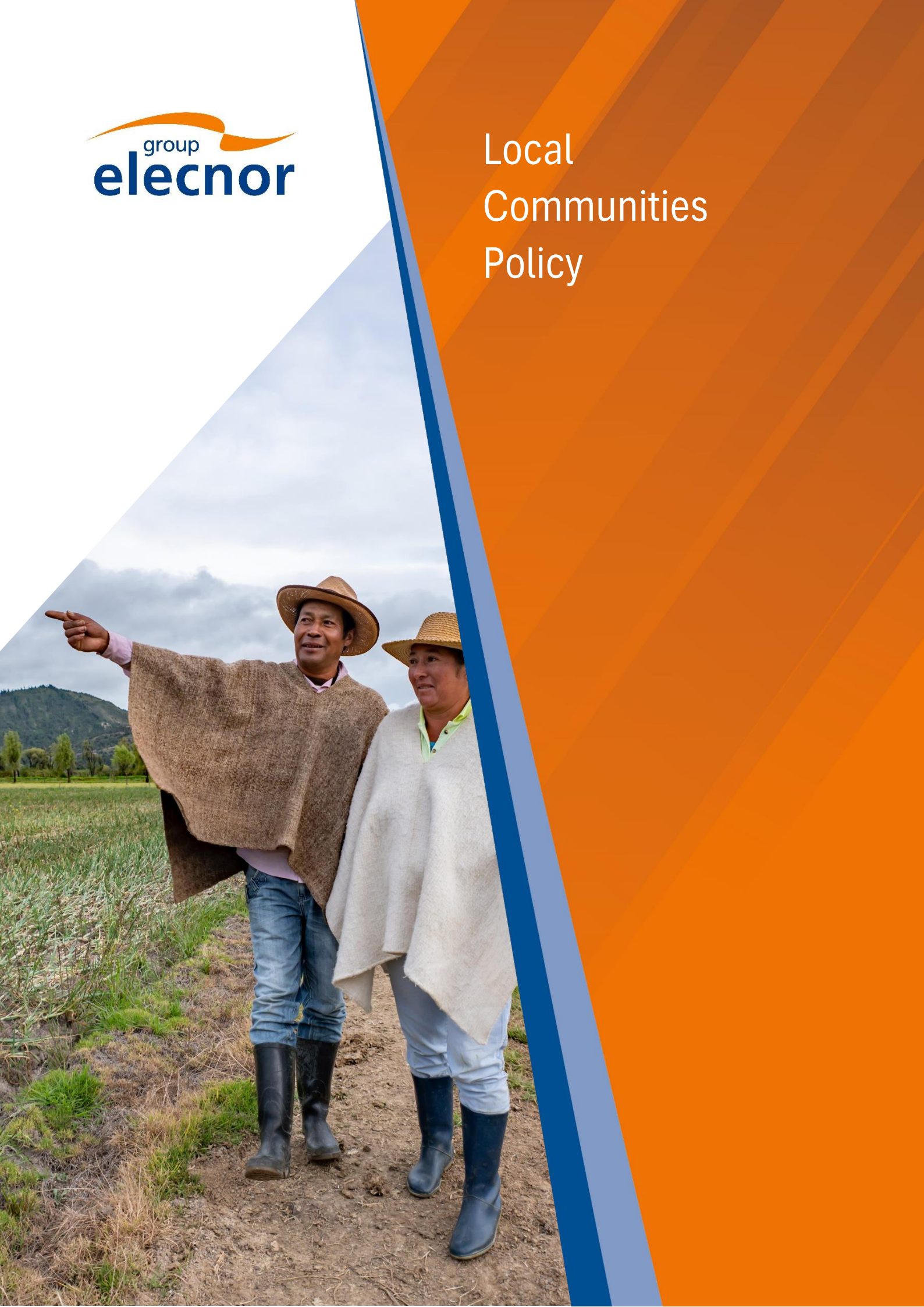




# Local Communities Policy



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## 1. INTRODUCTION

As a listed company, the Board of Directors of Elecnor, S.A. (“**Elecnor Holding**” or the “**Company**”) is legally vested with the non-delegable power to determine the general policies and strategies of the Company and of the Group of which it is the controlling entity (“**Elecnor Group**” or “**Group**”), a power also set forth in the Regulations of the Board of Directors.

This Local Communities Policy (the “**Policy**”) is based on the Elecnor Group’s objective of contributing to the economic progress, social well-being and the sustainable development of the communities where it operates, generating change and well-being by taking infrastructure, energy and services to territories throughout the world so they may develop their potential. The Elecnor Group places engineering and technology at the service of the people.

Pursuant to the foregoing, the Board of Directors of Elecnor Holding has approved this Policy, which shall form part of the Company’s sustainability regulations and complements and must be interpreted in coordination with the Company’s various policies and, in particular, the Elecnor Group’s General Sustainability Policy, the Elecnor Group’s Sustainability Due Diligence Policy and the Elecnor Group’s Human Rights Policy.

## 2. OBJECT

The essential purpose of this Policy is to formalise the commitment of Elecnor Holding and its Group companies to promoting and respecting the rights of local communities, with special attention to the most vulnerable groups.

