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1. Our commitment

The Elecnor Group is a global corporation present in over 50 countries whose purpose is to promote change and wellbeing by bringing infrastructures, power, and services to bear to enable regions around the world to develop their potential. In that way the Group helps achieve the Sustainable Development Goals established under the international agenda and is a part of the solution with a view to meeting the social and climate-related challenges currently faced.

The Elecnor Group understands sustainability as contributing to technological and economic progress, social wellbeing, and sustainable development through

a solid, resilient business model and marked synergies between its businesses. Sustainability is an essential value that pervades all its relationships and ties with its stakeholders, embodied in a clear commitment to all of them to create shared, long-term value.

The pillars of the sustainability of the Elecnor Group are grounded in its consolidation as a profitable business with a future; fostering a solid governance structure; promoting the development of sustainable infrastructures that serve to improve people's standard of living; and always acting ethically and responsibly.



2. Frame of reference

This Sustainability Policy is in alignment with the following reference standards:

- United Nations Sustainable Development Goals (SDGs)
- The 10 Principles of the United Nations Global Compact
- OECD Guidelines for multinational enterprises
- Guidance on Social Responsibility for Businesses (ISO 26000)
- Code of Ethics and Conduct
- Compliance Policy
- Human Rights Policy
- Integrated Management System Policy
- Code of Ethics and Conduct for Providers, Subcontractors, and Associates
- Policy for Dialogue with Local Communities
- Corporate Governance Policy
- Gender Equality Plan
- Tax Policy

This Policy is also closely linked to the following internal policies of the Group:

3. Scale and scope of application

This Policy will have effect in all countries in which the Elecnor Group and its subsidiary and investee companies operate and hence for all the organisations that belong to the Group.



4. Principles of action

To build trusting relationships with its stakeholders, the Elecnor Group has drawn up the following basic principles of action that serve as a framework for advancing its commitment to sustainability to benefit the societies in which it is active, seeking a brighter future for the generations to come.

Ethical management and regulatory compliance

The Elecnor Group is firmly committed to carrying out its activities in accordance with the highest ethical standards. This commitment imbues its entire business culture and philosophy. The organisation therefore follows the principle of zero tolerance for any practices that are in breach of any ethical provisions and integrity.

The entire organisation complies with and obeys the law and applicable regulations in all locations and countries in which the Group and its subsidiary or investee companies operate at all times.

Its Code of Ethics and Conduct is the foundation for the Group's culture of ethics and compliance and is the instrument that provides guidance for personal and professional conduct by its employees and for all other persons and companies that work with or are associated with the Group in going about their business activities.

Human rights and dialogue with local communities

In like fashion, the Elecnor Group is particularly committed to respecting and protecting human rights and to a dialogue with local communities in the terms set out in both those policies.

This commitment extends to all the company's stakeholders, with the goal of sharing and requiring this commitment in all their relationships in all the countries where they are active.

Transparency

The Elecnor Group promotes an efficient, sustainable, and transparent management model. It keeps up links with all parties involved in complying with the commitments accepted and in attaining the targets that have been set, all in the context of full integrity and total transparency. Its track record, corporate governance, and daily work provide its customers, shareholders, employees, providers, and other stakeholders with the assurance of commitment and reliability.

The company has in place for all its stakeholders communications means and channels that serve as the fundamental platform for conveying credibility and trust. It also draws up reports within the scope of national and international legislative frameworks to bring across a better understanding of the organisation, its activities, and its efforts in the realm of sustainable management.

Integrated Management System

The Elecnor Group has an Integrated Management System that brings together all the various aspects in the fields of the Environment, Quality, Health and Safety, Energy Management, R&D Management, and Data Security. Its Integrated Management System Policy ensures thorough-going compliance with the various commitments in these areas with a view to continuous improvement of the system's efficiency.

The Integrated Management System is built around customer needs; the health and safety of all employees and associates; efficient use of resources; pollution prevention measures and environmental protection and conservation; R&D to improve competitiveness; and efficient and effective protection of data usage. These are the cornerstones for formulating commitments and specific lines of action for each area.

Climate change response strategy

Fighting climate change is one of the Elecnor Group's strategic priorities. The organisation is helping to build a sustainable, low-carbon future by generating renewable energy, fostering energy efficiency, mitigating the adverse effects of climate change, and providing adaptive mechanisms. All this makes the Group a resilient, competitive, and sustainable concern.

The Elecnor Group has set in motion a Climate Change Strategy for 2035 built around two main goals and four global action areas and has formulated a framework for all the Group's activities aimed at lowering greenhouse gas emissions, adapting to the impacts of climate change, and taking advantage of associated opportunities.

Commitment to all stakeholders

The Elecnor Group's commitment to all its stakeholders is to create shared, long-term value.

Its purpose is to provide customers with the highest-quality, most efficient service; earn returns for investors and shareholders; attract and retain the best and most engaged professionals by promoting equal opportunity, diversity, career development, and stringent health and safety standards. It also aims at directly impacting employment, progress, and social wellbeing in the countries in which it operates.

A further goal is to engage all its stakeholders in making a beneficial impact on the environment and social milieu of the communities in which the Group carries out its activities.

To ensure compliance with the above-mentioned principles, the Elecnor Group has set up a **Corporate Social Responsibility Management System** based on the SR10 standard. That system furnishes the tools needed to be able to manage sustainability and continuous improvement properly with the support of the other management systems implemented by the Group.



5. Dissemination of this policy

The Elecnor Group will make this Policy known to all its stakeholders. This Policy is available on the Group's website and is also available to all its employees on its internal communications channels.

6. Approval and monitoring

The Board of Directors of Elecnor, S.A. is responsible for approving this Group policy and hence for ensuring compliance.

Its Appointments, Remunerations, and Sustainability Committee is in charge of periodically reviewing and evaluating this Sustainability Policy and the strategy for this area put in place by the Sustainability Committee.

Approved by the Board of Directors

February 2022

