

CODE OF BUSINESS CONDUCT FOR

GNI Employees including Employees of Subsidiary Companies

1. INTRODUCTION

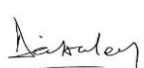
- 1.1. GNI's values are Building on Experience, Doing What's Right and Energised for Change. These values define the character of the organisation, guide our actions and decisions and provide a framework for how we interact with our colleagues, customers and stakeholders.

In line with GNI's Doing What's Right value, ethical standards must underpin how business is conducted on a daily basis.

- 1.2. Given GNI's public profile and the visibility of everything that it does, it follows that those in positions of responsibility in the organisation, in particular Board Members, Senior Management and Directors ("**Management**"), must be beyond reproach in their conduct.
- 1.3. GNI complies with the Code of Practice for the Governance of State Bodies issued by the Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation (the "**Code of Practice**") and any associated guidance. While the highest ethical standards are required of all GNI personnel, it is necessary, in light of their unique position, to provide requirements for Management (For the purposes of this Code of Business Conduct (the "**Code**"), Senior Management shall mean GNI employees of Grade C and above (including employees of subsidiary companies).
- 1.4. The Code should be read, where applicable, together with warrants of appointment, contracts of employment, and ethical standards of professional bodies to which Management is affiliated. The following policies are also noteworthy in the context of this Code and Management should be very familiar with their requirements -
- Regulation of Lobbying Act Policy (PD 04);
 - Protected Disclosures Policy (PD 09);
 - Corporate Giving and Sponsorship Policy (PD 83);
 - Anti-Fraud, Bribery and Corruption Policy (PD 107);
 - Expenses policy;
 - Credit Card Policy and procedures (PD 68); and
 - Human Resources policies.

2. PURPOSE

- 2.1 The purpose of the Code is to:

	REVISION NO.	APPROVAL	DATE
Page 1 of 13	29		29.09.2026

GNI/PD 16

- establish an agreed set of ethical principles;
- offer guidance on what actions are acceptable/unacceptable and on expected business behaviours;
- promote and maintain confidence and trust in GNI and its subsidiary companies including the protection of GNI's good name; and
- prevent the development or acceptance of unethical practices.

3. SCOPE

3.1 For the purposes of this Code, the term "GNI" should be construed as including Gas Networks Ireland ("GNI") and its subsidiary companies in any geographic region (e.g. GNI (UK) Limited and Gas Networks Ireland (IOM) Limited). GNI may incorporate further subsidiaries from time to time and this Code shall apply to all subsidiaries, notwithstanding that they may not be in existence at the time this Code was put in place.

3.2 It is not possible to envisage all potential scenarios where an ethical issue which is the subject of this Code may arise for Employees. Accordingly, both the spirit and particular requirements of this Code must be observed at all times.

3.3 Non-compliance with the Code may be treated as a disciplinary matter.

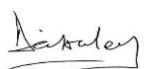
4. CONFLICTS OF INTEREST

4.1 All Employees of GNI have a primary duty to be loyal to GNI as their employer. GNI requires all Employees to conform to the highest standards of personal and business ethics in all of their dealings which may impact on the business activities of GNI.

4.2 All Employees are required to disclose in writing to their line manager (or GNI contact) details of any conflict of interest which might affect their impartiality in carrying out their duties as soon as they become apparent, including:

- Any interest, shareholding or possible conflict of interest an Employee has with any firm or organisation from which GNI purchases supplies, works or services, or to whom GNI proposes to sell property or services;
- Any interest of an Employee's immediate family (spouse, children, parents, brothers and sisters) that could involve such a conflict of interest.

4.3 Where a conflict of interest situation could arise for an Employee, he/she must desist from dealing with the matter giving rise to that situation and may not attempt in any way to influence GNI's decision on the matter. An Employee who has a concern or query into his or her particular circumstances which may give rise to a situation where there is an actual or potential conflict of interest or other ethical issue should consult with the Chief Legal Officer.

