travel		73	274			
7 Employee commuting		559	579			
8 Upstream leased assets		-	-			
9 Downstream transport and distribution		-	-			
10 Processing of sold products		-	-			
11 Use of sold products		-	-			
12 End-of-life treatment of sold products		-	-			
13 Downstream leased assets		-	-			
14 Franchises		-	-			
15 Investments		-	-			
TOTAL GHG EMISSIONS						
Total GHG emissions (based on location) (Teq CO ₂)		107,941	89,151			
Total GHG emissions (based on the market) (Teq CO ₂)		105,977	88,050	-34% vs 2021	-90% vs 2021	-17%

BREAKDOWN OF SCOPE 1 EMISSIONS BY SOURCE (TEQCO₂)

SOURCE	2024
Stationary combustion	8,305
Mobile combustion	2,080
Process emissions	17,027
Fugitive emissions	25,017
Total Scope 1	52,329

GHG INTENSITY PER NET TURNOVER	2024
Total GHG emissions per net turnover (in Teq CO ₂ / monetary unit)	0.18

This calculation measures the GHG (greenhouse gas) intensity emitted in relation to the revenue reported in the Teréga SAS Group's consolidated financial statements under the section "Information relating to items in the consolidated statement of comprehensive income," i.e., €485,565 K.

6.5. GHG REMOVALS AND GHG MITIGATION PROJECTS FINANCED THROUGH CARBON CREDITS

The Teréga SAS Group is committed, across Scopes 1, 2 and 3, to contributing to carbon neutrality by 2050. To achieve carbon neutrality, simply reducing GHG emissions as much as possible is not sufficient, as some emissions are unavoidable. The Teréga SAS Group has therefore implemented a residual emissions offsetting strategy, the third pillar of the BE POSITIF programme (Avoid, Reduce, Offset). As outlined above, priority is given to reducing its own GHG emissions according to the following targets: a 34% reduction by 2030, then a 90% reduction by 2050, for Scopes 1, 2, and 3, compared to the 2021 baseline year. To meet the carbon neutrality objective, the Teréga SAS Group plans to neutralise residual emissions through carbon sequestration actions.

To this end, the Teréga SAS Group launched a voluntary carbon offset strategy in 2020 to compensate for part of its emissions and to initiate a process aimed at ensuring carbon neutrality by 2050.

Between 2020 and 2022, the Teréga SAS Group neutralised its emissions through the voluntary carbon offset project titled Clean Water (Gold Standard). This programme provides access to drinking water for communities in Ethiopia and Eritrea by rehabilitating wells, thereby avoiding the felling of 20,000 trees that would otherwise be used to boil water.

For the 2023–2025 period, the Teréga SAS Group is continuing its voluntary contribution strategy toward carbon neutrality by maintaining its dedicated annual budget, while directing 50% of its offsetting policy and funding towards local projects, near its gas infrastructure facilities.

For the development of local projects, the Teréga SAS Group calls on the National Centre for Forest Property (CNPF), a public institution responsible for promoting sustainable management of private forests (which account for 75% of France's forests). The CNPF participated from 2015 to 2018 in the creation of the Low Carbon Label (LBC) in France. The CNPF designs tailor-made afforestation projects for the Teréga SAS Group certified under the LBC, which will generate emission reduction certificates starting in 2028, with the first plantings having begun in 2024.

Regarding international projects, in line with the policy established in 2020, the Teréga SAS Group has financed carbon credits through EcoAct, which aims to protect forests while generating co-benefits for local communities and the environment.

Notably, the Clean Water project mentioned above, and the Anourok forestry project in Cambodia (Verra), aim to protect 497,000 hectares of forest and its biodiversity. This region is home to the second-largest pristine tropical forest in Southeast Asia, which faces significant pressure due to illegal logging and poaching.

CARBON CREDITS CANCELLED DURING THE REFERENCE YEAR**2024**

Total (TeqCO₂)	28,957
Proportion related to absorption projects (in %)	0%
Proportion related to reduction projects (in %)	100%
<i>of which % certified to recognised quality standards⁽¹⁾</i>	100%
Proportion related to projects conducted within the EU (in %)	0%

(1) Clean Water project in Eritrea and Ethiopia: Gold Standard (GS)

Project in Cambodia: Verified Carbon Standard (VCS) + Climate, Community & Biodiversity (CCB) Standards + Sustainable Development Verified Impact Standard (SD ViSta)

CARBON CREDITS EXPECTED TO BE CANCELLED IN THE FUTURE**2025**

Total (TeqCO₂)	29,567
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6.6. INTERNAL CARBON PRICING

The Teréga SAS Group does not currently have an internal carbon pricing system.

1. INTRODUCTION

In accordance with Article 8 of European Regulation 2020/852 of 18 June 2020, supplemented by four Delegated Acts – (2021/2139) dated 4 June 2021, (2022/1214) of 9 March 2022, and (2023/2485 and 2023/2486) of 27 June 2023 – the Teréga SAS Group publishes the proportion of its activity that is eligible and aligned with the EU Green Taxonomy.

The Taxonomy Regulation introduces a unified classification system to determine the sustainability level of investments, with the aim of directing capital towards financing the EU's environmental transition.

All economic activities falling within the scope of the Taxonomy Regulation (i.e., "eligible" activities) must be assessed for their environmental impact. This assessment is based on environmental criteria ("technical screening criteria") defined in the delegated acts related to the Taxonomy.

To be considered environmentally sustainable, an economic activity must make a substantial contribution to at least one of the six "environmental objectives", without causing "significant harm" to the others, and must comply with "minimum safeguards" concerning social and ethical standards.

For the 2024 financial year, and for the first time, both eligibility and alignment were analysed for all six environmental objectives. To review, the six objectives are: climate change mitigation, climate change adaptation, sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, and protection and restoration of biodiversity and ecosystems.

The eligibility analysis was carried out by examining all activities listed in the delegated acts of the EU Taxonomy Regulation. The main eligible activities for the Teréga SAS Group are the replacement and conversion of existing infrastructure to enable the transport of renewable gases and the reduction of methane emissions.

Gas storage is not included in the list of economic activities considered eligible under the taxonomy. However, it offers key leverage in the energy transition. Indeed, storage sites are an essential component of energy systems and will play a crucial role in the development of biomethane and hydrogen in the future.

To date, no investments have been made in pipeline installations dedicated to hydrogen transport, and the current network does not yet carry this molecule.

At present, economic activities related to the production of energy from natural gas or nuclear power, as covered by Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022, are not part of the Teréga SAS Group's business model.

2. EVALUATION, METHODOLOGY

The indicators used to calculate eligibility and alignment rates strictly follow the definitions set out in the taxonomy, and the calculation is detailed below [capital expenditure (Capex), operating expenditures (Opex), and revenue (revenue)].

With regard to the first two climate-related objectives, an activity may be considered taxonomy-eligible if it is low carbon, contributes to the transition towards a net-zero economy, or enables other activities to reduce their CO₂ emissions. To be considered aligned, an activity must first be eligible and then meet the technical screening criteria, do no significant harm (DNSH) to the five other environmental objectives, and comply with the minimum safeguards set out in the regulation.

The alignment assessment of the Teréga SAS Group's activities with the six objectives was carried out using existing reporting systems and assumptions validated by management.

The level of alignment is very close to the level of eligibility, owing to the predominance of activity 4.14 (Transmission and distribution networks for renewable and low-carbon gases), for which the eligibility descriptions and technical alignment criteria are almost identical. Compliance with the DNSH (Do No Significant Harm) principle is addressed below.

Where an activity is eligible under several objectives, its alignment potential was analysed for each objective, and the activity was assigned to the most relevant objective to avoid double counting. All eligible activities were reported under the climate change mitigation objective, for revenue, Opex, and Capex alike.

3. DESCRIPTION OF INDICATORS

Regulation 2021/2078, dated 6 July 2021, requires the publication in this statement of the Teréga SAS Group's eligibility and alignment rates with the Taxonomy through three indicators defined by the regulation:

- turnover (revenue);
- capital expenditure (Capex);
- operating expenditure (Opex).

3.1. TURNOVER INDICATOR

Due to its business model, the Teréga SAS Group uses the percentage of renewable gas, referred to as the Renewable Gas Index (IGR), injected into the networks in France during the year relative to national consumption, to reflect the eligibility and alignment rate of its revenue. This represents the share of low-carbon gas flowing through its network, contributing to climate change mitigation (CCM 4.14). Applying this index to its transport activity revenue accurately reflects the portion of its revenue that incorporates low-carbon gases. The index

chosen is at the national (France) level because, although Teréga's operations are based in the greater Southwest region, its network facilitates gas transit across the whole of France. This method was initially applied in coordination with its counterpart managing the other part of the French network to have a common indicator. This percentage is expected to increase in the coming years with the development of methanisation projects.

The turnover amount used as the denominator corresponds to the revenue from services sold as shown in the income statement.

The turnover amount taken into account this year refers to the revenue reported in the Teréga SAS consolidated financial statements, under the "Income" section, i.e. €485,565 K in 2024.

Compliance with the Do No Significant Harm (DNSH) criteria and minimum social safeguards is detailed below.

The corresponding table can be found in the annex below.

3.2. CAPITAL EXPENDITURE (CAPEX) INDICATORS

The Capex implemented by the Teréga SAS Group during the year 2024 have been identified and analysed according to eligibility and alignment criteria.

The activities identified as eligible are:

CCM 4.14: Transport and distribution networks for renewable and low-carbon gases, due to investments adapting its networks to increased integration of low-carbon gases.

The Capex considered mainly cover investments related to the connection of biomethane stations as well as projects aimed at reducing methane leaks and, consequently, the GHG emissions of the Teréga SAS Group's operations.

Also taken into account, following the same reasoning as for turnover, is the percentage of renewable gas injected into French networks during the year relative to national consumption, applied to residual Capex to reflect the share of maintenance and safety investments linked to renewable gases. The calculation of the eligible share of Capex is performed by dividing the amount of investments related to eligible/aligned projects by the total amount of investments.

CCM 7.6: Installation, maintenance, and repair of technologies related to renewable energies, due to the installation of photovoltaic solar systems enabling self-consumption of energy (Solus project).

Other activities that could have been considered eligible were excluded due to their low value, thus deemed insignificant and not studied in detail, such as charging stations, etc.

The Capex amounts taken into account are found in the consolidated financial statements of Teréga SAS under the

"Intangible assets and goodwill" and "Property, plant and equipment" sections, excluding financial assets, amounting to €155,079 K.

Compliance with the Do No Significant Harm (DNSH) criteria and minimum social safeguards is detailed below.

The corresponding table can be found in the annex below.

3.3. OPERATING EXPENDITURE (OPEX) INDICATORS

The eligible/aligned Opex related to activity CCM 4.14: transport and distribution networks for renewable and low-carbon gases consist of R&D costs linked to the energy transition and, as calculated and explained in the revenue and Capex indicators, the share of Opex resulting from the ratio between renewable gas injected into the networks during the year and national consumption. This ratio allows for the inclusion of the portion of maintenance and safety expenses in its transport activity that supports the integration of low-carbon gases.

The calculation of the eligible share of Opex is obtained by dividing the amount of eligible/aligned Opex by the total Opex amount.

To reconcile this with the operational expenses reported in the financial statements, it is necessary to exclude operating depreciation charges on fixed assets, expenses related to capitalised production, and purchases linked to sales (such as balancing gas, congestion charges, etc.).

These data come from the Teréga SA reporting tool, enabling a more realistic view of the amounts considered.

Compliance with the Do No Significant Harm (DNSH) criteria and minimum social safeguards is detailed below.

The corresponding table can be found in the annex below.

4. CRITERIA FOR SUBSTANTIAL CONTRIBUTION, DO NO SIGNIFICANT HARM (DNSH), AND RESPECT FOR MINIMUM SOCIAL SAFEGUARDS

4.1. SUBSTANTIAL CONTRIBUTIONS

The Teréga SAS Group has analysed the substantial contribution of activities 4.14 and 7.6 to the objective of climate change mitigation.

Regarding activity CCM 4.14, for revenue, Capex, and Opex, based on the main assumption of the Renewable Gas Index (IGR), the Teréga SAS Group fully meets the technical screening criteria, particularly point (c), which relates to the adaptation of transport networks enabling the integration of other low-carbon gases. This includes allowing the network to increase the blend of other low-carbon gases within the gas system due to its biomethane transport activities and its integration into the networks.

Regarding activity 7.6, for Capex only, the Teréga SAS Group meets the technical screening criteria, specifically point (a), which relates to the installation of solar photovoltaic systems and auxiliary technical equipment carried out through its Solus project, enabling self-consumption of the energy produced.

4.2. DO NO SIGNIFICANT HARM (DNSH) CRITERIA

To be considered sustainable, an activity must not hinder the other five environmental objectives, in accordance with the “Do No Significant Harm” (DNSH) principle, and must comply with minimum safeguards relating to human rights, anti-corruption, taxation, business ethics, and specifically fair competition.

The Teréga SAS Group has analysed the DNSH criteria to confirm that its contribution is made without harming the other environmental objectives. The generic DNSH for climate change adaptation has been addressed at the Teréga SAS Group level for all projects related to gas transport activities. Infrastructure operations are carried out over a long period, exceeding ten years. Therefore, a detailed assessment of climate-related risks and vulnerabilities is therefore necessary.

Regarding the classification of chronic hazards, the Teréga SAS Group design specifications enable effective management of these hazards (see *ESRS EI - 4.3*).

For the DNSH specific to other objectives (water, pollution, biodiversity), the indicators studied mainly relate to the primary activity CCM 4.14 (transport and distribution networks

for renewable and low-carbon gases). This activity does not impede these DNSH:

- a water management plan is applied to each project related to transport activities;
- the use of high energy-performance equipment is systematic;
- for each project, an environmental impact assessment, including biodiversity considerations, is carried out based on the three principles of “Avoid, Reduce, Compensate”. ISO 14001 certification guarantees compliance with the requirements of the environmental management system.

Regarding activity CCM 7.6 (installation, maintenance, and repair of renewable energy technologies), investments in photovoltaics have been made with the goal of reducing GHG emissions. The site of this investment has undergone a physical risk analysis conducted by AXA Climate (see *ESRS EI - 4*).

4.3. RESPECT FOR MINIMUM SOCIAL SAFEGUARDS

Minimum social safeguards consist of ensuring that the Teréga SAS Group procedures comply with the OECD Guidelines and the United Nations’ principles relating to business conduct, human rights, and the core conventions of the International Labour Organization (ILO). These procedures are a prerequisite for eligible activities to be considered aligned.

The criteria for compliance with minimum social safeguards (human rights, anti-corruption, customs and taxation, business ethics) are addressed comprehensively across the Teréga SAS Group. These safeguards are primarily reflected in its Code of Ethics, which is accessible to all employees and contractors. To manage risks related to these issues, the Teréga SAS Group also has specific policies on anti-corruption and responsible procurement, including procedures governing organisation, tendering, and supplier relationship management. As of 31 December 2024, the Teréga SAS Group has not been subject to any convictions relating to any of the four aforementioned areas.

Since the Teréga SAS Group operates solely within French territory, it is subject to French and European legislation and regulations.

Based on these assessments, the Teréga SAS Group has concluded that it complies with the minimum social safeguards.

Given the evolving nature of the European regulatory framework and the information available to date, the Teréga SAS Group will review its indicator calculation methodology in line with future regulatory developments..

TURNOVER

EXERCISE	2024			Criteria for substantial contribution						DNSH criteria									
Economic activities	Codes	Turnover	Portion of turnover, year N	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum guarantees	Share of revenue aligned with or eligible for taxonomy in N-1	Enabling activity category	Transitional activity category
		€M	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E
A. Activities eligible for the taxonomy																			
A.1. Environmentally sustainable activities (aligned with the taxonomy)																			
Renewable and decarbonised gas transport and distribution networks	CCM 4.14	10	2%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	N/A	Y	Y	N/A	-	-
Revenue from activities aligned with the taxonomy (A.1)		10	2%	2%	0%	0%	0%	0%	0%	Y	Y	Y	Y	N/A	Y	Y	N/A		-
Including enabling activities			-	-	-	-	-	-	-	Y	Y	Y	Y	N/A	Y	Y			
Including transitional activities			-							Y	Y	Y	Y	N/A	Y	Y			
A.2. Environmentally eligible but non-sustainable activities (not aligned with the taxonomy)																			
Revenue from activities eligible but not aligned with the taxonomy (A.1)		0	0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Total A. Revenue from activities eligible for the taxonomy (A.1 + A.2)		10	2%	2%	0%	0%	0%	0%	0%								N/A		
B. Activities not eligible for the taxonomy																			
Revenue from activities not eligible for the taxonomy (B)		476	98%																
Total A + B		486	100%																

CAPEX

				Criteria for substantial contribution						DNSH criteria									
Activities	Codes	Capex	Share of Capex, year N	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum guarantees	Share of revenue aligned with or eligible for taxonomy in N-1	Enabling activity category	Transitional activity category
		€M	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%		
A. Activities eligible for the taxonomy																			
A.1. Environmentally sustainable activities (aligned with the taxonomy)																			
Renewable and decarbonised gas transport and distribution networks	CCM 4.14	11	7%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	N/A	Y	Y	N/A		
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	2	1%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	N/A	N/A	N/A	N/A	N/A	N/A	E	
Revenue from activities aligned with the taxonomy (A.1)		12	8%	8%	0%	0%	0%	0%	0%	Y	Y	Y	Y	N/A	Y	Y	N/A		
Including enabling activities			1%																
Including transitional activities																			
A.2. Environmentally eligible but non-sustainable activities (not aligned with the taxonomy)																			
Capex of activities eligible but not aligned with the taxonomy (A.2)		0	0%	0%	0%	0%	0%	0%	0%								N/A		
Total A (A.1 + A.2) Capex of activities eligible for the taxonomy		12	8%	8%	0%	0%	0%	0%	0%								N/A		
B. Activities not eligible for the taxonomy																			
Capex of activities eligible for the taxonomy (B)		144	92%																
Total A + B		155	100%																

OPEX

				Criteria for substantial contribution						DNSH criteria									
Activities	Codes	Opex	Opex percentage	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum guarantees	Share of revenue aligned with or eligible for taxonomy in N-1	Enabling activity category	Transitional activity category
		€M	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%		
A. Activities eligible for the taxonomy																			
A.1. Environmentally sustainable activities (aligned with the taxonomy)																			
Renewable and decarbonised gas transport and distribution networks	CCM 4.14	4	3%	Y	Y	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	N/A	Y	Y	N/A		
Opex of activities aligned with the taxonomy (A.1)		4	3%	Y	Y	0%	0%	0%	0%	Y	Y	Y	Y	N/A	Y	Y	N/A		
Including enabling activities																			
Including transitional activities																			
A.2. Activities eligible but not aligned with the taxonomy																			
Opex of activities eligible but not aligned with the taxonomy (A.2)		0	0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Total A (A.1 + A.2) Opex of activities eligible for the taxonomy		4	3%	3%	0%	0%	0%	0%	0%								N/A		
B. Activities not eligible for the taxonomy																			
Opex of activities eligible for the taxonomy (B)		157	97 %																
Total A + B		161	100%																

CSRD ANNEXES

TURNOVER	PORTION OF REVENUE/ TOTAL REVENUE	
	ALIGNED WITH TAXONOMY PER OBJECTIVE	ELIGIBLE FOR TAXONOMY PER OBJECTIVE
CCM	2%	2%
CCA	- %	-%
WTR	-%	-%
CE	-%	-%
PPC	-%	-%
BIO	-%	-%

CAPEX	PORTION OF REVENUE/ TOTAL REVENUE	
	ALIGNED WITH TAXONOMY PER OBJECTIVE	ELIGIBLE FOR TAXONOMY PER OBJECTIVE
CCM	8%	8%
CCA	-%	-%
WTR	-%	-%
CE	-%	-%
PPC	-%	-%
BIO	-%	-%

OPEX	PORTION OF REVENUE/ TOTAL REVENUE	
	ALIGNED WITH TAXONOMY PER OBJECTIVE	ELIGIBLE FOR TAXONOMY PER OBJECTIVE
CCM	3%	3%
CCA	-%	-%
WTR	-%	-%
CE	-%	-%
PPC	-%	-%
BIO	-%	-%

TAXONOMY TABLE FOR NUCLEAR AND GAS ACTIVITIES COVERED BY THE COMPLEMENTARY CLIMATE DELEGATED ACT

ACTIVITIES RELATED TO NUCLEAR ENERGY

1	The company engages in, finances, or is exposed to research, development, demonstration, and deployment activities related to innovative electricity generation facilities using nuclear processes with minimal waste from the fuel cycle.	No
2	The company engages in, finances, or is exposed to activities related to the safe construction and operation of new nuclear power plants for electricity or industrial heat production, including for district heating or industrial processes such as hydrogen production, including safety upgrades, using the best available technologies.	No
3	The company engages in, finances, or is exposed to activities related to the safe construction and operation of new nuclear power plants for electricity or industrial heat production, including for district heating or industrial processes such as hydrogen production, including safety upgrades, using the best available technologies.	No

ACTIVITIES RELATED TO FOSSIL GAS

4	The company engages in, finances, or is exposed to activities related to the construction or operation of electricity generation facilities using fossil gas fuels.	No
5	The company carries out, finances, or is exposed to activities related to the construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gas fuels.	No
6	The company carries out, finances, or is exposed to activities related to the construction, refurbishment, or operation of heat generation facilities that produce heat/cooling from fossil gas fuels.	No

1. INTRODUCTION

The management of the impacts of the Teréga SAS Group’s activities is based on consideration of pollution issues across its value chain.

