

# COMPLIANCE (REGULATORY AND CRIME PREVENTION) AND INTERNAL INFORMATION SYSTEM POLICY

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## 1 INTRODUCTION

The will of **NORTEGAS** to fully, solidly and exhaustively comply with any legal obligation, as well as any demand or request from an environmental, social and corporate governance point of view by third parties (customers, shareholders, investors, employees, public authorities and any other interest group) has led the Company to develop organisational measures, technical means, personal resources and internal controls to guarantee compliance with the applicable regulations and requirements.

In this context, **NORTEGAS** approves this COMPLIANCE POLICY (REGULATORY AND CRIME PREVENTION) AND INTERNAL INFORMATION SYSTEM (the "**Policy**") in order to provide an internal reference framework for the "**Regulatory Compliance and Crime Prevention System**" whose purpose is to prevent, manage and mitigate the risk of irregular conduct and illegal or unlawful acts within the organisation. It also provides a reference framework for the **Internal Information System** as a channel for reporting or informing on possible irregular conduct or potential illegal or unlawful acts.

## 2 SCOPE AND APPLICATION OF THE POLICY

This Policy establishes the principles and guidelines to guarantee **NORTEGAS**:

- (i) compliance with all obligations and requirements contained in applicable laws, regulations and policies (including where internal or voluntary), any commitments referred to in contracts or agreements, and any liability resulting from applicable acts, facts or circumstances.
- (ii) the prevention, detection and, as far as possible, eradication of all behaviour or conduct that could be considered criminal offences.
- (iii) the protection of persons who, within the framework of an employment or professional relationship, report breaches of the law through the Internal Information System.

This Policy applies to the Nortegas Group (comprising Nortegas Energía Grupo, S.L.U. and its subsidiaries, provided that Nortegas Energía Grupo, S.L.U. owns, directly or indirectly, at least 50% of the share capital) and, in particular, to all its activities, processes, projects, products and related services, in all lines of business and in all the geographical areas in which it operates.

## 3 PRINCIPLES, VALUES AND COMMITMENTS

This Policy demonstrates the intention and determination of the Board of Directors of **NORTEGAS** to promote and guarantee a true Culture of Integrity and Regulatory Compliance within the organisation and to provide the necessary control and support to comply with all applicable legal obligations, requirements and responsibilities; likewise, this Policy reflects the firm, definitive and unconditional commitment of the Board of Directors of **NORTEGAS** to prevent and detect criminal acts and infractions and to punish those responsible, establishing the Internal Information System as a channel for communicating complaints or information of possible irregular conduct or potential illegal or unlawful acts.. In addition, this Policy is an appropriate tool to (i) require ethical behaviour from all persons working in or for **NORTEGAS**, (ii) preserve the reputation of **NORTEGAS**, (iii) eliminate conflicts of interest, and (iv) avoid the destruction of value for shareholders and investors.

**NORTEGAS** believes that ethics and business should go hand in hand and, therefore, ethics is a fundamental pillar of **NORTEGAS'** culture.

On the one hand, compliance with all applicable legal obligations, requirements and responsibilities is part of the Mission of **NORTEGAS**, which wishes to be recognised as an ethical organisation. Furthermore, responsibility - considered as "guiding the decisions we make at all levels with integrity, respecting ethics, all regulations and laws" - is one of **NORTEGAS'** values. On the other hand, **NORTEGAS** applies zero tolerance towards any criminal conduct.

Therefore, **NORTEGAS** expects any corporate or individual behaviour to conform to this Policy and is committed to creating an environment of accountability, transparency, sustainability, innovation and customer orientation:

- The development and adoption, with its own corporate approach, of a Regulatory Compliance System and a regulatory framework for Compliance and Crime Prevention that enables its effective implementation, promoting its continuous review, updating and improvement, and ensuring its sustainability, suitability and effectiveness.
- Promoting a culture of integrity and respect for compliance and ethical rules and standards, taking into account not only the interests and reputation of **NORTEGAS**, but also the needs and expectations of its stakeholders.
- Helping to create a true Culture of Integrity and Compliance at **NORTEGAS** through, among others, the conduct of its directors and members of senior management, leading by example, responding promptly and emphatically to risks or breaches of ethical standards or rules.
- The application of a zero tolerance approach to all behaviour or conduct that may involve breaches of applicable regulations or internal policies and procedures for Regulatory Compliance and Crime Prevention, implementing and supervising controls and preventive measures to avoid and detect acts, conduct or behaviour of non-compliance and, as far as possible, eradicating all behaviour or conduct that may be considered a crime or criminal offence and adopting disciplinary, corrective or punitive measures when necessary.
- Informing all managers, staff members and third parties about the Regulatory Compliance and Crime Prevention System, about the Internal Information System and promoting training programmes, so that everyone knows, understands and accepts the rules and obligations necessary in their activity when acting for, representing or interacting with **NORTEGAS**.
- The monitoring of the implementation of controls and preventive measures and the establishment of a disciplinary regime.
- The establishment of an Internal Information System as a channel for reporting or denouncing acts, conduct or behaviour that may involve non-compliance, violations or infringements in the area of Regulatory Compliance and/or Crime Prevention.

### 3.1 STRUCTURE OF THE COMPLIANCE FUNCTION

The organisational structure of the **Regulatory Compliance Function** consists of a Compliance Officer and a unit (Compliance Department) that jointly, but independently and autonomously, carry out the regulatory compliance function in the manner provided for in sections 4.3 and 4.5, respectively. The assumption by the Compliance Officer or the Compliance Department of the different responsibilities and duties that define the Regulatory Compliance Function does not exempt the managers from complying with their legal obligations, which are inherent to the performance of their duties.

The **Compliance Department** reports hierarchically to the General Secretary, who in turn reports to the Chief Executive Officer of the Company.

The **Compliance Officer** is an independent function (with functional reporting to the Audit Committee), with appropriate autonomy from management, authority within the organisation and sufficient resources to ensure that the Regulatory Compliance and Crime Prevention System is effectively implemented, including direct access to the organisation's governance authority (in this case, the Audit Committee and the Board of Directors).

### 3.2 DUTIES OF THE COMPLIANCE FUNCTION

In general terms, the Compliance Function is responsible for:

- (i) Identify Criminal Risk and Compliance Risk.
- (ii) Identify compliance obligations.
- (iii) Develop policies and procedures that contribute to the continuous improvement of the Regulatory Compliance and Crime Prevention System.
- (iv) Providing training to the organisation.
- (v) Manage the information and documentation of the compliance system.
- (vi) Establish and maintain performance indicators for the compliance system.
- (vii) Analyse the results of the compliance system.
- (viii) Ensuring regular verification of the compliance system
- (ix) Provide employees with easy access to policies and procedures.
- (x) Objectively assess the organisation's compliance with regulations.
- (xi) Comply with possible requirements established by the Audit Committee for the purposes of the Regulatory Compliance and Crime Prevention System.

## 4 REGULATORY COMPLIANCE AND CRIME PREVENTION SYSTEM: RESPONSIBILITIES

All persons within **NORTEGAS** must comply with all obligations and requirements contained in all applicable laws, rules, policies and ethical standards.

Any breach of this Policy, as well as the breach of any procedure or obligation related to the Regulatory Compliance and Crime Prevention System, will be considered a serious or, where appropriate, very serious offence and will automatically trigger the application of the **NORTEGAS** disciplinary system.

All members of **NORTEGAS** are obliged to know and understand this Policy. Ignorance of this Policy or of any procedure or obligation related to the Regulatory Compliance and Crime Prevention System does not exempt from responsibility for its compliance.

### 4.1 BOARD OF DIRECTORS

The Board of Directors is the fundamental decision-making body that defines and approves the strategic, management and governance guidelines and policies at **NORTEGAS** relating to the Regulatory Compliance and Crime Prevention System and must monitor their implementation and establish the necessary communication and information exchange mechanisms. This includes ongoing direction and review of the internal structure to ensure that there are lines of accountability for management and governance throughout the organisation.

