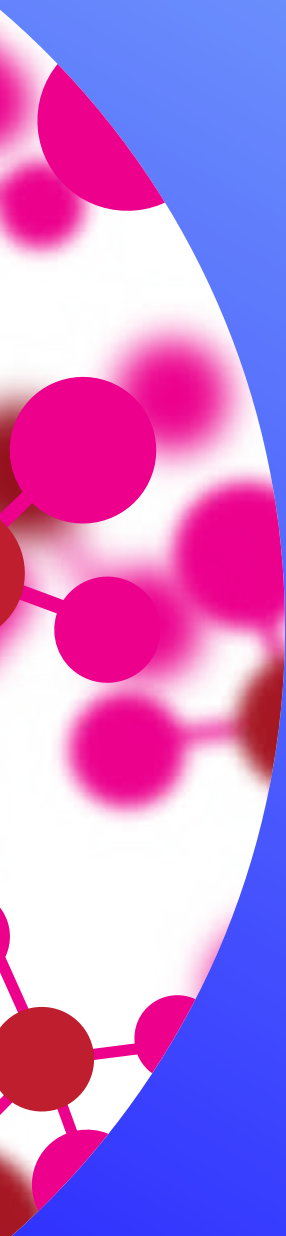


THE RENEWABLE GASES • Energy in motion

This piece represents renewable gases through a graphic approach that creates patterns and uses vibrant colours to express a living energy, with 175 years of experience, based on renewable gas molecules. We see different layers that convey the multiplicity of its real impact on consumers' lives, simultaneously reflecting the commitment to a more transparent, clean, and efficient future.



GRI Tables and ESG Indicators

This document is an annex to Floene's Management Report and Accounts 2024. It identifies the GRI Standards and indicators to which a response is being made, with reference to the respective contents in the Report (or other external resources) and detailing the response in the Table itself, where applicable.

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Omissions

Declaration of use	Floene reported in accordance with the GRI Standards for the period 01/01/2024 to 31/12/2024
GRI 1 used	GRI 1: Fundamentals 2021
Applicable GRI Sector Standard	GRI 11: Oil and Gas Sector 2021

		Omission		
GRI standard/ Other source	Contents	Require- ment(s) omitted	Reason for omission	Explanation
Economic Performance				
Economic Performance	201-2 Financial implications, risks and opportunities due to climate change	Partial (ii, iii, v)	Information not applicable	Floene does not currently quantify the financial impact of risks and opportunities before implementing measures
Environmental Performance				
Environmental Performance	305-6 Emissions of ozone-depleting substances (ODS)	All	Information not applicable	The activities carried out do not involve the production, use or emission of substances that contribute to the degradation of the ozone layer
	305-7 Emissions of nitrogen oxides (NOx), sulphur oxides (SOx) and other significant atmospheric emissions	All	Information not available	Currently, there is no structured system for quantifying NOx, SOx and other significant atmospheric emissions
Social Performance				
Social Performance	413-2 Operations with significant potential or actual negative impacts on local communities	All	Information not available	There is no knowledge of negative impacts derived from Floene's activity on local communities



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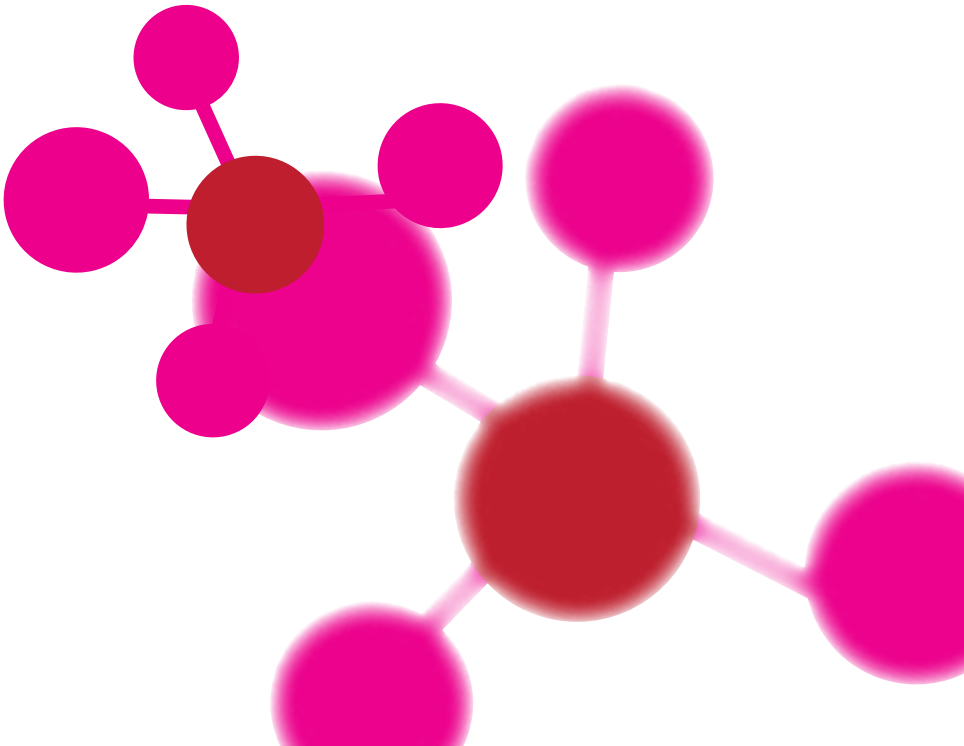
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Glossary

Understanding of the following concepts, applicable to the various indicators in the GRI table.

Concepts	
Region	Considering that Floene only has employees with tax residency in Portugal, the region should be considered as Portugal .
Location	The term local is equivalent to resident in Portugal , as all Floene employees are based in Portugal .
Local community	It refers to the national territory , covering the communities and geographical context of Portugal where Floene carries out its activities.
Important operational units	All of Floene's existing directorates , which are key units for the management and operation of the organisation, are taken into account.





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The organisation and its reporting practices

2-1 Organisation Details

Legal name of organisation: FLOENE ENERGIAS, S.A.

Nature of organisation: Public limited company

Registered office: Rua Tomás da Fonseca, Torre A, 15º Piso, 1600-209 Lisboa, Portugal

Country of operation: Portugal

2-2 Entities included in the organisation's sustainability report

The Floene Group is the largest gas distribution operator in Portugal, through the direct participation and management of nine Regional Gas Distribution Operators (DSO), present in 106 municipalities from the north to the south of Portugal. To this extent, this sustainability report includes the entity Grupo Floene Energias, S.A., which includes nine DSOs (Subsidiaries): Duriensegás, Beiragás, Lusitaniagás, Tagusgás, Lisboaagás, Setgás, Dianagás, Paxgás and Medigás and five CURr (Retail Supplier of Last Resort): Beiragás, Duriensegás, Dianagás, Tagusgás, Paxgás and Medigás.

2-3 Reporting period, frequency and point of contact

The sustainability report is included in Floene's Management Report and Accounts 2024 and refers to the activities carried out during the period between 01/01/2024 and 31/12/2024. Whenever possible, the indicators are presented with a history of up to 3 years. Floene's Management and Accounts Report is published annually.

For more information on this report or the topics covered in it, please contact the Investor Relations, Risk Management and Social, Environmental and Governance Responsibility Department at ir@floene.pt and ESG@floene.pt (for information on ESG) and/or 219 023 417.

2-4 Reformulations of information

Any reformulations to any information presented in previous reports are referred to throughout the report, where applicable.

2-5 External verification

This report has been subject to independent verification of non-financial information, based on the International Standard on Assurance Engagements (ISAE) 3000 (Revised) "Assurance Engagements Other Than Audits or Reviews of Historical Financial Information". The verification was carried out by PwC Portugal (PricewaterhouseCoopers & Associados – Sociedade de Revisores Oficiais de Contas, Lda).



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Activities and workers

2-6 Floene Group

Activities, value chain and other business relationships

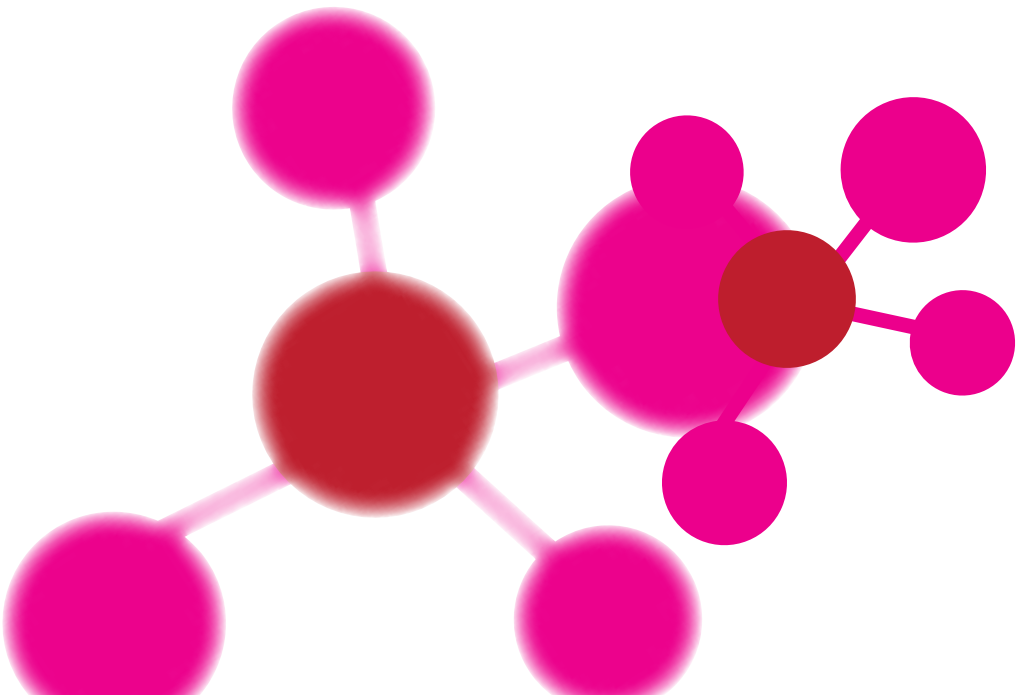
The Floene Energias, S.A. Group (Floene) is the largest gas distribution network operator in Portugal, through the direct participation and management of nine Regional Gas Distribution Network Operators (DSOs), present in 106 municipalities from the north to the south of the country. The distribution activity is a regulated activity in the gas value chain in Portugal, carried out by the distribution network operators, with each DSO operating in an exclusive geographical area on the basis of a Concession or Licence contract.

Distribution activity – Distribution ensures the flow of natural gas from the high-pressure transmission network (AP), through the medium-pressure (MP: between 20 and 4 bar) and low-pressure (BP: below 4 bar) networks, to consumer facilities (delivery points). These networks are also called interconnected networks, as opposed to other local distribution networks, which are supplied by liquefied natural gas (UAG) tanks delivered by tanker lorry.

Last resort retail supply activity – The DSOs supplying gas to fewer than 100,000 customers (Beiragás, Duriensegás, Dianagás, Tagusgás, Paxgás and Medigás) also carry out gas supply activities, as last resort retail suppliers (CURr) and with an accounting unbundling obligation.

More information in Floene's 2024 Annual Report:

Chapter 2.1. Activity and business model	18-21
Chapter 5.2.3. Sustainable supply chain	60





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Referring to the standard published in 2021

Activities and workers**2-7 Floene Group****Employees**

Number of employees by gender (and type of contract)	Gender	2022	2023	2024
Number of permanent employees (permanent contract)	Male	265	270	259
	Female	125	124	126
	Other	-	-	-
	Subtotal	390	394	385
Number of temporary employees (fixed-term or uncertain)	Male	1	5	5
	Female	1	5	1
	Other	-	-	-
	Subtotal	2	10	6
Number of non-guaranteed hours employees (non-guaranteed hours employee)	Male	-	-	-
	Female	-	-	-
	Other	-	-	-
	Subtotal	-	-	-
Number of full-time employees (full-time)	Male	266	275	264
	Female	126	129	127
	Other	-	-	-
	Subtotal	392	404	391
Number of part-time employees (part-time)	Male	-	-	-
	Female	-	-	-
	Other	-	-	-
	Subtotal	-	-	-
Total (number of employees by gender)	Male	266	275	264
	Female	126	129	127
	Other	-	-	-
	Total	392	404	391

Note 1: The count was carried out at the end of the reporting period.

The FTE (Full-Time Equivalent) criterion was used to count employees. The number of employees does not include trainees/interns, employees on unpaid leave and members of the Governing Bodies.

Note 2: The 4 members of the Executive Board do not have a contractual employment relationship and are therefore not included in this indicator. However, they are taken into account in the other indicators involving employees.

Note 3: Corrections were made to the headcounts for previous years due to a change in criteria.

Note 4: A significant fluctuation is defined as voluntary departures equal to or greater than 15 per cent of the total number of employees over a 12-month period, excluding terminations due to pre-retirement or retirement. In 2024, 11 employees left voluntarily, corresponding to approximately 3% of the total workforce, a figure which is not considered a significant fluctuation in the terms defined.



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Activities and workers**2-8 Floene Group**

Non-employee workers

On 31 December 2024, Floene had 760 non-employee workers whose work is controlled by the Organisation. These include both contractors – who have a direct contractual relationship with the Organisation – and subcontractors, whose contractual relationship is indirect, mediated by the contractors. The activities carried out in these areas include, in particular, contract work, inspections, safety and environmental coordination, as well as the provision of administrative and maintenance services. The number of employees (headcount) is provided monthly by the service providers, according to the employees who have been assigned to Floene's activities. It should be clarified that the difference of 41 non-contractually bound employees between 2023 and 2024 is not due to any change in the reporting methodology.

This variation is directly linked to work planning, particularly in the context of contracts, the size and timing of which naturally fluctuate according to the Organisation's operational and strategic needs. As has already been reported in other GRI topics, such as the GRI related to waste, this variation is correlated with the volume of work contracted, resulting from contracting or renewal of contracts.

In this way, and since these variations are directly associated with the nature and type of works in progress, it is not considered that there is a significant fluctuation, in the terms defined by the standard.

2-9 Floene Group

Government structure and its composition

More information in Floene's 2024 Annual Report:

Chapter 4.1.2. Corporate governance model	32-33
Chapter 4.1.3. Integrating sustainability into our organisation	33-34
Chapter 5.1. Framework and commitment	46-50

2-10 Floene Group

Appointment and selection to the highest governance body

The Board of Directors is made up of a fixed number of 6 to 12 directors elected by the General Meeting. The General Meeting will elect the Chairman of the Board of Directors – the highest hierarchical governance body – who will be replaced by whoever he appoints in his absence or impediment.

The criteria used in their appointment are, in particular, Stakeholder views, independence and competences relevant to Floene's impacts.

2-11 Floene Group

Chairman of the highest governance body

The Chairman of the Board of Directors is the highest governance body.

More information in Floene's 2024 Annual Report:

4.1. Governance structure and model	30-34
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2-12 Floene Group	
Role played by the highest governance body in overseeing impact management	
More information in Floene's 2024 Annual Report:	
Chapter 4.1. Governance structure and model	30-34
Chapter 4.3. Risk management and internal control	34-36
Chapter 5.1. Framework and commitment	46-50
2-13 Floene Group	
Delegation of responsibility for impact management	
More information in Floene's 2024 Annual Report:	
Chapter 4.1. Governance structure and model	30-34
Chapter 4.3. Risk management and internal control	34-36
Chapter 5.1. Framework and commitment	46-50
2-14 Floene Group	
Role of the highest governance body in sustainability reporting	
More information in Floene's 2024 Annual Report:	
Chapter 4.1. Governance structure and model	30-34
Chapter 5.1. Framework and commitment	46-50
2-15 Floene Group	
Conflicts of interest	
Our Code of Ethics and Conduct serves as a benchmark for the behaviour of our employees and partners, materialising Floene's purpose, mission and values through principles and guiding our day-to-day practice so that every action fits in with our corporate culture. To this end, as stated in this document, we are committed to developing and implementing internal rules aimed at preventing conflicts of interest, as well as endeavouring to ensure that the contracts in which we participate include mechanisms to prevent such conflicts. For more information on this indicator, see the chapter mentioned below, as well as the Code of Ethics and Conduct available on the Floene website.	
More information in Floene's 2024 Annual Report:	
Chapter 4.2. Ethics and transparency	34



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Activities and workers**2-16 Floene Group**

Communicating crucial concerns

The day-to-day operation of the Company is conducted by the Executive Committee, in accordance with the powers delegated to it by the Board of Directors, which supervises and evaluates management through its non-executive members. This body carries out status reports and monitors activities as described in section 2-12.