The identification and selection process enables the establishment of strong partnerships with various stakeholders within the Teréga SAS Group’s upstream value chain. As a result, the company promotes ambitious environmental commitments and strives to instil them among its upstream partners, particularly in relation to air, water, and soil pollution. These long-term relationships are essential to the success of the Teréga SAS Group’s public-interest mission, especially in terms of sharing best practices.

2. IMPACTS, RISKS AND OPPORTUNITIES MANAGEMENT

2.1. DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL POLLUTION-RELATED IMPACTS, RISKS AND OPPORTUNITIES

As part of its double materiality assessment, the Teréga SAS Group examined the influence of all its activities (including those within its value chain) on air, water and soil pollution. Following this analysis, the Teréga SAS Group concluded that the main impact primarily stems from the activities of actors within its upstream value chain. As such, the identified material impact is as follows:

	SUSTAINABILITY ISSUES	IROs	DESCRIPTION OF IMPACT, RISK, OR OPPORTUNITY	DESCRIPTION
ENVIRONMENT	Pollution from the value chain	Impact (-)	Pollutions (of all types) resulting from upstream value chain activities	Pollution resulting from upstream value chain activities such as the extraction of minerals and gas, and transport, which may affect the quality of air, water (including microplastics), and soil, or have an impact on the health of employees, local communities, and nearby animal and plant species at production sites or along distribution routes. Examples include: incidents, accidents or irregular activities, gas leaks, pollution during raw material extraction, transport of hazardous substances, etc.

The term “pollution” used in the description of the material impact refers, for instance, to an incident, an irregular activity, a leak, or an abnormal quantity of substances discharged into the natural environment.

The upstream value chain is made up of two main sectors: the gas sector, and the supply of materials and services for the construction, maintenance, and operation of infrastructure.

The activities identified in the Teréga SAS Group’s upstream value chain (see *ESRS 2 - 3.1.4*) are as follows:

- the extraction of fossil (including natural gas) and mineral raw materials;
- the liquefaction of gas, its transportation by tanker ship, and the regasification of liquefied natural gas;
- the transportation of natural gas (and injected biomethane) through pipelines operated by other network operators;
- the processing and provision of raw materials for infrastructure management;

- the production of biological raw materials (from agricultural sources);
- the production of biomethane by anaerobic digestion units

All the activities listed above involve various actors in the upstream value chain, notably suppliers and service providers. This second category of stakeholders contributes to the Teréga SAS Group’s internal operations through collaboration on construction and/or maintenance projects.

The supply of raw materials notably includes the purchase of steel pipes sourced from Germany. The most recent available market studies (2023 data) indicate that France’s natural gas imports come primarily from Norway, the United States, and Algeria.

Mining operations have harmful effects on the environment, leading to biodiversity loss, soil erosion, and the contamination of surface water, groundwater, and soil. Chemical leaks from mining sites can also have negative health impacts on the populations living on or near these sites.

In the case of steel, the production process can generate large quantities of greenhouse gas (GHG) emissions and other air pollutants, as it requires significant amounts of energy and fossil fuels to produce the necessary heat and electricity. Furthermore, the same process can also generate toxic waste—such as slag and exhaust gases—that may contaminate the surrounding air and soil.

The connection of the Teréga SAS Group with the upstream phase of its activities is established through its relationships with contractors and suppliers, within the framework of procurement, construction, installation, and maintenance of its pipelines, as well as with its gas-supplying clients.

2.2. POLICIES RELATED TO POLLUTION

The Teréga SAS Group does not currently have a dedicated policy addressing pollution issues within its upstream value chain. However, regarding the impact of the gas value chain, as part of its GAÏA 2035 corporate strategic plan, the Teréga SAS Group promotes the adaptation of its infrastructure for new gas flows and the development of infrastructure for hydrogen and carbon dioxide. Indeed, two of the three pillars of its strategic plan are based on a decarbonisation strategy and a long-term vision of a paradigm shift from natural gas to low-carbon gases. This strategy to diversify energy sources also aims to reduce pollution-related impacts in the coming years.

It is worth noting that in 2024, the subsidiary Teréga SA initiated studies on the Ambès project in Gironde (33), which involves implementing a protocol to convert a methane pipeline for hydrogen use.

In the face of environmental, climate, and energy challenges, the development of renewable gas production capacities is becoming an imperative. Renewable and low-carbon gases represent a key alternative to fossil fuels. Their production and value chain, initiated from resources such as biomass, significantly contribute both to emission reductions and to the energy independence of territorial ecosystems. The use of biological inputs helps reduce pollution of the air, soil, and water compared to intensive and traditional raw material extraction. The Teréga SAS Group is actively involved in developing a sector that meets these challenges. This strategy for integrating locally produced “green” energies will reduce the share of natural gas and thus have a downward impact on pollution associated with mineral extraction and gas refining.

Aware of the challenges in the supply value chain (mainly steel), the Teréga SAS Group has begun to address the issue,

notably through the Responsible Purchasing Charter established in 2024. Indeed, the entry point of the upstream value chain for Teréga SA is its tier 1 suppliers (service providers, equipment purchases). This charter is based on the internal BE POSITIF programme (Positive Environmental Balance). This programme aims to erase the environmental footprint of the Teréga SAS Group’s activities and covers all environmental issues, including air, water, landscape pollution, noise, waste, etc. All these measures have been validated by Teréga SAS Group management (see *ESRS 2 - 2.1.1*).

Regarding environmental matters, the Responsible Purchasing Charter states:

“The consideration of environmental protection is a core element of the procurement process and forms part of the supplier selection criteria. Teréga expects its suppliers to strictly comply with the Environmental Code and, more generally, with current regulations, and to actively work towards environmental protection in general (waste, pollutants, water discharges, resource consumption, including principles of the circular economy, emissions, etc.). This approach must be integrated at the heart of their strategy, with a focus on applicable measures to avoid, reduce, or even offset the specific impacts of their activities. More specifically, for activities with significant environmental impacts (infrastructure projects, maintenance of installations, manufacturing of equipment, development projects), Teréga expects its suppliers to propose innovative techniques and optimised operating procedures aimed at increasing energy efficiency, reducing air emissions, water discharges, waste production, or any other pollutants.”

Additionally, the Teréga SAS Group works with suppliers that carry out services with significant HSE (Health, Safety, Environment) stakes and, depending on the procurement segmentation (S32E matrix – Health, Safety, Security, Environment and Energy), are required to hold HSE accreditation. Some of its suppliers also hold MASE certification (Manual for the Improvement of Health, Safety and Environmental Management in Companies) and/or ISO certification (International Organization for Standardization).

The Teréga SAS Group co-develops strong business relationships with its suppliers through the implementation of annual business reviews with its main suppliers. These regular interactions with suppliers help convey key messages regarding the Teréga SAS Group’s expectations on environmental, social, and governance issues. This ongoing communication emphasises to suppliers the actions they must implement to promote best practices concerning environmental matters.

Currently, the Teréga SAS Group does not have a method for collecting information on substances of concern and substances of very high concern in relation to the practices of upstream value chain actors. It should be noted that the Teréga SAS Group does not develop consumer products.

2.3. ACTIONS AND RESOURCES RELATED TO POLLUTION

For the Teréga SAS Group, managing the environmental impact of its activities as well as those related to its value chain is an important and carefully considered issue.

The management of impacts from the Teréga SAS Group's operations is based on addressing environmental concerns right from the stage of selecting the direct tier 1 supplier (services and equipment), as well as during the preliminary phases of a project and the operation of facilities.

The Teréga SAS Group continues to select its suppliers based on the 3S2E criteria [Safety, Security, IT Security (cybersecurity), Environment and Energy] and grants them an HSE accreditation valid for three years.

HSE accreditation

To obtain HSE accreditation, the supplier must complete documents demonstrating their commitment and outlining their intentions to support and improve in the areas of environment, energy, and pollution.

The expected commitments are:

- to protect the environment and minimise energy impacts;
- to comply with all applicable regulations;
- to engage in a continuous improvement approach.

Regarding environmental results over five years, the expected elements are:

- the number of environmental accidents/incidents: the number of unexpected events having an environmental impact, such as overconsumption of natural resources (energy, water, etc.), atmospheric gas emissions, water or soil pollution, uncontrolled generation of waste, or nuisances affecting the natural environment or third parties;
- annual reporting of these accidents/incidents for each of the last five full calendar years;
- short-, medium-, and/or long-term actions implemented, at least for the most serious events.

Suppliers must adhere to environmental commitments according to the HSE requirements addressed to them. The suppliers of the Teréga SAS Group also ensure that their own subcontractors apply these same commitments.

MASE certification

Furthermore, some of its suppliers (both service providers and equipment suppliers) hold MASE certification (123/900), which notably includes obligations related to pollution control:

- risk analysis takes into account, at a minimum, environmental impacts on air, water, soil, or the surrounding area (energy, materials, pollution, etc.), as well as the collection and monitoring of waste (disposal channels, recycling, etc.);
- organisational measures: the employer ensures that risks related to environmental preservation are addressed,

particularly regarding pollution prevention (air, water, and soil) and waste management (sorting, storage, and disposal);

- the employer establishes a report after completing tasks, works, or services based on, at minimum, environmental impacts (waste management, effluents, pollution, etc.).

Equipment referencing

The Teréga SAS Group carries out equipment referencing with its suppliers. As part of this process, the Purchasing Department asks suppliers to complete an "equipment specification sheet." This sheet includes a carbon tab where the origin, weight, type of energy used, and recyclability are specified. In such cases, the use of recycled materials helps to reduce the extraction of raw materials. This request is sent for all types of equipment, whether steel, polypropylene, or polyethylene.

In addition to this initial request, the Purchasing Department encourages suppliers to complete a PEP (Product Environmental Profile) sheet to collect information regarding the environmental footprint of the equipment. All this information is collected and stored in a database, which serves as a basis for selecting suppliers likely to collaborate with the Teréga SAS Group.

3. METRICS AND TARGETS

3.1. TARGETS RELATED TO POLLUTION

As mentioned earlier, any company whose activities involve significant HSE issues and require work on Teréga SAS Group sites or facilities must hold an HSE accreditation. In 2024, 91% of the suppliers accredited by the Teréga SAS Group held either MASE certification, ISO 14001, or ISO 45001.

However, to date, the Teréga SAS Group does not have information on the description and definition of targets regarding the prevention and control of atmospheric pollutants, water discharges, soil pollution, and substances of concern or of very high concern throughout its value chain.

The CSRD regulatory requirement concerning value chain issues has highlighted the necessity of addressing this material topic (see *ESRS 2 - 4.1*). Thus, the Teréga SAS Group is aware of the importance of this complex issue, which will require further analysis in the coming years regarding impacts and the actions to be undertaken.

1. INTRODUCTION

The Teréga SAS Group holds a strategic position within the French energy landscape. Working at the Teréga SAS Group means contributing to the development of a more efficient energy system based on an energy mix that favours renewable sources. To meet the challenges of the energy transition, the Teréga SAS Group anticipates the development of its employees' skills to co-build a more sustainable future. The energy market has embarked on its ecological transition. Gas-related professions are enriched with increasingly advanced technological and digital skills, keeping pace with technological and environmental innovations.

2. STRATEGY

2.1. INTERESTS AND VIEWS OF STAKEHOLDERS

The Teréga SAS Group places particular emphasis on the engagement and satisfaction of its employees. They contribute to the company's growth and overall performance and are key to its success. The Teréga SAS Group is committed to placing people at the heart of its concerns, prioritising the safety and health of its employees and ensuring a calm and supportive working environment.

The corporate culture at the Teréga SAS Group is driven by its four core values:

- Responsibility: Being a full participant in the success of the Teréga SAS Group's projects and one's own career.
- Cooperation: Sharing knowledge and experience to grow together.
- Innovation: Exploring new horizons and fields of expertise.
- Ambition: Having an ambitious vision of what the future energy world should be.

The Teréga SAS Group employs staff on permanent contracts (CDI) as well as fixed-term contracts (CDD), including professional training and apprenticeship contracts. With a view to knowledge and skills transfer, the Teréga SAS Group is actively engaged in intergenerational exchange through the employment of young people via work-study programmes and mentoring by more senior staff.

Employees are encouraged to take charge of their own career development. They can rely on Human Resources Managers to help build their career path and assess their training and development needs.

Given the activities of the Teréga SAS Group, two employee groups have been identified: operational roles and support functions. Operational roles are inherently more exposed to health and safety risks.

For this first year of reporting, the Teréga SAS Group applies the progressive measurement approach (< 750 employees) regarding the category of non-employed personnel.

2.2. MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH THE STRATEGY AND BUSINESS MODEL

Through its corporate strategic plan GAÏA 2035, the Teréga SAS Group aims to transform its network into a regional hub for the energies of the future by 2050. This plan seeks to secure and adapt existing infrastructure to emerging needs, develop biomethane, and implement solutions for new gases contributing to decarbonisation.

In this respect, the Teréga SAS Group expresses a strong commitment to developing its workforce by promoting the acquisition of new skills among employees from technical roles and expert fields, in order to be able to meet the current and future demands of its activities and successfully deliver major infrastructure projects. This commitment is also reflected in the way the company fosters a relationship of trust between top management and employees, ensuring cross-functional collaboration between the company's various divisions and departments.

In doing so, the Teréga SAS Group aims for operational efficiency by clearly defining roles, responsibilities, and processes. GAÏA 2035 also advocates for the implementation of responsible social practices that have a positive impact on employability and reindustrialisation.

Considering the company's industrial activities and human resources mobilised to implement its strategic plan, the following impacts, risks, and opportunities have been assessed as material:

	SUSTAINABILITY ISSUES	IROs	DESCRIPTION OF IMPACT, RISK, OR OPPORTUNITY	DESCRIPTION
SOCIAL	Working conditions of internal workforce	Impact (-)	Deterioration of Teréga employees' well-being due to working conditions.	Deterioration of the physical and mental well-being of Teréga employees (work-life imbalance, health risks, demotivation, etc.) resulting from working conditions: work organisation (specific work rhythms), working hours, balance between professional and personal life.
	Health and safety	Impact (-)	Safety incident at the workplace and loss of employee engagement at Teréga.	Harm to the physical integrity (illness, injury, death) and mental integrity (stress, fatigue, etc.) of Teréga employees due to a serious safety/security incident at the workplace, which could lead to a loss of trust and engagement from all employees towards Teréga.
	Skill development	Risks	Lack of skill support impacting Teréga's strategic ambitions.	Failure to achieve Teréga's strategic ambitions (transition, market, stakeholders) due to insufficient skills support or failure to anticipate current and future needs.
	Labour relations and social dialogue	Opportunity	Positive social climate favourable to the development of employees and the company	A calm and constructive social dialogue will foster engagement and enable adherence to the company's strategy, improving operational performance, employer brand, and employee well-being.

All Teréga SAS Group employees are impacted by these material impacts, risks, and opportunities. However, due to the nature of their activities, personnel involved in operations, maintenance, and infrastructure projects face higher exposure to deteriorating working conditions and workplace safety incidents.

3. IMPACTS, RISKS AND OPPORTUNITIES MANAGEMENT

3.1. POLICIES RELATED TO OWN WORKFORCE

As part of its local operations, the Teréga SAS Group advocates for the protection and promotion of human rights and fundamental freedoms. In this regard, the Teréga SAS Group refers to the United Nations Universal Declaration of Human Rights, the International Labour Organization (ILO) Fundamental Conventions, and the guidelines of the Organisation for Economic Co-operation and Development (OECD). The Teréga SAS Group does not operate internationally; consequently, its gas transport and storage activities are subject to French law.

As a responsible French company, it ensures compliance with French labour law concerning working hours, work-life balance, safety, and their proper implementation.

To support the deployment of its corporate plan, the Teréga SAS Group implements a responsible social policy tailored to its development challenges. The objectives of this social policy are to:

- leverage resources to deliver GAIA 2035 through:
 - the acquisition and development of skills to secure current operational activities and anticipate sector and job evolution;
 - resource allocation aimed at optimising and anticipating the effective deployment of resources to meet operational needs;
 - change management to support people throughout the transformation process.
- establish a social foundation combining sustainable economic and social performance by means of mechanisms that reward performance and career progression within the company;
- embed Corporate Social Responsibility (CSR) into practices and actions by strengthening employee engagement.

The Teréga SAS Group social policy applies to all employees, although specific measures target more exposed groups depending on their roles.

Policy development is initiated by the Human Resources Strategy Department (SRH) and submitted to the Director of Human Resources and Transformation (DRHT), who defines the social strategy and validates it with the Comex.

Subsequently, these policies are communicated and implemented throughout the company. Their compliance is monitored by the Human Resources Strategy Department (SRH).

The Teréga SAS Group is a committed player that relies on two programmes – PARI 2035 (Accident and Industrial Risk Prevention), ENERGIZ MOUV, and the Intrapreneurship

initiative - focusing on the “S” pillar of ESG criteria, particularly addressing employee health and safety, workplace well-being, social climate, and skills development.

All the policies and programmes described below apply to all employees and respond to the identified material impacts, risks, and opportunities.

ASSOCIATED IMPACTS, RISKS, AND OPPORTUNITIES	POLICIES, PROGRAMMES AND INITIATIVES DEPLOYED AT TERÉGA SA
Deterioration of Teréga employees’ well-being due to working conditions	PARI 2035 ENERGIZ MOUV Social policy measures on working conditions Collective agreements related to working conditions Specific health and safety policies
Security incidents at the workplace and loss of employee engagement at Teréga	PARI 2035 ENERGIZ MOUV Employee engagement survey Specific health and safety policies
Lack of skills development impacting Teréga’s strategic ambitions	Skills and talent development policy – Training Plan Intrapreneuriat
Peaceful, positive social climate favourable to employee and company development	ENERGIZ MOUV Policies specific to working conditions Specific agreement on social dialogue

Presentation of the PARI 2035 programme

The health and safety of people are priorities at the Teréga SAS Group. Risk management covers workplace health and safety, industrial safety, cybersecurity, and operational security. The Teréga SAS Group has launched an ambitious programme, PARI 2035, which strengthens risk management and fosters an integrated safety culture through concrete measures, actions, and objectives led by the Health and Safety Department, the Security Department, and the Industrial Safety Service. Since most accidents involve personnel from contracting companies, the Teréga SAS Group focuses its efforts on the responsibility and safety commitment of its suppliers and contractors.

Through PARI 2035, the Teréga SAS Group ensures the safety of people, facilities, and their environment with the goal of: “Zero accidents, Zero collisions, and Zero surprises.”

The PARI 2035 programme clearly states the Teréga SAS Group position and commitments in health and workplace safety, industrial safety, operational security, and cybersecurity. This programme is led by the Director of D3SA (Health, Safety and Activity Support Directorate) (see *ESRS S4 - 3.1*) and approved by the Comex.

Presentation of the ENERGIZ MOUV Programme

The ENERGIZ MOUV programme supports the social dimension and local engagement of the Teréga SAS Group. It encompasses all of the Teréga SAS Group actions serving both people and territories within a unified framework. It is based on four commitments that strengthen the company’s employer brand:

- supporting territorial ecosystems in the energy transition and local industrial development;
- promoting inclusion of people with disabilities or those distant from employment;
- ensuring gender diversity and equality;
- strengthening employee engagement.

For the Teréga SAS Group, these commitments generate the social capital necessary for the economic and social development of the regions. This programme also includes actions related to health and quality of working life, skills development, and employee engagement.

ENERGIZ MOUV symbolises the diverse energies within the company: those that the Teréga SAS Group transports daily through its infrastructure and projects, as well as the energies of committed employees who design and implement sustainable and responsible solutions. It represents the responsible commitment of the Teréga SAS Group in the service of Corporate Social Responsibility (CSR).

Presentation of the Intrapreneurship initiative

To meet current energy market demands, particularly around gas supply, decarbonisation, and energy efficiency, the Teréga SAS Group must identify new transformation projects and growth drivers. This led to the creation of the Intrapreneurship programme. The objectives of this programme are to:

- identify new business opportunities by supporting internal employees;
- promote a cultural shift towards agility, initiative, and boldness;
- enhance employees' understanding of customer approach, business challenges, and innovation;
- develop the company's human capital.

The Intrapreneurship programme combines the freedom to innovate with the security of the Teréga SAS Group ecosystem. It offers employees the means to internally create new products and services for external clients. Launched for the first time in September 2023, this programme has already resulted in innovative solutions in the field of energy transition. To support the energy transition of its activities, the Teréga SAS Group encourages its employees to engage in understanding the characteristics and risks associated with hydrogen, using an H₂ awareness test bench developed by its own teams at the Lussagnet site.

Policies specific to working conditions

The Teréga SAS Group applies and complies with French law. Additionally, on 9 February 2024, the Teréga SAS Group signed and implemented an Agreement on professional equality and quality of life and working conditions for all employees. This Agreement was signed by the President and CEO, the Director of Human Resources and Transformation, and the representative trade unions.

It builds upon the actions the Teréga SAS Group has been undertaking for many years regarding professional equality between women and men, as well as integration and retention in employment, and the quality of working life.