With this in mind, the Board of Directors is responsible for the approval and proper functioning of the Regulatory Compliance and Crime Prevention System and drives the organisational and management measures.

The Chief Executive Officer shall be responsible, in accordance with the powers granted by the Board of Directors, for approving policy development documents (protocols, procedures, etc.).

The Board of Directors, in relation to the Regulatory Compliance and Crime Prevention System, is responsible for:

- Approve the Regulatory Compliance and Crime Prevention System, which includes this policy and the Ethics Channel Internal Rules, as well as any other policy that may be necessary for this purpose. The Regulatory Compliance and Crime Prevention System has the following content:
  - Identification of activities involving a potential risk of criminal behaviour
  - Establishment of procedures and protocols in relation to the formation of social will and the making and implementation of decisions
  - Providing a financial resource management programme for crime prevention
  - Imposition of specific reporting obligations on criminal risks and possible infringements by the Chief Compliance Officer and the Compliance Department
  - Establishment of a disciplinary system that appropriately sanctions violations of the requirements of the Regulatory Compliance and Crime Prevention System.
  - Periodic verification of the Regulatory Compliance and Crime Prevention System and its review when (i) serious breaches occur, (ii) a crime is disclosed or (iii) organisational changes are made.
- Promote a true Culture of Integrity and Compliance at **NORTEGAS**.
- Designate a Compliance Function (composed of the Compliance Officer and the Compliance Department) with sufficient authority and resources.
- Appointing and dismissing the Compliance Officer, as well as the head of the Internal Information System.
- Entrust the supervision of the functioning of the Regulatory Compliance and Crime Prevention System to a Compliance Officer with adequate resources and autonomous powers.
- Provide the Compliance Function with the necessary support to carry out its tasks and fulfil its duties.

#### 4.2 **AUDIT COMMISSION**

The Audit Committee assists the Board of Directors of the Company in supervising the effectiveness of the Regulatory Compliance and Crime Prevention System.

The Audit Committee, in relation to the Regulatory Compliance and Crime Prevention System, is responsible for:

- Supervise the effectiveness of the Regulatory Compliance and Crime Prevention System on an annual basis. As a result of this review, the Audit Committee may submit recommendations or proposals to the Board of Directors of the Company.
- Guarantee the independence of the Compliance Officer, ensuring that he/she has the necessary means and resources to carry out his/her duties.
- Supervise the activity and performance of the Compliance Officer.
- Ensure the establishment and oversight of the mechanism that allows employees to confidentially and anonymously report any potentially significant irregularities they discover within the organisation and receive regular feedback on the functioning of the

above mechanism, including the number of complaints received, their origin, type, the outcome of investigations and proposed actions.

- Conduct, or supervise (as appropriate), such investigations as may be necessary following complaints by third parties against the Company or in cases of irregular or improper conduct.
- To make recommendations or proposals to the Board of Directors.
- Receive regular information regarding compliance with the internal rules set out in the Ethics Code.
- Propose to the Board of Directors the budget of the Compliance Officer and the appointment or replacement thereof.
- Follow up on the investigations conducted by the Compliance Officer into potentially significant irregularities, the results thereof and the proposed measures and, when deemed necessary, propose appropriate measures to reduce the risk of future irregularities.

#### 4.3 COMPLIANCE OFFICER

The Compliance Officer, as an essential part of the Regulatory Compliance Function, plays a key role in the development, implementation and management of the organisation's Regulatory Compliance, monitoring the Regulatory Compliance and Crime Prevention System mandated by the Board of Directors. In addition, the Compliance Officer must resolve any incidents or doubts regarding its interpretation or non-compliance and ensure fair handling of complaints.