	REVISION NO.	APPROVAL	DATE
Page 2 of 13	29		29.09.2026

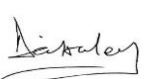
GNI/PD 16

- 4.4 Involvement by an Employee in outside employment/business interests in conflict or potential conflict with the business of GNI is prohibited.
- 4.5 It is recommended that the acceptance by an Employee of an engagement and/or employment where the potential for conflict of interest arises should be avoided during a reasonable period of time after the exercise of a function in GNI has ceased. In good time before taking up an engagement and/or employment which will or might involve a conflict of interest, a former employee should consult with the Chief Legal Officer.¹

5. INTEGRITY AND ETHICAL STANDARDS

- 5.1 It is GNI's policy to conduct all of its business in an honest and ethical manner. All Employees should conform and be seen to conform to the highest ethical standards and should be open, truthful and honest in all their dealings, both internally and external to GNI.
- 5.2 Those ethical standards should be adhered to when conducting the business activities of GNI with its customers, suppliers, contractors and third parties. Employees should compete vigorously and energetically but also ethically, honestly and lawfully in Ireland and in overseas markets. Established procedures, regulations and authority levels already govern the conduct of much of GNI's business and this Code is intended to be complementary to them.
- 5.3 Employees and/or their families should not participate in promotional offers, campaigns or competitions where the benefits of these are not available to GNI staff in general or to the general public.
- 5.4 Employees must not use the resources or time of GNI for personal gain, for the benefit of persons/organisations unconnected with GNI or for the benefit of its competitors. Employees, at any grade, must not use their position within the organisation to gain personal advantages e.g. discounted personal services from a GNI supplier.
- 5.5 Employees must ensure that GNI promotes a culture of claiming vouched expenses only as appropriate to business needs and in accordance with good practice in the public sector generally and the GNI Expenses Policy.
- 5.6 Employees must ensure that GNI's accounts/reports are accurate and not misleading.
- 5.7 Employees must not acquire information or business secrets by improper means.
- 5.8 Equal care should be taken in dealings with public officials abroad and in Ireland to ensure that every interaction, at every level of GNI (and within its subsidiaries), is ethical, honest and lawful. Employees should be familiar with the policies and procedures GNI has in place to prevent bribery and corruption. As an employee of GNI, you must never offer or accept a bribe and must not participate in or facilitate corrupt or illegal activities. Refer

¹ These provisions are in addition and without prejudice to any relevant terms of a contract **between the employee and GNI.**

	REVISION NO.	APPROVAL	DATE
Page 3 of 13	29		29.09.2026

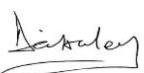
GNI/PD 16

to PD 107 Anti-Fraud, Bribery and Corruption Policy for further guidance.

6. GIFTS, HOSPITALITY AND SPONSORSHIP

6.1 Gifts and Hospitality

- 6.1.1 As a general principle, subject to the exceptions set out below, Employees should avoid the giving or receiving of corporate gifts, hospitality, preferential treatment or benefits which might affect, or might be perceived to affect, the ability of the donor or the recipient to act objectively when making business decisions.
- 6.1.2 If gifts, hospitality, or preferential treatment or benefits are offered or received, Employees should apply the principle of integrity in accepting such gifts and hospitality from parties with which GNI does business, or from parties seeking or likely to seek business from GNI. Particular care should be taken not to compromise the high standards expected by GNI in such matters which may give rise to an actual or perceived conflict of interest.
- 6.1.3 Particular attention is drawn to persons who occupy a “designated position” (as defined under the Ethics in Public Office Acts 1995 and 2001) in GNI to the requirements regarding the disclosure of gifts and hospitality under the Ethics in Public Office Acts.
- 6.1.4 Employees must not use their connections for personal advantage. In particular, they must not request or receive personal services from a supplier or contractor which might be perceived as compromising the exercise of objective judgement in GNI's selection of suppliers or contractors. Similarly, Employees must not request discounts from suppliers or contractors for personal services.
- 6.1.5 Employees should be aware that by virtue of the Criminal Justice (Corruption Offences) Act 2018, it is an offence for any Board Member or member of Senior Management to solicit or accept a gift, consideration or “advantage” from any person for himself, herself or another person, as an inducement or reward, in return for any Employee doing, or omitting to do, any act in relation to his or her position or GNI's business.
- 6.1.6 With respect to GNI's operations or dealings in the UK, it is an offence under the UK Bribery Act 2010 to either entice or reward a person with a financial or other “advantage” to improperly perform his or her duties or to accept financial or other “advantage” in return for the improper performance of a duty. Similar laws apply in many other countries (such as the US).
- 6.1.7 This does not mean that receiving gifts or accepting modest hospitality is inappropriate in all circumstances. Reasonable, small, appropriate and bona fide gifts, modest hospitality or entertainment given to or received from third parties is generally acceptable in the following circumstances:
- acceptance of the gift/hospitality has been approved in writing by your manager;