Work environment

The measures implemented by the Teréga SAS Group cover workplace ergonomics, vehicle ergonomics, and daily services (such as the canteen), hygiene and sanitary conditions (vaccination campaigns, occupational health services), combating sedentary behaviour for support functions, prevention of occupational diseases through Physical Activity Risk Prevention (PRAP), mental health prevention via the Quality of Work Life (QWL) policy, and the management of psychosocial risks (PSR).

The approach to quality of working life

The mechanisms related to improving quality of work life include analysing workloads, identifying and addressing irritants, fostering cooperation and cross-functional collaboration, implementing suitable tools and workspaces, supporting employees through change management, and

recognising and valuing employees' work (fair wages, social protection).

Work-life balance provisions

The Teréga SAS Group's measures to respect work-life balance include the right to disconnect, support for parenthood, working time management, the creation of a "close caregiver" referent role, and teleworking arrangements.

Specific health and safety at work (HSW) policies

The Teréga SAS Group's HSW policy is based on a structured and mature Management System (SMS), certified ISO 45001. ISO 45001 certification is a voluntary commitment aiming to establish an occupational risk prevention approach placing the human element at its core. Safety is a fundamental value and a constant requirement for the Teréga SAS Group.

The SMS focuses on three main areas:

- managing risks linked to activities via the Annual Programme for the Prevention of Occupational Risks and Improvement of Working Conditions (PAPRI Pact);
- regulatory assessment and compliance;
- maintaining a strong safety culture.

These three pillars form a continuous improvement approach striving towards the goal of zero accidents. They are interdependent and intended to protect employees, partners, installations, and their environment.

The HSW policy applies both to Teréga SAS Group employees and to personnel from External Companies (EI). It is validated and signed by the President and CEO and is implemented daily by the Director of Health, Safety, and Operational Support.

The Teréga SAS Group has adopted a Code of Ethics. It is linked to its internal regulations and serves as a practical guide for all employees. To detect and manage any issues or breaches of this Code, the Teréga SAS Group has implemented a confidential alert system. The system allows employees to confidentially report any misconduct or behaviours contrary to the Teréga SAS Group's ethical values.

Given the priority of the Teréga SAS Group's employee health and safety, a safety report is made at every Board of Directors meeting.

Specific training policies

The Teréga SAS Group is undergoing a profound transformation of its professions towards energy transition and new activities.

The skills and talent development policy is a key driver for successfully meeting the challenges of evolving professions in the energy transition, digital, and social sectors of the Teréga SAS Group. It applies to all employees. Aligned with strategic workforce and skills orientations, this policy establishes the framework and approach for developing human potential and creating individual and collective value, thus

equipping the Teréga SAS Group with the human resources needed for its ambitions.

It aims to:

- secure and optimise the Teréga SAS Group skill base in both core and transversal expertise;
- maintain the movement and learning dynamics necessary for the Teréga SAS Group's agility;
- anticipate organisational, job, and skills evolution for the Teréga SAS Group of tomorrow;
- secure employees' career paths;
- enable employees to adapt to job evolutions, new ways of working, digitalisation, and collaborative work methods necessary for the Teréga SAS Group;
- retain talents and prepare them for roles critical to the success of the Teréga SAS Group.

Training access is provided via an application serving as a knowledge base, available to all employees (Fresh Service).

Specific social dialogue policies

Social dialogue at the Teréga SAS Group is based on trust and legitimacy of all actors, aiming to transcend particular interests and consider the general interest.

Social relations at the Teréga SAS Group are embedded in a constant practice of quality dialogue. This relies on sharing information about economic and social strategic orientations and operational challenges. Moreover, a favourable feedback loop from the field is essential for implementing appropriate solutions and developing a foundation of social measures.

This involves an in-depth social dialogue covering economic and social aspects, developing exchange and information bodies, and a conducive negotiation framework.

The social dialogue at the Teréga SAS Group is governed by an Agreement aiming to adapt regulatory and conventional frameworks while considering the company's dialogue practices and challenges. This Agreement provides means for trade unions and elected representatives to exercise their prerogatives. It defines the rules for collective negotiations and employee representative bodies.

The policy is the responsibility of the Director of Human Resources and Transformation, supported by a Social Relations Officer.

As social dialogue is a material issue for the Teréga SAS Group, two employee representatives sit on the Teréga SA Board of Directors (see ESRS 2 - 2.1.1).

3.2. PROCESSES FOR ENGAGING WITH OWN WORKERS AND WORKERS' REPRESENTATIVES ABOUT IMPACTS

The company's dialogue process with employees and their representatives enables staff to express their concerns and helps to maintain a calm and constructive social climate (see ESRS 2 - 4.1).

To this end, the Teréga SAS Group has implemented various upward and downward communication channels:

- annual company-wide events, such as the Convention focusing on the company's business plan (review and future outlook), and the Safetyval, aimed at raising team awareness around safety issues;
- information and orientation meetings with managers, designed to cascade information down to teams;
- departmental seminars, intended to unite teams around the achievement of shared goals;
- monthly web conferences open to all employees and hosted by the President and CEO, providing staff with regular updates on company news and the opportunity to ask questions directly to senior management;
- information sharing via various communication tools, including the ReZo intranet, the reZonance magazine, and the internal social network Workplace;
- an employee engagement survey, which evaluates trust levels and identifies areas for improvement, followed by the implementation of concrete actions to boost engagement;
- a whistle-blowing system, allowing reports of any activity suspected of seriously violating human rights, fundamental freedoms, health and safety, or the environment—or constituting fraud, corruption, conflict of interest, or other breaches of laws and regulations (see ESRS G1 - 3.2.2);
- employee-initiated meetings with their line managers, to raise concerns and express grievances. Such initiatives are encouraged to maintain constant dialogue. These direct discussions help facilitate communication between managers and employees;
- reporting of Risky Actions or Situations (ASR) by any employee through the mobile application TERA (Teréga Events Report Application) (see ESRS S1 - 3.3);
- an annual Development and Performance Review (EDP) with their direct manager;
- the option to contact trade unions, to bring certain matters to their attention.

All of these mechanisms are communicated to employees via email exchanges, meeting invitations, information days, and online questionnaires.

The Teréga SAS Group places strong importance on feedback at all levels. All of these established and widely shared communication channels are designed to enable Teréga SAS Group employees to engage with company management, express concerns, and communicate their needs.

In terms of social dialogue, the 2024 agenda included:

- Organising various meetings with employee representatives and trade union delegates, including:
 - 2 Group Committee meetings;
 - 16 meetings of the Social and Economic Committee (CSE) within Teréga SA;
 - 7 meetings of the Health, Safety and Working Conditions Commission within Teréga SA;
 - 12 meetings of the Social and Economic Committee (CSE) within Teréga Solutions;
 - The holding of specific commissions to monitor the implementation of collective agreements.
- CSE consultations carried out as follows:
 - 3 recurring consultations at the level of Teréga SA:
 - > Consultation on strategic direction;
 - > Consultation on the financial and economic situation;
 - > Consultation on social policy;
 - 13 ad hoc consultations on various topics at the level of Teréga SA and 3 at the level of Teréga Solutions.
- Conducting negotiations between the Management – represented by the Human Resources and Transformation Department (DRHT) – and the trade union organisations, represented by their union delegates):
 - 9 meetings with union delegates for the Teréga SA scope;
 - 6 meetings with union delegates for the Teréga Solutions scope;
 - 15 meetings with union delegates for the Group scope;

The resulting Agreements are signed jointly by the President and the Director of Human Resources and Transformation on the one hand, and the representative trade union organisations on the other.

In 2024, these negotiations led to the signing of:

- At the Teréga SAS Group level, three Agreements, four Amendments, and one disagreement:
 - Agreement on professional equality and quality of life and working conditions;
 - Profit-sharing Agreement specifying the calculation and distribution methods for the special profit-sharing reserve;
 - Top-up health insurance Agreement establishing an additional healthcare scheme to complement the basic plan;
 - Amendment to the mobility security Agreement;
 - Amendment to the complementary health insurance Agreement;
 - Amendment to the social dialogue Agreement;
 - Amendment to the Agreement on working time and organisation of work;
 - Disagreement following negotiations on senior employees.
- At the Teréga SAS level, one Agreement:
 - A profit-sharing agreement establishing performance indicators and a calculation formula for profit-sharing.
- At the Teréga SA level, two Agreements and one Amendment:
 - A salary Agreement following the mandatory annual negotiation on remuneration;

- A profit-sharing Agreement, establishing performance indicators and a calculation formula for profit-sharing;
- An Amendment to the social dialogue agreement outlining changes to the operation of the CSE (the drafting of minutes and the frequency of CSE expert assessments in relation to recurring consultations).

- At the Teréga Solutions level, one Agreement and one disagreement:
 - A profit-sharing Agreement, establishing performance indicators and a calculation formula for profit-sharing;
 - A salary disagreement following the mandatory annual negotiation on remuneration.

3.3. ACTIONS CONCERNING MATERIAL IMPACTS ON THE COMPANY'S PERSONNEL

The Teréga SAS Group implements various initiatives to support its commitments in the areas of working conditions, health and safety, as well as training and skill management.

All of the actions listed below enable Teréga SAS Group employees to work in good conditions, in complete safety, and to remain engaged and motivated in supporting the strategy implemented by the Group. These initiatives also aim to provide training on new challenges identified through GAÏA 2035, and to uphold social dialogue.

In this way, the Teréga SAS Group addresses material issues and seeks to minimise identified impacts (see *ESRS 2 - 4.1*).

Specific actions related to working conditions

To strengthen employee engagement and satisfaction, the Teréga SAS Group undertakes several initiatives across different areas.

Creation of new offices and work environment

The Teréga SAS Group has implemented a new working model to facilitate collaboration and the sharing of information through shared offices, open-plan spaces, and acoustic booths. This initiative applies to the headquarters.

The Teréga SAS Group has also opened new offices in regional areas to improve working conditions (offices in the Agen region and a distribution room for storage at the Lussagnet site).

Consideration of climatic events

The Teréga SAS Group has taken into account the consequences of climate events to adapt employees' Personal Protective Equipment (PPE), particularly following the wildfires of 2023. The type of PPE used on worksites depends on the needs identified and is tailored to each specific situation.

Personal organisation arrangements

The Teréga SAS Group has renewed its teleworking arrangements, allowing ten days per month. This option is voluntary and available to all employees in support functions.

The Teréga SAS Group provides the appropriate IT equipment (and accessories) for each position, both on-site and for remote work, ensuring all employees are properly equipped.

Consideration of employee feedback

The Teréga SAS Group has integrated feedback from the employee engagement survey into the design of the new organisational model. More than 240 employees shared their views.

The Teréga SAS Group conducts Annual Development and Performance Reviews (EDP) with each employee, during which the manager and the employee discuss matters related to working time, mental workload, and work-life balance.

The Teréga SAS Group organises a welcome day for all new hires to introduce the company, outline employee benefits, and raise awareness of occupational illnesses.

The deployment of specific actions relating to workplace conditions is managed by the General Resources Department within the D3SA.

The workplace improvements implemented allow all employees to work in a healthy and pleasant environment. The Teréga SAS Group is committed to creating a physical and relational environment in which individual well-being contributes to collective success, fostering a spirit of cooperation and cross-functional collaboration.

Specific actions relating to health and safety

As part of its commitment to employee health and safety, the Teréga SAS Group has developed the TERA mobile application, which enables employees to report Risky Actions or Situations (ASR) and accidents in real time. These events are then handled by HSE Officers, who identify the necessary corrective actions. Depending on the severity of the incident, an investigation may be conducted to identify and address the root causes.

Beyond ASRs and accidents, Teréga SAS Group employees are also encouraged to report good practices, undeclared works, scheduled general inspections, and on-site checks.

In addition, an annual Prevention Day is held in the presence of operational and support management teams to review the past year's safety performance and set goals for the upcoming year. This event helps to align the safety strategies of the company's various departments.

The Occupational Risk Assessment Document (DUERP) is used to identify roles that require specific training, whether regulatory or essential to performing the job safely. All such training is recorded in the HSE training matrix.

In 2024, with the aim of achieving "Zero accidents, Zero incidents, Zero surprises," the Teréga SAS Group:

- allocated a €253K budget for HSE-related training;

- carried out 9 Safety Tour sessions;
- participated in 3 HSE clubs including the Teréga SAS Group and subcontractors (EIs), offering an opportunity for bilateral exchanges between the Teréga SAS Group and the EIs on topics such as incident feedback, implementation of best practices, and collective problem-solving, among more;
- organised a Prevention Day during which the Teréga SAS Group reviewed health and safety activity and set new goals for the following year;
- held a Safetyval event with: 355 Teréga SAS Group employees and 101 subcontractor representatives. The event cost the Teréga SAS Group €72K;
- revised its HSE requirements: 25 documents updated and 12 new ones created.

As part of its strategic safety approach, PARI 2035, safety in the workplace is a key area of focus and commitment. The safety of the men and women working on the Teréga SAS Group sites represents a collective responsibility. The actions implemented enable employees to work safely.

The deployment of these health and safety initiatives is managed by the Occupational Health and Safety Department within the D3SA.

Specific actions relating to training

The Teréga SAS Group has established a process for identifying training needs in various contexts. Employees may voluntarily request training based on their own development goals.

Additionally, every year in November and December, each department is asked to submit its training needs. Training requests can also be made throughout the year, subject to approval by the relevant manager.

In 2024, priority areas included:

- HSE risk prevention: roll-out of fire safety and security training (objectives: identifying types of security alarms, reacting appropriately in each situation, and managing stress);
- Securing core operational activities: job-specific training related to transport and storage operations;
- Supporting transformational challenges: e-learning on biomethane, CO₂, and hydrogen, as well as training related to the energy transition;
- Development of managerial skills: programmes to build managerial capabilities (e.g. the Magic programme, launched in 2018);
- Digital upskilling: training on new digital tools;
- Maintaining and enhancing the performance of support functions and employee employability: training in transversal skills, such as project-based work and English language learning;
- Increasing ownership of corporate policies and cross-functional programmes: training on CSR, the Integrated Management System (IMS), ethics, quality of work life (QWL), security, and data;

- Support for career transitions and promotion of apprenticeships: training as part of career development plans (including top-ups to the Personal Training Account [CPF]), and through the Teréga Pass scheme.

The Teréga SAS Group is committed to a long-term partnership with its employees. The Teréga SAS Group is committed to supporting lifelong learning and professional development to create a dynamic skills ecosystem and build a shared body of knowledge. Addressing training needs is essential given the evolving challenges the company faces. As a result, employees are equipped and prepared for the strategic challenges identified by the company.

The roll-out of training initiatives is managed by the Training Department within the Human Resources and Transformation Division (DRHT).

In 2024, The Teréga SAS Group invested €1 million in training expenditure.

Specific actions relating to social dialogue

The implementation of initiatives relating to social dialogue is overseen by the Director of Human Resources and Transformation and the Employee Relations Officer (see *ESRS SI - 3.2*).

4. METRICS AND TARGETS

4.1. TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

The Group's programmes and policies reflect its human-centred values, its innovative model, and its transformation initiatives. By establishing dedicated programmes and policies on these matters, the Teréga SAS Group reaffirms its commitment to placing people at the heart of its corporate strategy.

This vision brings together various actions under a common purpose: encouraging employees to take an active role in shaping their careers and enhancing their professional experience within the Teréga SAS Group.

The process of setting objectives in these areas is led by the Human Resources and Transformation Department (DRHT), based on historical results and the organisation's ability to achieve them. Certain objectives may also be discussed with recognised trade unions during negotiations and may be formalised in Collective Agreements, depending on the subject matter. This proposal is reviewed in collaboration with the Finance, Procurement, Legal and Sustainable Development Department (DFAJD) and is subject to final approval by the Comex.

Targets related to working conditions

The Teréga SAS Group strives to maintain a high level of employee engagement, as measured by the Energiz survey. The highlights include:

- alignment with the company's values and strategy;
- workplace relationships;
- work-life balance and overall well-being;
- recognition;
- autonomy and professional development;
- preservation of the strong reputation of the Teréga SAS Group among its clients.

The Teréga SAS Group has set a target to achieve an engagement score of 7.5 out of 10 or higher by 2025. In the most recent survey conducted in 2023, the employee engagement score was 7.4 out of 10. The next survey is scheduled for 2025.

Targets related to health and safety

The Teréga SAS Group has set the ambition of achieving "Zero accidents, Zero incidents, and Zero surprises." Nonetheless, each year, The Teréga SAS Group defines a specific safety objective, particularly through a target for the Lost Time Injury Frequency Rate (LTIFR).

Targets related to training

To support employees and regional stakeholders in co-building a more sustainable future:

- In terms of awareness-raising around the energy transition, the objective is to inform and/or train employees. For 2024, a target was set for 25% of training activities to address this topic. The actual result achieved was 35%.
- 97.5 % of employees participated in at least one training course (target: > 90 %).

The strategic directions regarding employment, skills, and training are set over multiple years.

Looking ahead, the Teréga SAS Group aims to allocate a significant proportion of its training budget to support the energy transition. With this in mind, 13% of the non-mandatory HSE training budget is earmarked for training related to the energy transition in the near term. By 2035, this target is expected to reach 30% of the training budget.

Targets related to social dialogue

The Teréga SAS Group continues to foster meaningful dialogue with employee representatives and staff through the organisation of various meetings with employee representatives and trade union delegates. Social dialogue is also sustained through a combination of regular and ad hoc consultations. Throughout the year, social dialogue also takes the form of negotiations between management and the trade union organisations.

4.2. CHARACTERISTICS OF THE UNDERTAKING'S EMPLOYEES

Registered workforce includes all employees under contract with the Teréga SAS Group. All employees are based in France.

Below is the breakdown of the Teréga SAS Group's workforce by gender:

WORKFORCE AS OF 31/12 ⁽¹⁾	2024	2023
Male	490	487
Female	192	192
Others	0	0
Undetermined	0	0
Total employees	682	679
% of employees in France	100%	100%

(1) Fixed-term staff (including apprentices, temporary replacements, and additional fixed-term contracts) and permanent employees present on the final day of December, i.e., 31/12. Employees who left on the last day of the month are counted in the workforce for that month and are removed on the first day of the following month (month m + 1).

Due to the non-seasonal nature of the company's activity, choosing to report a headcount as of 31 December of the year provides a representative view of the workforce.

This figure is included in the consolidated financial statements brochure of Teréga SAS as of 31 December 2024, in the "Workforce" section.

Below is the breakdown of permanent workforce by gender. The permanent workforce, as defined by the French Labour Code, refers to all full-time employees on permanent contracts (CDI), who were on the payroll for the entire year.

PERMANENT WORKFORCE FOR THE YEAR	2024
Male	431
Female	160
TOTAL	591

The Teréga SAS Group also employs staff on fixed-term contracts, including work-study trainees, apprentices, replacement fixed-term contracts, and fixed-term contracts due to increased workload.

Breakdown of fixed-term workforce by gender

TEMPORARY WORKFORCE AS OF 31/12 ⁽¹⁾	2024
Male	33
Female	18
TOTAL	51

The number of people who left the company includes resignations, dismissals, retirements, mutually agreed terminations, deaths during the calendar year, and the end of fixed-term contracts.

To calculate the turnover rate, this number was divided by the average annual headcount of the Teréga SAS Group (including fixed-term contracts).

Employee departures and staff turnover

THE TERÉGA SAS GROUP	2024
Number of employees who left the company	47
Turnover rate	7%

The breakdown of the workforce by working time (full-time/part-time) is shown below.

THE TERÉGA SAS GROUP: EMPLOYEES ⁽¹⁾	TOTAL	WOMEN	MEN
Number of full-time employees	654	182	472
Number of part-time employees	28	10	18

(1) Employees on permanent and fixed-term contracts as of 31/12/N.

4.3. CHARACTERISTICS OF NON-EMPLOYEE WORKERS IN THE UNDERTAKING'S OWN WORKFORCE

The Teréga SAS Group benefits from the progressive measurement allowance granted to organisations with fewer than 750 employees on this matter.

4.4. COLLECTIVE BARGAINING COVERAGE AND SOCIAL DIALOGUE

As the Teréga SAS Group operates exclusively within France, it is subject to the obligations of French labour law.

COUNTRY/ REGION	COVERAGE OF COLLECTIVE BARGAINING ^(a)	COVERAGE OF SOCIAL DIALOGUE ^(b)
France	100 %	100 %

(a) Percentage of employees covered by collective labour agreements.
(b) Percentage of employees represented by employee representatives.

4.5. TRAINING AND SKILLS DEVELOPMENT METRICS

The skills approach aims to maintain and develop the Teréga SAS Group's skills assets through training, in order to consolidate and enhance the various competencies related to the priorities of current and future activities (regulatory, HSE, core business, energy transition), as well as to develop other skills to support employee development and employability.

The identification of the training plan is based on a collection of needs from the business units, supported by a gap analysis between the skills currently held and those required or to be developed, alongside a forward-looking assessment anticipating the evolution of roles and skills.

Participation in performance and career development evaluations is monitored by contract type and gender.

THE TERÉGA SAS GROUP ⁽¹⁾	2024	PERMANENT CONTRACTS	FIXED-TERM CONTRACTS
% of employees who have participated in regular evaluations of their performance and career development	96%	98%	59%
% of women	92%	98%	41%
% of men	97%	98%	70%

(1) Employees present as of 31/12/N.