More information in Floene's 2024 Annual Report:

Chapter 4.2. Ethics and transparency	34
Chapter 4.3. Risk management and internal control	34-36

2-17 Floene Group

Collective knowledge of the highest governance body

The Chairman of the Board of Directors actively participates in various internal committees – such as ESG & Stakeholders, the Board of Directors and Risk Management, among others – where the various initiatives that Floene develops in this area are discussed. For more information on this indicator, see the chapters mentioned below.

More information in Floene's 2024 Annual Report:

Chapter 4.1. Governance structure and model	30-34
Chapter 5.1. Framework and commitment	46-50

2-18 Floene Group

Evaluation of the performance of the highest governance body

The PCA's performance is assessed by the shareholders. The General Meeting carries out an annual general appraisal of the members of the company's management and supervisory bodies, under the terms of Article 455 of the Commercial Companies Code. The need to draw up a Remuneration Policy for the members of the Board of Directors has been identified, which will include, among other things, the performance assessment criteria.

More information in Floene's 2024 Annual Report:

Chapter 11 Annexes – Annex I, Point E. "Annual amount of remuneration earned, in aggregate and individually, by the members of the Company's management and supervisory bodies and the board of the General Meeting in 2024"	108-110
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2-19 Floene Group

Remuneration policies

The remuneration of the Governing Bodies is available in this Annual Report 2024, Annex I, Point E. "Annual amount of remuneration earned, in aggregate and individually, by the members of the Company's management and supervisory bodies and the board of the General Meeting in 2024".

The need to draw up a Remuneration Policy for the members of the Board of Directors has been identified, which will include, among other things, the performance assessment criteria.



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Activities and workers

2-20 Floene Group

Process for determining remuneration

There is a set of KPIs (Key Performance Indicators) defined annually for the variable component.

More information in Floene's 2024 Annual Report:

Chapter 11 Annexes – Annex I, Point E. "Annual amount of remuneration earned, in aggregate and individually, by the members of the Company's management and supervisory bodies and the board of the General Meeting in 2024"

108-110

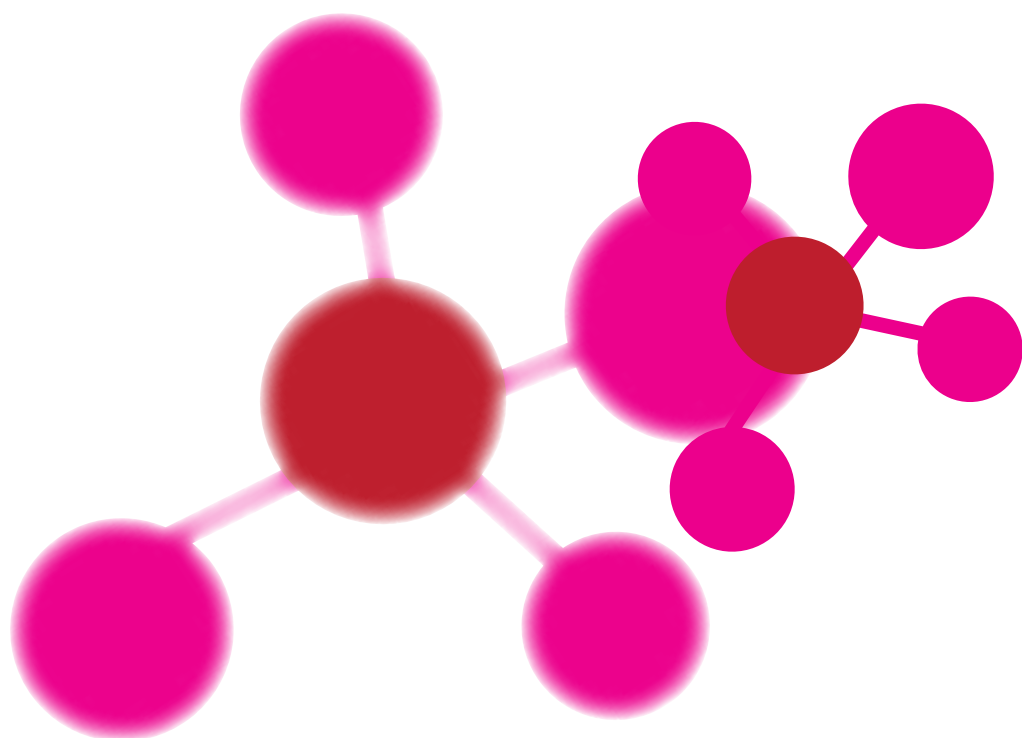
2-21 Floene Group

Proportion of total annual remuneration

The ratio between the CEO's annual total remuneration and the average annual total remuneration of all employees (excluding Governing Bodies and trainees) is 5.4.

The ratio between the percentage increase in the CEO's remuneration and the average percentage increase in the total annual remuneration of all employees (excluding Governing Bodies and trainees) is 0, as there was no increase in the CEO's remuneration in 2024.

Note: Only the basic salary is being considered in "annual remuneration".





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Strategy, policies and practices**2-22 Floene Group**

Declaration on the sustainable development strategy

More information in Floene's 2024 Annual Report:

Chapter 1.1. Message to Stakeholders

8-10

2-23 Floene Group

Policy-related commitments

Floene's actions are guided by various intergovernmental instruments – including the United Nations Human Rights principles – which guide the commitments made in various institutional documents, such as the Human Rights Policy, the Corporate Social Responsibility Policy, the Code of Ethics and Conduct, the Quality Policy, the Safety, Health and Environment Policy and the Prevention of Major Accidents Policy, as well as the Data Protection regulations, among others.

As the leading gas distributor in Portugal, Floene recognises that, in addition to its business activity, it is essential to contribute to the country's economic and social development. Its goal is to promote sustainable communities – that is, to grow and create value in a lasting way, benefiting the common good and driving new energies for the future – by adopting, in partnership with the most relevant Stakeholders throughout its value chain, the best market practices.

Floene clearly and unequivocally defends respect for human rights and the application of the Precautionary Principle, which it considers indispensable for building a sustainable society. To this end, operations are carried out with special attention to preserving the dignity, freedom and equality of all people, as well as protecting labour and trade union rights, health, safety in the workplace and the environment. The company undertakes to promote, enforce and safeguard human rights with all Stakeholders, adopting measures to prevent its activities from directly or indirectly causing abuses or violations of these internationally recognised rights.

All policies are approved by the Board of Directors, communicated internally and applied to all Floene Group employees, and the most relevant policies are publicly available on the company's website (<https://floene.pt/a-floene/#politicas>) for those Stakeholders who need them.

More information in Floene's 2024 Annual Report:

Chapter 4.2. Ethics and transparency

34

Chapter 4.4. Involvement with Stakeholders

37-43

Chapter 5.2.3. Sustainable supply chain

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Annex VI – Analysis of technical environmental alignment

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Strategy, policies and practices**2-24 Floene Group****Incorporating policy commitments**

Aware of its impact, Floene is committed to creating sustainable value and sharing it with its Stakeholders. The Group plays an important role in the national economy and influences the lives of thousands of people. It is therefore becoming increasingly clear that the way it manages its relations with the community, natural resources and the risks inherent in its activities has an impact on its economic performance. To align itself with energy transition trends, Floene has made progress in implementing various initiatives, assuming its responsibility throughout the value chain.

More information in Floene's 2024 Annual Report:

Chapter 4.2. Ethics and transparency	34
Chapter 4.4. Involvement with Stakeholders	37-43
Chapter 5.2.3. Sustainable supply chain	60
Annex VI – Analysis of technical-environmental alignment	220-223

2-25 Floene Group**Processes to remedy negative impacts**

Floene has a whistleblowing mechanism that allows any Stakeholder to report any deviations or breaches of the Code of Ethics and Conduct to the Supervisory Board via the Ethics and Conduct Committee. To this end, the company also uses the Internal Control Manual, the implementation of which is rigorously monitored and evaluated by the Board of Directors, the Executive Committee, the Supervisory Board and Internal Audit.

To manage the risks and opportunities identified in the company, Floene also has a Risk and Internal Control Committee, a structure dedicated to risk management and responsible for:

- Monitoring issues relating to Floene's risk management and internal control model;
- Reviewing risk treatment strategies and appointing those responsible for mitigation measures;
- Monitoring compliance with established policies and assessing the effectiveness of the mitigation plans implemented.

To ensure the effectiveness of whistleblowing mechanisms and other remediation processes, specific working groups are set up on these issues, complemented by periodic satisfaction surveys.

More information in Floene's 2024 Annual Report:

Chapter 4.2. Ethics and transparency	34
Chapter 4.3. Risk management and internal control	34-36
Chapter 6.3.2. Customer satisfaction	86-87

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page

Strategy, policies and practices

2-26 Floene Group

Mechanisms for seeking advice and raising questions

Floene has robust mechanisms for ethical counselling and the implementation of internal policies. These are disseminated to employees through a transparent communication policy and ongoing training programmes. In addition, the company promotes a culture of whistleblowing, as set out in the Code of Ethics and Conduct. To this end, it offers training to employees on how to report suspicions, using the ethics line (ComunicaÉtica), which aims to prevent and combat irregularities within the organisation, always within the legal limits in force.

The Ethics and Conduct Committee, appointed by Floene's Supervisory Board, acts as an independent and impartial governance body. Its responsibilities include ensuring the correct application of the Code of Ethics and Conduct, supervising the interpretation and execution of policies and dealing with complaints received, in accordance with established internal procedures.

All the supporting documentation is available on the company's intranet for all employees, as well as on the official website.

More information in Floene's 2024 Annual Report:

Chapter 4.2. Ethics and transparency

34

2-27 Floene Group

Compliance with laws and regulations

During the reporting period, two administrative offence proceedings were registered in a regulatory context, totalling EUR 60,500. The fines imposed complied with the criteria established in Law no. 9/2013 of 28 January.

Administrative offence 73/2022:
1 offence due to inadequate classification of the level of consumption in Natural Gas installations - Lisboagás: EUR 27,000.

Administrative offences 27, 28, 29, 32, 35, 37, 39/2021:
1 offence for failing to disclose, in a clear, comprehensible and easily accessible manner, the alternative dispute resolution entities to which they are bound, including their websites, applicable to companies (BRG, DNG, TGG, PXG, DRG, MDG, LTG, STG): EUR 33,500.

No fines or non-pecuniary penalties other than those mentioned were recorded.

The fines mentioned correspond to regulatory proceedings that began in 2021 and 2022, but were finalised in 2023 and/or 2024. Therefore, although the facts occurred in previous periods, the payments were made in 2024, after the respective proceedings were concluded.

Note: Floene considers non-compliance to be significant when the fine exceeds EUR 5,000.



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Strategy, policies and practices**2-28 Floene Group**

Participation in associations

Among the most relevant business associations and advocacy groups, we highlight:

Organisation name	Views participation as strategic	Serves on Governing Bodies	Participates in projects or commissions
Eurogas	Yes	Yes	Yes
Gas Distributors for Sustainability (GD4S)	Yes	Yes	Yes
Marcogaz	Yes	No	Yes
International Gas Union (IGU)	Yes	No	Yes
European Clean Hydrogen Alliance (ECHA)	Yes	No	Yes
European Biogas Association (EBA)	Yes	No	Yes
Biomethane Industrial Partnership (BIP)	Yes	No	Yes
The Conseillers du Commerce Extérieur de La France (CCE)	Yes	No	N/A
European Network for Cyber Security (ENCS)	Yes	No	No
Teh Oil & Gas Methane Partnership 2.0 (OGMP 2.0)	Yes	No	Yes
Ready4H2	Yes	No	Yes
Energy Agency (ADENE)	Yes	No	Yes
Business Council for Sustainable Development (BCSD Portugal)	Yes	No	Yes
Portuguese Association for the Promotion of Hydrogen (AP2H2)	Yes	No	Yes
Portuguese Energy Association (APE)	Yes	No	Yes
Portuguese Association of Gas Companies (APEG)	Yes	Yes	Yes
Portuguese Business Confederation (CIP)	Yes	No	Yes
Portuguese Association of Contact Centres (APCC)	Yes	No	No
Setúbal Peninsula Industry Association (AISET)	Yes	Yes	No
Regional Energy Agency of Extremadura (ENERDURA)	Yes	Yes	No
Gas Technology Institute (ITG)	Yes	Yes	No
Santarém Region Business Association (NERSANT)	Yes	No	No
Business Association (NERVIR)	Yes	Yes	No
Viseu Region Business Association (AIRV)	Yes	No	No
Aveiro District Chamber of Commerce and Industry (AIDA CCI)	Yes	No	No
Almada Municipal Energy Agency (AGENEAL)	Yes	No	No
Institute of Science and Innovation in Mechanical Engineering and Industrial Engineering (INEGI)	Yes	No	No

Floene's lobbying activities in the European Union (EU) are aimed at the promotion or defence of the company's interests by its representatives before the European institutions, with the aim of influencing, directly or indirectly, proposals or decisions likely to have an effect on the EU's climate and energy framework and, more specifically, on the company's activities. We are committed to acting transparently and responsibly.

More information in Floene's 2024 Annual Report:



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Referring to the standard published in 2021

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Strategy, policies and practices**2-29 Floene Group****Approach to Stakeholder involvement**

Our Stakeholders	Most popular topics	Interaction
Investors/ Shareholders	Financial performance targets, responsible and sustainable organisation	General meetings and assemblies; Periodic financial reports; Other communications.
Customers	Customer-orientated service; network accessibility; secure and sustainable supply	Customer satisfaction surveys; Complaints channels and their management; Efficient management of SRB activity.
Employees	Well-being and development; safe working environment	Staff meetings and knowledge-sharing forums; Publications and internal communications; Training activities; Workers' committee; Consultation with health and safety workers.
Associations	Partnership in decarbonisation; sustainable energy supply; market facilitation	Working groups; Participation in association management bodies; Other initiatives.
Financial sector	Efficient and integrated management of financial resources; financial value; sustainability positioning; ethics and transparency	Presentation meetings; Periodic financial reports; Other communications.
Suppliers	Safe supply; technical knowledge; planning for decarbonisation; customer orientation and service	Training activities; Qualification mechanisms and prerequisites; Partnerships/general supply agreements.
Public opinion	Sustainability positioning; security of supply; energy efficiency; decarbonisation; ethics and transparency	Articles and news for magazines and newspapers; Social networks; Press releases and public clarifications.
Official entities (ERSE, DGEG, etc.) and regional/local communities	Sustainable development of activity; innovation; energy efficiency; decarbonisation strategy; market facilitation	Report and accounts; Conclusion of protocols; Public consultations; Mandatory legal documents within the scope of the Regulator; Initiatives and proposals; ERSE Consultative and Tariff Council.
Partners and Research/ Academia	Training of technicians; resilience of the activity; quality, efficient and safe service; decarbonisation; market facilitation	Protocols; Training; Partnerships for the development of specific studies and projects.

More information in Floene's 2024 Annual Report:

Chapter 4.4. Stakeholder engagement

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Strategy, policies and practices

2-30 Floene Group

Collective bargaining agreements

	2022	2023	2024
Total number of employees covered by collective bargaining agreements	118	118	94
No. of employees	396	408	395
Percentage of employees covered by collective bargaining agreements (%)	30%	29%	24%

Note 1: The count was carried out at the end of the reporting period.

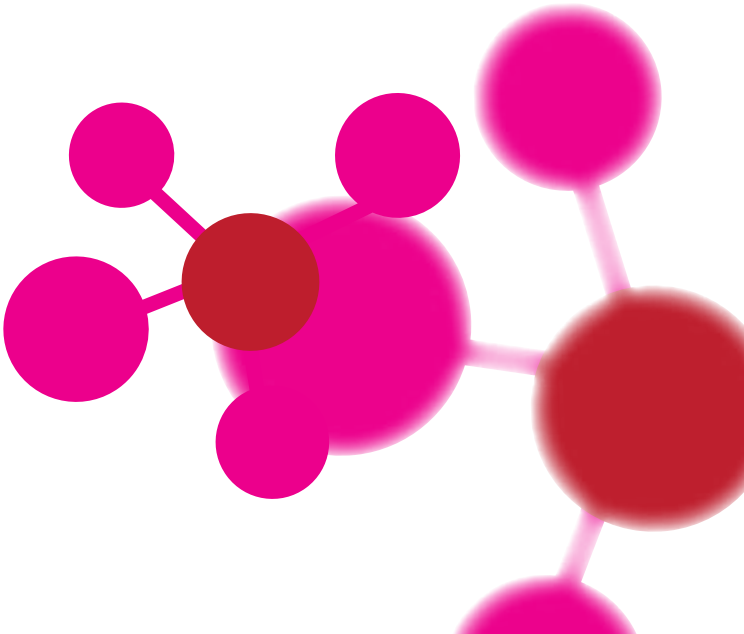
The FTE (Full-Time Equivalent) criterion was used to count employees. The headcount takes into account the members of the Executive Committee (4) and excludes trainees/interns, employees on unpaid leave and other members of the Governing Bodies.

