

Integrated Policy on Environmental Management, Quality, Health and Safety, Energy Management, R&D&i Management, Information Security and Risk Management



The Elecnor Group is a Spanish corporation which is present in over 50 countries. The company's aim is to generate change and well-being, taking infrastructures, energy and services to territories all over the world so that they can develop their potential. The Elecnor Group places engineering and technology at people's service.

It is a global company whose purpose is driven by a business model based on people, a company which believes in creating shared values and sustainability.

A business model that is developed through two key businesses which mutually complement and reinforce each other:



Essential Services and Sustainable Projects: execution of engineering projects, construction and services in the sectors of electricity, power generation, gas, telecommunications and systems, railways, maintenance, facilities, construction, water, environment and space.



Investment in Infrastructures and Renewable Energy: promotion, external financing, construction, investment and management of energy assets, as well as other strategic assets.



Within the framework of the company's Sustainability Policy, the Management of the Elecnor Group wishes to confer the utmost rigour on its policies of Environmental Management, Quality Management, Health and Safety Management, Energy Management, R&D&i Management, Information Security and Risk Management. These seven driving forces make up the Integrated Management Policy of the Elecnor Group, each with its own specific objectives and strategies, but all with the same mission: the continuous improvement of the organisation.



As proof of this rigour, the Elecnor Group has based its Integrated Policy on precise knowledge of the nature and magnitude of its environmental impact; customers' expectations; the risks to workers posed by its activities and products; energy use and consumption in its installations and projects; the firm commitment to backing R&D&i; thereby ensuring compliance at all times with the standards established for confidentiality, availability and integrity regarding its IT assets; and the risk management at the strategic and operational levels of the company's activity which enables a risk profile to be maintained in line with the Group's business model. Furthermore, the Elecnor Group has voluntarily taken on the requirements contained in the benchmark standards for auditing and certification.

The management undertakes to promote the development of the strategies contained in this Integrated Management Policy and to provide the necessary resources to this effect.

Approved by the Board of Directors: February 2023

General principles

The Elecnor Group has established the principles to which it is committed and which should govern how the whole organisation works regarding Environment, Quality Management, Health and Safety, Energy Management, R&D&i, Information Security and Risk Management, so that they serve as a reference to define and revise objectives that continuously improve the effectiveness of the management systems.



These principles are as follows:

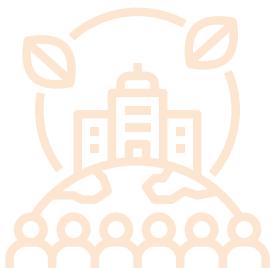
- Strict compliance with current applicable legislation and other requirements that the company observes in all the markets in which it operates.
- Customer satisfaction.
- Prevention of damage to and deterioration of the Group's employees' health, by improving their working conditions in order to increase the level of protection of their health and safety.
- Prevention of pollution.
- Efficient energy use and consumption.
- Creation of a positive impact of its activities on the social environment.
- Improvement of competitiveness through R&D&i.
- Effective and efficient protection through a focus on information use that is preventive, perceptive, responsive and dynamic.
- Integration of risk management into the organisation's activities using a preventive approach which makes it possible to anticipate, manage and control the risks which the Group is exposed to.



Principles of conduct in Environmental Management

Aware that the main environmental impact of its activities comes from its use of resources and generation of waste in the activities of construction and demolition, the Elecnor Group has defined and applied the most effective correction mechanisms in order to minimise the scope of this impact.

Similarly, the Group has taken on certain activities that contribute to the protection of the natural environment and its resources and made them an intrinsic part of its business operations. These activities include, among others, generation of renewable energy, water treatment and recycling or efficient energy use in all of its operations, as established in Elecnor's Energy Management Policy.



In general terms, the strategy of the Elecnor Group in terms of Environmental Management is governed by the following principles of conduct:

- Incorporation of the environmental aspect into the decision-making processes regarding investments and the planning and realisation of activities, by fostering consideration of this aspect in cost-benefit analyses.
- Fostering protection and conservation of the natural environment's biodiversity, by introducing the necessary measures to mitigate, compensate for and even avoid the negative impact caused by the activities of the Group, and boosting those that create positive impacts.
- Making sustainable use of resources, encouraging responsible consumption, minimisation of waste material and the circular economy.
- Responsible and efficient management of water resources, by looking after every aspect of the full cycle, supporting social development and the conservation of ecosystems.
- Involvement of all of its interest groups (employees, shareholders, customers, suppliers and society in general) in the joint search for useful solutions to the challenge of conserving and developing the environment and the sustainable use of natural resources.