	REVISION NO.	APPROVAL	DATE
Page 4 of 13	29		29.09.2026

GNI/PD 16

- the gift/ hospitality is unsolicited;
- the gift/hospitality is appropriate in the circumstances, taking account of the reason for the gift, its timing and value i.e. it is customary for small gifts to be given at Christmas;
- the gift/hospitality is given openly, not secretly;
- it does not include cash or cash equivalent (i.e. gift vouchers, gift tokens);
- the gift/ hospitality is not given or could not be perceived to be given, with the intention of unethically influencing decision making. Extreme care must be taken where the party offering the gifts/hospitality is seeking to do business with or gain some advantage from GNI;
- the frequency and scale of hospitality is not more than GNI might be expected to give in return;
- the number of Employees availing of the hospitality is kept to a minimum;
- it does not include the provision of travel or overnight accommodation;
- accepting the gift or availing of the hospitality does not identify GNI in a public way with any particular supplier or contractor; and
- details of the gift/hospitality are disclosed as part of the gifts and hospitality notification process, outlined below at 6.2.

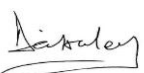
6.1.8. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift/hospitality should always be considered. Particular care should be exercised when tender processes are being conducted.

6.1.8 In all other cases, gifts, etc should be returned to the sender, with a note advising that acceptance would be contrary to NGI policy. In no circumstances may cash or cash vouchers be accepted.

6.1.9 In circumstances where Employees are unsure as to whether or not it is appropriate to accept a gift or benefit, even after consulting this Code, they should discuss the matter with their relevant manager.

6.2. Notification procedures for Employees of gifts/hospitality

6.2.1. On a quarterly basis the all employees are required to provide details of all gifts/hospitality extended/accepted/declined by them.

	REVISION NO.	APPROVAL	DATE
Page 5 of 13	29		29.09.2026

GNI/PD 16

6.2.2. Employees are required to enter the details of all hospitality extended to and accepted/declined by them on the Gifts and Hospitality SharePoint Portal on a quarterly basis. Managers should review the entries made by their direct reports and teams on the portal also.

6.2.3. A confidential register of gifts and hospitality returns is maintained by the Company Secretary and periodically (no less than annually) is reviewed by the Head of Internal Audit.

6.2.4. The deliberate non-declaration of gifts or hospitality or other inducements may result in disciplinary proceedings.

6.2.5. Low value hospitality items (tea/coffee/lunch) and gifts of small intrinsic value (e.g. calendars, diaries, pens) do not need to be recorded in the quarterly hospitality return. Industry events providing hospitality (excluding accommodation or travel) with the purpose of providing training and/or continuous professional development do not need to be recorded.

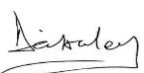
6.3. Sponsorship

6.3.1. Sponsorship must never be solicited by an Employee from suppliers, contractors or other persons doing or seeking to do business with GNI. Where sponsorship is offered it may be accepted only when expressly approved by the Chief Executive Officer.

7. INFORMATION SHARING, RETENTION AND CONFIDENTIALITY

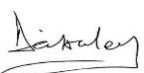
7.1 Employees are required to comply with GNI's Acceptable Usage Policy (PD 82) when accessing GNI's information assets, hardware devices, computer networks, systems and facilities. Ultimately, all GNI Data (as defined in PD 82) belongs to or is the responsibility of GNI. Access to this data is to be granted on a need-to-know basis. Any document, message or correspondence that is created using GNI's resources, whether electronic or paper-based, personal or business-related, belongs to GNI. All end-user devices, including but not limited to laptops, desktops, tablets, smart phones, etc. issued by GNI ("**GNI Equipment**"), and all information stored on GNI Equipment is the property of GNI. All usage of GNI Data or GNI Equipment can and will be monitored for compliance with the Acceptable Usage Policy and for other legitimate business purposes.