Note 2: Corrections have been made to the headcounts for previous years due to a change in criteria.

Note 3: As indicated in the employment contract between the employee and any company in the Group, the employment relationship is governed by the law and the internal rules applicable at Floene. It should be noted that there are working conditions which, as they constitute mandatory rights and duties, cannot be altered by the will of the parties, regardless of the existence of collective labour regulation instruments (IRCT), which include the collective labour agreement (ACT), governed by law, namely the Labour Code. In conclusion:

1. Working conditions are regulated in the employment contract signed by the employee and the employer/Floene Group company;
2. If the employee is not covered by the IRCT/ACT, whatever is omitted from the employment contract is governed by the law (e.g. the Labour Code with regard to rules of a mandatory nature or minimum guarantee) and the internal rules, the latter prevailing if they are more favourable;
3. If the employee is covered by the IRCT/ACT, the provisions of the law (e.g. the Labour Code with regard to mandatory issues), the provisions of the IRCT and the applicable internal rules are applied, the latter prevailing if they are more favourable.

Note 4: Working conditions and terms of employment are not based on collective bargaining agreements covering other employees of the organisation, nor collective bargaining agreements of other organisations.



GRI 3: MATERIAL TOPICS

Referring to the standard published in 2021

page

3-1 Floene Group

Materiality definition process

In order to identify and assess the most relevant sustainability issues and trends for our Stakeholders and business, we carried out a materiality exercise in 2022, which will continue for 2024.

This exercise was based, firstly, on a benchmarking study, for which our national and international peers were taken into account, and then on consultation with our Stakeholders, through surveys, focus groups and interviews, in order to identify the most relevant sustainability topics. These methodologies involved the participation of employees from all the company's departments, in order to obtain a representative and diverse view.

The materiality analysis, based on the concept of dual materiality, had the following objectives:

- (1) assess the significance of our impacts on the economy, the environment and people, including human rights, as a result of our activity or business relations (impact materiality);
- (2) the financial, operational and reputational relevance of material topics for the Company (financial materiality).

Based on an analysis of 19 sustainability topics, it was possible to identify a total of ten material topics for Floene and its Stakeholders. These are identified in GRI indicator 3-3 Management of material topics and are present in the contents of the chapters and sub-chapters of this report.

This process was essential in defining the sustainability positioning and defining Floene's Sustainability Agenda, ensuring alignment between the strategic objectives of the gas/renewable gas distribution operation and the expectations and needs of the Stakeholders.

More information in Floene's 2024 Annual Report:

Chapter 5.1. Framework and commitment	46-50
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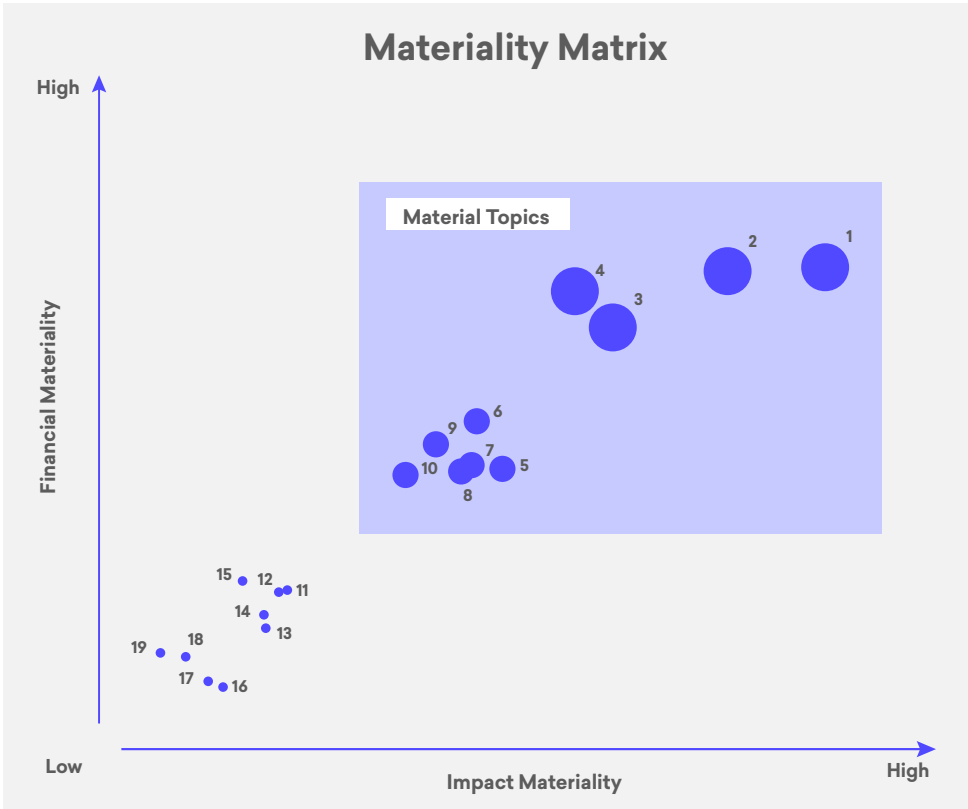
GRI 3: MATERIAL TOPICS

Referring to the standard published in 2021

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3-2 Floene Group

List of material topics



Caption:

- | | |
|---|--|
| - 1 Quality service, safe and efficient supply | - 11 Respect for human rights |
| - 2 Energy efficiency and climate change | - 12 Diversity and Inclusion |
| - 3 Customer satisfaction | - 13 Water management |
| - 4 Economic performance and financial sustainability | - 14 Information quality |
| - 5 Regulatory compliance | - 15 Risk management and internal control |
| - 6 Innovation, adaptation and resilience | - 16 Waste management |
| - 7 Safety, well-being and development of our people | - 17 Data protection and privacy |
| - 8 Involvement with the local community/Stakeholders | - 18 Biodiversity management/Natural capital |
| - 9 Ethics and transparency | - 19 Combating corruption and fraud |
| - 10 Sustainable supply chain management | |

More information in Floene's 2024 Annual Report:



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PERFORMANCE**GRI 3: MATERIAL TOPICS**

Referring to the standard published in 2021

3-3 Floene Group

Management of material topics

Material topics	Chapter	Specific Standards and Indicators	GRI Sector Standard Ref No.
Quality service, safe and efficient supply	6.3. Service quality and customer satisfaction	GRI 306: Waste 2020 306-3 GRI 416: Consumer Health and Safety 2016 416-2 GRI 417: Marketing and Labelling 2016 417-3	11.8. Asset integrity and critical incident management
Energy efficiency and climate change	4.3. Risk management and internal control 5.2. Environment	GRI 302: Energy 2016 302-1 GRI 302: Energy 2016 302-2 GRI 302: Energy 2016 302-3 GRI 305: Emissions 2016 305-1 GRI 305: Emissions 2016 305-2 GRI 305: Emissions 2016 305-3 GRI 305: Emissions 2016 305-4 GRI 305: Emissions 2016 305-5 GRI 305: Emissions 2016 305-6 GRI 305: Emissions 2016 305-7 GRI 406: Non-Discrimination 2016 406-1	11.1. GHG emissions 11.2. Adaptation, resilience and climate transition
Innovation, Adaptation and Resilience	6. Financial performance	GRI 201: Economic Performance 2016 201-2	11.2. Adaptation, resilience and climate transition
Economic performance and financial sustainability	6. Financial performance	GRI 201: Economic Performance 2016 201-1 GRI 201: Economic Performance 2016 201-4 GRI 203: Indirect Economic Impacts 2016 203-1 GRI 203: Indirect Economic Impacts 2016 203-2 GRI 204: Purchasing Practices 2016 204-1	11.14. Economic impacts
Involvement with the local community/ Stakeholders	4. Our Governance	GRI 202: Market Presence 2016 202-2 GRI 413: Local Communities 2016 413-1 GRI 413: Local Communities 2016 413-2	11.15. Local communities
Sustainable supply chain management	5.2. Environment	GRI 308: Environmental Assessment of Suppliers 2016 308-1 GRI 308: Environmental Assessment of Suppliers 2016 308-2 GRI 414: Social Assessment of Suppliers 2016 414-1 GRI 414: Supplier Social Assessment 2016 414-2	11.12. Forced labour and modern slavery
Regulatory compliance	4. Our Governance	GRI 204: Purchasing Practices 2016 204-1 GRI 207: Taxes 2019 207-1 GRI 207: Taxes 2019 207-2 GRI 207: Taxes 2019 207-3 GRI 207: Taxes 2019 207-4 GRI 415: Public Policies 2016 415-1	

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GRI 3: MATERIAL TOPICS
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3-3 Floene Group
Management of material topics

Material topics	Chapter	Specific Standards and Indicators	GRI Sector Standard Ref No.
Safety, well-being and development of our people	5.3. Social	GRI 202: Market Presence 2016 202-1	
		GRI 401: Employment 2016 401-1	
		GRI 401: Employment 2016 401-2	
		GRI 401: Employment 2016 401-3	
		GRI 402: Labour Relations 2016 402-1	
		GRI 403: Occupational Health and Safety 2018 403-1	
		GRI 403: Occupational Health and Safety 2018 403-2	
		GRI 403: Occupational Health and Safety 2018 403-3	
		GRI 403: Occupational Health and Safety 2018 403-4	
		GRI 403: Occupational Health and Safety 2018 403-5	
		GRI 403: Occupational Health and Safety 2018 403-6	
		GRI 403: Occupational Health and Safety 2018 403-7	11.9. Occupational health and safety
		GRI 403: Occupational Health and Safety 2018 403-8	
		GRI 403: Occupational Health and Safety 2018 403-9	
		GRI 403: Occupational Health and Safety 2018 403-10	
		GRI 404: Training and Education 2016 404-1	
		GRI 404: Training and Education 2016 404-2	
		GRI 404: Training and Education 2016 404-3	
		GRI 405: Diversity and Equal Opportunities 2016 405-1	
		GRI 405: Diversity and Equal Opportunities 2016 405-2	
		GRI 406: Non-Discrimination 2016 406-1	
		GRI 414: Social Assessment of Suppliers 2016 414-1	
		GRI 414: Social Assessment of Suppliers 2016 414-2	
			11.10. Employment practices



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PERFORMANCE**GRI 3: MATERIAL TOPICS**

Referring to the standard published in 2021

3-3 Floene Group

Management of material topics

Material topics	Chapter	Specific Standards and Indicators	GRI Sector Standard Ref No.
Ethics and Transparency	4. Our Governance	GRI 205: Fighting Corruption 2016 205-1	
		GRI 205: Fighting Corruption 2016 205-2	
		GRI 205: Fighting Corruption 2016 205-3	11.21. Payments to our governments
		GRI 206: Unfair Competition 2016 206-1	
		GRI 407: Freedom of Association and Collective Bargaining 2016 407-1	11.22. Public policies
		GRI 418: Customer Privacy 2016 418-1	
Customer satisfaction	6. Financial performance	There are no GRI Thematic Standards associated with this Material Topic.	

Note 1: Each material topic presents, in the respective subchapters, information on its relevance to the Group and our Stakeholders, as well as the approach taken – including defined policies and commitments – reflecting the Group's management approach.

Note 2: Floene has a channel for reporting irregularities, entitled "ComunicaÉtica", which is transversally applicable to the various material topics.

For more information on this topic, see the Floene Annual Report 2024, in chapter 4.2 Ethics and transparency.

Oil and gas sector issues (GRI 11) with additional sector information

Theme	Justification	Chapter
11.2. Adaptation, resilience and climate transition	Description of the organisation's approach to the development of public policies and its actions in defence of interests related to climate change	4.4. Engagement with Stakeholders 5.2.1. Energy Transition
11.8.3. Asset integrity and critical incident management	There were no recorded Tier 1 or Tier 2 process safety accidents during the reporting period	5.3.1. Safety and well-being
11.21.8. Payments to governments	Purpose	Information
	Type of product acquired	Natural Gas
	Volume acquired (Estimated)	203,563,813 kWh
	Purchasing Entities	Beiragás; Dianagás; Duriensegás; Medigás; Paxgás; Tagusgás
	Selling Entity (State)	TRANSGÁS, S.A
	Amount paid during the period	€5,567,136.42 incl. VAT



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Referring to the standard published in 2021

3-3 Floene Group

Management of material topics

Oil and gas sector issues (GRI 11) with additional sector information

Theme	Justification	Chapter
11.21.8. Payments to governments	We hereby inform that, during the reporting year of 2024, acquisitions of natural gas were made from Transgás, the state-designated company responsible for the commercialisation of this resource.	

Oil and gas sector issues (GRI 11) not disclosed

Theme	Justification
11.3. Atmospheric emissions	Taking into account the relevance threshold defined and the evaluation carried out, the topic was not considered material.
11.4. Biodiversity	Taking into account the relevance threshold defined and the evaluation carried out, the topic was not considered material.
11.5. Waste	Taking into account the relevance threshold defined and the evaluation carried out, the topic was not considered material.
11.6. Water and effluents	Taking into account the relevance threshold defined and the evaluation carried out, the topic was not considered material.
11.7. Closure and rehabilitation	Not applicable. Floene's activity does not include situations in which the closure and rehabilitation of oil and gas fields may occur.
11.11. Non-discrimination and equal opportunities	Taking into account the relevance threshold defined and the evaluation carried out, the topic was not considered material.
11.13. Freedom of association and collective bargaining	Taking into account the relevance threshold defined and the evaluation carried out, the topic was not considered material.
11.15. Local communities	As of the date of the report, Floene does not have calculation mechanisms to provide additional sector information.
11.16. Rights to land and natural resources	Not applicable. In the geography where Floene operates and in its business, there are no situations of disputes over land and its natural resources.
11.17. Rights of indigenous peoples	Not applicable. In the geographical area where Floene operates, there are no situations of possible violation of the rights of indigenous communities.
11.18. Conflict and security	Taking into account the relevance threshold defined and the evaluation carried out, the topic was not considered material.
11.19. Unfair competition	Taking into account the relevance threshold defined and the evaluation carried out, the topic was not considered material.
11.20. Fighting corruption	Taking into account the relevance threshold defined and the evaluation carried out, the topic was not considered material.



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Referring to the standard published in 2016

page

201-1 Floene Group

Direct economic value generated and distributed

	2022	2023	2024
I) Direct Economic Value Generated	149,438,921.5	155,072,600.7	157,081,506.8
Recipes	149,438,922	155,072,601	157,081,507
II) Direct Economic Value Distributed (Operating costs)	74,541,573	94,191,047	102,509,263
Operating costs	31,216,315	34,226,107	34,974,099
Employee salaries and benefits	23,995,413	25,292,672	27 456 993
Payments to capital providers	11,269,036	29,489,009	33,382,901
Taxes	8,060,808	5,168,918	6,665,499
Investments in the community	-	14,341	29,772
III) Accumulated Economic Value (I-II)	74,897,349.0	60,881,553.9	54,572,243.4

Note: **Operating costs:** Includes training and personal protective equipment and excludes fleet and pass-through**Employee salaries and benefits:** Excludes training and includes fleet costs**Payments to capital providers:** Interest on financing, on the part of financiers**Taxes:** Does not include deferred tax**Revenues:** Total income, excluding recognition of investment subsidies, IFRIC and excluding pass-through items**201-2 Floene Group**

Financial implications, risks and opportunities due to climate change

In 2024, risks associated with climate change were identified, categorised according to their nature:

Strategic risk – Energy transition

Operational risk – Critical interruption of operational processes

The energy transition risk was reassessed as high due to the delay in the development of renewable gases, particularly in the implementation of the Biomethane Action Plan, which was published in March 2024 and had not made significant progress by the end of the year.