Number of training hours by employee category and by gender

THE TERÉGA SAS GROUP ⁽¹⁾	2024	MANAGERS	NON-MANAGERS
Average number of training hours	35	31	39
Average number of training hours: Men	38	32	43
Average number of training hours: Women	27	30	22

(1) Employees on permanent and fixed-term contracts as of 31/12/N.

4.6. HEALTH AND SAFETY METRICS

All employees of the Teréga SAS Group are covered by health and safety measures.

ISO 45001 certification attests to the performance of the company's Occupational Health and Safety Management System (OHSMS).

For many years, the Teréga SAS Group has tracked workplace accidents involving its employees, temporary staff, and those of contracting companies. This includes the calculation of the lost-time injury rate, which helps assess the effectiveness of the health and safety measures described previously.

SAFETY INDICATORS	2024	2023
% of personnel covered by the health and safety management system	100%	100%
Number of fatalities among the Teréga SAS Group staff due to work-related accidents or occupational illnesses	0	0
Lost-time injury rate of the Teréga SAS Group ⁽¹⁾	0.0	0.0
Lost-time injury rate of Contracting Companies (EIs) + EI temporary staff ^{(1) (2)}	1.7	7.0
Combined lost-time injury rate of the Teréga SAS Group + the Teréga SAS Group temporary staff + EIs + EI temporary staff ^{(1) (2)}	0.6	2.9
Combined lost-time injury rate of the Teréga SAS Group + the Teréga SAS Group temporary staff	0	0
Number of work-related accidents of EIs + EI temporary staff ⁽²⁾	1	5
Number of occupational illness cases among the Teréga SAS Group employees ⁽³⁾	1	0

(1) The lost-time injury rate is the number of lost-time work accidents per million hours worked over a 12-month period.

(2) Figures provided in addition to the Teréga SAS Group's mandatory reporting indicators.

(3) Number of occupational illnesses declared and recognised by the Social Security system.

Number of lost workdays among Teréga SAS Group employees

NUMBER OF LOST WORKDAYS:	2024
due to workplace accidents	0
due to fatalities from work-related accidents	0
due to work-related health issues	262

No fatalities have been reported as a result of work-related accidents or work-related health issues.

The Teréga SAS Group classifies as occupational accidents those occurring during business travel (referred to as "on-duty travel accidents").

However, the Teréga SAS Group does not count accidents occurring during private commuting between the home and the workplace (referred to as "commuting accidents") as occupational accidents. That said, such commuting accidents

are reported by the Teréga SAS Group to the Social Security system to ensure, where applicable, that employees can receive medical care free of charge.

The Teréga SAS Group ensures full traceability of these incidents. Both on-duty travel accidents and commuting accidents are recorded within the reporting scope of the Teréga SAS Group and its contracting companies (EIs). The EIs are responsible for providing data on commuting accidents.

To date, the Group has not recorded any recognised cases linked to business travel.

As of 31 December 2024, the Teréga SAS Group recorded the following:

- 2 on-duty travel accidents (both requiring only first aid);
- 10 commuting accidents, broken down as follows:
 - > 6 involving Teréga SA employees (4 requiring only first aid, 2 resulting in lost time);
 - > 1 involving a Teréga SAS Group employee (first aid only);
 - > 3 involving contracting company (EI) staff: (1 fatality, 1 resulting in lost time, 1 without lost time).

4.7. WORK-LIFE BALANCE METRICS

All employees of the Teréga SAS Group are entitled to family leave, including maternity, paternity, parental, caregiver leave, authorised absence for a child with a disability, and leave for the hospitalisation of a spouse or child.

Percentage of employees on permanent (CDI) and fixed-term (CDD) contracts eligible for and who have taken family leave, by gender

THE TERÉGA SAS GROUP	2024
% of employees entitled to family leave	100%
% of employees who have taken family leave	8%
% of women	2.5%
% of men	5.7%

4.8. INCIDENTS, COMPLAINTS AND SEVERE HUMAN RIGHTS IMPACTS

No cases of discrimination, complaints, or serious human rights incidents affecting company personnel were reported in 2024, according to the established information reporting processes.

The Teréga SAS Group has a whistle-blowing system in place (see *ESRS G1 - 3.2.2*). Moreover, any Teréga SA employee may contact their line manager, who is responsible for forwarding shared concerns to the Human Resources and Talent Department (DRHT).

1. INTRODUCTION

As a regional and national energy player, the Teréga SAS Group has been developing and operating gas transport and storage infrastructure for 80 years to ensure universal access to energy through a network that is increasingly reliable, efficient, and environmentally integrated. As part of its new corporate plan, the Teréga SAS Group also aims to transform its network into a decarbonised regional hub, by supporting the emergence of local biomethane production and actively working to develop innovative solutions that promote the use of hydrogen and CO₂ treatment.

In line with its double materiality assessment (see ESRS 2 - 4.1), Teréga SA has analysed both the actual and potential impacts of its gas infrastructure development activities – and those of its value chain – on communities, as well as the business risks directly arising from these impacts.

During this analysis, one material impact and one material risk were identified:

	SUSTAINABILITY ISSUES	IROs	DESCRIPTION OF IMPACT, RISK, OR OPPORTUNITY	DESCRIPTION
SOCIAL	Local communities (Teréga)	Impact (-)	Non-acceptance of Teréga projects by local residents	Concerns, stress, resistance, and non-acceptance of Teréga's projects by local residents and their representatives, due to the nature of the projects implemented or associated negative perceptions (e.g. fears of visual, traffic-related, or odour-related disturbances).
		Risks	Failure of dialogue and poor consideration of local communities by Teréga	Deterioration of Teréga's reputation and loss of stakeholder trust due to inadequate consideration of local communities and ineffective dialogue with them (acceptability).

Given the potential impacts that infrastructure development projects can have on local communities living near the facilities, the Teréga SAS Group recognises that their success depends on building strong relationships and maintaining regular communication with local stakeholders, including local authorities, agricultural chambers, winegrowers' unions, elected officials, residents, and other public environmental protection agencies.

2. STRATEGY AND INTEGRATION OF LOCAL COMMUNITY INTERESTS

The integration of the perspectives and interests of local communities and stakeholders is deeply embedded in the Teréga SAS Group's infrastructure development and operational model (see ESRS 2 - 3.2).

More specifically, the Teréga SAS Group ensures that each of its projects adheres to principles guiding a responsible approach towards local communities, both for development projects and assets in operation.

Entrusted with a public service mission, the Teréga SAS Group's investment strategy is primarily driven by various considerations, all focused on serving the public interest. These considerations notably include:

- Taking into account new local dynamics in energy consumption and the capacity for renewable gas production to serve underserved areas (so-called regional network reinforcement investments);

- Maintaining the safety and reliability of gas facilities to comply with regulatory changes and stakeholder requirements (so-called maintenance investments);
- Developing energy exchanges at the European level to respond to market evolution and the territory's supply security needs (so-called major transit investments).

Furthermore, to earn the trust of communities and secure acceptance of its projects, the Teréga SAS Group places territorial dialogue at the heart of its development strategy and commits to upholding a set of ethical values and principles in business conduct. Accordingly, the Teréga SAS Group explicitly refers to the United Nations Universal Declaration of Human Rights in its Code of Ethics, and it pays particular attention, as fundamental rights, to environmental protection (physical, natural, and human) and respect for the land and property rights of communities.

The mechanisms for dialogue with communities regarding development projects within the scope of the Teréga SAS Group's historic transport and storage activities and those used to ensure respect for fundamental rights are described in the following sections.

Fully committed to the energy transition of territorial ecosystems, the Teréga SAS Group draws on this expertise and historical know-how and follows the same processes in terms of studies, preparation of authorisation requests, consultation, and public dialogue to:

- adapt existing infrastructure to emerging needs in decarbonised energy (biomethane, low-carbon hydrogen, CO₂);
- develop innovative solutions for new gases;
- support local stakeholders through educational initiatives and advice for the development of decarbonised industrial and territorial ecosystems, and contribute to the acceptance of projects involving the production, use of renewable gases, and deployment of new infrastructure.

3. IMPACT, RISK AND OPPORTUNITY MANAGEMENT

3.1. POLICY ON COMMUNITY ACCEPTANCE OF PROJECTS

Convinced that the success of its projects relies on strong relationships and regular dialogue with communities, the Teréga SAS Group places territorial dialogue at the core of its strategy for developing gas transport and storage infrastructure. From the study phase onwards, the company engages in organised discussions with all relevant local stakeholders – such as local authorities, agricultural chambers, winegrowers' unions, water authorities, elected officials, and residents – to better understand, anticipate, and address issues related to urban planning, land use, safety, environment, and the protection of natural areas raised by gas infrastructure construction projects.

In terms of responsibility, each Project Manager is tasked with ensuring that this dialogue takes place throughout the project lifecycle and results in the delivery of infrastructure under the best possible conditions.

To successfully carry out their project, the Project Manager is provided with allocated resources – both human and financial – that are determined in advance in accordance with the Teréga SAS Group's established processes and organisational principles.

The financial resources planned within project budgets notably include amounts corresponding to easements for installing gas infrastructure on private land – based on rates established by the tax authorities or agricultural unions –, as well as compensation for damages caused by construction works during project execution (see *ESRS S3 - 3.2.2 and ESRS S3 - 3.2.3*).

3.2. PROCESSES AND ACTIONS FOR SECURING COMMUNITY ACCEPTANCE OF PROJECTS

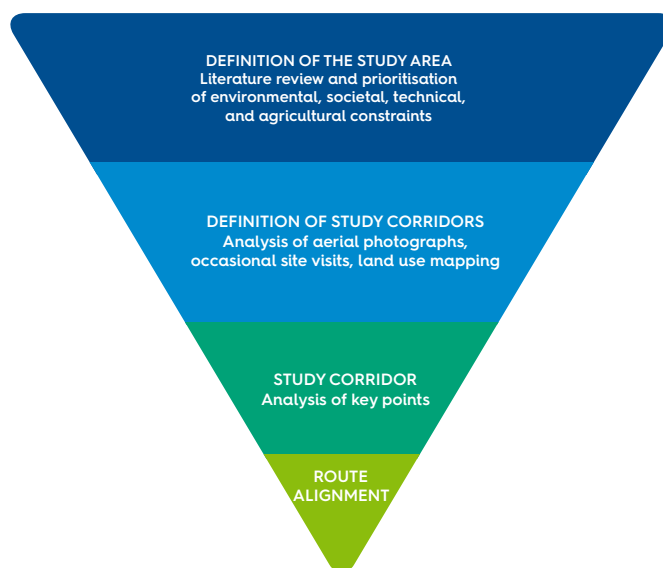
3.2.1. Request for Construction and Operation Authorisation (DACE)

Construction and/or renewal projects of gas infrastructure, where pressure and length exceed thresholds set by the Environmental Code, require a DACE dossier to be submitted to the Prefect of the relevant department.

The preparation of this dossier involves extensive discussions with administrations representing the interests of various stakeholders potentially impacted by the project. These discussions aim to identify construction solutions with the least possible impact. The granting of the Construction and Operation Authorisation thus serves as a guarantee of trust and acceptance of the projects by the local communities concerned.

For information, the DACE dossier systematically includes the following key documents:

- A Hazard Study (EDD), which identifies and analyses the risks the infrastructure may pose to the population and its environment, as well as risks to the infrastructure itself considering its surroundings. This study outlines the measures that will be implemented to reduce the likelihood and effects of these risks;
- An environmental assessment presenting the baseline state of the physical, natural, and human environment of the proposed project, which includes the selection of the route with the least impact following the implementation of the MERCI method (Monitor, Avoid, Reduce, and Offset Impacts) to optimise the project within its territory.



3.2.2. Dialogue process with impacted communities upstream of projects

Dialogue with elected officials and administrative services

To prepare the DACE dossier, the Teréga SAS Group, assisted by external consultants, initiates early contact with elected officials and the relevant administrative services involved in the project. The objective is to provide these bodies with preliminary information about the project and to gather all necessary data and constraints to identify the route with the least impact compared to the proposed route, establish the list of public land requisitions, and draft the environmental impact and hazard studies.

Public information meetings

Additionally, the Teréga SAS Group may organise public information or consultation meetings at its own initiative. These meetings occur once per project and bring together regional, departmental, and municipal elected officials, local stakeholders, operators, and landowners whose properties may be impacted or crossed by the project route. Following these consultations, and with the information gathered from dialogue with officials and the public, the DACE dossier is examined by various administrations including chambers of agriculture, chambers of commerce and trades, local councils, civil services, the National Institute of Origin and Quality (INAO), and in some cases military authorities, during the so-called administrative review phase.

Public inquiry procedure

Where the construction or operation of gas installations pose significant risks or inconveniences regarding neighbourhood amenities, health, safety, nature, or landscape protection, the Environmental Code (*Article L. 555-1*) requires a public inquiry procedure. This may be initiated by the Prefect's decision. The inquiry is conducted by an investigating commissioner appointed by the administrative court, who makes the inquiry dossier and a register for public comments available to the public.

This public inquiry process complies with requirements set out notably by the 1998 Aarhus Convention, signed by 39 States, which aims to promote public participation in environmental decision-making, improve the quality of public decisions, and enhance their democratic legitimacy.

At the end of the inquiry, the commissioner compiles a report summarising public opinions, questions, and their own findings. The Teréga SAS Group, as project owner, must consider this report and respond to the issues raised in a formal memorandum.

In 2024, the projects of the Teréga SAS Group that are subject to public inquiry received no adverse opinions from commissioners nor public observations requiring modifications to the projects.

Establishment of amicable easement agreements

The negotiation of amicable easement agreements is essential for the installation of gas transport and storage infrastructure on public or private land. These agreements constitute the Teréga SAS Group's legal rights to occupy the land crossed, whether publicly or privately owned.

This crucial stage, overseen by the Project Manager, is carried out with the necessary diplomacy and rigour to achieve the Teréga SAS Group's objectives:

- accurate identification of legal ownership;
- respect of the Teréga SAS Group's rights and obligations, ensuring official processes and contractual documents are beyond reproach;
- securing the maximum number of amicable easement agreements without resorting to legal procedures, negotiating in a spirit of fairness and long-term respect;
- achieving a technically feasible and low-impact route.

To this end, the Teréga SAS Group establishes a compensation scale for landowners by consulting the France Domaine Service of the tax administration in the relevant departments or by reaching agreements with authorised agricultural bodies such as:

- Chambers of Agriculture;
- Representative organisations of agricultural and forestry unions.

Compensation for easements is based on the market value of agricultural land crossed and is proportionate to the damage caused by the right to install infrastructure.

The negotiation phase, conducted by a land consultancy provider on behalf of the Teréga SAS Group, requires meticulousness and local knowledge.

During negotiations, route adjustments may be made to accommodate land or crop constraints of impacted owners or operators. Throughout the negotiation period, the land consultant maintains regular contact with Teréga SA's Project Manager to secure approval for every price and route compromise.

To date, the quality of dialogue with landowners impacted by new infrastructure routes has resulted in an average amicable easement agreement signing rate of 99% (against a target of 95%), fostering positive relationships for pipeline operation throughout their lifecycle.

Where amicable agreements cannot be reached, the Teréga SAS Group may rely on legal easements prescribed by the Prefect of the relevant department. The process for obtaining legal easements also involves a public inquiry phase, allowing consideration of observations from local communities potentially impacted by the project. These legal easements primarily address cases of "ownerless property" or "unregularised inheritances."

3.2.3. Dialogue process with impacted communities and impact remediation during construction phase

Status assessments before and after works

Beyond the communication channels offered during public information meetings or the public inquiry process – including registers for public comments allowing questions or suggestions – the Teréga SAS Group also pays particular attention to impacts that construction works may have on private property.

Teréga SA therefore conducts a status assessment both before and after the works.

Prior to the works, the land consultancy provider appointed by the Teréga SAS Group individually invites each landowner and/or operator impacted by the installation works by letter to attend a joint pre-work site inspection. In the presence of all concerned parties, the land consultant documents and records on a dedicated form all elements within the temporary occupation zone, including the nature of crops, fences, OGE survey markers (OGE: Ordre des Géomètres Experts), buildings, infrastructures, drains, pipes, cables, etc., along with any information provided by the operator that may assist the smooth execution of the works and damage estimation.

After the works, the land consultant, referencing the pre-work assessment, records all damage resulting from the works and machinery passage.

The contractor responsible for the works issues a compliance certificate to the Teréga SAS Group confirming that restoration meets project requirements. A post-work site inspection report certifying the satisfactory completion of restoration is then signed in the presence of the landowner, the operator (e.g., farmer, forester, grower), and the Teréga SAS Group.

Compensation payments corresponding to damages are then made to the landowner within a maximum average timeframe of thirty days.

The number of refusals to sign post-work site inspections remains very marginal, demonstrating the effectiveness of Teréga SA's dialogue processes and remediation actions with landowners and operators whose parcels are crossed by the works.

However, in the event of any suspected serious violation of human rights, fundamental freedoms, health, or safety, the concerned stakeholder may use the alert system established by the Teréga SAS Group (see *ESRS G1 - 3.2.2.2*). To date, the Teréga SAS Group has never received any reports concerning potential serious incidents related to human rights.

Contributions to local development

Beyond actions aimed at remedying, mitigating, or repairing negative impacts that project implementation may have on communities, the Teréga SAS Group also contributes to the

social and economic vitality of the local communities that it traverses. This is achieved through close collaboration with numerous local and regional contractors specialising in various fields: technical studies, engineering, piping, boilermaking, civil engineering, information systems, and more.

These positive externalities, encompassing the efforts to maintain constructive dialogue with populations living near installations, as well as the quality of the work performed, enable the Teréga SAS Group to manage its reputational risk and maintain a strong level of trust among its stakeholders.

4. INDICATORS AND TARGETS CONNECTED TO THE MANAGEMENT OF IMPACTS AND RISKS

Considering the level of acceptance of its projects by stakeholders, Teréga SA – apart from the indicator related to the rate of amicable easement agreement signatures (see *ESRS S3 - 3.2.2*) – does not set additional targets with deadlines to guide and measure its progress in mitigating potential negative impacts and risks associated with its projects.

1. INTRODUCTION

The Teréga SAS Group is a public-interest company with a public service obligation. It must meet the essential needs of society by ensuring, for its clients and end consumers and/or users, the security of natural gas supply, guaranteeing and maintaining continuity of public service and consistently delivering operational excellence. The Teréga SAS Group recognises that the esteem of its clients and end consumers and/or users is of paramount importance to the success of its activities.

2. STRATEGY

2.1. INTERESTS AND VIEWS OF STAKEHOLDERS

The strategy and business model of the Teréga SAS Group are primarily based on providing services to other companies (Business to Business, B2B) through its two subsidiaries.

Teréga SA subsidiary

The Teréga SA strategy and business model are primarily based on providing services to other companies (Business to Business, B2B), namely the transportation and storage of gas – Teréga SA does not own the gas molecules transported and stored.

To fulfil its public service mission and ensure the proper functioning of the network, Teréga SA operates a flow management service that balances the system.

For Teréga SA, end users are defined as individuals or legal entities consuming gas for their own use, purchased from a gas supplier. Consumption covers industrial, domestic (residential), and tertiary uses.

Under a decree dated 7 April 2022 concerning the curtailment of natural gas consumption, an annual list of end users who cannot be subject to significant consumption reductions is established by the prefect. Among these consumers are those performing a public interest mission related to essential national needs, notably in security, defence, health, or providing heating services for sites carrying out such missions. For these particular consumers, no rapid gas consumption reduction measures are possible in the event of a supply crisis. These consumers benefit from a crisis management mechanism implemented by Teréga SA to guarantee the level of protection recognised by regulations.

Teréga SA considers its clients for gas transportation and storage services to be the supplier shippers and directly connected industrial users – that is, any natural or legal person delivering gas to Teréga SA at any point on the transmission network, or receiving gas delivered by Teréga SA at any such point. Teréga SA manages these types of consumers identically.

Teréga Solutions subsidiary

Teréga Solutions aims to accelerate the energy transition of regional ecosystems, building on the related activities of Teréga SA.

Four Business Units:

Hydrogen Business Unit (H₂ BU)

- Responsible for deploying support solutions for all stakeholders across the hydrogen value chain.

For the H₂ BU, end users are defined as any natural or legal person consuming hydrogen (or electricity generated by a fuel cell) for their own use, purchased from a low-carbon hydrogen supplier-distributor. Consumption covers the following uses: mobility, industrial applications, and events.

The H₂ BU considers as consumers of its development, distribution, surface transport and storage services the hydrogen suppliers, as well as industrial companies, local authorities, or event organisers – that is, any natural or legal person delivering hydrogen to the H₂ BU or receiving hydrogen distributed by the H₂ BU via pipeline, truck, or refuelling station.

Biomethane Business Unit (BMG BU)

- Responsible for providing solutions to valorise agricultural waste within the biomethane sector.

For the BMG BU, end consumers are farmers or farmer cooperatives, and final users are all gas consumers (both individual and industrial).

Concerning the *Multi-Energies and Digital Business Unit (MED BU)* and the *CO₂ Business Unit (CO₂ BU)*, their service offerings are consumed by legal entities, without the existence of an “end user” (natural person) as defined under the S4 standard.

Currently, Teréga Solutions’ infrastructure projects are primarily in the study phase.

This subsidiary does not operate any continuously running infrastructure.