7.2 The need for observing confidentiality in regard to GNI company affairs is paramount. The unauthorised release of internal, confidential or restricted information (in each case as defined in GNI's Data Classification Standard) directly or indirectly to third parties, including the media, represents a gross breach of trust which can be highly damaging to GNI and is strictly prohibited. This also includes the loss, misuse or disclosure directly or indirectly of internal, confidential or restricted information or the disclosure of proprietary information, for example in relation to competitive matters, the introduction of new services, contracts or property transactions, information not in the public domain, personal data or information received in confidence.

	REVISION NO.	APPROVAL	DATE
Page 6 of 13	29		29.09.2026

GNI/PD 16

- 7.3 Particular attention is drawn to the provisions of Section 12 of the Gas Regulation Act 2013, which prohibits employees of GNI disclosing confidential information obtained while performing functions as a Board Member or a member of staff of GNI. A breach of this statutory duty is an offence liable on summary conviction to a fine. In relation to the disclosure of information, the Chief Executive Officer or his nominee is authorised to:
- discuss, explain and comment on operational and day to day matters relating to the operation of GNI. In practice most queries and responses will be via the Director of Customer & Business Development;
 - respond to queries for clarification of GNI policy; and
 - respond to queries at legal proceedings, Public Enquiries and Oireachtas Committees at which GNI may be in attendance for the purpose of disclosure of information.
- 7.4. Employees must ensure that all supplier and tender information relating to tender processes in which GNI is involved is treated in the strictest confidence and disclosure of such information in particular to another interested party, is strictly prohibited.
- 7.5. Employees shall observe appropriate prior consultation procedures with third parties where, exceptionally, it is proposed to release sensitive information in the public interest and in particular will ensure compliance by GNI with all relevant statutory provisions, including the provisions of Data Protection Law (meaning the General Data Protection Regulation (EU 2016/679 the Data Protection Acts 1988-2018, the European Communities (Electronic Communications Networks & Services) (Privacy & Electronic Communications) Regulations 2011, the EU ePrivacy Directive 2002/58/EC (as amended)) and any applicable national implementing or supplemental legislation, along with guidance published by competent regulatory authorities).
- 7.6. In certain circumstances, GNI and/or its subsidiaries may hold information to which it is appropriate to restrict access from other parts of the business, in particular commercially sensitive information regarding customer, financial or regulatory information. In order to ensure that information is not release or used inappropriately.
- 7.6.1. Employees should release commercially sensitive information only to authorised persons within the business; and
- 7.6.2. If Employees are unsure whether information is commercially sensitive, or whether the requester is authorised, Employees should consult with their line manager.
- 7.7. Employees are obliged to comply with GNI's Data Protection Policy (PD 64), Acceptable Usage Policy (PD 82), and Information Security Policy (PD 69) when sharing information both within the business and externally and in particular with the guidance in PD 82 which requires that GNI Data is not shared "with webmail accounts (e.g. Hotmail, Gmail) without prior approval from the Information Security or Data Protection Teams."

	REVISION NO.	APPROVAL	DATE
Page 7 of 13	29		29.09.2026

GNI/PD 16**7.8. Cyber Incident Reporting and Security Obligations**

Employees must promptly report any suspected cyber security incident, loss of information, unauthorised access, compromise of systems, phishing attempt or other information security event in accordance with GNI's cyber security policies and incident management procedures. Delays in reporting concerns may increase operational, regulatory and security risks to GNI and its customers.

7.9. AI and Generative AI Usage

Employees must comply with GNI's policies regarding Artificial Intelligence ("AI") and Generative AI tools. Internal, confidential, restricted, commercially sensitive or personal data must not be entered into, processed by, or disclosed through AI systems unless such use is authorised by GNI and carried out in accordance with applicable policies, security requirements and legal obligations. Users remain accountable for decisions made using AI generated outputs and should exercise appropriate professional judgement and verification before relying upon such outputs.