Principles of conduct in Quality Management

Quality has formed part of the Elecnor Group's culture since its very beginnings, with a clear focus on customer service which sets it apart from the rest of the field.



In general terms, the strategy of the Elecnor Group in terms of Quality Management is governed by the following principles of conduct:

- The starting-point is always an understanding of the customers' real expectations when it comes to designing and supplying products and services, with the aim of achieving total customer satisfaction.
- Development of all the processes under the premise of continuous improvement, by evaluating how it is carried out and implementing plans to optimise it, introducing opportunities for improvement and lessons learned, that lead to the reduction of costs arising both from a lack of quality and from attitudes that pose a barrier to this principle.
- Involvement of each member of staff with their contributions in the quality challenge, by integrating know-how into the quality system.



Principles of conduct in Health and Safety Management

The health and safety of all the people involved in the Group's activities and products are essential values for the Elecnor Group. In general terms, health and safety strategy is governed by the following principles of conduct:

- Supplying the material resources that contribute to health and safety.
- Emphasis on training in prevention techniques.
- Elimination of hazards and reduction of risks to health and safety in the workplace.
- Development of awareness campaigns for the whole Group.
- Ongoing on-site inspections and audits and adoption of suitable corrective measures, to correct the source of the shortcomings.

Although no company initiative can be effective without the full collaboration of all employees, who are requested to:

- Perform their jobs according to the regulations, instructions and procedures regarding operations as established by the Group.
- Use personal or collective protective equipment supplied by the Group properly.
- Use equipment, tools, vehicles and any other resources used to perform their jobs in a suitable way.
- Not to perform tasks that pose a serious imminent risk to employees. They should inform their immediate superior so that the necessary steps to be taken can be determined. Any action performed in order to avoid a possible accident or incident will always be protected under these guidelines.
- To collaborate with the company in the continuous improvement of the system through the agreed mechanisms of consultation and participation.

The commitment of the Elecnor Group to employee consultation and participation guarantees continuous improvement regarding health and safety.

Actions intended to improve road safety are also a cornerstone in health and safety activities, given the way that this hazard crosses over into all the Elecnor Group's activities and collectives.



Principles of conduct in Energy Management

The Elecnor Group undertakes the promotion and development of operations aimed at efficient Energy Management as a factor that differentiates the organisation, as well as the commitment to environmental sustainability in all the company's activities.



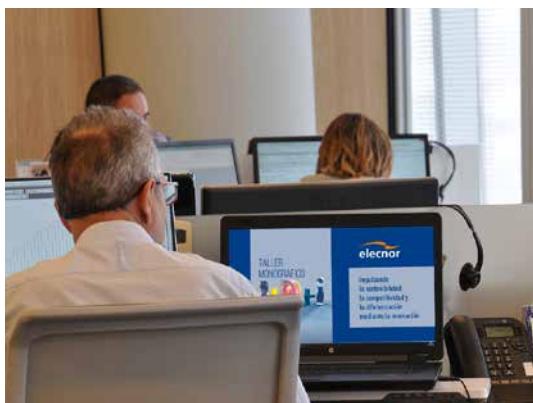
In general terms, the strategy of the Elecnor Group regarding Energy Management is governed by the following principles of conduct:

- Understanding the use and consumption of energy in the Group's installations and projects, ensuring that the information is readily available and establishing the necessary measures to reach objectives and goals in a constant endeavour to improve energy performance.
- Constantly searching for a balance between financial profitability and energy efficiency in acquiring energy and products, as well as in designing installations.
- Raising awareness among employees and suppliers regarding the importance of efficient and responsible energy use and consumption.



Principles of conduct in R&D&i

The Elecnor Group bases its R&D&i policy on promoting innovative activities regarding aspects that add value and allow the company to differentiate itself from its competitors. The technological areas of interest relate to energy, the environment, water, infrastructures and unique projects, among others.