Due to the principle of separation between energy transport and production activities, Teréga Solutions is not permitted to own production units directly, such as biomethane units, for example. On this point, Teréga Solutions offers an innovative solution involving the rental of methanisation units to farmers who operate them: a first unit, Strawberry, was commissioned in the Berry region in June 2024.

In addition, Teréga Solutions may provide services involving the temporary use of hydrogen installations, which require safety and hazard reviews from the design phase, as well as the implementation of emergency measures or intervention by emergency services in the event of an incident or accident.

The Teréga SAS Group fully acknowledges its responsibilities concerning safety, security, cybersecurity, and risk management related to its activities and gas transport and storage infrastructure. Safety is, first and foremost, a moral duty and a regulatory responsibility to preserve the physical and moral integrity of individuals (employees, clients, consumers, and users) throughout their activities. Safety also aims to protect the security of property, both tangible, such as sites and infrastructure, and intangible, such as IT systems. It helps ensure business continuity and strengthens the company's resilience concerning its important missions.

Moreover, safety is a prerequisite within Teréga SA's commitments to health, safety, security, and sustainable development, creating long-term value.

In its safety approach, the Teréga SAS Group prioritises two essential principles: compliance with safety rules (the more rules are followed, the higher the safety level) and safety initiative – that is, at every level of the company, the reflex to consider safety as a criterion in all decisions.

To guarantee maximum safety, the Teréga SAS Group particularly focuses on risk analysis, anticipation, and prioritisation.

2.2. MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH THE STRATEGY AND BUSINESS MODEL

Due to its activity, the industrial safety of its infrastructures is a major and ongoing priority for the Teréga SAS Group. By establishing this priority as the foundation of its strategy, the Teréga SAS Group has identified and confirmed the materiality of three key impacts and risks:

	SUSTAINABILITY ISSUES	IROs	DESCRIPTION OF IMPACT, RISK, OR OPPORTUNITY	DESCRIPTION
SOCIAL	Infrastructure security	Impact (-)	Infrastructure failure or operational accident on Teréga's network	Failure of infrastructures (including information systems) or operational accidents that may affect the health (pollution) and/or safety of third parties (distributors, end clients, local residents, etc.).
		Impact (-)	Temporary energy insecurity for end users in the event of infrastructure failure	Temporary energy insecurity for end users in the event of non-compliance by Teréga with public service obligations or infrastructure safety requirements (accident, network or infrastructure unavailability, etc.).
		Risks	Operational and financial consequences resulting from a failure in infrastructure safety	Disruption of supply and associated economic losses (including penalties and costs of service restoration and repairs) due to a failure in infrastructure safety.

These impacts and risks are material given the Teréga SAS Group's economic model dependence on gas consumption and usage in France.

Consequently, the Teréga SAS Group has implemented a Business Continuity Plan (BCP), which outlines the strategy and measures in place to ensure the resumption and

continuity of its activities following a disaster or an event severely disrupting its normal operations. This plan is updated annually through a dedicated campaign, involving all relevant stakeholders to ensure that the strategies and the continuity mechanisms remain fully operational.

3. IMPACTS, RISKS AND OPPORTUNITIES MANAGEMENT

3.1. POLICIES RELATING TO CONSUMERS AND END-USERS

At the Teréga SAS Group level, the PARI 2035 programme, the Major Accident Prevention Policy (PPAM), and the commercial policies set out the company's commitments regarding risk management, incident and major accident prevention, as well as safety control at every workstation. These policies address the impacts and risks identified during the double materiality assessment (see ESRS 2 – 4.1).

The PARI 2035 programme

The PARI 2035 programme sets out the Teréga SAS Group position and commitments in the areas of occupational health and safety, industrial safety, environmental protection and energy efficiency, security and performance, and sustainable development. This programme is led by the Director of the D3SA division and approved by the Comex.

It is set within a context of energy transition and extensive digitalisation, in which the sector is evolving, jobs are changing with the emergence of new activities (such as new gases and smart grids), and new risks are arising. Safety has thus become multi-faceted.

For this reason, the Teréga SAS Group has defined three key pillars for risk management:

- **Workplace safety:** Protecting the physical and mental integrity of its employees and external contractors throughout their activities across all its sites and construction projects (see ESRS S1);
- **Industrial safety:** Protecting its infrastructure from incidents, accidents, or natural disasters.

A safety management system certified to ISO 45001 (Occupational Health & Safety) has been implemented to provide structure and methodology, with the aim of relying on a clear and simplified reference framework to achieve the goals Zero accidents "Zero incidents" (on infrastructure).

- **Security and cybersecurity:** Ensuring the integrity of physical infrastructure and information systems to protect the Teréga SAS Group from malicious acts. To support this approach, the Teréga SAS Group has recently rolled out the process "Conducting Teréga Group activities while managing security and cybersecurity risks," providing an overarching view of the system.

The Teréga SAS Group is committed to continuously improving its consideration of security and cybersecurity risks in order to meet a clear goal: zero surprises.

Major Accident Prevention Policy (PPAM)

The PPAM is based on:

- The analysis of technological risks (EDD) and their consequences, enabling risk reduction measures to be implemented at the source;
- Design grounded in technical standards using the best available technologies; Control of operations, risk management measures and emergency response plans;
- Participation in urban planning control measures through the Technological Risk Prevention Plan (PPRT);
- Change management and maintenance of its facilities, incorporating the full lifecycle;
- Consideration of internal and external feedback (REX) to extract lessons learned;
- Implementation of prioritised action plans to reduce risks to an acceptable level;
- The organisation of appropriate human, material and financial resources to ensure the quality of services provided to stakeholders;
- The development of competencies and a strong safety culture through regular training of internal staff and awareness-raising for external contractors;
- Active monitoring to improve safety performance levels;
- The implementation of procedures to ensure overall operational quality, relying on internationally recognised management systems;
- Regular evaluation of system performance to support continuous optimisation and improvement.

Commercial policies

The commercial policies are aimed at ensuring the quality and reliability of the products and services provided. As such, Teréga SAS Group employees are required to:

- Comply with internal procedures related to customer relationship management;
- Adhere to contractual terms and, within their scope, provide transparent and non-discriminatory services and products that meet clients' expectations and reasonable needs;
- Provide accurate and comprehensive information about products and services, and maintain clarity in publications and other communications, enabling clients to make informed decisions.

The Teréga SAS Group complies with the UN Guiding Principles on Business and Human Rights in the conduct of its commercial activities. The company implements transparent and responsible practices concerning human rights throughout its operational cycle – from project design through to execution –, combating unlawful acts and, more broadly, ensuring compliance with relevant laws and regulations.

3.2. PROCESSES FOR ENGAGING WITH CONSUMERS AND END-USERS ABOUT IMPACTS

The Teréga SAS Group has established an agile organisation firmly focused on performance, with the aim of ensuring the highest possible quality of service for its consumers and end users, while maintaining full safety.

The dialogue process implemented by the Teréga SAS Group with its consumers – namely, shipping clients and industrial users – is primarily conducted by employees from the Commercial and Gas System Regulation Division (DCRSG) and the Operations, Studies and Projects Division (DOEP) for operational field activities. This dialogue is essential for maintaining strong commercial relationships, listening to customer needs, identifying their expectations, and honouring commitments. The responsibility for this dialogue process lies with the President and CEO of the Teréga SAS Group.

The dialogue established with end users follows a bottom-up approach. These users can contact the Teréga SAS Group in the event of suspected or confirmed incidents and/or accidents involving its infrastructure.

With regard to transport and storage activities, consumers and end users may contact:

- By telephone, using two dedicated emergency toll-free numbers that are available 24/7, under the responsibility of the technicians operating in the field:
 - Transport: +33 (0)800 028 800

This number is displayed on the instruction plates of the markers and beacons used to locate pipelines, as well as on the fencing surrounding ancillary installations (delivery stations, sectionalising stations, and compression stations).

- Storage: +33 (0)800 291 023

This number is displayed on the fencing and gates of the storage sites and well clusters.

- Users may also contact emergency services, who will assess the situation upon arrival and get in touch with the technical teams if necessary.

3.3. PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR CONSUMERS AND END-USERS TO RAISE CONCERNS

The Teréga SAS Group is involved in providing information and preventive communication to the populations living near its sites (see *ESRS S3*).

The processes aimed at remedying material impacts in the event of an accident are as follows:

- activation of the crisis unit (see *ESRS S4 - 3.4*);
- intervention on the Teréga SAS Group's network to identify the problem and ensure the safety of people and property in the vicinity of the incident and/or accident.

Safety operations on a damaged pipeline may involve, depending on the circumstances:

- isolating the impacted section and venting the natural gas contained within it at the sectioning stations;
- initiating the repair process to restore connections (see *ESRS S4 - 3.4*);
- involvement of the Legal and Insurance Department in coordination with the insurance companies.

The Teréga SAS Group also has a comprehensive insurance programme that covers the Teréga SAS Group against any damage that could be caused to third parties, in order to remedy material negative impacts.

The industrial multi-risk policy includes a "Neighbours and Third-Party Claims" section. This section covers the Teréga SAS Group's liabilities towards third parties, provided they result from a loss covered by the policy.

The general Civil Liability (CL) insurance policy covers the financial consequences of the Teréga SAS Group's liability in all cases where it may be held responsible for damage, loss and/or injury caused to third parties as a result of its activities, products, works or services.

The Environmental Liability (EL) insurance policy covers both the Teréga SAS Group's civil liability for environmental damage (bodily, material or immaterial harm caused to a third party) and its environmental liability (environmental damage arising from its activities).

3.4. TAKING ACTION ON MATERIAL IMPACTS ON CONSUMERS AND END-USERS, AND EFFECTIVENESS OF THOSE ACTIONS

Through its subsidiary Teréga SA, the Teréga SAS Group carries out actions in both the transport and storage sectors to manage material impacts and risks (see *ESRS S4 - 2.2*).

Specific actions in the transport sector

In the field of gas transport via pipelines, accidental damage caused by third parties during works represents the most significant industrial risk. Teréga SA requires contractors to submit work declarations and also implements a robust prevention policy, which includes various specific protective measures and a safety management system.

The entire gas transport network is interconnected with adjacent transport networks as well as natural gas production and underground storage sites. It is optimised with six compression stations. Depending on their capacity, some of these facilities are classified as Regulated Facilities for Environmental Protection (ICPE) and require authorisation. Furthermore, the transport pipelines are subject to regulations concerning the safety of pipelines transporting combustible gases, liquid or liquefied hydrocarbons, and so-called "multi-fluid" chemical products. This regulatory framework specifies the technical requirements imposed on gas transport infrastructures: pipelines and ancillary facilities (compression stations, sectionalising stations, delivery

stations). Thus, the safety of transport infrastructures is an absolute priority. It is even considered a core value and a permanent requirement.

In terms of industrial safety, Teréga SA continually strengthens its risk management processes by applying recognised standards and developing new procedures adapted to evolving constraints and requirements. This concerns industrial safety engineering, natural risks, equipment maintenance, crisis management, and more. Risk control primarily involves identification and evaluation actions. This approach is applied from the design phase through to operation of the facilities. This identification and/or evaluation takes place within the framework of hazard studies (EDD):

- either when projects involve construction or modification of pipelines or ancillary installations. They define measures adopted to reduce the likelihood and effects of accidents. They also specify compensatory measures taken during design and operational phases. These studies are submitted to the supervisory authority for approval before any project launch;
- or every five years, a generic EDD is conducted over the entire network, including ancillary facilities. Submitted to the administration, it presents risks and the prevention and protection measures implemented. It is accompanied by a multi-year programme of compensatory measures to enhance the safety of infrastructures, especially in areas that have seen new urban developments. The latest study was submitted in September 2024 and is currently under review. The previous 2019 study received a report of acceptability from the DREAL, the regional coordinating authority.

Accident prevention and response actions are organised through a Safety Management System (SGS) in the transport sector, designed to meet regulatory requirements. The SGS encompasses eight main activities:

- organisation and training;
- identification and assessment of risks related to accidental events;
- operational control;
- management of changes;
- emergency management;
- management of feedback (lessons learned);
- specific monitoring of critical points;
- SGS control, audits, and management reviews.

Through its internal Surveillance and Maintenance Plan (PSM), Teréga SA also implements inspection and modernisation actions on infrastructures to ensure the operation of gas transport facilities under optimal safety conditions.

Regular exercises are conducted within the framework of Safety and Intervention Plans (PSI), in coordination with emergency services, to remain prepared for any possible accident. These plans define:

- the organisation;
- intervention methods;
- resources to be deployed in case of an accident;
- coordination with emergency services.

An accident prevention policy is implemented with specific protection measures in compliance with regulations:

- beacons and markers for network marking and physical identification of the pipeline grid. They are subject to regular aerial and pedestrian monitoring;
- pipe thickness often exceeding regulatory requirements in rural areas, to anticipate urban development, and in zones with frequent works;
- burial depth of pipelines greater than the regulatory minimum since 2000;
- additional pipeline protections at road, path, river, and stream crossings;
- safety management including consideration of the human factor.

Moreover, Teréga SA raises awareness among construction and public works professionals, local residents, and farmers on the importance of declaring works to avoid accidents. Approximately 26,000 awareness letters are sent annually to landowners impacted by easements. Each year, Teréga SA processes over 20,000 Work Requests (DT) and Declarations of Intent to Commence Work (DICT). The Teréga SA natural gas transport network is monitored remotely and continuously (24/7).

In the event of a major accident, an operational crisis system is deployed. It includes an operational device and a Crisis Management Cell (CMC).

The role of the CMC is to:

- anticipate the course of ongoing operations to manage and resolve the crisis as quickly as possible;
- handle all communication and information transmission aspects.

To manage the crisis cell effectively, Teréga SA has established an emergency management plan under the responsibility of the President and CEO or their representative. This plan details the organisation of the crisis cell and the mission statements of its members. Alerts can be triggered by third parties, firefighters, or the national gendarmerie. They may come directly from teletransmitted information systems.

The physical dispatching centre centralises all emergency information related to the natural gas transport network and triggers Teréga SA's internal alert if necessary.

Teréga SA has implemented procedures for emergency management. The Security Department is responsible for defining, facilitating, and ensuring the proper application of the crisis management and business continuity process.

As previously mentioned, a PSI exists for each of the 15 departments served by Teréga SA (Ariège, Aude, Aveyron, Cantal, Haute-Garonne, Gers, Gironde, Landes, Lot, Lot-et-Garonne, Pyrénées-Atlantiques, Hautes-Pyrénées, Pyrénées-Orientales, Tarn, and Tarn-et-Garonne). Where possible, these 15 PSIs are exercised every three years in rotation, although the environmental code has extended the frequency to five years.

These procedures are integrated into Teréga SA's SGS notably through the administration of emergency plans, governed by the "Emergency Plans Administration" procedure. This procedure specifies the coordination of Teréga SA's various emergency plans and regulates minimum content, distribution, periodic verification, and testing through exercises.

The crisis management plan and its general provisions clarify the organisation between the accident site and the CMC, defining communication principles and the roles of each CMC member.

Even during the health crisis, the CMC is regularly mobilised, either for exercises or training workshops aimed at helping potential crisis managers become familiar with available tools.

This organisation extends across Teréga SA's network and with external emergency services according to the following procedures:

- PSI for each department;
- "Teréga SA Information Procedure for Fire and Rescue Services (SDIS) and Intervention and Rescue Centres (CIS)", defining meeting methods and objectives with fire-fighters and agreements with SDIS. Teréga SA currently has 15 signed agreements with SDIS in its operational zone;
- "Conduct to Adopt in Case of an Accident with a Leak on Teréga SA Network", detailing actions in the event of a leak accident, in line with regulatory PSIs;
- "DREAL Information - Transport Activity" for events occurring on the Teréga SA network;
- "Intervention on the Operating Network - Repair of Defects", outlining repair methods for urgent and non-urgent pipeline interventions on the Teréga SA network.

Internally, crisis management training is systematically provided to new technicians assigned to on-call duties. This training fosters field interactions during crises between Teréga SA's local representatives and stakeholders (emergency services, public security, elected officials, residents, and journalists).

Externally, prefectures (on-call staff from the Interministerial Defence and Civil Protection Service, SIDPC) and SDIS officers receive awareness sessions on gas risks and Teréga SA's crisis organisation.

The physical dispatching centre centralises all emergency information concerning the network and triggers internal alerts as needed. It also receives all calls to the emergency number displayed on pipeline route markers.

Common crisis management procedures between Teréga SA and GRDF are summarised in the document "Crisis Management Procedures with Public Distributors (GRDF/ELD)". A convention between Teréga SA and GRDF is established and renewed periodically.

The internal resources of Teréga SA consist of equipment necessary for emergency intervention and personnel organised to respond at any time to various accidents that may occur on the natural gas transport network.

Specific actions in the storage sector

Underground natural gas storage facilities represent another major priority for industrial risk prevention. The operation of the two underground storage sites, Lussagnet and Izaute, naturally involves responsibilities including protection, prevention, risk control, and monitoring, within a framework of continuous improvement.

Risk management for underground gas storage facilities begins primarily with prevention actions.

Teréga SA starts with risk identification and assessment within the EDD framework. This includes descriptions of various potential accident scenarios, evaluation of consequences, and justification of corrective measures. In accordance with Seveso regulations, EDDs are updated at least every five years. Equipment monitoring, maintenance, and surveillance is performed. This ensures that operational conditions are maintained and installations modernised.

Teréga SA has a Safety Management System focused on major accident prevention for the storage sector. Additionally, underground gas storage sites are subject to PPRTs (Technological Risk Prevention Plans) developed by prefects. The objective is to control risks around the two "SEVESO upper-tier" sites by reducing installation-related risks and managing urban planning.

Supported by a safety management system, storage monitoring is implemented at various levels through risk control measures and specific safety barriers. Subsurface monitoring is managed by reservoir engineers via numerous devices, including control wells and sensors providing information on the mechanical integrity of the terrain.

To handle any abnormal situation, Teréga SA maintains emergency plans regularly tested and updated, alongside safety equipment, in coordination with authorities and emergency services.

These plans, specific to each storage site, are based on:

1. A general organisation capable of assessing and managing abnormal operating situations by securing installations, implementing degraded situation management procedures, or, in the event of an uncontrollable situation, activating the specific plans described below.
2. Internal Operation Plan (POI) and Well Eruption Intervention Plan (PIPE).

The POI is an emergency plan that defines organisational measures, intervention methods, and resources required to manage a serious accident, protect personnel, the environment, and installations. The POI documents for Lussagnet and Izaute are primarily intended for operators and firefighters, who will be the first responders in case of an incident.

For specific well eruption accidents, the PIPE is activated. At that moment, it takes over from the POI.

These emergency plans can be implemented by on-call personnel 24/7. On-call management is carried out according to the “On-Call Organisation” procedure.

3. Crisis management plan.

When the POI is activated, Teréga SA simultaneously activates the “Crisis Management Plan” procedure, which primarily concerns Teréga SA’s support functions. These may decide to set up a Crisis Management Cell (CMC).

4. Business continuity plan.

This plan, in line with the “Business Continuity Management” procedure, describes Teréga SA’s main organisational arrangements under degraded conditions to ensure continuity of essential activities during a crisis. The plan is reviewed and updated annually on a cross-functional basis. Exercises are conducted to test the strategies and resources contributing to the Business Continuity Plan (BCP).

5. Specific Intervention Plan (PPI).

This plan defines the organisation of rescue services and intervention resources in the event of a major accident with possible consequences outside the installations. It establishes coordination between internal and external resources under the authority of the Prefect. Initiated by the administrative authority, updating the PPI is not the responsibility of Teréga SA.

6. Emergency Plan Training Exercises.

Every year, a POI exercise is organised alternately at the Lussagnet and Izaute sites with participation from the Fire and Rescue Services (SDIS). These exercises address major risks identified notably within the EDD framework. During these exercises, human and material resources of the POI are mobilised.

Each exercise is documented according to the “HSE Exercise Report” procedure.

Warning sirens are tested regularly.

Common actions

Finally, to control industrial risks from the infrastructure design stage, Teréga SA applies recognised standards and develops new processes adapted to constraints with a high level of requirements. The Industrial Safety Department ensures, from the project phase, that siting rules are properly

applied and that all safety conditions are respected, whether concerning transport or storage activities. The internal project process allows validation phases prior to submission of files and construction.

The regulatory context for both transport and storage requires regular monitoring by supervisory authorities (DREAL, prefecture, and occasionally ministries or DGEC). In addition to validating files submitted for new projects and five-yearly studies, the administration conducts regular controls and inspections several times per year for each perimeter. Teréga SA monitors these inspections internally on an annual basis, striving to respond to requests within deadlines and identifying potential topics requiring special attention.

The same applies to the SGS, which are monitored and inspected annually.

Teréga SA also chooses to audit certain themes yearly through specialised companies to ensure that necessary subjects are evaluated and improved.

Moreover, regarding surveillance, Teréga SA is convinced that feedback (REX) strongly contributes to continuous improvement. This work of analysis and information compilation involves:

- detecting the most significant accidents and incidents;
- investigating failures of prevention measures;
- conducting inquiries and analyses to address detected failures and ensure follow-up of corrective actions;
- participating in interprofessional working groups for feedback exchange with other industrial operators running similar installations.