The Compliance Officer, in relation to the Regulatory Compliance and Crime Prevention System, is responsible for:

- Perform any functions or tasks delegated by the Audit Committee in relation to the Regulatory Compliance and Crime Prevention System.
- Oversee the development of policies, procedures and controls that contribute to the implementation of the Regulatory Compliance and Crime Prevention System.
- Periodically review and validate the Regulatory Compliance and Crime Prevention System, including any identified deficiencies and possible modifications, suggestions or improvements.
- Review and validate the periodic report prepared by the Compliance Department on the effectiveness of the Regulatory Compliance and Crime Prevention System.
- Execute the resolutions issued by the Board of Directors in relation to the Regulatory Compliance and Crime Prevention System.
- Manage the Internal Information System so that any person, confidentially and anonymously, can report acts or behaviours of non-compliance or considered as crimes, guaranteeing at all times the confidentiality of the complaints processed.
- Receive, examine and resolve complaints relating to acts or behaviours of non-compliance or considered as offences, irregularities and requirements of the Ethics Code.
- Promote and supervise appropriate training programmes on Regulatory Compliance for all **NORTEGAS** employees.
- To deal with and answer any queries on Regulatory Compliance.
- To ensure the proper handling of the procedures initiated, as well as the rights of persons allegedly involved in a possible infringement.
- To prepare an annual report on its performance with the recommendations it deems appropriate to convey to the Board of Directors through the Audit Committee.

For the purposes of fulfilling the aforementioned responsibilities, the Compliance Officer, as the person responsible for the proper performance of the Regulatory Compliance Function, shall perform his or her duties in accordance with the following principles and guarantees:

- a) **Autonomy:** The Compliance Officer shall have sufficient autonomy to carry out his or her functions, without being able to take instructions from or act at the request of other areas. The Compliance Officer has autonomy to make decisions without the need for another area or function of the organisation to approve or endorse his or her views. Sufficient autonomy includes direct access to the organisation's governance authority (in this case, the Audit Committee and the Board of Directors).

**Independence:** (In order to guarantee his/her independence, the Compliance Officer shall not be subject to the fulfilment of commercial objectives but shall be subject only to those of his/her own activity and to the entity's global corporate challenges.

Likewise, the appointment, dismissal, the establishment of their remuneration (both fixed and variable with reasonable proportionality) and the evaluation of the degree of achievement of their objectives or challenges shall be the responsibility of the Board of Directors, subject to compliance with the applicable legal requirements.

- b) **Authority:** The Compliance Officer shall have sufficient authority for his or her decisions to be assumed by other areas of the entity. The Compliance Officer may at any time initiate evaluations and verification processes and investigations related to areas or processes that present real or potential risks of non-compliance that could put **NORTEGAS** at risk.
- c) **Resources:** Due to the importance of the mission of the Regulatory Compliance Function and its responsibilities within the organisation, the Compliance Officer must have sufficient resources to assume the activities and responsibilities assigned to the Regulatory Compliance Function in this Policy. Therefore, sufficient material, IT and technical resources must be assigned to enable him/her to effectively perform his/her function, taking into account the nature, volume and complexity of the operations and the nature of the risks assumed by **NORTEGAS**. To this end, the Compliance Officer must have a budget that allows him/her to carry out his/her activities, which must be in accordance with the level of non-compliance risk to which the entity is exposed.
- d) **Competence and suitability:** The Compliance Officer must meet the requirements of knowledge, experience, qualifications and professional integrity necessary to perform his or her duties with assurance throughout the organisation, and thus ensure broad coverage of the Compliance Function on an ongoing basis. To this end, training programmes should be established for the performance of the Compliance Function, as well as plans for its professional development.
- e) **Access to information:** The Compliance Officer shall have access to all the information and documentation necessary to carry out his or her functions properly. Likewise, he/she must have the necessary collaboration at all levels to comply with the reporting requirements to the supervisory bodies within the deadlines established by them.
- f) **Risk perspective:** In the exercise of his activity, the Compliance Officer must at all times keep in mind a risk-based approach and therefore perform a continuous assessment of the Regulatory Compliance Risk associated with the core processes, to prioritise the oversight and monitoring activities that are specific to the Regulatory Compliance



Function, as well as to carry out an appropriate allocation of resources based on the risks identified.

#### 4.4 ETHICS COMMITTEE

The Ethics Committee promotes understanding of and compliance with the Ethics Code and assists the Chief Compliance Officer in resolving issues or concerns about its interpretation or non-compliance.