The risk of critical interruption to operational processes, related to the occurrence of extreme weather events with a potential impact on Floene's infrastructures, remained unchanged from the previous year and is monitored on an ongoing basis as part of operational risk management.

More information in Floene's 2024 Annual Report:

4.3. Risk management and internal control

34-36

201-4 Floene

Financial assistance received from government

Floene received total support of EUR 72,495 from the Environmental Fund as part of the Green Pipeline Project, a project that aims to inject and distribute green hydrogen into the natural gas network in the Seixal region, contributing to the decarbonisation of the energy sector.



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PERFORMANCE**GRI 202: MARKET PRESENCE**

Referring to the standard published in 2016

202-1 Floene

Ratios of standard entry level wage by gender compared to local

		2022	2023	2024
National Minimum Wage (EUR)	Men	705.0	760.0	820.0
	Women	705.0	760.0	820.0
Organisation's Minimum Wage (the lowest salary practised) (EUR) ¹	Men	998.4	1,045.3	1,045.3
	Women	840.8	880.3	880.3
Ratio between the organisation's minimum wage and the local minimum wage	Men	1.4	1.4	1.3
	Women	1.2	1.2	1.1

1. Corresponds to the lowest salary paid which, although in the same functional category, covers employees performing different functions and levels of responsibility.

Note: With regard to workers who are not employees of the company (reported in GRI 2-8), responsibility for remuneration lies with the service providers who hired them.

202-2 Floene

Proportion of senior management hired from the local community

		2022	2023	2024
Total members in senior management positions in important operating units	Men	40	41	41
	Women	12	18	18
Total members in senior management positions in important operating units hired from the local community	Men	39	38	37
	Women	12	18	18
Percentage of members in senior management positions in important operating units hired from the local community (%)	Men	98%	93%	90%
	Women	100%	100%	100%

Note 1: The following definitions are adopted by the organisation:

"Top management" – Board of Directors (Executive Committee), Heads of Area and Managers;

"Local" – For this type of indicator (referring to top management) local is synonymous with resident in Portugal;

"Important operational units" – All of Floene's existing directorates.

Note 2: Data relating to full-time employees.



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Referring to the standard published in 2016

page

203-1 Floene Group

Infrastructure investments and services supported

To calculate this indicator, the following investments were taken into account, totalling EUR 28,059:

- i) Business Development;
- ii) Other Infrastructure; and
- iii) Other Investments, namely, Renewal of meters due to legal requirements and Special Projects: Green Pipeline (H2).

More information in Floene's 2024 Annual Report:

Chapter 6.2. Operating and financial results

73-82

203-2 Floene Group

Significant indirect economic impacts

Although no new impacts have been identified in addition to those already reported, the reporting period has seen continued positive economic impacts resulting from the supply of natural gas to the territories and communities where Floene operates, through its distribution network.

This is due to the fact that natural gas is the fossil energy that has the least negative impact on the environment and generates the fewest emissions, as well as being the most economical in the current context, thus being instrumental in the accessibility of families and companies and in combating energy poverty.

In addition, Floene's network is one of the most up-to-date on the European scene and is therefore prepared – and available – to receive and distribute renewable gases throughout the country, making it an important ally in the energy transition and, in this sense, in the national sustainability agenda.

In addition to the direct economic impact, there is a significant indirect economic impact, associated, among other things, with job creation, the distribution of natural gas in remote areas and Floene's role as a supplier of last resort:

- Floene plays an essential role in creating direct and indirect jobs with the expansion and maintenance activities of its infrastructure, which require specialised skills. In addition, the strengthening of local and regional value chains and the associated economic development, as well as the boost to the industrial sector that is generated by the continuous, reliable and secure supply of natural gas, create a multiplier effect on employment;
- The expansion of the gas network to more isolated territories significantly improves the quality of life of communities, as it reduces their dependence on more expensive and polluting energy sources;
- Acting as a supplier of last resort, Floene ensures the supply of natural gas to consumers who, for various reasons, do not have viable supply alternatives, a responsibility that guarantees the availability of a more economical energy solution with lower emissions, contributing, in particular, to the protection of the most vulnerable segments of the population.



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GRI 203: INDIRECT ECONOMIC IMPACTS
Referring to the standard published in 2016

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203-2 Floene Group
Significant indirect economic impacts

Floene's activity also encourages innovation and sustainability, supporting the development of more efficient and environmentally responsible energy solutions and the emergence of projects in the area of renewable gases.

The relevance of these indirect economic impacts is aligned with the priorities of Floene's Stakeholders and with relevant external references, including national and international regulations around a just energy transition, sustainable economic development or the reduction of regional inequalities.

As in the past, Floene continued to play a key role in building a fairer, more balanced and resilient society in 2024.

More information in Floene's 2024 Annual Report:	
Chapter 5.2.1. Energy transition	51-55
Chapter 6. Financial performance	72-87

GRI 204: PURCHASING / SUPPLY PRACTICES
Referring to the standard published in 2016

204-1 Floene Group
Proportion of spending on local suppliers

In 2024, Floene recorded a total cost of EUR 34,987,376.77 with suppliers, of which approximately 99 per cent corresponded to purchases made from local (national) suppliers.

Note 1: External Supplies and Services (ES&S) were considered with the addition of training costs, and excluding pass-through costs with transmission tariffs (UGS+URT) and investment in the community.

Note 2: Capitalisation costs were not taken into account in this calculation, as in Floene's opinion they are not included in the suppliers' figures. In addition, they total an immaterial value in the aggregate of the indicator, and do not present a materially relevant distortion for this purpose.



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GRI 205: ANTI-CORRUPTION

Referring to the standard published in 2016

205-1 Floene Group

Operations assessed for risks related to corruption

No corruption risk assessments were carried out during the reporting period. However, Floene has policies in place to prevent money laundering and terrorist financing, guaranteeing its commitment to promoting full compliance with the Code of Ethics and Conduct, and has a whistleblowing channel, "ComunicaÉtica", for reporting any breaches of the Code of Ethics and internal rules, as well as legal violations. The Ethics and Conduct Committee monitors compliance with these policies.

Since 2022, the Internal Control System has been strengthened with the implementation of the Internal Control Manual, which includes five components of internal control: i) control environment; ii) risk assessment; iii) control activities; iv) information and communication; and v) monitoring activities. The Supervisory Board and Internal Audit supervise and assess its efficiency and effectiveness.

As of 1st January 2025, the Legal team will assume full responsibility for Compliance at Floene, which was previously ensured by the service contract established with the previous shareholder.

205-2 Grupo Floene

Communication and training about anti-corruption policies and procedures

Category of employees	Total number of employees ¹	Anti-corruption training	
		No. of employees	%
Management (Executive Committee)	2	0	0%
Heads of Area	13	1	8%
Managers	45	8	18%
Specialists	165	57	35%
Technical Contributors	181	84	46%
Operational & Administrative Contributors	1	1	100%

1. The total number of employees reported refers only to those who have been provided with any type of training.

Note: The information shown in the table only relates to Floene employees. Whenever policies are communicated, they are published on the intranet for all Floene employees (including the Board of Directors – Executive Committee (4)). Stakeholders have access via Floene's official website (floene.pt), and in the case of service providers/suppliers, both the policies and Floene's Code of Conduct form an integral part of the contract.

Note 2: Includes employees who left the company during the reporting period, as well as Governing Bodies.

In 2024, all new employees were given training on this topic as part of their welcome, in addition to specific training on Ethics and Corruption.

205-3 Floene Group

Confirmed incidents of corruption and actions taken

No confirmed cases of corruption were recorded during the reporting period.



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GRI 206: UNFAIR COMPETITION

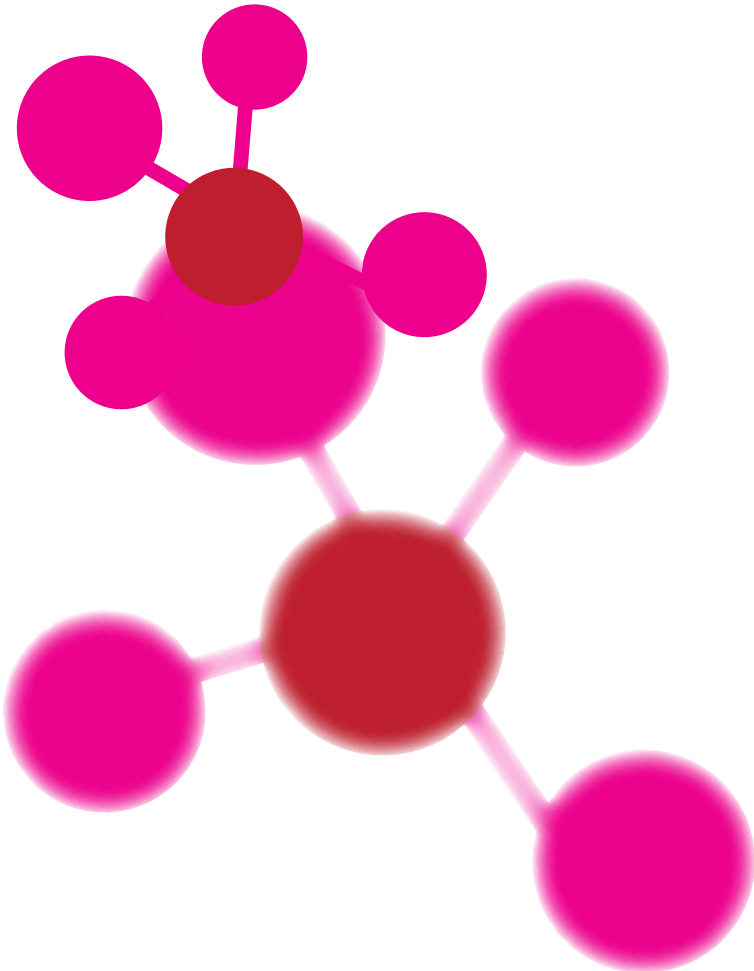
Referring to the standard published in 2016

206-1 Floene Group

Legal actions for anti-competitive behavior, anti-trust and monopoly

During the period covered by this report, Floene was not subject to any legal or judicial action related to anti-competitive practices, unfair competition or abuse of a dominant position.

With regard to the ERSE 17/2021 administrative offence, ERSE imposed a fine of EUR 2,500 on Medigás due to the lack of a guarantee of exemption and exclusivity on the part of the sales representatives acting on its behalf.





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PERFORMANCE**GRI 207: TAX APPROACH**

Referring to the standard published in 2019

page

207-1 Floene Group

Approach to tax

The tax policy planned for 2024 has not been defined, as the internal reorganisation underway is awaiting the consolidation and stabilisation of processes in order to move forward with the drafting/ approval of documentation.

Although it is not formalised in any public document, Floene has a tax strategy, which is analysed and approved annually by the Board of Directors and the Executive Committee.

To ensure the regulatory compliance of its tax strategy, Floene observes the tax and tax disclosure requirements in accordance with the applicable laws and regulations, adopting the appropriate measures to this end.

With regard to relationships between related parties, the Floene Group companies prepare a transfer pricing tax documentation process in line with international practices, which includes all the documentation relating to the policy adopted in determining transfer prices and maintaining elements capable of proving the respective parity with the market, as well as the selection of the most appropriate method for determining the prices charged.

207-2 Floene Group

Tax governance, control and risk management

The Supervisory Board is the body responsible for ensuring compliance in tax matters by supervising, accounting policies, valuation criteria, the effectiveness of the risk management and internal control system and the process of preparing and disclosing financial information.

Each year, the Supervisory Board draws up a report on its supervisory activities and issues an opinion on the report, accounts and proposals presented by the Board of Directors. In addition to this Board, the external auditors/Statutory Auditor and internal auditors also play a key role in this regard.

207-3 Floene Group

Stakeholder engagement and management of concerns related to tax

The organisation adopts a stance of total compliance with the tax regulations in force, ensuring strict and transparent compliance with its obligations. It maintains full collaboration with the tax authorities, both in inspection processes and in any other applicable interaction, continually analysing legislation and seeking the necessary input to ensure its correct application.

207-4 Floene Group

Country-by-country reporting

Since all Floene Group companies are resident in Portugal, only Portuguese jurisdiction applies.

More information in Floene's 2024 Annual Report:

Chapter 2.1. Activity and business model	18-19
Annex III a) – Financial Statements – Consolidated	112-156
Annex III b) – Financial Statements – Individual	168-204



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PERFORMANCE**GRI 302: ENERGY**

Referring to the standard published in 2016

302-1 Floene Group

Energy consumption within the organisation

	Unit	2022	2023	2024
Non-renewable fuels		18,058.9	19,442.1	18,864.4
Natural Gas		1,913.6	2,107.0	1,788.4
Diesel		14,425.1	13,745.7	11,948.4
Petrol		1,289	3,311.2	4,976.7
LPG	GJ	431.2	278.2	150.9
Renewable fuels				
Purchased electricity		2,954.2	2,682.5	2,761.8
Electricity sold				
Total		21,013.0	22,124.6	21,626.2

To this end, the following sources of energy consumption within the organisation were considered: electricity consumption, natural gas consumption and fleet fuel consumption (diesel, petrol and LPG). It should be noted that, as of 2022, the electricity purchased was certified as 100 per cent renewable energy.

The sources of conversion factors used were as follows: DGEG, 2024 – Conversion of GWh to GJ; APA NIR, 2024 – Conversion of litres of fuel to GJ; GALP, PCI Factor – Conversion of natural gas consumption (m³) to GJ.

302-2 Floene Group

Energy consumption outside the organisation

To determine energy consumption outside the organisation, Floene used the following "GHG Protocol – Scope 3" category:

4 – Upstream transport and distribution, with an equivalent energy consumption (GJ): 6115.

The sources of conversion factors used were as follows: APA NIR, 2024 – Conversion of litres of fuel to GJ; IPCC, AR5 – consumption of litres per km.

302-3 Floene Group

Energy intensity

	2022	2023	2024
Energy Intensity (GJ)	0.00035	0.00039	0.00039

Note: For this purpose, the metric selected to calculate the ratio is energy distributed in GJ. The following types of energy have been included in the ratio:

- Consumption within the organisation: electricity, natural gas, vehicle fuel
- Distribution: natural gas



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PERFORMANCE**GRI 305: EMISSIONS**

Referring to the standard published in 2016

page

305-1 Floene Group

Direct (Scope 1) GHG emissions

Direct GHG emissions (scope 1): **20,386 tCO₂eq**.

To calculate natural gas emissions resulting from network losses (fugitive emissions), the Sedigas methodology is used, which is widely used by several companies in the sector ("Metodología para la cuantificación de las emisiones de metano en los sistemas de distribución de gas", 29 June 2020).

The following greenhouse gases (GHGs) were taken into account when calculating Scope 1 emissions: carbon dioxide (CO₂), methane (CH₄) and nitrous oxide (N₂O).

Historical direct GHG emissions (Scope 1), tCO₂eq¹

2020	2021	2022	2023	2024
21,583	15,002	15,008	23,470	20,386

1. 2020 was established as the base year since the scope 1 emissions reporting exercise began in 2021

The following sources were used as a reference for the emission factors: the emission factors from the APA's National Inventory Report and the Global Warming Potentials from the IPCC – Sixth Assessment Report (AR6).

More information in Floene's 2024 Annual Report:

Chapter 5.2.2. Carbon footprint

56-59

305-2 Floene Group

Energy indirect (Scope 2) GHG emissions

Indirect GHG emissions (scope 2): **0 tCO₂eq¹**Indirect GHG emissions (scope 2): **130 tCO₂eq²**

1. Market-based calculation using our supplier's emission factor.

2. Location-based calculation, where the APA's emission factors were taken into account, given that our activity takes place in Portugal.

Historical direct GHG emissions (Scope 2) Market Based, tCO₂eq³

2020	2021	2022	2023	2024
162	147	0	0	0

Historical direct GHG emissions (Scope 2) Location Based, tCO₂eq³

2020	2021	2022	2023	2024
149	135	151	121	130

3. 2020 was established as the base year since the scope 1 emissions reporting exercise began in 2021

Since 2022, the market-based factor has been 0, since all the electricity purchased is now 100 per cent renewable.