R&D&i activities are strategic in order to guarantee the Elecnor Group's competitiveness and sustainability, with innovation regarded as a cornerstone of the corporate reputation strategy and they are developed in accordance with the following principles of conduct:

- Promotion of the systematic generation of innovative ideas within the company and supporting them until they become R&D&i projects. Changing ideas in new businesses or making improvements relating to the existing ones, bringing technology to markets and customers in order to drive sustainable development together and to manage this innovation in a more flexible, dynamic way.
- The systematic use of R&D&i tools is aimed at generating new opportunities and projects in this field. Performing activities following criteria of continuous improvement, sustainability and integrating innovations.
- These projects are the power behind Elecnor's R&D&i management system and focus on increasing capacity and competitiveness. The result of this effort can be seen in, among other things, improvements in productivity, quality, customer satisfaction, safety in the workplace, talent management, use of new material and products and the designing of processes or productive systems that are more effective and sustainable.
- Basing all decisions on R&D&i activities within a strategic vision of the innovation process which is shared at all levels of management in the company.
- Analysing legal requirements and regulations which could affect the area of the R&D&i Management System.

Principles of conduct in Information Security

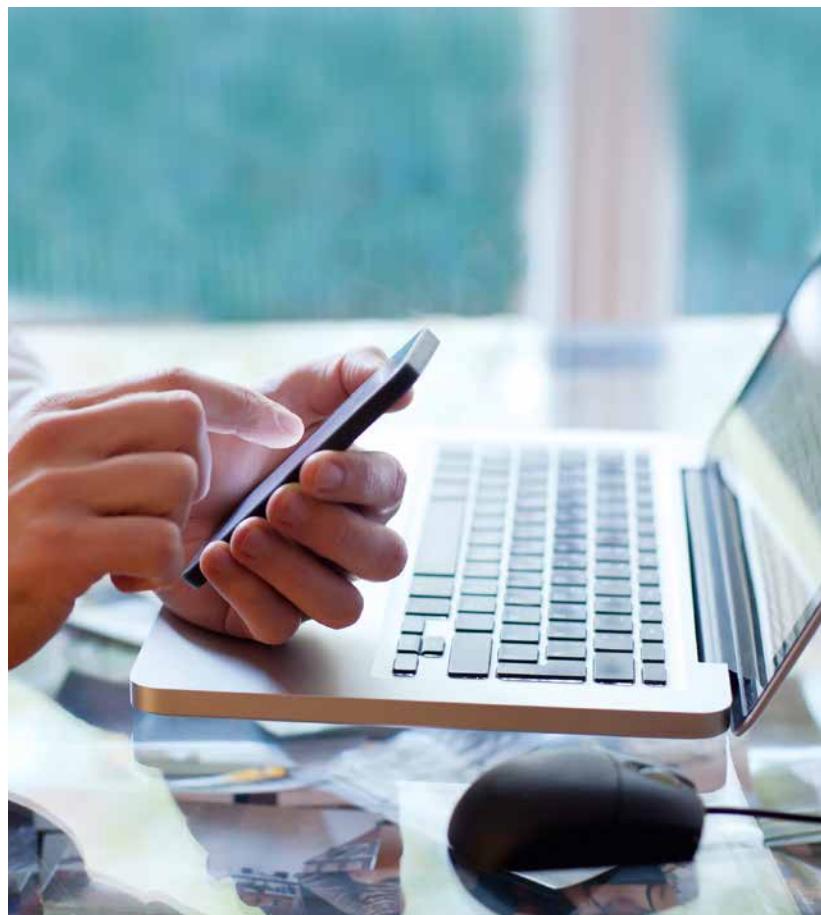
The Elecnor Group sees information security as an integral process that continues over time. This security should be composed of all the technical, human, material and organisational elements necessary to ensure that it is appropriately managed.

Therefore, security measures have been put in place to reduce the possible appearance of threats and so that any security incidents which arise may be detected, can be dealt with in time and do not seriously affect the information being handled or the services being provided, whilst enabling their restoration.



To this effect, the principles of conduct are the following:

- To define, develop and put into operation the necessary technical, legal and management controls to ensure compliance with the risk levels approved for the organisation at all times.
- To create a "security culture", both internally with all the staff and externally with customers and suppliers. In particular, to promote this security culture and its implementation in the services that the Elecnor Group offers to its customers.



Principles of conduct in Risk Management

The Elecnor Group is committed to Risk Management at the strategic and operational levels of the company's activity in order to establish strategies, objectives and policies which enable its risk profile to be kept under control.



To this effect, the Group uses the following principles as a basis:

- Leadership in risk management with the Management Department as the key to ensuring compliance with commitments, the implementation of the system and the availability of the resources necessary for this.
- Implementation and integration of risk management in all of the business processes.
- Transparent and ethical management of conflicting risks and objectives, always avoiding risk transfer relating to ethics, health, safety, the environment, compliance and reputation. The Risk Management System should always be used to minimise the probability of these occurring and/or their impact.
- Transparent information and communication in relation to the whole organisation and other interested parties.