Specific actions by Teréga Solutions

Multi-Energies and Digital Business Unit (MED BU)

To optimise operations and industrial performance, and to manage fluctuations within multi-energy ecosystems for greater efficiency and energy sobriety, the MED BU has developed two proprietary tools: Indabox®, a patented tool for collecting industrial data, and IO-Base®, a highly secure platform for data storage, real-time visualisation, and remote monitoring. These tools have been developed in compliance with the high-performance and stringent safety requirements of industrial sites, offering essential guarantees in terms of cybersecurity for clients.

CO₂ Business Unit (CO₂ BU)

Established in May 2024, the CO₂ BU is focused on delivering a logistics solution for major CO₂ emitters in the South-West of France, covering the entire chain from capture to the transportation of CO₂ to sites for valorisation, storage, or export. The CO₂ BU leverages the technical expertise and operational experience of the Teréga SAS Group in the field of natural gas to ensure the highest safety standards for installations handling CO₂. In addition, Teréga Solutions draws on both internal and external technical expertise – including

from INERIS and TEN – to define a comprehensive safety and risk management framework specifically tailored to CO₂, covering all processes involved in the CCUS (Carbon Capture, Utilisation and Storage) logistics chain.

Biomethane Business Unit (BMG BU)

In 2024, a compliance review was carried out in accordance with ICPE regulation 2781, which relates to the operation of methanisation facilities processing non-hazardous waste or raw plant materials. This review focused on the Strawberry biomethane production site located in the Indre department (36). The initiative reflects a proactive approach aimed at maintaining a high level of regulatory compliance at the site.

Conducted in the presence of the site operators, the review identified several areas for improvement. For most of these, actions had already been incorporated into the site's operational schedule. For the remaining points, the operators will develop an action plan, outlining priorities and timelines, to be presented during the first half of 2025.

Hydrogen Business Unit (H₂ BU)

Safety and hazard reviews are conducted during the design and installation phases of the facilities (to date, only temporary installations for the decarbonisation of events – such as the service provided for the Vendée Globe – have been deployed). Measures and resources are made available to allow for intervention or the mobilisation of emergency services if required. Alert and response systems are established in coordination with event security services and the departmental fire and rescue services (SDIS).

As part of the services offered – such as the deployment of temporary low-carbon solutions like renewable electricity generation using hydro-generator units – a risk analysis and a prevention plan are developed and implemented.

4. METRICS AND TARGETS

4.1. TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

Ensuring the safety, integrity, and security of its employees, partners, and facilities is a top priority for the Teréga SAS Group. The Group has set the ambition of achieving “Zero accidents, Zero incidents, and Zero surprises.”

The Teréga SAS Group monitors numerous indicators related to incidents and/or accidents, emergency drills, asset integrity, maintenance, and infrastructure surveillance. These are managed and reported to internal governance bodies, including the Board of Directors. For confidentiality reasons, this data will not be disclosed. It should be noted, however, that these indicators are considered benchmarks within the industry and are also used by peers.

In 2024, the Security Department organised a cross-functional business continuity exercise over 48 hours. The objective was to strengthen its resilience in order to reduce its impact on end clients. The simultaneous activation of the operational crisis unit, the business continuity cell (PCA), and the crisis management team provided valuable learning opportunities and helped identify areas for improvement. These have been consolidated into an action plan, approved by the Executive Committee, and are currently being implemented.

2024 retrospective

In 2024, the Teréga SAS Group recorded one third-party works-related incident (following a record five-year period without any such accidents).

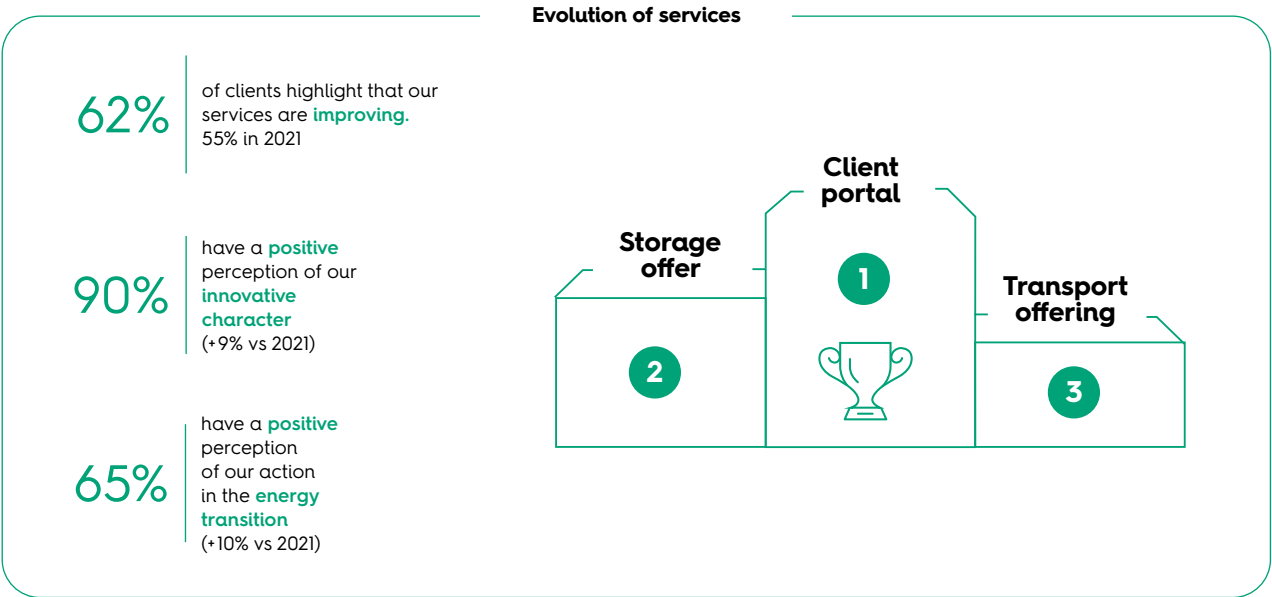
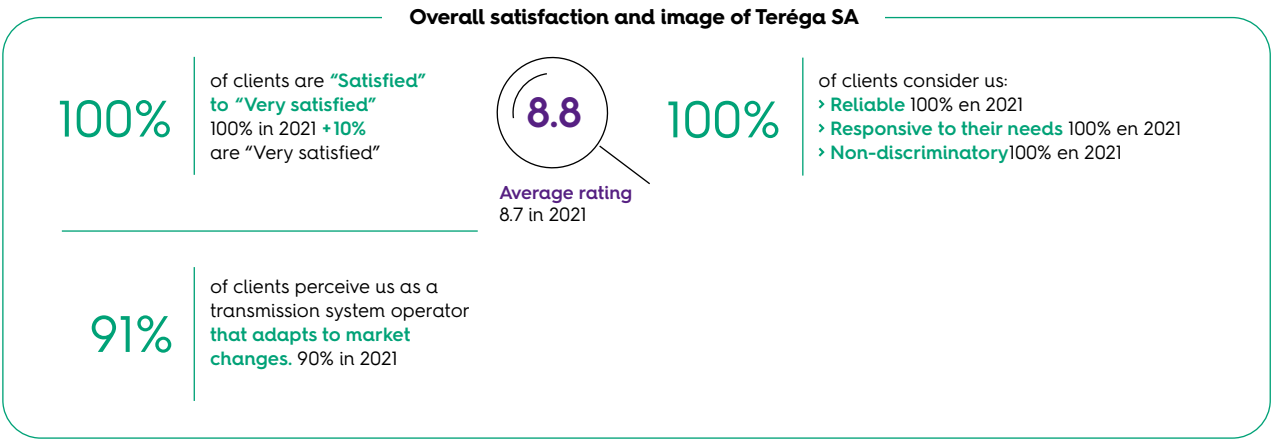
The Teréga SAS Group reported no incidents and/or serious accidents related to human rights violations involving consumers or end users.

Through its subsidiary Teréga SA, the Teréga SAS Group conducts a satisfaction survey of its end consumers – namely, its shipper clients – every two years.

Based on the results, Teréga SA is able to:

- assess the level of customer satisfaction with its services, including both commercial and contractual aspects;
- identify concrete areas for improvement.

Below are the results of the 2023 survey:

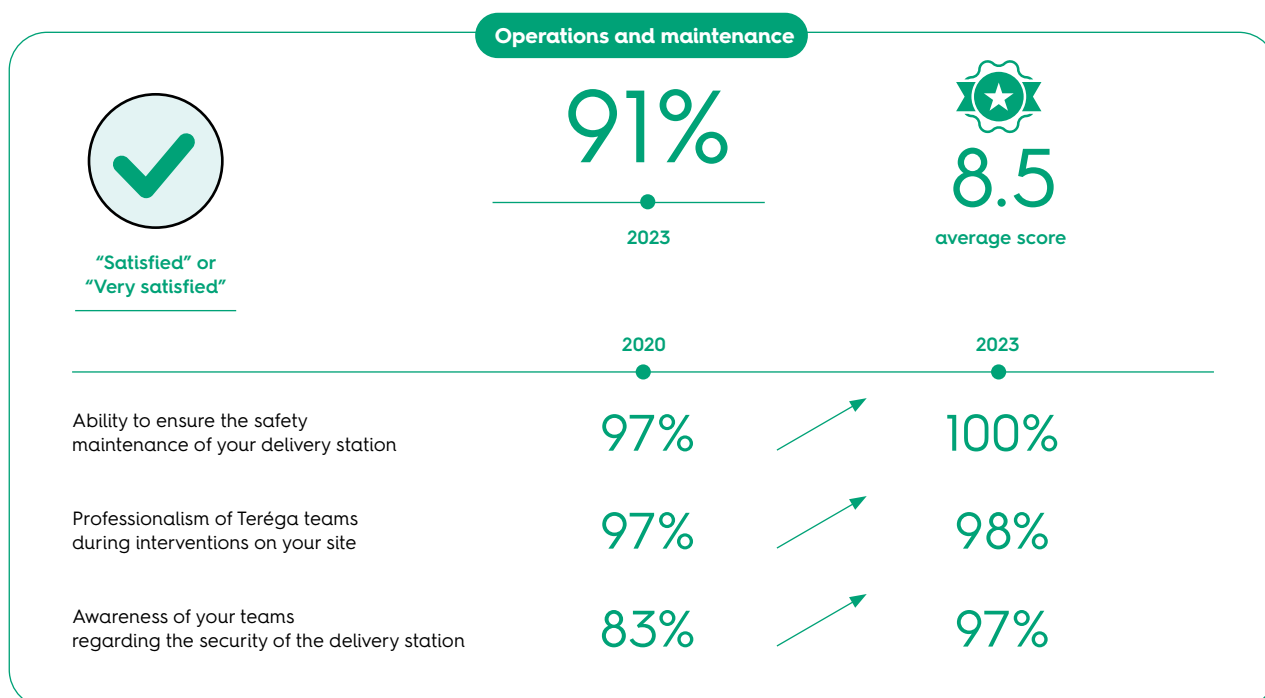


Through its subsidiary Teréga SA, the Teréga SAS Group conducts a satisfaction survey of its end clients – namely, its industrial clients – every two years⁽¹⁾.
Based on the results, Teréga SA is able to:

- measure brand awareness of Teréga SA;
- evaluate client satisfaction with the services offered and the customer relationship;
- identify specific improvement actions.

(1) Figures for 2020 and 2023: this exceptional three-year period is explained by the global Covid-19 pandemic.

Below are the results of the 2023 survey:



1. INTRODUCTION

To successfully implement its strategy and its ambition to build a sustainable business model, the Teréga SAS Group has set itself the objective of exemplary conduct in all its activities.

As part of its double materiality assessment (see *ESRS 2 - 4.1*), the Teréga SAS Group has reviewed its sustainability-related issues with regard to governance and business conduct.

Through this analysis, two risks and one opportunity were identified:

	SUSTAINABILITY ISSUES	IROs	DESCRIPTION OF IMPACT, RISK, OR OPPORTUNITY	DESCRIPTION
GOVERNANCE	Political commitment and influence	Opportunity	Strategic development of activities in new markets	Strategic development of Teréga's activities and projects in new markets, driven by favourable regulations or increasing decarbonisation requirements.
	Business ethics	Risks	Legal, financial, and reputational consequences for Teréga due to failure to adhere to business ethics practices	Liability risk for Teréga, including legal sanctions, fines and/or costs, and loss of stakeholder trust due to non-compliance with business ethics, anti-corruption practices, or energy regulation (e.g. CRE regulations on competition and unbundling of regulated activities).
	Regulatory compliance	Risks	Legal, financial and reputational consequences for Teréga due to non-compliance with energy regulatory obligations.	Liability risk for Teréga (including sanctions, fines and/or costs, loss of certification) and loss of stakeholder trust in the event of regulatory breaches.

2. GOVERNANCE

2.1. ROLE AND EXPERTISE OF THE ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES IN CONDUCTING THE COMPANY'S AFFAIRS

The role of the administrative, management or supervisory bodies in business conduct, as well as their expertise in this area, is described in the general disclosures (see *ESRS 2 - 2.1.1*).

3. MANAGEMENT OF IMPACTS AND RISKS IN CONDUCTING THE COMPANY'S AFFAIRS

3.1. DESCRIPTION OF THE PROCESSES FOR IDENTIFYING AND ASSESSING MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

The description of the process for identifying impacts, risks and opportunities related to sustainability matters in business conduct is provided in the general standard (see *ESRS 2 - 4.1*).

3.2. CORPORATE CULTURE AND BUSINESS CONDUCT POLICIES AND CORPORATE CULTURE

3.2.1. Policies

Since 2015, the Teréga SAS Group has had a Code of Ethics designed to inspire and guide the actions of all employees and to help the company build trusted relationships with its stakeholders: shareholders, institutions, associations, local communities, clients, suppliers, etc.

A shared foundation of values and rules reflecting the Teréga SAS Group culture, the Code of Ethics promotes:

- compliance with laws and regulations;
- dialogue with stakeholders on sustainable development issues;
- the protection of human rights and fundamental freedoms;
- the rejection of all forms of discrimination, violence or corruption;
- the health and safety of employees;
- the protection of the environment and biodiversity;
- energy efficiency;

- and working relationships based on honesty, fairness, cooperation, loyalty and mutual respect.

In accordance with the principles of its Code of Ethics, the Teréga SAS Group is committed to conducting its business relations with integrity and fairness, and strictly prohibits any act of corruption, illegitimate favour, collusion, or solicitation aimed at satisfying personal interests.

To ensure adherence to these principles, the Teréga SAS Group has implemented, in line with the Sapin II law, an Anti-Corruption Code of Conduct which defines and illustrates various forms of prohibited behaviour that may constitute acts of corruption or bribery.

As a cornerstone of its anti-corruption framework making it possible to effectively determine prevention and detection measures, the Teréga SAS Group has produced a corruption risk mapping, taking into account the specificities of its sector and the geographical areas in which it operates.

The Teréga SAS Group also requires its stakeholders, particularly its suppliers, to commit to complying with the provisions of both Codes.

The company's internal network features a dedicated ethics and anti-corruption page accessible to all employees. It outlines the key issues and measures put in place for each topic.

Lastly, mindful of the importance of engaging all stakeholders in upholding its ethical values and principles, the Teréga SAS Group launched a dedicated page on its website in 2024. This page sets out the company's values and the system established to ensure their implementation. On this occasion, the whistle-blowing system was made accessible to all external stakeholders.

3.2.2. Governance of ethics and corporate culture

3.2.2.1. The Ethics Committee: guaranteeing compliance with principles of business conduct

To promote awareness and implementation of the principles of the Code of Ethics among Teréga SAS Group employees and stakeholders, an Ethics Committee, serving as the internal reference body, has been in place since 2015.

Its composition aims to address two key concerns:

- to build a collective capable of representing ethical issues arising from all Teréga SAS Group activities, including those generated by operational functions, in order to strengthen the ethical culture among employees;
- to enhance neutrality, complementarity, and impartiality in discussions and decisions by appointing an external member outside the organisation.

Since January 2024, the Ethics Committee comprises representatives from the following functions:

- a representative of Finance, Procurement, Legal and Sustainable Development Management;
- a representative of Human Resources and Transformation Management;
- a representative of operational activities;
- a representative of sustainability issues;
- an external member.

These members are appointed by the President of the Teréga SAS Group. The inclusion of the external member was approved by the Executive Committee (Comex) and the Social and Economic Committee (CSE), becoming effective in January 2024.

The President of the Ethics Committee is elected from among its five members. and is also appointed by the President of the Teréga SAS Group. Currently, this position is held by the Director of Human Resources and Transformation.

The Ethics Committee's mission is to raise awareness and provide guidance to all employees regarding ethical conduct, including providing opinions particularly on anti-corruption and bribery matters.

It is also responsible for receiving and handling whistle-blowing reports in accordance with applicable provisions (ESRS G1 - 3.2.4).

In conclusion, the Ethics Committee produces an annual activity report, which is submitted to the Audit, Risk, and Sustainability Committee as well as to the members of the Social and Economic Committee (CSE). This report enables them to be informed of the types of alerts and ethical issues submitted to the Committee during the past year.

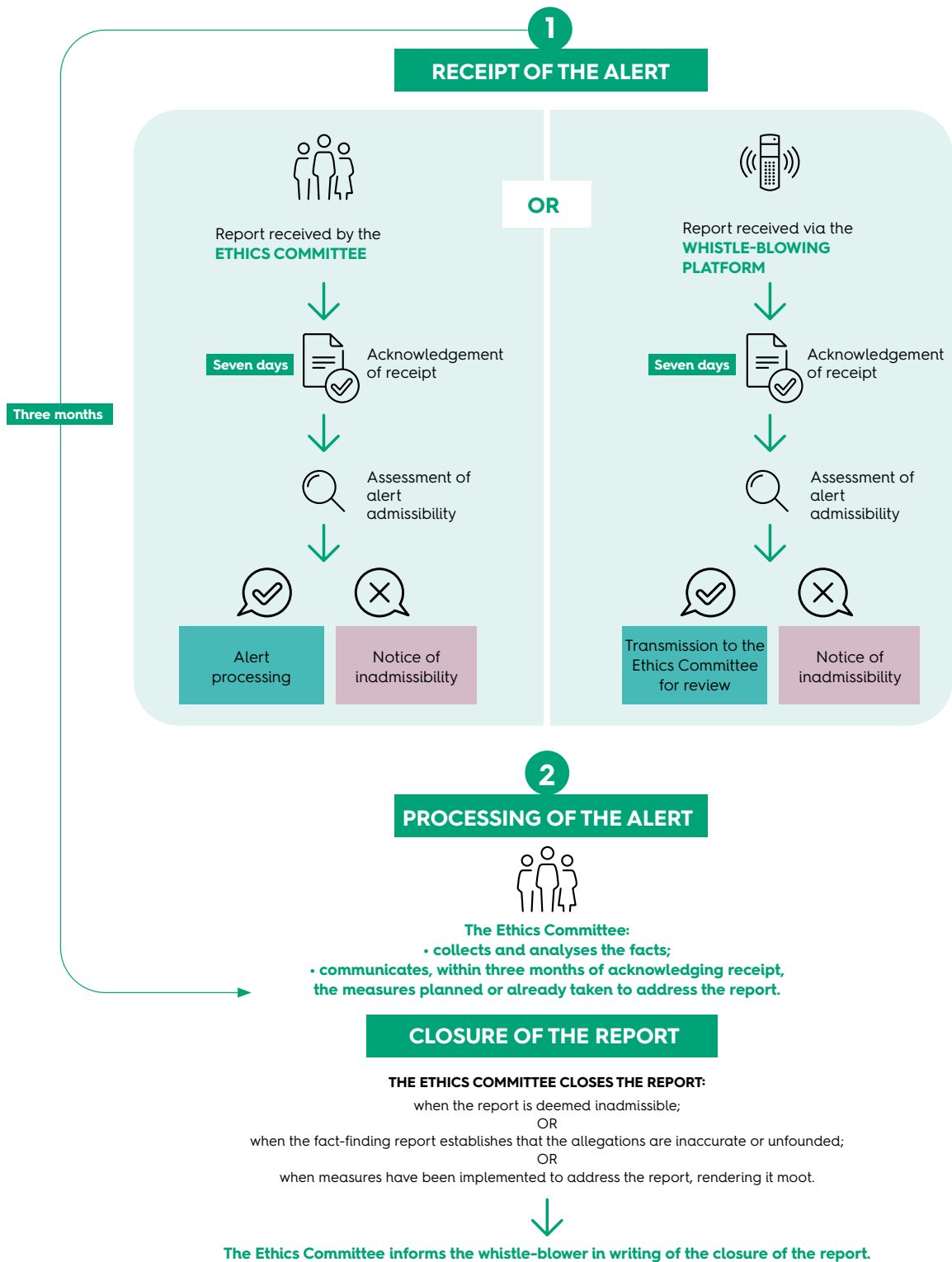
3.2.2.2. A whistle-blowing mechanism

Employees, as well as stakeholders of the Teréga SAS Group, are encouraged to report any case or suspicion of activity that could seriously infringe upon human rights, fundamental freedoms, health and safety, or the environment, or that could constitute an act of fraud, corruption, conflict of interest, or any other breach of laws and regulations.

To this end, the Teréga SAS Group has established a professional whistle-blowing procedure, the compliance with and effective implementation of which is the responsibility of the Ethics Committee. This procedure, updated in 2024, was submitted for review and subsequently approved by employee representatives of the Teréga SAS Group's companies. It clearly outlines the process and conditions under which employees and all stakeholders can make reports in complete confidentiality.