The members of the Ethics Committee are the persons who at any given time perform the following functions:

- The Compliance Officer
- General Counsel
- Human Resources Directorate
- Chief Financial Officer (CFO)
- Sustainability Directorate

The Ethics Committee is responsible for:

- Promote ethical culture in the Society and other stakeholders.
- Ensure and monitor the dissemination of the Ethics Code and the promotion of its understanding and compliance.
- Promote appropriate training programmes on Ethics for all **NORTEGAS** employees.
- Interpret the rules of the Ethics Code.
- Propose corporate ethics policies and instruments to the Audit Committee for subsequent approval by the Board of Directors.
- Periodically review the Ethics Code and the procedures derived from it in order to adapt them to the needs of **NORTEGAS**.

#### 4.5 COMPLIANCE DEPARTMENT

The Compliance Department, in relation to the Regulatory Compliance and Crime Prevention System, is responsible for:

- Develop policies, procedures and controls that contribute to the implementation of the Regulatory Compliance and Crime Prevention System.
- Identify and update Regulatory Compliance obligations and define, together with each responsible party, controls to mitigate the risk of non-compliance.
- Conduct a periodic review of the Regulatory Compliance and Crime Prevention System that measures results, identifies deficiencies and promotes continuous improvement, keeping the Regulatory Compliance and Crime Prevention System up to date.
- Prepare a periodic report on the effectiveness of the Regulatory Compliance and Crime Prevention System.
- Promote, together with the Ethics Committee, appropriate training programmes on Compliance for all **NORTEGAS** employees.
- Attending and answering any queries on compliance.
- Provide guidance and assistance to management on compliance.



#### 4.6 MANAGEMENT

Management, in relation to the Regulatory Compliance and Crime Prevention System, is responsible for:

- Contribute to creating a true Culture of Integrity and Compliance among its employees and within the organisation and lead the commitment against any criminal behaviour.
- Follow compliance rules and processes at all times and ensure compliance by staff reporting to them.
- Keep abreast of all requirements of laws and regulations applicable to their management areas and inform the Compliance Department of any changes in circumstances.
- Implement measures designed to mitigate Criminal Risk and Compliance Risk and generate evidence of their effectiveness.
- Report any scenario of non-compliance or any irregularity or suspicion of criminal conduct.
- Exercising its functions and powers under the Culture of Integrity and Compliance
- Comply with the requirements set by the Compliance Officer and the Compliance Department.

#### 4.7 STAFF

All employees are responsible for:

- Contribute to creating a true Culture of Integrity and Compliance within the organisation.
- Be aware of the legislation/regulations associated with their functions and activities.
- Comply with the Regulatory Compliance and Crime Prevention System and comply with any controls and mitigation measures, leaving evidence of them.
- Comply with the requirements set by the Compliance Officer and the Compliance Department.
- Report concerns, problems and cases of suspected criminal conduct or incidences of non-compliant conduct or behaviour through the Internal Information System provided for this purpose.

### 5 INTERNAL INFORMATION SYSTEM AND WHISTLEBLOWER PROTECTION

**NORTEGAS** has implemented an Internal Information System in accordance with the applicable regulations, to detect and prevent irregularities, enabling the reporting of improper or unlawful acts, non-compliance and any conduct contrary to current legislation and/or internal regulations (including, in particular, any conduct that could constitute a crime, a serious or very serious administrative offence, or a breach of European Union law) through the Ethics Channel.

The Internal Information System comprises this Policy and the Ethics Channel as a channel for receiving information (with the "Ethics Channel Internal Rules" that establishes how this works), with the Compliance Officer being responsible for the Internal Information System.

The Internal Information System is designed to guarantee: (i) the confidentiality of the identity of the informant and of any third party mentioned in the complaint or information, and of the actions carried out in the management and processing thereof, as well as the protection of personal data, preventing access to the content of the investigation by unauthorised personnel;

and (ii) that the complaints or information submitted can be dealt with effectively within the Company.