In this regard, the Elecnor Group’s human rights commitments, which are the subject of this Policy, are based on the Elecnor Group’s Code of Conduct, the Elecnor Group’s General Sustainability Policy, the Elecnor Group’s Sustainability Due Diligence Policy, the Elecnor Group’s Compliance Policy, the Integrated Management System Policy and the Elecnor Group’s Code of Conduct for Business Partners, and are also aligned with the most relevant international norms and standards in the field of human rights, such as the UN Guiding Principles on Business and Human Rights, the Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises, the principles on which the UN Global Compact is based, the Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy and the conventions of the International Labour Organisation (including conventions 107 and 169), the Sustainable Development Goals approved by the UN, as well as the documents and texts that may replace or complement the aforementioned.

## 3. SCOPE OF APPLICATION

This Policy and other internal implementing regulations established by Elecnor Holding are applicable at the Group level and to all the companies that make up the Elecnor Group.

Likewise, the Policy is applicable to joint ventures, temporary joint ventures and other equivalent associations in which any Elecnor Group company has management control, always within the legally established limits.

In those companies not directly or indirectly controlled by the Company, principles consistent with those of this Policy shall be promoted, maintaining information channels to ensure knowledge and monitoring of the local community relations standards of such companies.

In any case, the different companies of the Group shall ensure that the principles of the Policy are projected on their services and projects, as well as, to the extent appropriate, on the individuals or legal entities that, by virtue of a

commercial agreement with the companies of the Group, contribute as part of the activity chain of the Group to the provision of its services or execution of its projects (the “**Business Partners**”).

Furthermore, in implementing the principles of this Policy, the companies of the Group shall cooperate constructively with those stakeholders or interested parties that may affect or be affected by the activities of the Group and its Business Partners, with the aim of establishing channels of communication, consultation and contacts that contribute to the best sustainability performance of the Group and its Business Partners (the “**Stakeholders**”).

## 4. OUR COMMITMENT

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:

- Contribute to the **sustainable development and well-being** of the communities in the territories where it operates
- Respect the right of these local communities to an **adequate, healthy and sustainable environment**, taking into account their expectations and needs
- Construct **solid relationships, built on trust and mutual respect**, promoting a fluid and continuous dialogue that allows the opinions and concerns of the various Stakeholders that affect or may be affected by the Group’s activities to be adequately managed
- Ensure **a framework of conduct in accordance with the principles and values of Elecnor Holding and its Group** and, in particular, with those established in the Elecnor Group’s Code of Conduct, the Elecnor Group’s General Sustainability Policy, the Elecnor Group’s Sustainability Due Diligence Policy, the Elecnor Group’s Compliance Policy and the Elecnor Group’s Human Rights Policy.
- Gain **social legitimacy** for all the stakeholders involved in project development.
- All relations with Stakeholders shall be developed with full respect for privacy and data protection regulations, also establishing the relevant information security measures.

## 5. PRINCIPLES OF ACTION

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:

- **Identify the communities potentially affected** by the service or project to be developed in order to understand the local context
- **Evaluate** the environmental, social and economic aspects which the service or project may introduce into the community

- **Compliance with laws, regulations and the highest ethical standards and commitments voluntarily-acquired** that impact the community
- **Involve 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
- Establish a **direct relationship and systematic communication** with communities that ensures that they receive information in a way that is transparent, up-to-date and effective
- **Responsibly manage the positive, negative and potential impacts** on the communities and maintain solid relationships built on trust and mutual respect in order to promote sustainable value
- **Respect local communities' values, traditions and cultures**
- Regularly review and, where appropriate, update adopted measures in order to **identify areas for improvement and implement reinforcement actions**.

## 6. 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:

- **Recognise and respect the unique nature of** indigenous, tribal, aboriginal and native peoples, as well as their organisation, and social and economic structure
- **Endorse two-way, transparent, respectful dialogue** which incorporates the different cultural frameworks and encourages consensus
- Use 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 or mitigate this impact.
- **Comply with and respect national and international regulations** on this matter where it operates.

## 7. IMPLEMENTATION AND MONITORING

In order to guarantee the effectiveness of the commitments acquired in this Policy, Elecnor Holding shall set forth definitions, which shall apply at the Group level, for the internal rules, procedures and protocols necessary for the implementation and monitoring of this Policy.

All members of the Elecnor Group organisation are obliged to comply with the precepts of this Policy regardless of the country or region in which they are located.

## 8. GOVERNANCE

This Policy includes the bases of the Group's governance in matters of sustainability established in the Elecnor Group's General Sustainability Policy, contemplating in this respect the competencies and functions corresponding, on the one hand, to the Board of Directors and its Committees, the Appointments, Remunerations and Sustainability Committee



and the Audit Committee, and on the other hand, to the Sustainability Committee and the person responsible for the sustainability function, with this governance being projected onto the various companies comprising the Elecnor Group.

## 9. REVIEW AND UPDATING

This Policy shall be reviewed and updated when circumstances so determine or make it advisable based on regulatory changes, international standards, new commitments, best practices, or criteria established by the supervisory and control authorities in the area of sustainability due diligence or, specifically on the matter of local community relations, in addition to circumstances related to the evolution of the structure and activities of the Elecnor Group.

## 10. DISSEMINATION

Elecnor Holding shall promote the dissemination of this Policy in the Company and its Group, also taking into account its Business Partners and Stakeholders, and promoting awareness of it is a basic commitment of this Policy.

The Policy is available on the Group's website ([www.grupoelecnor.com](http://www.grupoelecnor.com)) and through internal communication channels for all employees.

## 11. ENTRY INTO FORCE

This Policy was approved by the Board of Directors of Elecnor Holding at its meeting held on 27 November 2024, coming into force as of that date, without prejudice to the Elecnor Group being able to avail itself of the deadlines contemplated in the applicable regulations regarding the enforceability of obligations in the area of sustainability due diligence.