7.10. The terms of engagement of consultants, suppliers, contractors and advisors employed by GNI should be reviewed to ensure that they are subject to appropriate confidentiality, cyber security and data protection obligations, commensurate with the sensitivity of the information, systems and services involved.

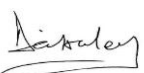
7.11. Employees should recognise that their behaviour can impact GNI's reputation, especially where they are identified as representing the organisation, and must ensure that they never bring GNI or any of its subsidiaries into disrepute through their personal or professional actions.

7.11.1. The reputation of GNI and its subsidiary companies should never be compromised in any way through inappropriate online interactions, in particular through the use of social media channels. In this regard, Employees should not do anything to prejudice the reputation of GNI or any of its subsidiaries when engaging in online activity. Furthermore, they should never discuss or disclose confidential or non-public information relating to the organisation either on public media or any online media channels. Employees should familiarise themselves with the Social Media Advocacy Guidelines available on the Zone.

7.11.2. Employees should not comment or provide feedback on media related queries and should, where possible, direct such queries to the Head of Customer Care and Communications.

7.12. Employees are required to comply with GNI's Regulation of Lobbying Policy (PD 04) which aims to give effect to the obligations and provisions of the Regulation of Lobbying Act 2015 with a view to increasing openness and transparency in respect of any lobbying activities in which GNI engages. Employees should have regard to the principles of the Code of Conduct for Persons carrying on Lobbying Activities as published by the Standards in Public Office Commission in 2018 to ensure that their lobbying activities are carried out ethically and transparently.

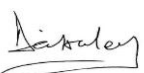
7.13. GNI has adopted measures to ensure it is transparent in its operations and accountable for the responsibilities it manages. The Freedom of Information Act 2014 (the "**FOI Act**") is in place to enable members of the public to obtain access, to the greatest extent possible consistent with the public interest

	REVISION NO.	APPROVAL	DATE
Page 8 of 13	29		29.09.2026

GNI/PD 16

and the right to privacy, to information in the possession of public bodies. GNI has prepared and published a Publication Scheme on its website in accordance with the requirements of Section 8 of the FOI Act. In addition, under the FOI Act, information provided by GNI to public bodies subject to the FOI Act may become the subject of a freedom of information request. All Employees should be mindful of FOI publication obligations when entering into commercial agreements and in their dealings generally.

- 7.14. Employees must take all steps to ensure compliance by GNI with the provisions of the FOI Act. In order to assist in maintaining the confidentiality of GNI and its subsidiaries' information, Employees must ensure that when any commercially sensitive information is submitted to Government Departments or other public bodies, appropriate wording is inserted to protect the documentation under the provision so the FOI Act. In addition, it is important to ensure that appropriate confidentiality agreements are in place to ensure the confidentiality of any information released to consultants/advisers appointed to assist Government Departments in relation to any dealings with GNI and its subsidiaries. Queries and concerns in relation to freedom of information can be directed to GNI's Freedom of Information Officer by email to foi@gasnetworks.ie.
- 7.15. Employees should be aware that bonds issued by GNI are listed on the Irish Stock Exchange. This requires GNI (as issuer) to comply with provisions of the European Union (Market Abuse) Regulations 2016, (the "**2016 Regulations**"), dealing with insider dealing, market manipulation and disclosures to the market in a controlled and timely manner of information which, when made public, may have a significant effect on the price of such bonds. Any such information should, therefore, be treated in the strictest confidence until released to the market in the required manner. The Treasury function supporting GNI maintains a detailed procedures manual outlining the systems and controls for compliance with GNI's disclosures obligations under the Irish Listing Rules and the 2016 Regulations.
- 7.16. Employees should be aware that any attempt to engage in insider dealing (use of confidential information about a company/business gained through employment in that company/business, to buy and/or sell stocks and bonds based on the private knowledge that the value will go up or down) or market manipulation (deliberate attempt to interfere with the free and fair operation of the market and create artificial, false or misleading appearances with respect to the price of, or market for, a product, security, commodity or currency) with respect to bonds issued by GNI and listed on the Irish Stock Exchange is strictly prohibited and may constitute a criminal offence. The Company Secretary will maintain a list of all persons within GNI who have, from time to time, possession of information that may be regarded as inside information (together with a register of Persons Discharging Managerial Responsibilities ("**PDMRs**") and Persons Closely Associated ("**PCAs**") with any PDMR as required under the 2016 Regulations). The Company Secretary will notify these persons of their obligations in respect of transactions in company securities.
- 7.17. In order to ensure compliance with the 2016 Regulations, Employees must seek the permission of the Chief Legal Officer and the Chief Financial Officer before trading in the debt instruments and derivatives or other financial instruments linked to the debt instruments of GNI. GNI employees are required to comply with GNI's Market Abuse Policy (PD 108).