More information in Floene's 2024 Annual Report:

Chapter 5.2.2. Carbon footprint

56-59

GRI 305: EMISSIONS

Referring to the standard published in 2016

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305-3 Floene Group

Other indirect (Scope 3) GHG emissions

Indirect GHG emissions (scope 3): **7,131 tCO₂eq.**

The methodology followed was that of the Greenhouse Gas Protocol, using the Global Warming Potentials calculated in the Sixth Assessment Report (AR6) and emission factors from various sources, such as: IPCC; DEFRA 2024; NIR 2024; ADEME; Carris; CP – Comboios de Portugal; Transtejo; Metropolitano de Lisboa.

More information in Floene's 2024 Annual Report:

Chapter 5.2.2. Carbon footprint

56-59

305-4 Floene Group

GHG emissions intensity

Units	2022	2023	2024
tCO ₂ eq/GWh (scope 1+2)	0.9	1.5	1.3
tCO ₂ eq/km de rede (scope 1+2)	1.1	1.7	1.5
tCO ₂ eq/GWh (scope 1+2+3)	1.4	2	1.8
tCO ₂ eq/km (scope 1+2+3)	1.7	2.2	2

The intensity of GHG emissions was calculated using two metrics considered relevant: volume of gas distributed (GWh) and kilometres of distribution network (km). The following greenhouse gases (GHGs) were taken into account when calculating emissions in scopes 1, 2 and 3: carbon dioxide (CO₂), methane (CH₄) and nitrous oxide (N₂O).

305-5 Floene Group

Reduction of GHG emissions

A short-term decarbonisation plan has been defined (2022-2025), with the aim of reducing emissions by 25% by 2025 (compared to the base year of 2020). This plan includes several operational initiatives, such as:

- the purchase of electricity certified as 100 per cent from renewable sources – 100 per cent completed;
- replacing the fleet with hybrid vehicles – In progress, with 12 per cent of the fleet converted;
- conversion of the existing iron and steel network to polyethylene and implementation of a leak detection improvement programme in order to reduce the occurrence of leaks in the network and consequently its emissions – 72% completed of the established network renewal plan, and a 32% reduction in the number of leaks detected and repaired in 2024 vs 2020;
- reduction in the number of incidents of damage by third parties – Ongoing, with a 14% average reduction in incidents compared to the base year.

More information in Floene's 2024 Annual Report:

Chapter 5.2.2. Carbon footprint

56-59



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PERFORMANCE**GRI 306: WASTE**

Referring to the standard published in 2020

306-3 Floene Group

Waste generated

Contractor waste	2022	2023	2024
Total waste generation (tonnes)	66,154	61,363	53,872
Destined for recovery (tonnes)	22,484	31,753	29,463
Re-use and incorporation into construction work (tonnes)	43,670	29,609	24,410
Percentage of waste recovered (%)	100	100	100
Percentage of reuse and incorporation on site (%)	66.01	48.25	45
By category:			
Hazardous waste (total) (tonne)	0.32	0.27	0.1
Non-hazardous waste (total) (tonne)	66,154	61,362	53,872

Administrative waste	2022	2023	2024
Total waste generation (tonnes)	120.06	150.34	139.25
Destined for recovery (tonnes)	112.92	144.24	135.94
Destined for disposal (tonnes)	7.15	6.11	3.31
Percentage of waste recovered (%)	94.05	95.94	97.62
By category:			
Hazardous waste (total) (tonne)	0.69	0.16	0.28
Destined for recovery (tonnes)	0.17	0.06	0.27
Destined for disposal (tonnes)	0.52	0.1	0.01
Non-hazardous waste (total) (tonne)	119.37	150.18	138.98
Destined for recovery (tonnes)	112.75	144.17	135.67
Destined for disposal (tonnes)	6.63	6.01	3.31

Total waste generated	2022	2023	2024
Total waste generation (tonnes)	66,274	61,513	54,011
Destined for recovery, reuse and incorporation on site (tonnes)	66,267	61,507	54,009
Destined for disposal (tonnes)	7.15	6.11	3.31
Percentage of waste recovered (%)	99.99	99.99	99.996
By category:			
Hazardous waste (total) (tonne)	1.01	0.43	0.38
Destined for recovery, reuse and incorporation on site (tonnes)	0.49	0.33	0.37
Destined for disposal (tonnes)	0.52	0.1	0.01
Non-hazardous waste (total) (tonne)	66,273	61,513	54,011
Destined for recovery, reuse and incorporation on site (tonnes)	66,267	61,507	54,008
Destined for disposal (tonnes)	6.63	6.01	3.31

Note 1: Construction waste is all recovered or reused and incorporated into the work, it is not disposed of..



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GRI 306: WASTE
Referring to the standard published in 2020

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306-3 Floene Group
Waste generated

The information reported in the GRI table is compiled on the basis of the practices and methodologies adopted by the company, which follow the standards established by the applicable national and international legislation.

Floene's activity results in the production of contract waste and administrative waste, the data from which is collected periodically and the process supervised by the teams responsible for environmental and safety management. The information is obtained through records of operations, including the amount of waste generated, categorised according to type and final destination (recycling, incineration, landfill, among others). In addition, the information reported is validated internally, with the support of internal and external audits, guaranteeing the accuracy and compliance of the data. Every six months, the data is consolidated and presented in the GRI table, with the appropriate segregation by type of waste, in order to provide a clear and transparent view of environmental management and operational impact.

This methodology is in line with good practice in the sector, as is followed in the natural gas distribution network sector, which also adopts rigorous monitoring and recording processes for the management of its operational waste.

More information in Floene's 2024 Annual Report:	
Chapter 5.2.2. Carbon footprint	56-59

GRI 308: ENVIRONMENTAL ASSESSMENT OF SUPPLIERS
Referring to the standard published in 2016

308-1 Floene Group
New suppliers that were screened using environmental criteria

Floene guarantees responsible supply chain management, establishing partnerships that respect commercial and technical conditions, as well as the values expressed in our Code of Ethics, Codes of Conduct and Health, Safety, Environment, Quality and Human Rights Policies, ensuring compliance with current legislation. In addition, we subscribe to the BCSD Charter of Principles.

Risk management involves selecting, qualifying and monitoring service providers. Through the One Trust platform, which is integrated into purchasing management, we monitor and mitigate risks in tendering processes. Before signing any contract, we carry out compliance audits to identify possible warning signs, such as corruption or money laundering.

This system, which uses financial and non-financial information provided by our partners and available on the market, enables more comprehensive risk control, with an emphasis on areas such as ESG, cybersecurity and GDPR.

New suppliers	2022	2023	2024
No. of new tier 1 suppliers	n.d.	19	19
No. of new tier 1 suppliers that have undergone due diligence processes for environmental impacts	n.d.	17	17
Percentage of new tier 1 suppliers that have undergone due diligence processes for environmental impacts	n.d.	89%	89%



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GRI 308: ENVIRONMENTAL ASSESSMENT OF SUPPLIERS

Referring to the standard published in 2016

308-1 Floene Group

New suppliers that were screened using environmental criteria

Suppliers by type

Number of suppliers by type

Type of supplier	2022	2023	2024
Tier 1	65	78	69
Non-tier 1	0	0	0
Critical tier 1	19	21	14

Note 1: Tier 1 – Tier 1 services present a greater inherent cyber risk.

Results of the sustainability risk assessment:

Sustainability risk (no. of Floene tier 1 suppliers)	2022	2023	2024
with a high risk of economic sustainability	0	0	0
with a high risk of environmental sustainability	0	0	0
with a high risk of social sustainability	5	0	0

Results of the CSR risk assessment:

Risk level – Rating Social Responsibility – Questionnaires	No. of Floene suppliers with turnover in 2022		No. of Floene suppliers with turnover in 2023		No. of Floene suppliers with turnover in 2024	
	Tier 1	Critics	Tier 1	Critics	Tier 1	Critics
A+ Above average rating	34	15	36	16	28	5
A Rating within the average	10	3	16	3	11	4
B Below average rating	5	1	9	2	5	4

Certifications:

International Standards	2022	2023	2024
ISO 9001	92	96	112
ISO 14001	47	47	63
OHSAS 18001 /ISO 45001	46	43	60
Other certifications	25	29	41

Supplier audits:

	2022	2023	2024
No. of supplier audits	12	10	32
No. of tier 1 supplier audits	3	8	10
Audited critical suppliers (tier 1 and non-tier 1)	0	0	3



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GRI 308: ENVIRONMENTAL ASSESSMENT OF SUPPLIERS
Referring to the standard published in 2016

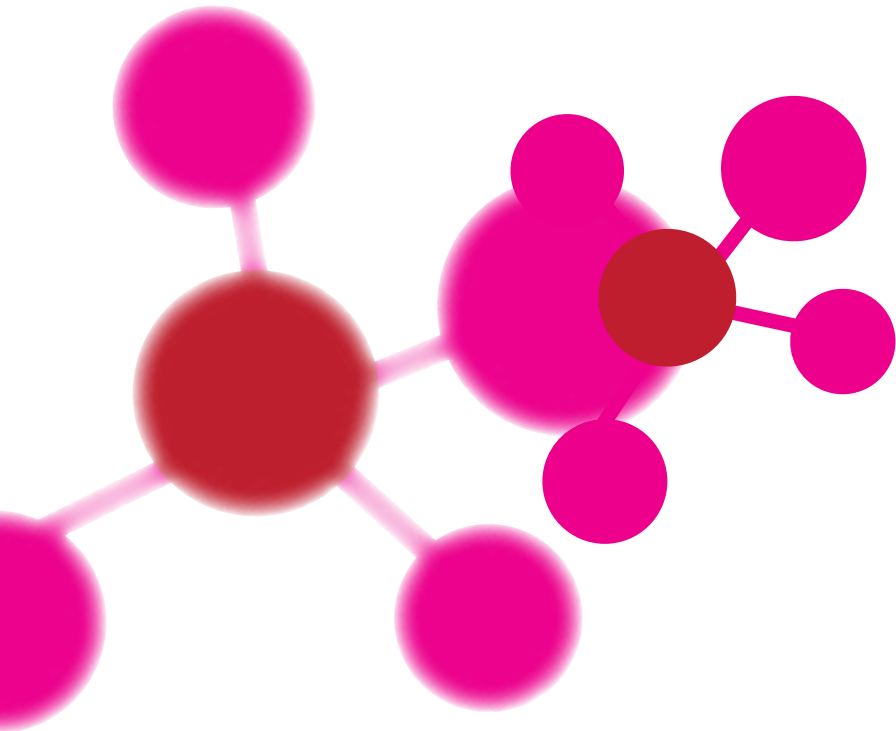
308-1 Floene Group
New suppliers that were screened using environmental criteria

In addition to risk management practices and the monitoring of certifications in the supply chain, audits are carried out on suppliers or potential suppliers:

- Finance;
- Technique;
- Corporate social responsibility;
- Safety & Health;
- Environment;
- Business continuity;
- SLA contract.

308-2 Floene Group
Negative environmental impacts in the supply chain and actions taken

No tier 1 suppliers (critical or non-critical) with a high environmental sustainability risk were identified .





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PERFORMANCE**GRI 401: EMPLOYMENT**

Referring to the standard published in 2016

401-1 Floene Group

New employee hires and employee turnover

Total number of employees at the end of the reporting period, by location, gender and age group

		2022			2023			2024		
		Gender			Gender			Gender		
		<30	30-50	>50	<30	30-50	>50	<30	30-50	>50
Region National	Men	8	117	145	10	117	152	9	109	150
	Women	4	75	47	7	72	50	7	70	50
Total employees (by age group)		12	192	192	17	189	202	16	179	200
Total employees (by gender)	Men	270			279			268		
	Women	126			129			127		
Total employees (national)		396			408			395		

Note: The accounting of the number of employees includes the members of the Executive Committee (4) and excludes trainees/interns, employees on unpaid leave and other members of the Governing Bodies. Employees of all the companies in the Floene Group are taken into account. Corrections have been made to the headcounts for previous years due to a change in criteria. The accounting refers to the end of the reporting period.

Total number of employees who joined or left in the reporting period

		2022					
		Inputs			Outputs		
	Gender	<30	30-50	>50	<30	30-50	>50
National	Men	8	13	0	2	1	20
	Women	7	8	1	1	0	7
Total entries and exits (by age group)		15	21	1	3	1	27
Total inflows and outflows (by gender)	Men	21			23		
	Women	16			8		
Total inflows and outflows (national)		37			31		

		2023					
		Inputs			Outputs		
	Gender	<30	30-50	>50	<30	30-50	>50
National	Men	6	17	0	1	7	6
	Women	7	5	0	3	2	4
Total entries and exits (by age group)		13	22	0	4	9	10
Total inflows and outflows (by gender)	Men	23			14		
	Women	12			9		
Total inflows and outflows (national)		35			23		



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PERFORMANCE**GRI 401: EMPLOYMENT**

Referring to the standard published in 2016

401-1 Floene Group

New employee hires and employee turnover

Total number of employees who joined or left in the reporting period

		2024					
	Gender	Inputs			Outputs		
		<30	30-50	>50	<30	30-50	>50
National	Men	4	8	2	2	4	19
	Women	3	7	0	2	2	8
Total entries and exits (by age group)		7	15	2	4	6	27
Total inflows and outflows (by gender)	Men	14			25		
	Women	10			12		
Total inflows and outflows (national)		24			37		

Note 1 (2022): The accounting covers members of the Executive Committee and trainees/interns, and excludes employees on unpaid leave and other members of the Governing Bodies. Employees of all Floene Group companies are taken into account.

Note 2 (2023, 2024): The accounting covers members of the Executive Committee and excludes trainees/interns, employees on unpaid leave and other members of the Governing Bodies. Employees of all Floene Group companies are taken into account.

Hiring rate and employee turnover in the reporting period (%)

		2022					
	Gender	Inputs (%)			Outputs ¹ (%)		
		<30	30-50	>50	<30	30-50	>50
National	Men	2.0	3.2	0.0	0.5	0.2	5.0
	Women	1.7	2.0	0.2	0.2	0.0	1.7
Rate of entries and exits (by age group)		3.7	5.2	0.2	0.7	0.2	6.7
Entry and exit rates (by gender)	Men	5.2			5.7		
	Women	4.0			2.0		
Entry and exit rates (national)		9.2			7.7		
Retention rate					92.0		
Turnover rate					7.8		



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PERFORMANCE**GRI 401: EMPLOYMENT**

Referring to the standard published in 2016

401-1 Floene Group

New employee hires and employee turnover

Hiring rate and employee turnover in the reporting period (%)

		2023					
	Gender	Inputs (%)			Outputs ¹ (%)		
		<30	30-50	>50	<30	30-50	>50
National	Men	1.5	4.2	0.0	0.2	1.7	1.5
	Women	1.7	1.2	0.0	0.7	0.5	1.0
Rate of entries and exits (by age group)		3.2	5.4	0.0	1.0	2.2	2.5
Entry and exit rates (by gender)	Men	5.7			3.4		
	Women	2.9			2.2		
Entry and exit rates (national)		8.6			5.6		
Retention rate					94.4		
Turnover rate					7.1		

		2024					
	Gender	Inputs (%)			Outputs ¹ (%)		
		<30	30-50	>50	<30	30-50	>50
National	Men	1.0	2.0	0.5	0.5	1.0	4.8
	Women	0.8	1.8	0.0	0.5	0.5	2.0
Rate of entries and exits (by age group)		1.8	3.8	0.5	1.0	1.5	6.8
Entry and exit rates (by gender)	Men	3.5			6.3		
	Women	2.5			3.0		
Entry and exit rates (national)		6.1			9.4		
Retention rate					90.6		
Turnover rate					7.7		

Note 1: For the sake of simplicity, the turnover rate (exit) was calculated using the final figures for each period. Corrections have been made to the headcounts for previous years due to the change in criteria. The accounting refers to the end of the reporting period.

Note 2 (2022): The accounting covers members of the Executive Committee and trainees/interns, and excludes employees on unpaid leave and other members of the Governing Bodies. Employees of all the companies in the Floene Group are taken into account.

Note 3 (2023, 2024): The accounting covers members of the Executive Committee and excludes trainees/interns, employees on unpaid leave and other members of the Governing Bodies. Employees of all Floene Group companies are taken into account.

Note 4: A significant fluctuation is defined as voluntary departures of 15% or more of the total number of employees over a 12-month period, excluding terminations due to pre-retirement or retirement. In 2024, 11 employees left their jobs voluntarily, corresponding to approximately 3% of the total workforce, which is not considered a significant fluctuation in the terms defined.