The procedure stipulates that reports can be made either directly via the Ethics Committee or through an external whistle-blowing platform hosted by a third-party provider. In accordance with applicable regulations, such reports may also be made directly to competent external authorities [such as the French Data Protection Authority (CNIL), the Defender of Rights, judicial authorities, etc.].

The internal processing of reports is carried out according to the following framework:



Awareness-raising and communication campaigns on the whistle-blowing system will be rolled out to all employees in 2025.

3.2.3. Protection of whistle-blowers

The Teréga SAS Group is subject to whistle-blower protection regulations as established by the Sapin II law and reinforced by the so-called “Waserman” law of 21 March 2022.

Accordingly, the Teréga SAS Group’s professional whistle-blowing procedure sets out strict principles of confidentiality and enhanced protection for whistle-blowers against all forms of retaliation.

Each member of the Ethics Committee, as well as any person involved in handling a whistle-blowing report, is bound by a duty of confidentiality that covers: the identity of the whistle-blower, the facts reported, the individuals implicated, and any third parties mentioned in the report.

This obligation is formally reaffirmed by the President of the Teréga SAS Group, who signs the appointment letters for each member of the Ethics Committee. Any conduct in breach of this obligation will automatically result in the termination of the individual’s role on the Ethics Committee.

In line with current regulations, the procedure explicitly states that no measure, threat, attempt at retaliation, or disciplinary sanction may be taken against a whistle-blower who has submitted a report in good faith and without receiving any direct financial compensation.

3.2.4. Rapid, independent, objective investigation procedures

Any report deemed admissible, in accordance with the professional whistle-blowing procedure, will be subject to fact-finding and analysis by the Ethics Committee. This enables the Committee to objectively assess the allegations brought to its attention and decide on the appropriate course of action. Key indicators are in place to ensure that alerts are processed within the required time frames (see *ESRS G1 - 3.2.2*).

To uphold the principles of independence and objectivity in its analysis work, the Ethics Committee may seek the expertise or testimony of internal or external individuals, under the same conditions of confidentiality and respect for the rights of the whistle-blower.

Furthermore, in the event that a member of the Ethics Committee is implicated or faces a conflict of interest, they are required to recuse themselves to ensure the impartiality of the conclusions reached.

These provisions ensure a clear separation between the Ethics Committee and the management chain concerned by the issue or report.

3.2.5. Training

Since 2019, the Teréga SAS Group has implemented a training programme designed to raise awareness among all members of the Codir and permanent employees of the risks of corruption, via an online training module. These online awareness sessions, reserved for permanent contract (CDI) employees, are also completed by all new hires, with the stated and achieved objective of training 90 % of new arrivals on corruption risks by 2024. To develop good reflexes through practical scenarios.

The training allows employees to test their knowledge and develop good reflexes through practical scenarios.

In parallel, specific training sessions led by an anti-corruption expert have been rolled out to Codir members and to employees identified as most exposed to corruption risks (see *ESRS G1 - 3.2.6*). These sessions are also limited to employees on permanent contracts.

In 2025, the Training Department will launch a new awareness initiative to assess all employees’ understanding of corruption-related issues. A particular focus will be placed on employees most exposed to corruption risks (see *ESRS G1 - 3.2.6*), with the goal of achieving a 100 % training and certification rate within this group.

To further reinforce the ethical culture within the company, the Teréga SAS Group also plans to launch a communications campaign in 2025 to promote the core principles and values underpinning ethical business conduct.

3.2.6. Roles most exposed to corruption and bribery risks

In line with recommendations from the French Anti-Corruption Agency (AFA), the Teréga SAS Group includes in its mandatory training programme those individuals and functions most exposed to corruption risks, namely:

- managers, due to their level of responsibility within the company;
- employees whose roles fall within areas identified as high-risk in the corruption risk map;
- personnel involved in implementing the anti-corruption framework.

With the support of an external consultancy, the Teréga SAS Group has developed a corruption risk map (see *ESRS G1 - 3.3*) to better meet the obligations of the Sapin II law, allowing it to identify key risk areas:

- sponsorship and patronage activities;
- engagements involving public officials;
- advisory services, particularly in the area of lobbying;
- specialised services related to land surveys and property negotiations.

On this basis, the Teréga SAS Group identified the individuals most exposed to the risks of corruption and bribery. This group represents approximately 17% of its total workforce, or 106 people.

3.3. ACTIONS TO PREVENT AND DETECT CORRUPTION

In addition to the various mechanisms previously outlined – including the Anti-Corruption Code of Conduct, risk mapping, whistle-blowing system, investigation procedures, and training – the Teréga SAS Group has also implemented practical procedures to support employees in applying and complying with these measures.

These prevention and detection actions do not require significant operational expenditure (Opex) or capital investment (Capex).

Gift and hospitality register

The Teréga SAS Group Anti-Corruption Code of Conduct sets out the guiding principles surrounding the offering and acceptance of gifts and invitations.

To support the dissemination of these principles, a “Gifts and Invitations” register has been introduced. This register is accessible to all employees and allows them to declare any gifts or invitations they receive or offer. The register allows the Teréga SAS Group to strengthen its protection against potential acts of corruption.

Sponsorship and patronage procedure

Sponsorship and patronage activities involving third-party organisations may present corruption or influence-peddling risks. The Teréga SAS Group has therefore deemed it essential to establish a clear framework, formalised in a dedicated procedure, to govern the conditions under which such activities are approved.

In this context, the Teréga Accélérateur d’Énergies endowment fund (see *ESRS 2 - 3.1.2*) supports talents and initiatives across four strategic pillars:

- supporting the economic and social development of the greater South-West region;
- protecting biodiversity;
- fostering social inclusion;
- promoting and disseminating French scientific and cultural heritage.

Third-party due diligence system

Drawing on its corruption risk mapping, the Teréga SAS Group has implemented a third-party integrity assessment solution. This system helps identify corruption risks among stakeholders and apply appropriate mitigation measures where necessary.

Accounting controls

The Teréga SAS Group has reviewed its existing accounting controls to determine which contribute to the prevention or

detection of corruption. Additional controls, derived from the corruption risk mapping, have also been implemented to cover both major and significant risks in this area.

3.4. INDICATORS AND TARGETS: CORRUPTION CASES DURING THE REPORTING PERIOD

No instances of corruption were identified within the Teréga SAS Group in 2024.

4. MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES RELATED TO LOBBYING ACTIVITIES

4.1. PRINCIPLE

The Teréga SAS Group’s political influence is strictly governed by the provisions set out in its Code of Ethics. Accordingly, the Teréga SAS Group does not provide any direct or indirect contributions, in any form, to political parties, movements, trade unions, or their representatives.

However, as an active player in the energy transition, the Teréga SAS Group fully and proactively engages with public authorities to communicate its vision and positions to national, regional, and European institutions. The aim is to accelerate the development of renewable and low-carbon gases and to deploy innovative solutions capable of decarbonising all forms of energy use within its local ecosystems.

In line with the Code of Ethics, both Teréga SAS Group employees and external partners are required to interact with public authorities in a manner that upholds the principles of transparency, fairness, and integrity, and to refrain from making any false statements.

4.2. GOVERNANCE

To ensure compliance with these principles, all lobbying or political influence activities fall exclusively under the authority of the Development and Strategy Department. Responsibility for defining and implementing the Teréga SAS Group’s influence strategy – in alignment with its decarbonisation objectives – lies with the Director of Strategy and Institutional Relations.

4.3. FINANCIAL OR IN-KIND CONTRIBUTIONS

All expenses related to the Teréga SAS Group’s interest representation activities are subject to an annual declaration to the Haute Autorité pour la Transparence de la Vie Publique (HATVP – High Authority for Transparency in Public Life).

These expenses include:

- costs associated with organising events involving public officials;
- fees for expertise used to produce documents or analyses submitted to public decision-makers;

- payments for consultancy services;
- remuneration costs for individuals involved in interest representation activities;
- membership fees for professional organisations.

An internal Teréga SA procedure defines the methodology used to calculate the total amount of these expenses.

For the year 2024, the Teréga SAS Group, in connection with lobbying activities conducted by Teréga SA, declared to the High Authority a range of expenditure on interest representation between €100 K and €200 K.

Furthermore, as all interest representation activities in 2024 were carried out by the legal entity Teréga SA, no interest representation declaration was submitted on behalf of Teréga SAS.

4.4. MAIN TOPICS COVERED AND PRINCIPAL POSITIONS ADVOCATED

The Teréga SAS Group firmly believes that the infrastructure it currently operates plays a key role in the energy transition and will serve as a lever for the gradual replacement of natural gas with renewable gases.

In support of this strategy, the Teréga SAS Group participated in numerous events throughout 2024 focused on energy transition, decarbonisation, and climate change.

As an active member of several European professional associations – such as Gas for Climate, European Hydrogen Backbone, and European Clean Hydrogen – as well as French organisations including France Gaz Renouvelables, France Hydrogène, and the Comité Stratégique de Filière (CSF), the Teréga SAS Group actively contributes to position papers and policy statements, and regularly engages in public consultation processes to promote its strategic views.

The strategic development of new activities linked to the energy transition has been identified as a material opportunity through the Teréga SAS Group's double materiality assessment. Accordingly, in 2024, Teréga SA took part in the following initiatives:

- at the European level, participated in discussions on the Hydrogen and Decarbonised Gas Market Package (the "4th Gas Package"), which defines the common rules for the internal market for renewable and low-carbon gases;
 - contributed to the creation of the future European association of hydrogen infrastructure operators (ENNOH);
 - took part in establishing the association of European hydrogen storage operators (H₂earth for Europe).
- at the national level, participated in public consultations and debates on key issues including:
 - carbon capture, utilisation and storage (CCUS) technologies and the national strategy for the development of low-carbon hydrogen;
 - the regulatory framework for hydrogen and CO₂ infrastructure;

- legislative measures to accelerate renewable energy production in France.

4.5. REGISTRATION IN TRANSPARENCY REGISTERS

Soucieux to conducting its activities with integrity and in compliance with legal standards, the Teréga SAS Group is registered in the directory of the Haute Autorité pour la Transparence de la Vie Publique (HATVP), in accordance with French Law No. 2016-1961 of 9 December 2016 on transparency, anti-corruption, and economic modernisation.

This directory provides public insight into the relationships between interest representatives such as the Teréga SAS Group and public authorities. Each year, the Teréga SAS Group declares its interest representation activities to the HATVP.

The Teréga SAS Group is also listed in the EU Transparency Register. Through it, the company annually reports its activities aimed at influencing EU policy and decision-making processes.

5. MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES RELATED TO REGULATORY COMPLIANCE

As a natural gas transporter and storage operator, the Teréga SAS Group holds a natural monopoly and is therefore subject to regulatory oversight. This regulation, overseen by an independent authority – the Commission de Régulation de l'Énergie (CRE) – ensures third-party access to the Teréga SAS Group's infrastructure on a non-discriminatory, transparent basis, and at a fair cost to consumers.

Within this framework, the Teréga SAS Group operates prudently and reasonably to fulfil its public service mission and comply with certain obligations set out in the Energy Code (*Article L. 121-32*).

These public service obligations notably include:

- the safety of property and individuals;
- the security of supply for the French market and the continuity of natural gas delivery;
- environmental protection;
- research and development of measures addressing the urgent climate and ecological challenges, including energy conservation, energy efficiency, and the promotion of bio-gas valorisation.

5.1. COMPLIANCE WITH LEGAL AND REGULATORY REQUIREMENTS, A CONSTANT PRIORITY

The rules governing non-discriminatory access to networks, as well as independence and transparency obligations imposed on network operators, are designed to ensure the proper functioning of the energy market and to foster healthy competition. This is reflected, in particular, by the effective exercise of consumers' right to freely choose their energy supplier. Network operator independence also requires a prohibition on engaging in any energy supply or production activities, whether renewable or not.

The Teréga SAS Group carries out all its responsibilities within this strict framework and ensures full compliance with all the criteria outlined above.

5.2. AN INDEPENDENT REGULATORY AUTHORITY OVERSEEING TERÉGA SA ACTIVITIES: THE ENERGY REGULATORY COMMISSION (CRE)

The CRE, an independent authority, oversees the proper functioning of the natural gas market and ensures that all sector stakeholders – suppliers, network operators, and consumers – benefit from a fair and competitive environment that protects everyone's interests.

For infrastructure operators, this role involves, in particular:

- defining the authorised revenues for each regulated activity (transport and storage for Teréga SA) as well as the applicable tariffs;
- monitoring compliance with the Code of Conduct by natural gas transmission system operators.

Within this remit, the CRE conducts inspections and audits, and publishes a report every two years on operators' adherence to the principles of independence, transparency, and non-discrimination. This report includes recommendations to prevent any practices that do not comply with these principles.

The CRE also plays a key role in promoting renewable energies to reduce France's dependence on fossil fuels and to mitigate the environmental impact of the national energy system. It ensures that operators consider the consequences of the energy transition at a fair cost to the end consumer. For example, gas network operators must adapt their infrastructure to accommodate an increasing share of renewable gases, strictly respecting the legal framework governing gas injection.

5.3. AN INTERNAL ORGANISATIONAL FRAMEWORK ENSURING COMPLIANCE WITH LEGAL AND REGULATORY REQUIREMENTS

To guarantee compliance with the regulatory obligations that apply to it, the Teréga SAS Group relies on:

- a Legal and Insurance Department, responsible for:
 - monitoring legislative developments through a monthly Monitoring Committee;
 - overseeing Teréga SA's compliance with asset separation obligations, with particular attention to the separation of regulated and non-regulated activities;
 - training and raising awareness among all Teréga SA employees on these matters.
- a Gas System Commercial and Regulation Directorate, which:
 - is fully conversant with all market rules applicable to the company;
 - participates in the establishment of these rules through French and European working groups that bring together all market stakeholders (notably the Gas Consultation), and through interactions with regulatory bodies, especially the CRE (for example, during tariff-setting processes);
 - monitors the publication of CRE decisions and regulations, as well as Teréga SA's compliance with them;
 - maintains ongoing relations with the CRE;
 - coordinates internal management of CRE audits, including the biennial audits concerning compliance with the Code of Conduct for infrastructure operators.

ANNEX 1: KEY ELEMENTS ON DUE DILIGENCE

	PAGES
DUE DILIGENCE AND GOVERNANCE, STRATEGY, AND BUSINESS MODEL	
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ESRS 2 - GOV-2 ESRS 2 - SBM-2 ESRS 2 - IRO-1 ESRS topics (E1-Climate change, E2-Pollution, S1-Own workforce, S3-Affected communities, S4-Consumers and end-users, G1-Business conduct)	Pages 12, 13, 14, 15 Page 28 Page 28 E1 page 36 E2 page 61 S1 page 64 S3 pages 78, 79 S4 page 80 G1 page 90
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ESRS topics (E1-Climate change, E2-Pollution, S1-Own workforce, S3-Affected communities, S4-Consumers and end-users, G1-Business conduct)	E1 page 42 E2 page 62 S1 page 69 S3 page 77 S4 page 83 G1 page 94
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ANNEX 2: SUMMARY OF IMPACTS, RISKS, AND OPPORTUNITIES

ESRS TOPICS / MATERIAL ISSUES	ASSOCIATED IMPACTS, RISKS AND OPPORTUNITIES (IROs)	MATERIALITY
ESRS E1 - CLIMATE CHANGE	From page 34	
Adaptation to climate change	Physical integrity of individuals affected by a natural disaster linked to climate disruption	No
	Environmental degradation caused by a natural disaster linked to climate disruption	No
	Deterioration of working conditions due to climate change	No
	Climatic hazards impacting Teréga's business continuity	Yes
Greenhouse gas emissions from Teréga's internal activities (Scopes 1 & 2)	Legal, financial, and reputational consequences for Teréga resulting from non-compliance with CO ₂ emissions reduction regulations	No
	Increase in costs related to CO ₂ quotas	No
	Greenhouse gas emissions linked to Teréga's internal activities	Yes
Greenhouse gas emissions related to value chain operations (Scope 3 including downstream gas consumption)	Supply chain instability due to regulations on greenhouse gas (GHG) emissions	No
	Greenhouse gas emissions from operations of the value chain	Yes
Energy transition	Threat to Teréga's sustainability in the event of failure to implement necessary changes for the energy transition	No
	Contribution to the energy transition of the sector	Yes
	Market opportunities related to decarbonised energies	Yes
	Negative impacts of decarbonisation solutions	No
ESRS E2 - POLLUTION	From page 60	
Pollution from Teréga's internal operations	Legal, financial, and reputational consequences for Teréga resulting from non-compliance with regulations on pollution and hazardous substances	No
	Financial impact of remediation work in the event of soil or water pollution	No
	Air pollution linked to Teréga's daily activities	No
	Water and soil pollution linked to Teréga's daily activities	No
	Environmental and public health impacts related to legacy pollution	No
	Light and noise pollution caused by Teréga's activities	No
Pollution from the value chain	Impact on business continuity in the event of non-compliance with pollution and hazardous substances regulations by the value chain	No
	Pollution (of all types) resulting from upstream value chain activities	Yes
	Pollution (of all types) resulting from downstream value chain activities	No

ANNEX 2: SUMMARY OF IMPACTS, RISKS, AND OPPORTUNITIES

ESRS TOPICS / MATERIAL ISSUES	ASSOCIATED IMPACTS, RISKS AND OPPORTUNITIES (IROs)	MATERIALITY
ESRS E3 - WATER AND MARINE RESOURCES	Not reported	
Water and marine resource use from Teréga's internal operations	Legal, financial, and reputational consequences for Teréga resulting from non-compliance with regulations on the use of fishery resources	No
	Inability of Teréga to ensure its storage activity due to groundwater withdrawal by local communities	No
	Contribution to local water stress due to infrastructure maintenance, transport, and office activities	No
	Poor management of water discharges from internal operations	No
	Local water stress or instability of water access due to gas storage activity	No
	Water contamination resulting from Teréga's internal operations	No
Use of water and marine resources by the value chain	Ban on shale gas leading to a decline in Teréga's financial performance	No
	Contribution to water stress due to activities in the value chain	No
ESRS E4 - BIODIVERSITY AND ECOSYSTEMS	Progressively addressed, however mentioned on page 8	
Consideration of biodiversity in Teréga's internal activities	Legal, financial and reputational consequences for Teréga due to non-compliance with biodiversity protection regulations by Teréga	No
	Teréga's action plan in favour of biodiversity deemed insufficient	Yes
	Increased costs related to biodiversity considerations	No
	Destruction of habitats, natural resources and/or species due to infrastructure works/construction	No
	Creation of movement corridors linked to Teréga's construction sites	No
	Use of plant protection products (infrastructure maintenance) impacting biodiversity	No
	Maintenance of office buildings impacting biodiversity	No
Consideration of biodiversity in the value chain	Impact on business continuity in the event of non-compliance with biodiversity protection regulations by the value chain	No
	Degradation of ecosystems due to upstream value chain activities	Yes
	Harm to the living conditions of local communities dependent on natural resources in the upstream value chain	No

ANNEX 2: SUMMARY OF IMPACTS, RISKS, AND OPPORTUNITIES

ESRS TOPICS / MATERIAL ISSUES	ASSOCIATED IMPACTS, RISKS AND OPPORTUNITIES (IROs)	MATERIALITY
ESRS 5 - CONSUMERS AND END-USERS	Not reported	
Use of natural resources	Impact on Teréga's business continuity and supply chain costs due to the scarcity of raw materials	No
	Scarcity of virgin raw materials necessary for Teréga's operations	No
Waste and end of product life management	Increase in costs related to waste and product end of life management	No
	Financial penalties for failure to manage waste	No
	Cost reduction through better waste management	No
	Harmful effects of undismantled infrastructure	No
	Waste production from Teréga's activities causing nuisances and pollution	No
ESRS S1 - OWN WORKFORCE	From page 64	
Working conditions of internal workforce	Legal, financial and reputational consequences for Teréga due to non-compliance with energy regulatory obligations	No
	Deterioration of Teréga employees' well-being due to working conditions	Yes
	Deterioration of Teréga employees' well-being due to inadequate remuneration	No
Health and safety	Operational and financial consequences of a serious health and safety incident	No
	Security incidents at the workplace and loss of employee engagement at Teréga	Yes
	Conséquences for the organization and working conditions due to a severe safety accident	No
Labour relations and social dialogue	Operational and financial consequences of non-compliance with labour relations or social dialogue regulations	No
	Failed social dialogue with Teréga employees	No
	Positive social climate favourable to the development of employees and the company	Yes
Equality of treatment	Legal, financial, and reputational consequences for Teréga due to discrimination or harassment at work	No
	Legal, financial, and reputational consequences for Teréga due to non-compliance with transparency and performance obligations in terms of diversity and inclusion	No
	Diversity and equity policy promoting fair treatment	No
	Discriminatory practices against Teréga employees	No

