



Local
Communities
Policy

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OUR COMMITMENT

With a presence in over 50 countries, the Elecnor Group is a global corporation which aims to contribute to the economic progress, social well-being and sustainable development of the communities where it is present. The group'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.

Based on solid values, the Elecnor Group's commitment is to fostering a culture of respect, generating relationships of trust and promoting value creation by endorsing initiatives and engaging in an ongoing dialogue with the communities in the countries and settings where it performs its activities, focusing particularly on the most vulnerable groups, such as ethnic minorities and indigenous peoples.

This Policy establishes the following bases for the Elecnor Group's general frame of reference regarding its relationship with the communities in the countries where it operates:

- Contribution to the sustainable development and well-being of the communities in the territories where it operates.
- Construction of solid relationships, built on trust, mutual respect and participatory dialogue.
- Establishment of guidelines on behaviour in accordance with the Code of Ethics and Conduct, the Compliance Policy, the Human Rights Policy and the Sustainability Policy of the Group in all its activities.
- Gaining social legitimacy from all the stakeholders involved in project development.

FRAMES OF REFERENCE

This Local Communities Policy is in line with the following reference standards:

- The United Nations' Sustainable Development Goals (SDG)
- The 10 Principles of the UN Global Compact
- The OECD Guidelines for Multinational Enterprises
- The Principles of Corporate Social Responsibility (ISO 26000)
- The International Labour Organisation (ILO) Conventions 107 and 169 on indigenous and tribal peoples

Furthermore, this Policy is closely linked to the following internal Group policies:

- Code of Ethics and Conduct
- Compliance Policy
- Human Rights Policy
- Sustainability Policy
- Integrated Management System Policy
- Code of Ethics and Conduct for Suppliers, Subcontractors and Collaborators

SCOPE AND SPHERE OF APPLICATION

This Policy applies to all the countries where the Elecnor Group and its subsidiaries and affiliates operate, particularly in developing countries and where the population is vulnerable.

Likewise, this Policy applies to all the directors, executives and employees of the Elecnor Group and to all the people and companies that collaborate or interact with the Group during the performance of its activities, such as suppliers, subcontractors, consultants or advisors, business partners and collaborators in general, all of whom, within the framework of their business relationship with the Elecnor Group, should act in accordance with the principles of ethics and conduct established by the company.

PRINCIPLES OF CONDUCT

To construct a relationship of trust with the communities where it performs its activities, the Elecnor Group has established the following basic principles of conduct:

1. **Identification** of the communities affected by the activity or project to be developed in order to understand the local context.
2. **Evaluation** of the environmental, social and economic aspects which the activity or project may introduce into the community.
3. **Compliance** with laws, regulations and voluntarily-acquired commitments.
4. **Involvement of the community in dialogue, information and participation** in the different stages of projects through consultation processes designed to understand the community's needs and expectations.
5. **Establishment of a direct relationship and systematic communication** with communities that will ensure that they receive information in a way that is transparent, up-to-date and effective.
6. **Responsible management** of the positive and negative impacts produced by the company's activities and actions.
7. **Respect** for local communities' values, traditions and cultures.
8. **Introduction** of processes of **continuous improvement**.

INDIGENOUS PEOPLES AND ETHNIC MINORITIES

The Elecnor Group respects the rights of the indigenous peoples and ethnic minorities present in the places where it operates by accepting the following commitments:

- Recognition of and respect for the unique nature of indigenous, tribal, aboriginal and native peoples, as well as their organisation, and social and economic structure.
- Endorsement of two-way, transparent, respectful dialogue which incorporates the different cultural frameworks and encourages consensus.
- Use of all the necessary, advisable means available in each project to understand the possible impact on the life, habits and customs of the population affected and offer proposals to avoid and/or mitigate this impact.
- Compliance with and respect for the regulations in force in the country, both national and international.

DISSEMINATION

The Elecnor Group will promote the knowledge of this Policy and its compliance among its employees, partners, suppliers, subcontractors and other interest groups who are connected to the communities where the Group is present.

All of them are obliged to comply with the provisions of this Policy, regardless of the country or region where they are. They have a duty to immediately report any irregular practice or illegal or unethical behaviour that they may be aware of or have witnessed, by email to codigoetico@elecnor.com

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