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PERFORMANCE**GRI 401: EMPLOYMENT**

Referring to the standard published in 2016

401-2 Floene Group

Benefits provided to full-time employees that are not provided to temporary or part-time employees

The benefits listed apply to all Floene employees (permanent and fixed-term), with the exception of the Pension Fund which will apply to Tagusgás employees from July 2025:

- Pension Fund (only for employees with an indefinite contract);
- Life Insurance;
- Personal Accident Insurance;
- Health insurance;
- Travel Insurance;
- Parental leave;
- Employee and children's birthday;
- Merit scholarship for employees' children.

401-3 Floene Group

Parental leave

According to the criteria in force, all employees of the Floene organisation are entitled by law to parental leave. To this end, the number of employees who actually took advantage of this right during the reporting period is detailed below:

	Gender	2022	2023	2024
No. of employees who took parental leave during the reporting period	Men	1	1	6
	Women	2	2	3
	Total	3	3	9
No. of employees returning to work after parental leave	Men	1	1	4
	Women	1	1	3
	Total	2	2	7
No. of employees who have returned to work and remain with the company after 12 months	Men	2	1	1
	Women	0	2	1
	Total	2	3	2
No. of employees who have returned to work and remain with the company at the end of the reporting period	Men	-	-	4
	Women	-	-	3
	Total	-	-	7
Return to work rate	Men	-	-	100%
	Women	-	-	100%
	Total	-	-	100%
Retention rate (12 months)	Men	100%	100%	100%
	Women	-	100%	100%
	Total	100%	100%	100%



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PERFORMANCE**GRI 402: LABOUR RELATIONS**

Referring to the standard published in 2016

402-1 Floene Group

Minimum notice periods regarding operational changes

Floene strictly complies with the deadlines established by legislation and internal regulations, ensuring that there is an adequate adaptation period for significant operational changes. Only Lisboaagás has a Collective Bargaining Agreement, in which case the notification period and the provisions for consultation and negotiation are specified therein.

GRI 403: OCCUPATIONAL HEALTH AND SAFETY

Referring to the standard published in 2018

403-1 Floene Group

Occupational health and safety management system

The companies in the Floene Group have implemented and certified an Occupational Health and Safety Management System (OSHMS) in accordance with the NP EN ISO 45001 standard, thus reinforcing their commitment to safe and healthy working environments. This system aims to prevent accidents and occupational illnesses, protecting both direct workers and those of service providers operating on their behalf. More than complying with mandatory legal requirements, Floene promotes a safety culture based on prevention and continuous improvement.

The NP EN ISO 45001 standard enables the establishment of a robust structure for occupational health and safety management, and is aligned with other management standards already in place, such as NP EN ISO 9001 (Quality Management) and ISO 14001 (Environmental Management).

The OSHMS is improved and maintained on the basis of the implementation of the NP EN ISO 45001 standard in the Floene Group companies. 2023 saw the start of another certification cycle with the renewal of certification under NP EN ISO 45001. For Floene, implementing the OSH management system in accordance with NP EN ISO 45001 has the following advantages:

- Improved safety culture and employee involvement, as it promotes a proactive approach to identifying and managing health and safety risks at work. This leads to greater awareness and commitment to health and safety at all levels, a sense of ownership and involvement, which leads to an increase in morale, productivity and the retention of qualified staff;
- Incident reduction and cost savings: by systematically identifying and addressing potential hazards and risks, the likelihood of accidents and incidents in the workplace is reduced. This not only protects workers, but also helps to minimise the associated financial and reputational costs. Fewer accidents mean lower healthcare costs, reduced insurance premiums and fewer costs associated with business interruptions;
- Legal compliance: compliance with NP EN ISO 45001 helps to identify, evidence and assess compliance with legal and regulatory requirements relating to health and safety at work. This translates into fewer legal situations, penalties and fines associated with non-compliance;
- Improved reputation: demonstrating a commitment to the health and safety of Stakeholders improves Floene's reputation. Customers, suppliers and other partners prefer to engage with companies that prioritise the well-being and health of their workers and Stakeholders;



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GRI 403: OCCUPATIONAL HEALTH AND SAFETY

Referring to the standard published in 2018

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403-1 Floene Group

Occupational health and safety management system

- Better communication: ISO 45001 emphasises communication and consultation with employees and other relevant parties. This promotes improved communication channels, ensuring that important health and safety information is shared effectively throughout the organisation and its Stakeholders;
- Greater efficiency and proactivity in operational planning.

The OSHMS of the Floene Group companies covers both internal and external workers:

- All workers who have an employment relationship with the organisation, in accordance with national legislation;
- All workers who are not employees but whose work and/or workplace is controlled by the organisation;
- All workers who are not employees and whose work and/or workplace is not controlled by the organisation, but the organisation's operations, products or services are directly linked to significant impacts on the occupational health and safety of these workers by their business relationships.

Within the scope of certification, the OSHMS covers all management activities relating to the construction, maintenance, operation and use of gas distribution networks, including gases of renewable origin and low-carbon gases.

All workplaces comprising administrative buildings and facilities of the natural gas distribution system managed and maintained by Floene Group companies, namely PRM, PRP, UAG, EMI and primary and secondary networks, are covered by the OSHMS certification.

More information in Floene's 2024 Annual Report:

Chapter 4.3. Risk management and internal control	34-36
Chapter 5.3.1. Safety and well-being	60-64

403-2 Floene Group

Hazard identification, risk assessment, and incident investigation

Floene has a documented procedure in its Occupational Health and Safety Management System (OHSMS) for identifying hazards, assessing and controlling risks. This process covers normal conditions, abnormal conditions and foreseeable emergencies, and is recorded in OSH hazard and risk assessment matrices. The process includes the following stages:

1. Drawing up/reviewing OSH hazard identification, risk assessment and control:
 - a) The QSA, together with those responsible for the processes and/or employees, carry out a survey of OSH hazards by type of activity involving routine and occasional activities and all people (service providers and visitors) who have access to Floene's workplaces;
 - b) This survey may be revised and updated whenever necessary, particularly in the light of new circumstances, for example: the introduction of new technologies, the occurrence of incidents, non-conformities or dangerous situations, the provision of new services, changes to legal requirements, or others.
2. Plan its implementation – Based on the identification of risks, an action plan is drawn up, following the risk control hierarchy. This plan defines those responsible, deadlines and priorities for implementing mitigation measures.

GRI 403: OCCUPATIONAL HEALTH AND SAFETY

Referring to the standard published in 2018

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403-2 Floene Group

Hazard identification, risk assessment, and incident investigation

The assessment and control of OSH risks is carried out by professionals qualified as level VI Senior Safety Technicians in collaboration with the experts carrying out the activities, which guarantees the quality of the process and its output, the identification of risk prevention and mitigation measures. The results of the process can be used for

- 1) Identifying gaps and critical points: by analysing hazards and risks, and especially accident investigations, it is possible to identify gaps in the safety system, such as flaws in practices, knowledge or equipment. This identification helps to make efforts in specific areas that need improvement;
- 2) Reviewing procedures and policies: when an accident, near miss or risk is identified, it can lead to the revision or creation of operating procedures, work instructions, manuals or other instruments;
- 3) Lessons learnt, continuous improvement and corrective action: the process of investigating accidents or near misses helps to understand the underlying causes of these events (such as human failings, equipment problems or process deficiencies). With this information, corrective actions are implemented to prevent the recurrence of these incidents and to continuously improve the company's safety culture and system;
- 4) Training and awareness: analysing accident results can reveal the need for training for workers, ensuring that everyone has a better understanding of the risks and how to protect themselves;
- 5) Employee involvement: the systematic and continuous approach to identifying and assessing risks directly involves workers in the safety process, promoting a more participatory safety culture. Employees suggest improvements, which strengthens the perception that they are an active part of the process of improving the working environment;
- 6) Monitoring and adjusting the management system: using the data obtained in the risk assessment and accident investigation phases, the occupational health and safety management system is adjusted to ensure that safety objectives are achieved and improved over time.

New tasks, hazards and risks identified can be reported by any employee, either through the hierarchy or through direct contact with OSH by email, telephone or at a meeting.

In addition to the above, Floene has implemented proactive safety and environmental prevention mechanisms, such as site visits, Safety Talks, observation of unsafe situations or acts, near misses, periodic employee participation and consultation, among others.

Floene has established and publicised to all employees that any situation that does not allow for the safety and health of workers during their activities must be stopped by the worker themselves or by whoever identifies the situation. Under no circumstances may managers subject workers to unsuitable working conditions.

Employees are protected against possible reprisals for identifying/reporting the situations referred to in the previous paragraphs by the Floene Group's Code of Ethics and Conduct. The communication channel is "ComunicaÉtica", available at floene.pt/comunicacao-de-irregularidades.

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Chapter 4.2. Ethics and transparency	34
Chapter 5.3.1. Safety and well-being	60-64



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GRI 403: OCCUPATIONAL HEALTH AND SAFETY
Referring to the standard published in 2018

403-3 Floene Group
Occupational health services

The occupational health and safety services are responsible for:

- a) Define and promote the application of Safety, Health, Environment and Major Accident Prevention policies at Floene and its service providers, with a view to minimising environmental impact and reducing risks for employees, customers, third parties, assets and the surrounding community;
- b) Define and apply the methodology for identifying, assessing and managing the risks and impacts inherent to activities, in order to prevent accidents and damage to the environment;
- c) Ensuring and publicising the identification of legal requirements in terms of Safety and the Environment;
- d) Proposing the establishment of appropriate standards, practices and procedures to guarantee the safety of people, facilities and the environment, in line with risk and impact assessments and applicable legislation;
- e) Proposing the definition of Goals and Objectives and implementing programmes and actions, acting proactively and anticipating the organisation's needs, ensuring their monitoring and dissemination;
- f) Defining and proposing the necessary processes to systematically investigate Incidents and Non-Conformities, determining their causes and correcting them, publicising their conclusions in order to prevent similar Incidents from occurring;
- g) Ensuring the adequacy of the Facilities and Activities Emergency Plans, as well as promoting and/or collaborating in carrying out drills, in order to contribute to the ongoing adequacy and operability of the means and procedures for response and communication in the event of an accident;
- h) Collaborate in identifying training needs in the area of Safety and the Environment, with the aim of ensuring that employees have the training and skills necessary to carry out their duties. Defining and/or delivering specific training actions;
- i) Promote the dissemination of knowledge and information on Safety and Environmental issues, in terms of risks and impacts, mitigation measures, as well as indicators, trends and benchmarks, in order to help strengthen the Safety and Environmental culture;
- j) Ensure that audits are carried out on operational activity and facilities, as well as service providers and contractors, in order to assess whether the pre-established provisions are implemented and whether they are suitable for achieving the company's objectives;
- k) Coordinating audits of the Major Accident Prevention Management System and ensuring the planning, management and certification of the Integrated Environment, Quality and Safety System, with regard to the environment and safety aspects, as a fundamental requirement for carrying out the regulated activity;



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GRI 403: OCCUPATIONAL HEALTH AND SAFETY

Referring to the standard published in 2018

403-3 Floene Group

Occupational health services

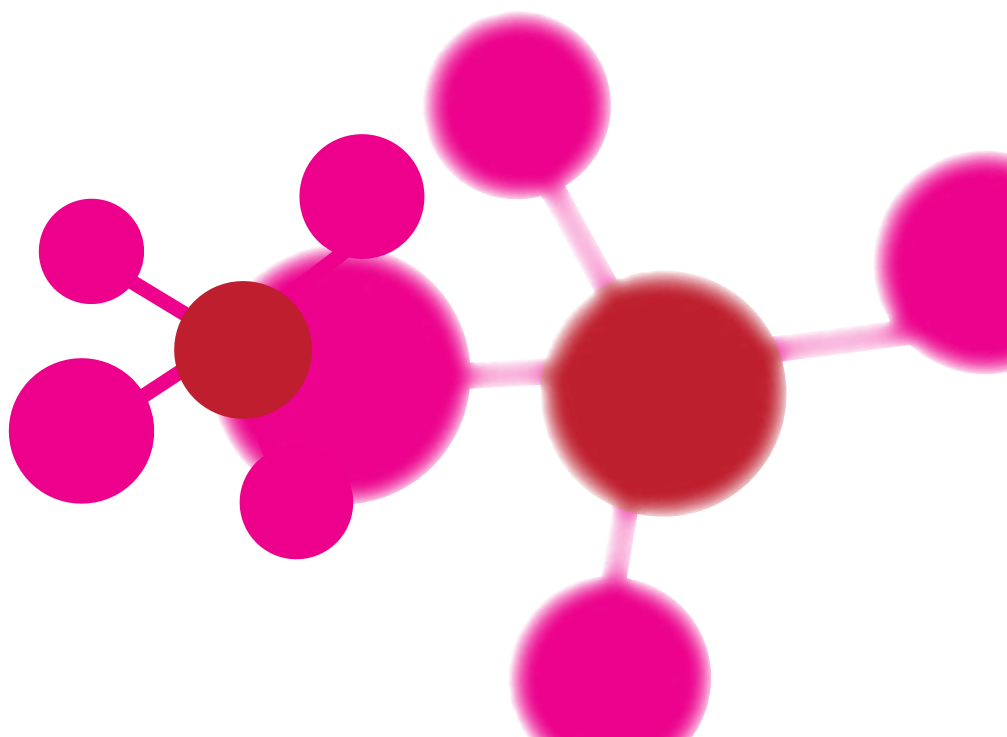
l) Contributing to the review of the QSE Management Systems, in terms of Safety and Environment, in order to guarantee ongoing compliance, suitability and effectiveness in its various aspects and promoting continuous improvement;

m) Ensuring representation and communication with national bodies and authorities in the field of Safety and Environment, safeguarding the Organisation's interests.

Floene ensures the quality of occupational safety services through an in-house team of level VI Senior Safety Technicians, complemented by external resources with equivalent qualifications. At Lisboagás, employee access to these services is facilitated, namely through their Occupational Health and Safety (OHS) representatives.

First and third party audits are carried out throughout the Floene Group.

In addition, occupational health services are provided internally at a medical centre located at Floene's headquarters or, given the geographical dispersion of the group's companies, locally in each area of operation. The confidentiality of workers' health data is a priority, and strict measures are taken to protect their privacy and ensure compliance with data protection regulations in the field of occupational health management.



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Referring to the standard published in 2018

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403-4 Floene Group
Worker participation, consultation, and communication on occupational health and safety

As required by law, two formal consultations are held every year with all employees on OSH and work equipment, using an online questionnaire. The aim of these consultations is to gather employees' opinions on the applicable legal requirements. With regard to external Stakeholders, an annual questionnaire is carried out within the scope of NP EN ISO 450001.

In addition to the above, the following complementary means of consulting, involving and informing Stakeholders are used:

- a) Participation and consultation in the process of identifying, evaluating and treating hazards and risks;
- b) Participation and consultation in the process of selecting personal protective equipment;
- c) Internal communication via the intranet of the results of occupational health and safety assessments, such as indoor air quality, legionella, radon and illuminance;
- d) External communications via the website www.floene.pt/en/;
- e) Any interested party can be contacted at any time by email or telephone;
- f) Meetings with employee representatives on OSH matters;
- g) Specific meetings with areas to deal with OSH issues;
- h) Introduction of consultative and participatory approaches to OSH audits and checks, allowing workers the opportunity to raise any concerns;
- i) Annual surveys to understand workers' concerns and attitudes towards OSH;
- j) Introduction of consultative and participatory approaches in the holding of Safety Dialogues.

After the decision has been taken, and whenever it is considered relevant, feedback is given to the workers on the decision taken and, if the opinions and/or proposals are not adopted in the decision, they are the subject of a reasoned decision and informed to the workers or their representatives.

In the case of Lisboaagás, there are monthly meetings between representatives of the company and the Workers' Committee and the Health and Safety at Work Committee. At both meetings, workers' representatives have the opportunity to raise concerns and/or suggestions regarding workers' safety, health and hygiene. Hazards, risks, etc. are frequently identified by workers in the field, who pass on their concerns to their representatives on the Committees identified above, thus guaranteeing their participation in the management of their working conditions.

The organisational and management method of these Committees follows the applicable legal precepts, namely in terms of credit hours, election, composition, among others.

More information in Floene's 2024 Annual Report:



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403-5 Floene Group**Worker training on occupational health and safety**

Every year, SSA defines the OSH training activities to be carried out, which are included in Floene's annual training plan.

At the same time, training is given to all new employees, both on arrival and during their integration.