ANNEX 2: SUMMARY OF IMPACTS, RISKS, AND OPPORTUNITIES

ESRS TOPICS / MATERIAL ISSUES	ASSOCIATED IMPACTS, RISKS AND OPPORTUNITIES (IROs)	MATERIALITY
Skill development	Legal, financial, and reputational consequences for Teréga due to non-compliance with regulatory requirements on skill development	No
	Failure to support skill development impacting Teréga's strategic ambitions	Yes
	Development of innovative solutions through rare skill development	No
	Stronger employer brand through a relevant skills development plan	No
	Deterioration in employability and failure to develop skills among Teréga employees	No
ESRS S2 - WORKERS IN THE VALUE CHAIN	Progressively addressed, however mentioned on page 8	
Health, safety, and working conditions in the value chain	Inappropriate working environment for workers in the value chain	Yes
	Operational and financial consequences due to inappropriate working conditions or accidents in the value chain	No
Respect for human rights and fundamental freedoms of value chain workers	Violation of human rights of workers in the value chain	Yes
	Legal, financial and reputational consequences for Teréga due to a human rights violation in the value chain	No
ESRS S3 - AFFECTED COMMUNITIES	From page 76	
Local communities (Teréga)	Failure of dialogue and poor consideration of local communities by Teréga	Yes
	Development of Teréga's brand image with local communities	No
	Non-acceptance of Teréga projects by local residents	Yes
	Creation of a local economic and social dynamic (Teréga)	No
	Development of responsible energy practices by local communities (Teréga)	No
Local communities (value chain)	Poor consideration of local communities by a strategic supplier	No
	Deterioration of living conditions for local communities due to projects by Teréga's partners	No
	Violation of the rights of local communities living near production sites (gas and raw materials)	No

ANNEX 2: SUMMARY OF IMPACTS, RISKS, AND OPPORTUNITIES

ESRS TOPICS / MATERIAL ISSUES	ASSOCIATED IMPACTS, RISKS AND OPPORTUNITIES (IROs)	MATERIALITY
ESRS S4- CONSUMERS AND END-USERS	From page 80	
Infrastructure security	Loss of operating license for Teréga due to a failure in infrastructure security	No
	Operational and financial consequences resulting from a failure in infrastructure safety	Yes
	Infrastructure failure or operational accident on the Teréga network	Yes
	Temporary energy insecurity for end users in the event of infrastructure failure	Yes
Information to end clients	Legal, financial, and reputational consequences for Teréga due to non-compliance with the obligation of transparency and information towards end users	No
	Teréga's failure to meet the duty of information impacting its clients	No
ESRS G1 - BUSINESS CONDUCT	From page 90	
Corporate governance	Inappropriate governance leading to deterioration in performance	No
	Inadequate corporate governance causing harm to the well-being and economic loss of Teréga employees	No
	Failure of Teréga's governance causing detrimental effects on the company	No
	Loss of investor confidence	No
Political commitment and influence	Inappropriate lobbying activities and non-compliance with regulations	No
	Strategic development of activities in new markets	Yes
	Promotion of positive effects and the public interest through Teréga's lobbying activities	No
Business ethics	Legal, financial, and reputational consequences for Teréga due to failure to adhere to business ethics practices	Yes
	Financial effects due to failure to adhere to business ethics practices	No
	Deterioration of employees' physical and mental well-being due to inappropriate business practices	No
	Damage to the reputation of stakeholders due to inappropriate business practices	No

ANNEX 2: SUMMARY OF IMPACTS, RISKS, AND OPPORTUNITIES

ESRS TOPICS / MATERIAL ISSUES	ASSOCIATED IMPACTS, RISKS AND OPPORTUNITIES (IROs)	MATERIALITY
Supplier relations	Legal, financial, and reputational consequences for Teréga due to poor management of the relationship with suppliers	No
	Operational and financial consequences due to a breakdown in the commercial relationship with a key supplier	No
	Inability for Teréga to find a supplier to carry out its projects	No
	Economic instability of suppliers dependent on Teréga	No
Regulatory compliance	Legal, financial, and reputational consequences for Teréga due to non-compliance with energy regulation obligations	Yes
	Non-compliance with energy market regulations	No

ANNEX 3: DISCLOSURE REQUIREMENTS UNDER THE ESRS COVERED BY THE COMPANY'S SUSTAINABILITY STATEMENT

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- Disclosure requirement GOV-2 – Resource use and circular economy	12, 13, 14, 15
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- Disclosure requirement GOV-4 – Statement on due diligence	16
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Strategy	
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Impact, risk and opportunity management	
- Disclosure requirement linked to ESRS 2 IRO-1 – Description of the processes to identify and assess material climate-related impacts, risks and opportunities	34
- Disclosure requirement E1-2 – Policies related to climate change mitigation and adaptation	38
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Metrics and targets	
- Disclosure requirement E1-4 – Targets related to climate change mitigation and adaptation	44
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**ANNEX 3: DISCLOSURE REQUIREMENTS UNDER THE ESRS COVERED
BY THE COMPANY'S SUSTAINABILITY STATEMENT**

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ANNEX 3: DISCLOSURE REQUIREMENTS UNDER THE ESRS COVERED BY THE COMPANY'S SUSTAINABILITY STATEMENT

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ESRS 2 GOV-4 Statement on due diligence paragraph 30	16
ESRS 2 SBM-1 Participation in fossil fuel-related activities paragraph 40 d) i)	17
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ESRS E1-7 GHG removals and carbon credits paragraph 56	50
ESRS E1-9 Exposure of the benchmark portfolio to physical climate risks paragraph 66	NA
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a)	NA
ESRS E1-9 Location of key assets exposed to material physical risk paragraph 66 (c)	NA
ESRS E1-9 Breakdown of the book value of real estate assets by energy efficiency classes paragraph 67 (c)	NA
ESRS E1-9 Degree of portfolio exposure to climate-related opportunities paragraph 69	NA
ESRS E2-4 Quantity of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) released into air, water and soil paragraph 28	NA
ESRS E3-1 Water and marine resources paragraph 9	Non-material standard
ESRS E3-1 Related policy paragraph 13	Non-material standard
ESRS E3-1 Sustainable practices concerning oceans and seas paragraph 14	Non-material standard
ESRS E3-4 Total percentage of water recycled and reused paragraph 28 (c)	Non-material standard
ESRS E3-4 Total water consumption in m ³ relative to revenue generated by the undertaking's own activities paragraph 29	Non-material standard
ESRS 2 - SBM-3 - E4 paragraph 16 (a) i)	Phased-in standard
ESRS 2 - SBM-3 - E4 paragraph 16 (b)	Phased-in standard
ESRS 2 - SBM-3 - E4 paragraph 16 (c)	Phased-in standard
ESRS E4-2 Sustainable land/agricultural practices or policies paragraph 24 (b)	Phased-in standard
ESRS E4-2 Sustainable ocean/marine practices or policies paragraph 24 (c)	Phased-in standard
ESRS E4-2 Policies to combat deforestation paragraph 24 (d)	Phased-in standard
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Non-material standard
ESRS E5-5 Hazardous and radioactive waste paragraph 39	Non-material standard

ANNEX 4: DISCLOSURE REQUIREMENTS AND ASSOCIATED DATA POINTS (IRO-2), TAKEN FROM ANNEX B (ESRS 1)

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ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	NA
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ESRS S1-17 Cases of discrimination paragraph 103 (a)	75
ESRS S1-17 Non-compliance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises paragraph 104 (a)	75
ESRS 2 - SBM-3 - S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Phased-in standard
ESRS S2-1 Commitments to pursue a human rights policy paragraph 17	Phased-in standard
ESRS S2-1 Policies related to value chain workers paragraph 18	Phased-in standard
ESRS S2-1 Non-compliance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises paragraph 19	Phased-in standard
ESRS S2-1 Due diligence policies on matters covered by ILO Fundamental Conventions 1 to 8 paragraph 19	Phased-in standard
ESRS S2-4 Human rights issues and incidents related to the upstream or downstream value chain paragraph 36	Phased-in standard
ESRS S3-1 Commitments to pursue a human rights policy paragraph 16	76
ESRS S3-1 Non-compliance with the UN Guiding Principles on Business and Human Rights, ILO principles or OECD Guidelines paragraph 17	76
ESRS S3-4 Human rights issues and incidents paragraph 36	79
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ESRS G1-4 Fines for breaches of anti-corruption laws and acts of corruption paragraph 24 (a)	94
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This is a free translation into English of the statutory auditor's report on the certification of sustainability information and verification of the disclosure requirements under Article 8 of Regulation (EU) 2020/852 of the Company issued in French and it is provided solely for the convenience of English-speaking users.

This report should be read in conjunction with, and construed in accordance with, French law and the H2A guidelines on Limited assurance engagement - Certification of sustainability reporting and verification of disclosure requirements set out in Article 8 of Regulation (EU) 2020/852.

REPORT ON THE CERTIFICATION OF SUSTAINABILITY INFORMATION AND VERIFICATION OF THE DISCLOSURE REQUIREMENTS UNDER ARTICLE 8 OF REGULATION (EU) 2020/852, RELATING TO THE YEAR ENDED DECEMBER 31, 2024

To the Annual General Meeting of Teréga, SAS,

This report is issued in our capacity as statutory auditor of Teréga, SAS. It covers the sustainability information and the information required by Article 8 of Regulation (EU) 2020/852, relating to the year ended December 31, 2024 and included in paragraph 4 entitled "Sustainability report" of section II of the management report (hereinafter the "Sustainability report").

Pursuant to Article L. 233-28-4 of the French Commercial Code, Teréga, SAS is required to include the above-mentioned information in a separate section of its management report. This information has been prepared in the context of the first-time application of the aforementioned Articles, a context characterized by uncertainties regarding the interpretation of the laws and regulations, the use of significant estimates, the absence of established practices and frameworks in particular for the double-materiality assessment, and an evolving internal control system. This information enables an understanding of the impact of the activity of the Group on sustainability matters, as well as the way in which these matters influence the development of the business of the Group, its performance and position. Sustainability matters include environmental, social and corporate governance matters.

Pursuant to Article L. 821-54 paragraph II of the aforementioned Code, our responsibility is to carry out the procedures necessary to issue a conclusion, expressing limited assurance, on:

- compliance with the sustainability reporting standards adopted pursuant to Article 29 b of Directive (EU) 2013/34 of the European Parliament and of the Council of 14 December 2022 (hereinafter ESRS for European Sustainability Reporting Standards) of the process implemented by Teréga, SAS to determine the information reported;
- compliance of the sustainability information included in the Sustainability report with the requirements of Article L. 233-28-4 of the French Commercial Code, including the ESRS; and
- compliance with the reporting requirements set out in Article 8 of Regulation (EU) 2020/852.

This engagement is carried out in compliance with the ethical rules, including independence, and quality control rules prescribed by the French Commercial Code.

It is also governed by the H2A guidelines on Limited assurance engagement - Certification of sustainability reporting and verification of disclosure requirements set out in Article 8 of Regulation (EU) 2020/852.

In the three separate sections of the report that follow, we present, for each of the sections of our engagement, the nature of the procedures that we carried out, the conclusions that we drew from these procedures and, in support of these conclusions, the elements to which we paid particular attention and the procedures that we carried out with regard to these elements. We draw your attention to the fact that we do not express a conclusion on any of these elements taken individually and that the procedures described should be considered in the overall context of the formation of the conclusions issued in respect of each of the three sections of our engagement.

Finally, where deemed necessary to draw your attention to one or more disclosures of sustainability information provided by Teréga, SAS in its Sustainability report, we have included an emphasis of matter(s) paragraph hereafter.

LIMITS OF OUR ENGAGEMENT

As the purpose of our engagement is to express limited assurance, the nature (choice of techniques), extent (scope) and timing of the procedures are less than those required to obtain reasonable assurance.

Furthermore, this engagement does not provide guarantee regarding the viability or the quality of the management of Teréga, SAS, in particular it does not provide an assessment of the relevance of the choices made by Teréga, SAS in terms of action plans, targets, policies, scenario analyses and transition plans, which would go beyond compliance with the ESRS reporting requirements.

It does, however, allow us to express conclusions regarding the Entity's process for determining the sustainability information to be reported, the sustainability information itself, and the information reported pursuant to Article 8 of Regulation (EU) 2020/852, as to the absence of identification or, on the contrary, the identification of errors, omissions or inconsistencies of such importance that they would be likely to influence the decisions that readers of the information subject to this engagement might make.

Any comparative information is not covered by our engagement.

Compliance with the ESRS of the process implemented by Teréga, SAS to determine the information reported

NATURE OF PROCEDURES CARRIED OUT

Our procedures consisted in verifying that:

- the process defined and implemented by Teréga, SAS has enabled it, in accordance with the ESRS, to identify and assess its impacts, risks and opportunities related to sustainability matters, and to identify the material impacts, risks and opportunities that led to the publication of sustainability information in the Sustainability report; and
- the information provided on this process also complies with the ESRS.

We also checked the compliance with the requirement to consult the social and economic committee.

CONCLUSION OF THE PROCEDURES CARRIED OUT

On the basis of the procedures we have carried out, we have not identified any material errors, omissions or inconsistencies regarding the compliance of the process implemented by Teréga, SAS with the ESRS.

ELEMENTS THAT RECEIVED PARTICULAR ATTENTION

We set out below the elements that have been the subject of particular attention in relation to our assessment of compliance with the ESRS of the process implemented by Teréga, SAS to determine the information reported.

Concerning the identification of stakeholders

Information on the identification of stakeholders is mentioned in part 3.2. entitled "Stakeholder Interests and Views" in the "ESRS 2 – General Disclosures" section of the Sustainability report.

We obtained an understanding of the analysis carried out by the Entity to identify:

- stakeholders, who may affect or be affected by the entities within the scope of the information, through their direct or indirect business activities and relationships in the value chain;
- the primary users of the sustainability statements (including the primary users of the financial statements).

With this in mind, we interviewed the CSR Department in charge of the analysis and the people concerned, and inspected available documentation as part of the stakeholder identification process.

Our due diligence consisted in particular in assessing the appropriateness of the description given in part 3.2. entitled "Stakeholder Interests and Views" in the "ESRS 2 – General Disclosures" section of the Sustainability report.

Concerning the identification of impacts, risks and opportunities

Information on the identification of impacts, risks and opportunities is mentioned in part 4.1. entitled "Description of the process for identifying and assessing material impacts, risks and opportunities" in the "ESRS 2 – General disclosures" section of the Sustainability report.

In particular, we obtained an understanding of the process implemented by the Entity regarding the identification of (negative or positive) actual or potential impacts, risks and opportunities ("IROs"), in connection with the sustainability issues mentioned in paragraph AR 16 of the "Application requirements" of ESRS 1.

We also assessed the scope used to identify IROs, particularly in relation to the scope of the consolidated financial statements.

We obtained an understanding of the Entity's mapping of identified IROs, including in particular the description of their distribution within its own activities and the value chain, as well as their time horizon (short, medium or long term). We examined the consistency of this mapping with the elements approved by the governance bodies.

Concerning the assessment of impact materiality and financial materiality

Information relating to the assessment of impact materiality and financial materiality is mentioned in part 4.1 entitled "Description of the process for identifying and assessing material impacts, risks and opportunities" in the "ESRS 2 - General disclosures" section of the Sustainability report.

We obtained an understanding, through an interview with the CSR Department in charge of analysing and inspecting available documentation, of the process for assessing the impact materiality and the financial materiality implemented by the Entity, and assessed its compliance with the criteria defined by ESRS 1.

We obtained an understanding of the decision-making process implemented by the Entity in the assessment of the impact and financial materialities, and assessed the presentation thereof in the aforementioned section.

In particular, we assessed the way in which the Entity established and applied the materiality criteria defined in ESRS 1, including the setting of thresholds, to determine which information was material for reporting purposes under the indicators relating to material IROs identified in accordance with the relevant thematic ESRS.

Compliance of the sustainability information included in the Sustainability report with the requirements of Article L. 233-28-4 of the French Commercial Code, including the ESRS

NATURE OF PROCEDURES CARRIED OUT

Our procedures consisted in verifying that, in accordance with legal and regulatory requirements, including the ESRS:

- the disclosures provided enable an understanding of the general basis for the preparation and governance of the sustainability information included in the Sustainability report, including the basis for determining the information relating to the value chain and the exemptions from disclosures used;
- the presentation of this information ensures its readability and understandability;
- the scope chosen by Teréga, SAS for providing this information is appropriate; and
- on the basis of a selection, based on our analysis of the risks of non-compliance of the information provided and the expectations of users, this information does not contain any material errors, omissions or inconsistencies, i.e. that are likely to influence the judgement or decisions of users of this information.

CONCLUSION OF THE PROCEDURES CARRIED OUT

Based on the procedures we have carried out, we have not identified material errors, omissions or inconsistencies regarding the compliance of the sustainability information included in the Sustainability report with the requirements of Article L. 233-28-4 of the French Commercial Code, including the ESRS.

EMPHASIS OF MATTER

Without qualifying the conclusion expressed above, we draw your attention to the information provided in the "General Introduction" part of the "ESRS 2 - General Disclosures" section of the Sustainability report, which highlights the uncertainties inherent in the first-time application of the ESRS, in particular with regard to the decision to exclude category 3.11 (use of products sold) from scope 3 of greenhouse gas emissions.

ELEMENTS THAT RECEIVED PARTICULAR ATTENTION

We set out below the elements that have been the subject of particular attention in relation to our assessment of the compliance of the sustainability information included in the Sustainability report with the requirements of Article L. 233-28-4 of the French Commercial Code, including the ESRS.

Information provided in application of environmental standards (ESRS E1 to E5)

Information published in respect of climate change (ESRS E1) is mentioned in the “ESRS E1 - Climate change” section of the Sustainability report.

Our due diligence consisted in particular in:

- conducting interviews with the Finance, Procurement, Legal and Sustainable Development Department and with the Management of the Shareholder Relations and CSR Department, to inquire about the process adopted by the Entity to produce this information, and assessing the consistency of the information presented in the «ESRS E1 - Climate change» section with our knowledge of the Entity, in particular the description of the policies, actions and targets implemented by the Entity;
- defining and implementing appropriate analytical procedures, based on this information and our knowledge of the Entity.

With respect to the disclosures for greenhouse gas (“GHG”) emissions, we also:

- obtained an understanding of the Entity’s GHG emissions assessment procedure, in particular:
 - assessed the consistency of the scope considered for the assessment of GHG emissions with the scope of the consolidated financial statements and the upstream and downstream value chain;
 - obtained an understanding of the methodology for calculating the estimated data and the sources of information used in the development of the estimates that we considered structuring, which the Entity used to develop its GHG emissions;
- assessed, on the basis of a selection, the emission factors used and the calculation of the related conversions as well as the calculation and extrapolation assumptions, taking into account the uncertainty inherent in the state of scientific or economic knowledge and the quality of the external data used;
- reconciled, for directly measurable data, such as energy consumption related to scopes 1 and 2, on a selection, the underlying data used for the assessment of GHG emissions with supporting documents;
- obtained an understanding of the methane emissions calculation file, which constitutes a significant part of Teréga, SAS’ total GHG emissions, and assessed the consistency between the data reported in this file and the source data that appear on various platforms and internal monitoring software;
- regarding scope 3 emissions:
 - assessed the justification for the inclusions and exclusions of the different categories and the transparency of the information provided in this respect;
 - appreciated the information gathering process;
 - obtained an understanding of the estimation methodologies used.

With regard to the transition plan for climate change mitigation, our work mainly consisted in:

- assessing whether the action plans reflect the commitments made by the platforms’ governing bodies as reflected in the minutes of the relevant meetings, it being specified that we are not required to express a conclusion on the appropriateness or level of ambition of the objectives of these action plans;
- examining whether the information published under the action plan for the climate change mitigation meets the requirements of ESRS E1 and appropriately describes the structuring assumptions underlying the plan, it being specified that the methodologies for assessing the compatibility or alignment of company-wide GHG emission reduction targets with the Paris Agreement are, to date, neither stabilized nor the subject of a consensus;
- reconciling, for a selection of data that underpin the quantitative contribution of decarbonization levers, the information produced with available documentation;
- obtaining an understanding of the process implemented to estimate the resources allocated (OpEx and CapEx) to climate change mitigation actions over time;
- examining the Entity’s identification of locked GHG emissions and its consideration in the adaptation plan.

Compliance with the reporting requirements set out in Article 8 of Regulation (EU) 2020/852

NATURE OF PROCEDURES CARRIED OUT

Our procedures consisted in verifying the process implemented by Teréga, SAS to determine the eligible and aligned nature of the activities of the entities included in the consolidation.

They also involved verifying the information reported pursuant to Article 8 of Regulation (EU) 2020/852, which involves checking:

- the compliance with the rules applicable to the presentation of this information to ensure that it is readable and understandable;
- on the basis of a selection, the absence of material errors, omissions or inconsistencies in the information provided, i.e. information likely to influence the judgement or decisions of users of this information.

CONCLUSION OF THE PROCEDURES CARRIED OUT

Based on the procedures we have carried out, we have not identified any material errors, omissions or inconsistencies relating to compliance with the requirements of Article 8 of Regulation (EU) 2020/852.

ELEMENTS THAT RECEIVED PARTICULAR ATTENTION

Concerning key performance indicators and accompanying information

The key performance indicators and accompanying information are set out in the “ESRS E – Taxonomy” section of the Sustainability report.

Regarding the Renewable Gas Index (RGI), which is taken into account in the calculation of the key performance indicators, we assessed the relevance of its choice on the basis of interviews with the Finance, Procurement, Legal and Sustainable Development Department, its contribution to the indicators and our knowledge of the sector.

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The Statutory Auditor
French original signed by
ERNST & YOUNG et Autres

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