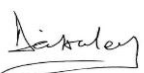
	REVISION NO.	APPROVAL	DATE
Page 9 of 13	29		29.09.2026

GNI/PD 16**8. WORK / EXTERNAL ENVIRONMENT**

- 8.1. Employees should endeavour to minimise any detrimental impact of operations on the environment.
- 8.2. Employees should ensure that community concerns are fully considered.
- 8.3. Employees should be committed to placing the highest priority on preserving the health and safety of their fellow Employees.
- 8.4. Employees shall comply with all resolutions, regulations and directions from time to time laid down by GNI and any Government Department including but not limited to, compliance with the Code of Practice and the Ethics in Public Office Acts 1995 and 2001.

9. RESPECT FOR HUMAN RIGHTS

- 9.1. GNI values the diversity of the people with whom we work and the contributions they make. GNI has a long-standing commitment to equal opportunity and intolerance of discrimination and harassment. GNI is dedicated to maintaining a workplace that is free from discrimination or harassment on the basis of race, gender, colour, nationality, ethnic or social origin, creed, age, disability, sexual orientation, political opinion or any other status protected by applicable law. The basis for recruitment, hiring, placement, training, compensation and advancement in GNI is qualifications, performance, skills and experience. Regardless of personal characteristics or status, GNI does not tolerate disrespectful or inappropriate behaviour, unfair treatment or retaliation of any kind. Harassment is unacceptable in the workplace and in any work-related circumstance outside the workplace. These principles apply not only Employees but also to the business partners with whom we work.
- 9.2. GNI conducts its business in a manner that respects the human rights and dignity of all people, endeavouring to comply with all applicable laws and regulations.
- 9.3. Employees of GNI are expected to value their fellow employees and to treat others with fairness, equality, dignity and respect.
- 9.4. Employees are expected never to infringe on human rights.
- 9.5. Employees are expected to be alert to any evidence of human rights infringements in our direct operations or in the operations of our business partners and to report any situation in which a human rights infringement is suspected to your line manager.
- 9.6. GNI takes its obligations in relation to modern slavery (as defined in the UK Modern Slavery Act 2015) extremely seriously. GNI is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chains. It is committed to ensuring that there

	REVISION NO.	APPROVAL	DATE
Page 10 of 13	29		29.09.2026

GNI/PD 16

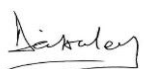
is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains and we expect the same high standards from our contractors, suppliers and other business partners.

10. FAIRNESS

- 10.1. Employees are required to conduct themselves in a professional and courteous manner in all of their dealings which may impact on the business activities of GNI.
- 10.2. Employees should not either during or after their engagement by GNI:
- 10.2.1. disclose any privileged or confidential information, or business or trade secrets of GNI; or
 - 10.2.2. accept positions of employment and/or engagement that could give rise to a potential conflict of interest.
- 10.3. Employees must ensure that GNI's purchasing activities of goods/services are carried out in accordance with best business practice.
- 10.4. Employees must comply with applicable tendering and purchasing procedures as well as complying with prescribed levels of authority for sanctioning any relevant expenditure.
- 10.5. Employees must comply with controls introduced to prevent fraud, including adequate controls to ensure compliance with prescribed procedures in relation to the claiming of expenses for business travel and subsistence.
- 10.6. Employees are reminded of their responsibilities under GNI's Anti-Fraud, Bribery and Corruption Policy (PD 107).
- 10.7. Employees must fully cooperate with Internal Audit in the internal audit process.
- 10.8. Employees must fulfil all regulatory and statutory obligations imposed on GNI.