OSH training for own employees includes, among other topics:

- a) Assessment of hazards and risks by activity, as well as the measures to be implemented to mitigate or reduce the risk to an acceptable level;
- b) Prevention of serious accidents, emergency plans, firefighting and the ATEX directive for employees whose jobs may expose them to risks arising from classified areas;
- c) Self-protection measures;
- d) Work authorisations;
- e) Incident communication and reporting;
- f) First aid for employees working in emergency teams;
- g) Personal protective equipment;
- h) Task safety analysis;
- i) Change management;
- j) Safety data sheets;
- k) QSA management systems;
- l) Legal issues not identified above.

With regard to OSH training for non-proprietary workers, Floene establishes in a contractual clause that training must be provided quarterly by the executing organisation and verifies compliance with this. In addition, the OSH provides safety inductions before work begins on sites covered by the ATEX directive, namely UAG, PRM, PRP and EMI.

OSH training needs are identified through the following means:

- a) Performance management, in which the hierarchy and the worker can identify actions, including those in the OSH field;
- b) Consultation with employees;
- c) Matrix of training and competences for functions;
- d) Audit results ;
- e) Risk assessment;
- f) Legislation ;
- g) Internal procedures.

These courses are offered free of charge and during working hours.

More information in Floene's 2024 Annual Report:

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403-6 Floene Group
Promotion of worker health

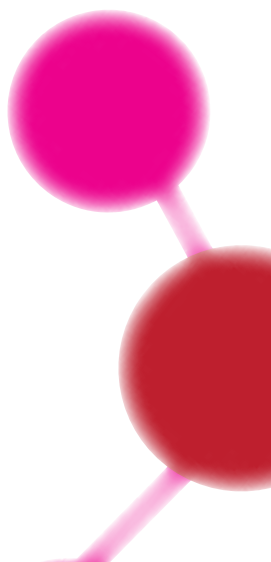
Floene provides all its employees and their families with health insurance, which ensures access to general and specialised medical care. This nationwide coverage is complemented by Multicare's Online Medicine services, which enable remote consultations, including psychological support, at no extra cost to employees. In addition, employees under the age of 60 are offered the flu vaccine free of charge.

The company has contracted various initiatives to promote employee health and well-being, such as:

- Multicare Vitality (App that encourages the promotion of a healthy lifestyle by stipulating a set of weekly targets for physical activity and healthy lifestyle habits, the fulfilment of which will allow employees to earn monetary advantages).
- Access to free online nutrition consultations.
- The Get Fit Programme (a programme to improve employees' physical fitness, consisting of online support from a personal trainer and a nutritionist).
- Smoking Cessation Programme.
- Better Sleep Programme – employees have access to this programme, which consists of 4 to 6 sessions of counselling by a psychologist, enabling them to acquire new routines for good sleep hygiene and learn relaxation techniques, so that they can sleep more soundly and regeneratively. Follow-up is always carried out by the same psychologist in an individualised and confidential manner.
- Free home delivery of medication.
- Sports Promotion Initiatives (Futsal, Padel and Running).
- Occupational medicine.

Given the geographical dispersion of Floene's employees, the use of online initiatives allows everyone to have equal access to these initiatives, guaranteeing equality between workers.

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403-7 Floene Group

Prevention and mitigation of occupational health and safety impacts directly linked by business relationships

Floene has a formally documented procedure in the Occupational Safety and Health Management System (OSHMS) for identifying hazards, assessing and controlling risks. This process covers normal conditions, abnormal conditions and reasonably foreseeable emergencies. The resulting information is recorded in OSH-specific hazard and risk assessment matrices. The identification of OSH hazards is carried out according to the type of activity, covering both routine and sporadic activities, and includes all people (service providers and visitors) who have access to Floene's workplaces.

At the same time, Floene adopts mechanisms for selecting and evaluating suppliers, with the aim of guaranteeing compliance with legal requirements in terms of OSH. The company also establishes contractual clauses relating to OSH with its business partners, ensuring that compliance with these conditions is verified.

More information in Floene's 2024 Annual Report:

Chapter 5.3.1. Safety and well-being

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403-8 Floene Group

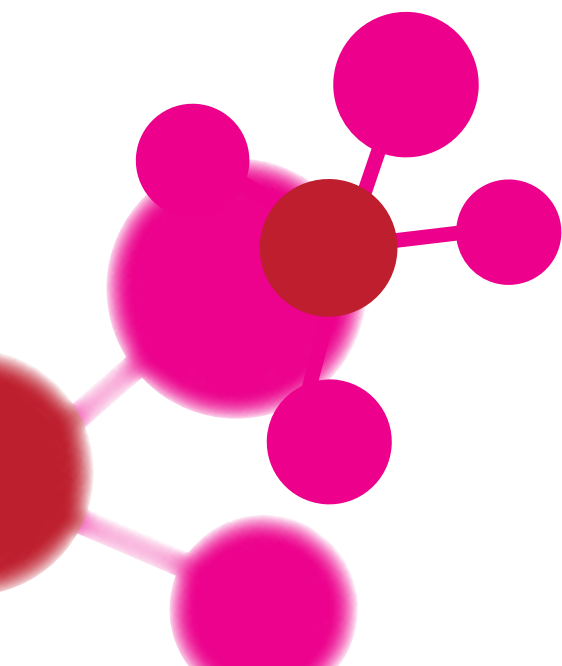
Workers covered by an occupational health and safety management system

The organisation has an Occupational Health and Safety Management System (OHSMS) certified and audited by an external entity, which covers all employees and other workers whose work is controlled by the organisation.

More information in Floene's 2024 Annual Report:

Chapter 5.3.1. Safety and well-being

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403-9 Floene Group**Work-related injuries****Employee data**

		2022	2023	2024
Total number of	deaths resulting from accidents at work	0	0	0
	serious accidents at work ¹ (excluding fatalities)	0	0	0
	compulsory reporting of accidents at work ²	5	4	2
	hours worked	650,437	704,425	682,763
Index of	deaths resulting from accidents at work	0	0	0
	serious accidents at work (excluding fatalities)	0	0	0
	compulsorily notifiable accidents at work	7.69	5.68	2.93

Data on workers who are not employees but whose work is controlled by the organisation

		2022	2023	2024
Total number of	deaths resulting from accidents at work	0	0	0
	serious accidents at work ¹ (excluding fatalities)	0	0	1
	compulsory reporting of accidents at work ²	3	3	2
	hours worked	1,292,510	1,216,035	1,147,654
Index of	deaths resulting from accidents at work	0	0	0
	serious accidents at work (excluding fatalities)	0	0	0,15
	compulsorily notifiable accidents at work	2.32	2.47	1.74

Note 1: According to the GRI criteria, serious accidents at work are injuries from which the worker will not recover or is expected to recover fully, within a maximum period of 6 months to the health condition prior to the accident.

Note 2: According to the GRI criteria, it includes all accidents that result in one of the following possibilities: deaths, accidents with sick leave, accidents that result in loss or reduction of ability to work or transfer to another job, accidents that lead to medical treatment beyond first aid, loss of consciousness, serious injury diagnosed by a doctor or other qualified health professional (N2+N3+N4). It can also be referred to as TRI (Total Recordable Incidents).

More information in Floene's 2024 Annual Report:

GRI 403: OCCUPATIONAL HEALTH AND SAFETY
Referring to the standard published in 2018

page

403-10 Floene Group
Work-related ill health

	2022	2023	2024
Number of deaths resulting from occupational diseases	0	0	0
Number of occupational disease cases reported	0	0	0
Number of confirmed occupational disease cases	0	0	0

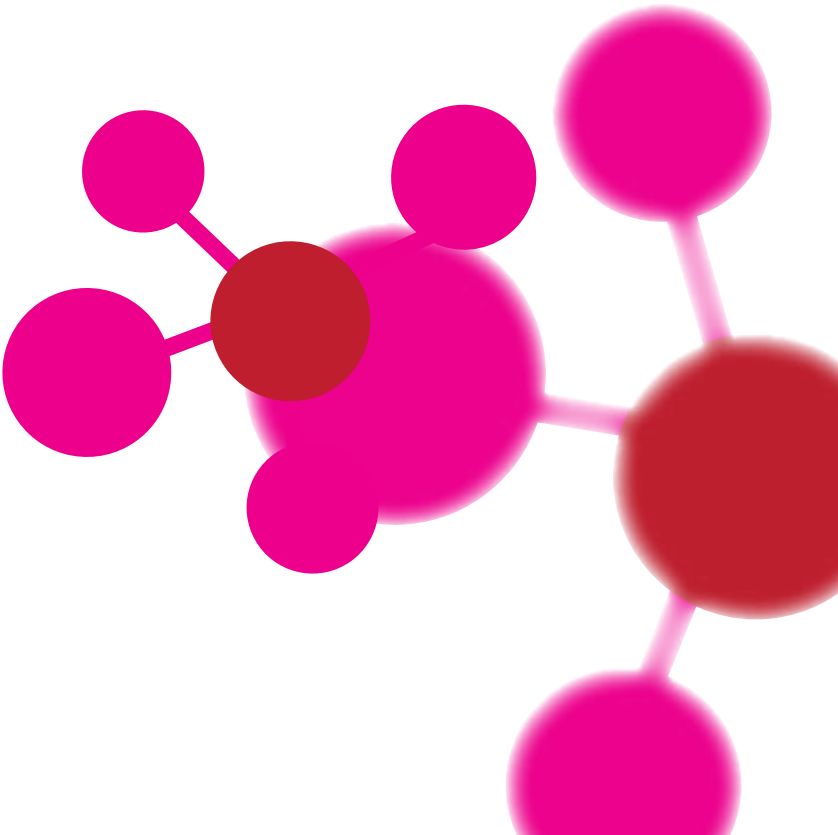
Note: It does not include information on occupational diseases of workers who are not employees, only deaths.

In the course of its activities, Floene recognises various hazards related to occupational diseases, which are not significant and which are duly controlled through the Occupational Health Services and its risk assessment and workplace visits. These risks have been duly identified using the Hazard Identification and Risk Assessment Methodology, and Floene includes in its Health Prevention Plan all the actions taken or underway to eliminate these hazards and minimise the risks, using the risk control hierarchy. No occupational illnesses were identified during the reporting period.

More information in Floene's 2024 Annual Report:

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Referring to the standard published in 2016

404-1 Floene Group

Average hours of training per year per employee

Total number of training hours by functional category and gender

	Gender	2022			2023			2024		
		<30	30-50	>50	<30	30-50	>50	<30	30-50	>50
Administration (Executive Committee)	Men	0	0	97	0	0	74	0	52	102
	Women	0	0	0	0	0	0	0	0	0
	Subtotal	0	0	97	0	0	74	0	52	102
Heads of Area	Men	0	339	441	0	178	171	0	280	180
	Women	0	189	0	0	42	46	0	40	23
	Subtotal	0	528	441	0	220	217	0	320	203
Managers	Men	0	215	426	0	600	1,271	0	258	936
	Women	0	287	108	0	662	401	0	507	224
	Subtotal	0	501	535	0	1,262	1,671	0	765	1,160
Specialists	Men	132	761	1,764	227	1,534	2,552	31	1,901	2,969
	Women	122	646	374	236	1,655	847	100	1,834	1,256
	Subtotal	254	1,408	2,138	464	3,188	3,399	132	3,736	4,225
Technical Contributors	Men	334	1,411	1,088	81	2,088	1,028	110	3,202	2,271
	Women	12	124	56	22	441	249	0	1,134	542
	Subtotal	346	1,536	1,145	103	2,529	1,277	110	4,336	2,813
Operational & Support Contributors	Men	0	0	0	0	0	0	0	0	0
	Women	0	0	22	0	0	5	0	0	55
	Subtotal	0	0	22	0	0	5	0	0	55
Total	Men	466	2,726	3,816	308	4,400	5,096	141	5,694	6,458
	Women	134	1,246	560	258	2,800	1,548	100	3,516	2,100
	Total	600	3,972	4,376	566	7,200	6,644	241	9,210	8,558

	2022	2023	2024
Training hours	8,948	14,410	18,009
Employees	396	410	395
Training hours/employee	22.6	35.1	45.6

Note 1: The count was carried out at the end of the reporting period.

Note 2: Includes employees who left the company during the reporting period, as well as Governing Bodies.

Note 3: Corrections were made to the headcounts for previous years due to a change in criteria.

GRI 404: TRAINING AND EDUCATION
Referring to the standard published in 2016

page

404-2 Floene Group
Programmes for upgrading employee skills and transition assistance programmes

Floene has demonstrated an ongoing commitment to developing the skills of its employees. In this context, various internal training programmes have been implemented, adapted to the specific needs of each area and function. These programmes have covered topics such as technical and leadership skills, with prominent examples such as the Hydrogen Technical Programme, with 83 employees, the Operational Leadership Skills Development Programme, aimed at 8 employees, as well as other programmes in the areas of the SEVESO Directive, ATEX (target population = 7 employees), Ozone (target population = 146 employees) and Foreign Languages, the latter with access extended to all the organisation's employees.

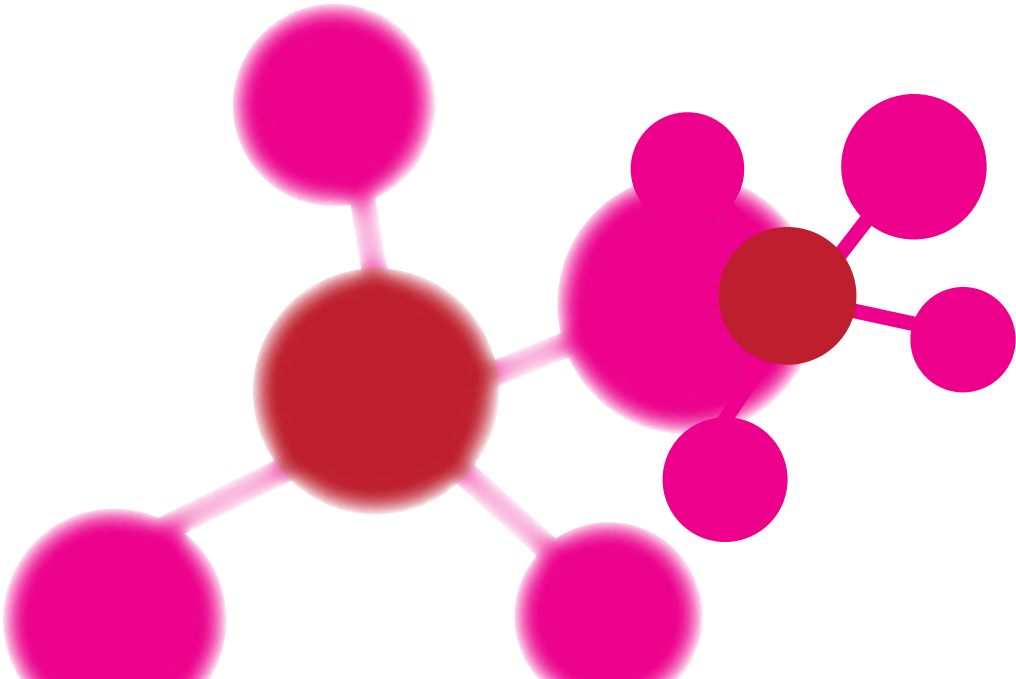
In addition to the internal development programmes, Floene also supported two post-graduate courses in Applied Management and paid for gas technician certification courses for new employees hired as Gas Infrastructure Technicians.

With regard to sabbaticals, an employee was granted unpaid leave to pursue a PhD. With regard to end-of-career management, Floene planned retirement periods.