### 5.1 ETHICS CHANNEL

The Company establishes for employees (including persons with an employment or statutory relationship that has ended, volunteers, trainees or workers in training periods), customers, suppliers, contractors, subcontractors, shareholders, participants, persons belonging to the administrative, management or supervisory body, as well as for other third parties provided for in the applicable regulations, the duty to report, through the Internal Information System, any improper or unlawful act, non-compliance and any behaviour contrary to current legislation and/or internal regulations of which they are aware.

For this purpose, **NORTEGAS** has set up the Ethics Channel, which allows to denounce and inform, either in writing, through the corresponding form located on the corporate website and intranet of **NORTEGAS**, through the mail [etica@nortegas.es](mailto:etica@nortegas.es), or by hand-delivering it or sending it by post to the Compliance Officer, or verbally.

Communications through the Ethics Channel may be made anonymously, must meet criteria of truthfulness and proportionality, and may not be used for purposes other than those of compliance with the regulations, and will be processed in accordance with the procedure established in the "Ethics Channel Internal Rules".

This Internal Information System should preferably be used so that the first to know about a possible irregularity is the institution itself. In the event that the whistleblower considers that there is a risk of reprisal, he/she may address his/her complaint to the Independent Whistleblower Protection Authority (A.A.I. according to its acronym in Spanish) or to the corresponding regional authorities or bodies.

### 5.2 WHISTLEBLOWER PROTECTION AND SAFEGUARDS

**NORTEGAS** undertakes, under the terms provided for in the regulations, not to adopt (and to ensure that its employees do not adopt) any form of retaliation, direct or indirect, including threats of retaliation or attempted retaliation, against: (i) any person who has reported any information, through the Ethics Channel, unless the report or information was false or that person acted in bad faith; (ii) any natural person who, within the organisation in which the reporting person provides services, assists the reporting person in the process, or is related to the reporting person, as a representative of the employees, co-worker or family member; and (iii) any legal person, for whom the informant works or with whom he/she is otherwise related in an employment context or in which he/she has a significant shareholding.

### 5.3 MANAGEMENT OF THE INTERNAL INFORMATION SYSTEM

The Compliance Officer is the body responsible for the management of the **NORTEGAS** Internal Information System, and for the processing and management of complaints or information received through the Ethics Channel, in accordance with the "Ethics Channel Internal Rules".

The Independent Whistleblower Protection Authority (I.W.P.A.) shall be notified in due time of the appointment of the Compliance Officer as the person responsible for the Internal Information System.

The Compliance Officer will investigate, as soon as possible, any complaint or information of a fact that may allegedly consist of a breach, guaranteeing the rights of the informant, as well as the rights to privacy, honour, defence and the presumption of innocence of the persons investigated or affected, in accordance with the "Ethics Channel Internal Rules".

This regulation provides for the immediate forwarding of information to the Public Prosecutor's Office when the facts could be indicative of a crime and, if they affect the financial interests of the European Union, they will be forwarded to the European Public Prosecutor's Office.

## **6 PROCEDURE FOR THE APPROVAL AND REVISION OF THE POLICY**

The Board of Directors of **NORTEGAS** is responsible for approving this Policy, as well as its possible modifications.

The Compliance Officer is the owner of the Policy and is responsible, together with the Compliance Department, for preparing the amendments to be submitted for approval by the Board of Directors of the Company.

The Compliance Officer will periodically review the Policy and, if deemed appropriate (or at the request of the Compliance Department), propose amendments to the Policy for submission to the Audit Committee for consideration and submission to the Board of Directors for approval.

References included in this Policy to specific departments, areas or positions shall be understood to be made, in the event of changes in the organisation that affect them, to the department, area or position that assumes their functions.

## **7 VALIDITY**

This Policy shall be valid indefinitely, without prejudice to any modifications, adaptations or updates that the relevant governing bodies of **NORTEGAS** may agree at any given time.

## **8 COMMUNICATION**

The Compliance Department and the Ethics Committee will promote the communication and knowledge of this Policy within **NORTEGAS** and to all those who are affected by it.