11. RAISING CONCERNS

- 11.1. In urgent or sensitive situations where confidential advice is required by an Employee or where concerns arise which cannot be appropriately addressed through normal channels, these should be directed to the Employee's line manager, where appropriate. However, if an Employee feels that this is not appropriate, concerns can be raised directly to the Chief Legal Officer. If neither of these options is appropriate or if an Employee can email (anonymously or otherwise) a confidential email address or leave a message on a confidential voicemail; both options will be directed to the Chief Legal Officer and the Head of Internal Audit (as Anti-Fraud Champion). Details of these confidential communication options are outlined below. In circumstances regarding possible financial improprieties, concerns can alternatively be directed to the Chairperson of the Audit & Risk Committee at the email address provided below.

	REVISION NO.	APPROVAL	DATE
Page 11 of 13	29		29.09.2026

GNI/PD 16

The following are the contact details for raising concerns under the Code:

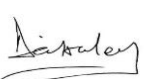
Chief Legal Officer: Emer Walsh
 Telephone: 087 2901968
 Email: emer.walsh@gasnetworks.ie

Confidential Email Address: confidential@gasnetworks.ie
 (Directed to the Chief Legal
 Officer and the Head of Internal
 Audit)

Confidential Voicemail: 01 – 892 6633 (external) 6633 (internal)
 (Directed to the Chief Legal
 Officer and the Head of Internal
 Audit)

Chairperson of the Audit and
 Risk Committee: auditandriskchairperson@gasnetworks.ie

- 11.2. GNI encourages Employees to raise any concerns internally and is committed to addressing these concerns while protecting the Employee(s) making the disclosure. In line with that commitment, an Employee who has concerns about any aspect of GNI's activities is encouraged and expected to come forward and voice those concerns and may do so without fear of victimisation, subsequent discrimination or disadvantage as a result of the disclosure.
- 11.3. Other external reporting channels may also be available as prescribed in Section 13 and 14 of PD 09 in relation to Protected Disclosures and as otherwise contained Protected Disclosures Act 2014 (as amended) and the May 2012 "External Whistleblowing Policy" of the Utility Regulator for Electricity and Gas Northern Ireland ("UREGNI"), formerly the Northern Ireland Authority for Utility Regulation), based on the Public Interest Disclosure (NI) Order 1998. The UREGNI policy applies in respect of a business that is subject to regulation by UREGNI (at present, GNI (UK) Limited) and relates to qualifying disclosures (including criminal offence, a breach of a licence or other legal obligation, damage to the environment and an anti-competitive practice) which a person reasonably believes has or will occur or is occurring.
- 11.4. Under the Criminal Justice Act 2011, a person (including GNI, a Board Member and a Director or member of staff of GNI) who has information that he or she knows or believes might be of material assistance in preventing the commission of or in solving or prosecuting certain crimes (such as theft and fraud) must disclose that information as soon as it is practicable to do so to An Garda Síochána. A person need not comply with the obligation if he or she has a reasonable excuse for not doing so. Any concern in respect of this provision should be discussed with the Chief Legal Officer.

	REVISION NO.	APPROVAL	DATE
Page 12 of 13	29		29.09.2026

12. REVIEW

GNI shall review this Code on an annual basis or more often as relevant law, regulation or practice dictates. Updates to this Code will be notified to Employees and the revised Code will be published on the intranet. GNI welcomes engagement with Employees on the provisions of this Code. Any comments or queries relating to the Code can be directed to the GNI Company Secretary.

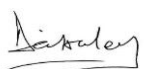
[TO BE SIGNED PRIOR TO COMMENCING EMPLOYMENT – ANY SUBSTANTIVE UPDATES TO THIS CODE WILL BE NOTIFIED TO EMPLOYEES AND PUBLISHED ON THE INTRANET]

I HEREBY CONFIRM THAT I HAVE READ AND UNDERSTOOD THE CODE OF BUSINESS CONDUCT FOR GNI EMPLOYEES.

SIGNED: _____

PRINT NAME: _____

DATE: _____

	REVISION NO.	APPROVAL	DATE
Page 13 of 13	29		29.09.2026