More information in Floene's 2024 Annual Report:

Chapter 5.3.2.2. Training

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Referring to the standard published in 2016

404-3 Floene Group

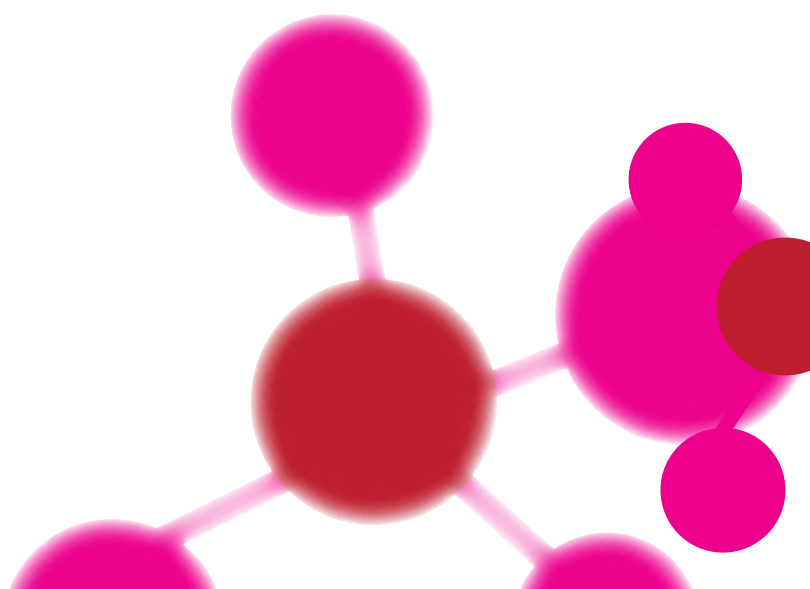
Percentage of employees receiving regular performance and career development reviews

Total number of employees eligible for performance appraisal, by professional category and gender

	Gender	2022	2023	2024
Heads of Area	Men	7	9	8
	Women		2	3
	Subtotal	7	11	11
Managers	Men	27	22	28
	Women	17	15	14
	Subtotal	44	37	42
Specialists	Men	89	92	91
	Women	48	56	64
	Subtotal	137	148	155
Technical Contributors	Men	142	130	129
	Women	56	47	42
	Subtotal	198	177	171
Operational & Support Contributors	Men	0	0	0
	Women	2	2	1
	Subtotal	2	2	1
Total	Men	265	253	256
	Women	123	122	124
	Total	388	375	380

Note 1: The evaluation of employees in year N relates to their performance in year N-1.

Note 2: Employees identified as eligible for evaluation in year N are those who were employed by the organisation at the end of year N-1 and who meet the eligibility criteria defined by the organisation (e.g. employees who joined the organisation in the last quarter of year N-1 should not be considered). Trainees/interns and Governing Bodies were not taken into account.





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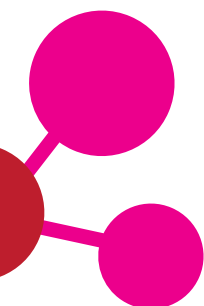
Percentage of employees receiving regular performance and career development reviews

Total number of employees who received a performance and career development review

	Gender	2022	2023	2024
Heads of Area	Men	7	9	8
	Women	0	2	3
	Subtotal	7	11	11
Managers	Men	27	22	28
	Women	17	14	14
	Subtotal	44	36	42
Specialists	Men	89	91	91
	Women	48	53	64
	Subtotal	137	144	155
Technical Contributors	Men	142	128	129
	Women	56	44	42
	Subtotal	198	172	171
Operational & Support Contributors	Men	0	0	0
	Women	2	2	1
	Subtotal	2	2	1
Total	Men	265	250	256
	Women	123	115	124
	Total	388	365	380

Note 1: The evaluation of employees in year N relates to their performance in year N-1.

Note 2: Not all eligible employees will have been effectively assessed or their assessment completed. Employees may have left in the meantime or taken parental leave, among other things, which may have an impact on the carrying out or completion of appraisal processes.





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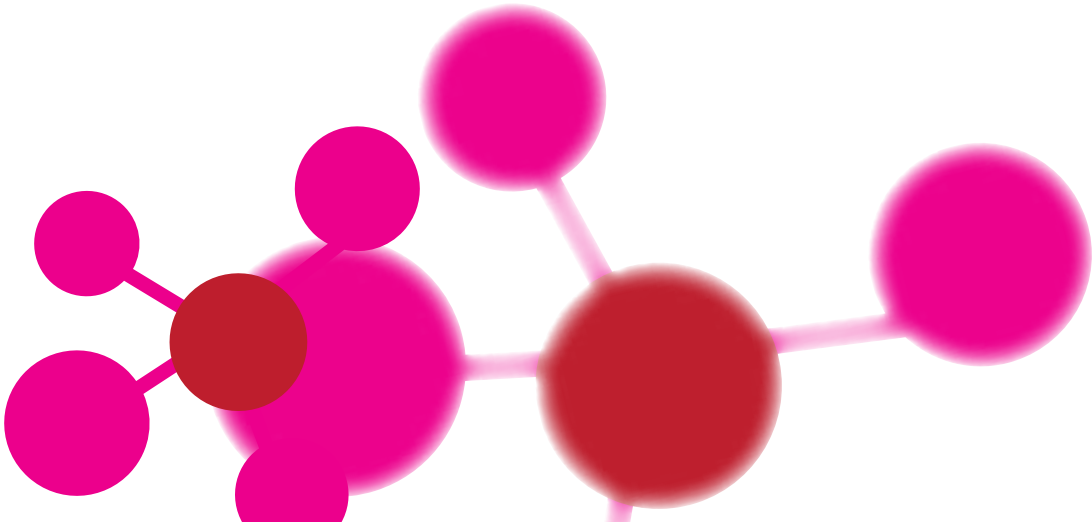
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GRI 404: TRAINING AND EDUCATION
Referring to the standard published in 2016

404-3 Floene Group
Percentage of employees receiving regular performance and career development reviews

Percentage of employees who received a performance and career development review

	Gender	2022	2023	2024
Heads of Area	Men	100%	100%	100%
	Women	-	100%	100%
	Subtotal	100%	100%	100%
Managers	Men	100%	100%	100%
	Women	100%	93%	100%
	Subtotal	100%	97%	100%
Specialists	Men	100%	99%	100%
	Women	100%	95%	100%
	Subtotal	100%	97%	100%
Technical Contributors	Men	100%	99%	100%
	Women	100%	94%	100%
	Subtotal	100%	97%	100%
Operational & Support Contributors	Men	-	-	100%
	Women	100%	100%	100%
	Subtotal	100%	100%	100%
Total	Men	100%	99%	100%
	Women	100%	94%	100%
	Total	100%	97%	100%





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GRI 405: DIVERSITY AND EQUAL OPPORTUNITIES

Referring to the standard published in 2016

405-1 Floene Group

Diversity of governance bodies and employees

	Gender	2022			2023			2024		
		<30	30-50	>50	<30	30-50	>50	<30	30-50	>50
Administration (Executive Committee)	Men	0	0	4	0	1	3	0	1	3
	Women	0	0	0	0	0	0	0	0	0
	Subtotal	0	0	4	0	1	3	0	1	3
Heads of Area	Men	0	4	4	0	5	4	0	4	5
	Women	0	2	0	0	2	1	0	2	2
	Subtotal	0	6	4	0	7	5	0	6	7
Managers	Men	0	11	15	0	9	19	0	8	20
	Women	0	10	4	0	10	6	0	9	5
	Subtotal	0	21	19	0	19	25	0	17	25
Specialists	Men	4	27	28	5	35	54	5	35	58
	Women	2	25	13	7	32	22	7	33	24
	Subtotal	6	52	41	12	67	76	12	68	82
Technical Contributors	Men	4	75	93	5	67	72	4	61	64
	Women	2	39	26	0	28	18	0	26	16
	Subtotal	6	114	118	5	95	90	4	87	80
Operational & Support Contributors	Men	0	0	0	0	0	0	0	0	0
	Women	0	0	4	0	0	3	0	0	3
	Subtotal	0	0	4	0	0	3	0	0	3
Total	Men	8	117	144	10	117	152	9	109	150
	Women	4	76	47	7	72	50	8	70	50
	Total	12	193	191	17	189	202	16	179	200

Note 1: The accounting of the number of employees includes the members of the Executive Committee (4) and excludes trainees/interns, employees on unpaid leave and other members of the Governing Bodies.

Note 2: Corrections have been made to previous years' headcounts due to a change in criteria.

405-2 Floene Group

Ratio of basic salary and remuneration of women to men

Category	Women	Men	Rácio
	Average pay received	Average pay received	
Management (Executive Committee)	-	10,696.00	-
Heads of Area	7,018.00	7,316.00	0.96
Managers	4,081.00	4,472.00	0.91
Specialists	2,246.00	2,474.00	0.91
Technical Contributors	1,457.00	1,506.00	0.97
Operational & Support Contributors	2,617.00	-	-



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GRI 406: NON-DISCRIMINATION

Referring to the standard published in 2016

406-1 Floene Group

Incidents of discrimination and corrective actions taken

No incidents of discrimination on the grounds of race, colour, gender, religion, political opinion, national or social origin or other forms of discrimination were recorded during the reporting period.

GRI 407: FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Referring to the standard published in 2016

page

407-1 Floene Group

Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk

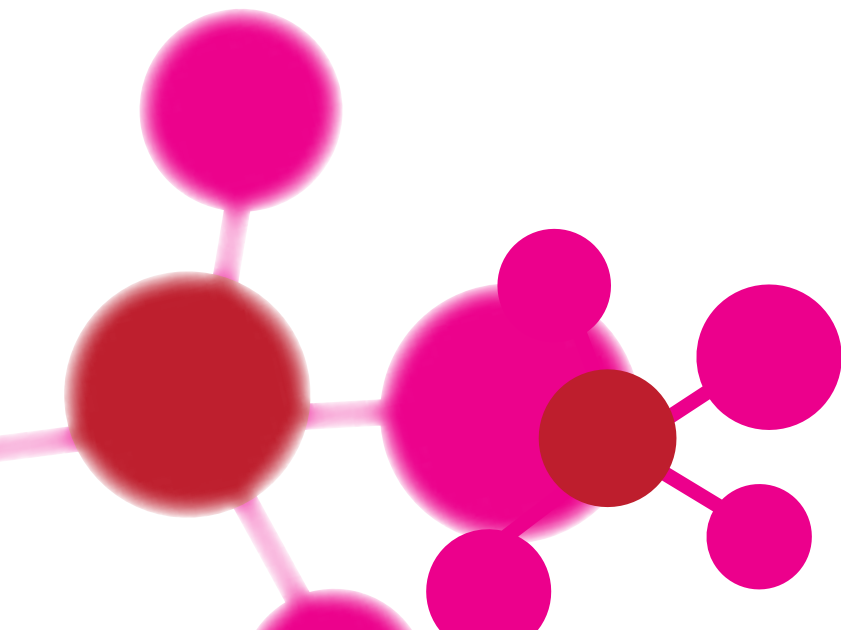
Floene is only present on national territory, which is governed by legislation that supports the right to exercise freedom of association and collective bargaining. The company complies with the legislation in force and thus supports freedom of association. Respect for the right of employees to be represented by trade union bodies or other forms of representation chosen under current legislation is duly reflected in Floene's Code of Ethics and Conduct, as well as in its Human Rights Policy, ensuring that they are not subject to any kind of judgement or retaliation. Suppliers are also subject to Floene's regulations and applicable national legislation.

Floene is not aware of any cases in which freedom of association or the right to collective bargaining have been seriously jeopardised or even violated.

More information in Floene's 2024 Annual Report:

Chapter 4.2. Ethics and transparency

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Referring to the standard published in 2016

page

413-1 Floene Group

Operations with local community engagement, impact assessments, and development programmes

Development programmes for the local community

Volunteer programme Give it Gas – Energy Literacy	2024
Volunteers	28
Students enrolled	177
Students impacted	474
Joining the programme	37%

Impacted community:

Three districts: Leiria, Aveiro and Viseu.

Six municipalities: Leiria, Marinha Grande, Óbidos, Anadia, Espinho and Tondela.

Six schools:

- three schools in Leiria (Escola Básica Dr Correia Mateus, Leiria; Escola Secundária Eng. Acácio Calazans Duarte, Marinha Grande; Escola Básica e Secundária Josefa de Óbidos, Óbidos);
- two schools in Aveiro (Escola Básica e Secundária de Anadia; Escola Básica e Secundária Dr Manuel Laranjeira, Espinho);
- one school in Viseu (Tondela Secondary School).

The impact of this programme is mainly to train young people about the energy transition and the importance of decarbonisation through renewable gases, as well as to build real awareness about the importance of renewable gases in changing the energy paradigm in Portugal.

In addition to the active participants, the campaign impacted a total of 474 students, including those who attended the awareness-raising sessions on renewable gases.

Communities of the Future	
	2024
Participations in Évora	139
Participations in Faro	95
Total participations	234

Corporate Social Responsibility Action – Volunteering

	2024
Volunteers in Lisbon	60
Volunteers in Viseu	19
Total volunteers	79
Total beneficiaries	74

More information in Floene's 2024 Annual Report:

Chapter 4.4. Involvement with Stakeholders

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GRI 414: SOCIAL ASSESSMENT OF SUPPLIERS

Referring to the standard published in 2016

414-1 Floene Group

New suppliers that were screened using social criteria

New suppliers

	2022	2023	2024
No. of new tier 1 suppliers	n.d	19	19
No. of new tier 1 suppliers that have undergone due diligence processes for social impacts	n.d	13	16
Percentage of new tier 1 suppliers that have undergone due diligence processes for social impacts	n.d	68%	84%

More detailed information on the new suppliers selected on the basis of social criteria can be found in indicator 308-1.

414-2 Floene Group

Negative social impacts in the supply chain and actions taken

No tier 1 suppliers (critical or non-critical) with a high social sustainability risk were identified.

GRI 415: PUBLIC POLICIES

Referring to the standard published in 2016

415-1 Floene Group

Political contributions

Floene made no contributions, monetary or in kind, to political organisations during the reporting period.

GRI 416: CONSUMER HEALTH AND SAFETY

Referring to the standard published in 2016

page

416-1 Floene Group

Assessment of the health and safety impacts of product and service categories

When assessing the impacts on health and safety, and considering that Floene's main activity consists of operating the gas distribution networks in Portugal, it is recognised that all the services associated with their maintenance are of significant importance. Therefore, carrying out preventive maintenance of the infrastructure is one of the main measures to mitigate the impacts on consumers' health and safety. In addition, Floene has complied with the emergency response indicators.

More information in Floene's 2024 Annual Report:

Chapter 6.3.1. Quality service, safe and efficient supply

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PERFORMANCESOCIAL
PERFORMANCE**GRI 416: CONSUMER HEALTH AND SAFETY**

Referring to the standard published in 2016

416-2 Floene Group

Incidents of non-compliance concerning the health and safety impacts of products and services

No non-compliances were recorded in this type of situation (with regulations that have led to fines or warnings from the competent regulatory body). Similarly, there were no non-compliances with regulations or voluntary codes.

GRI 417: MARKETING AND LABELLING

Referring to the standard published in 2016

417-3 Floene Group

Incidents of non-compliance concerning marketing communications

No cases of non-compliance relating to marketing communications were recorded during the reporting period.

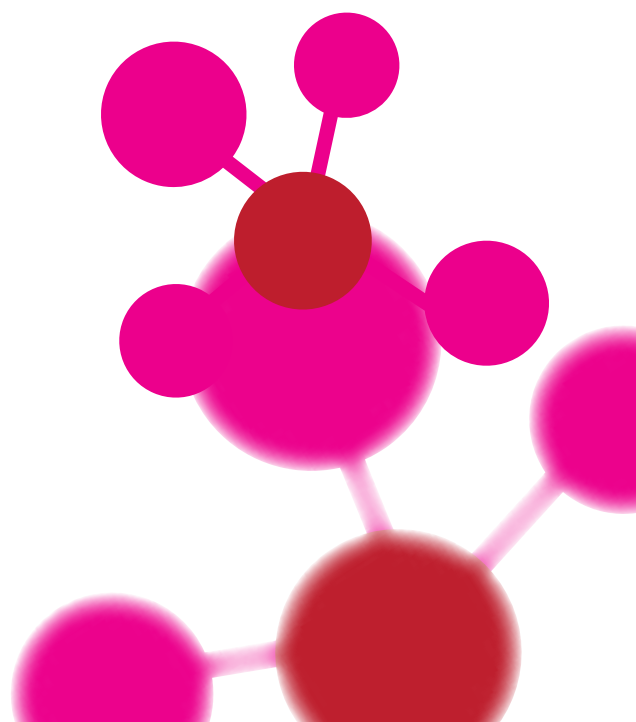
GRI 418: CUSTOMER PRIVACY

Referring to the standard published in 2016

418-1 Floene Group

Substantiated complaints concerning breaches of customer privacy and losses of customer data

There were no substantiated complaints about breaches and loss of customer data.



2024 ANNUAL REPORT

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N.P.C./M.C.R.C. 509 148 247
Capital social 89 529 141 euros

Design and graphic production:
Choice – Comunicação Global, Lda.
choice@choice.pt
www.choice.pt

Published:
April 2025



floene.pt