



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

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1. INTRODUCTION

The Elecnor Group is a Spanish corporation which is present in over 50 countries. The Elecnor 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. The Elecnor Group places engineering and technology at the service of the people.

It is a global company that drives its purpose with a business model based on people and that believes in generating shared value and sustainability.

The Group's activities are structured along three main strategic lines:

- **Essential services:** Integration of energy distribution, telecommunications, maintenance and installation services, essential for the generation of change and well-being in cities and which feed back into the business of sustainable projects.
- **Sustainable projects:** Promotion, construction, operation and maintenance of clean energy generation and transmission infrastructures around the world, improving the living conditions of communities and favouring sustainable development.
- **Concessions and own projects:** Development and operation of projects aimed at long-term stability and profitability through concession contracts and strategic investments in proprietary projects, strengthening its renewables and energy infrastructure portfolio and increasing the Group's long-term value.

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 Management, Cybersecurity, Artificial Intelligence Management and Risk Management. These 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 Group.

As proof of the aforementioned rigour, the Elecnor Group bases its Integrated Policy on precise knowledge of the nature, scope, severity and magnitude of its environmental impacts; the expectations of its customers; the risks for the worker of its activities and products; the use and consumption of energy in its facilities and projects; the firm commitment to R&D&i; the guarantee at all times of compliance with the established levels of confidentiality, availability, authenticity, traceability and integrity for its information assets, as well as compliance with the established levels of transparency, explainability and non-discrimination of algorithms and artificial intelligence tools; and risk management at the strategic and operational levels of the activity that enables the maintenance of a risk profile aligned with the Group's business model. Furthermore, the Elecnor Group has voluntarily adopted the requirements contained in the reference standards for auditing and certification.

Management undertakes to promote the development of the strategies contained in this Integrated Management Policy and to provide the necessary resources for this purpose.

2. GENERAL PRINCIPLES

The Elecnor Group has established the principles to which it is committed and which should govern how the whole Group works regarding Environment, Quality Management, Health and Safety, Energy, R&D&i, Information Security, Cybersecurity and Artificial Intelligence 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:

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- Strict compliance with current applicable legislation and other requirements that the Elecnor Group observes in all the markets in which it operates.
- Respect for the ethical values of the Elecnor Group.
- Customer satisfaction.
- The prevention of harm and deterioration of the health of all persons involved in its activities and products by improving their working conditions in order to raise the level of protection of their safety and health.
- Prevention of pollution.
- Commitment to eliminate hazards and reduce risks to health and safety at work.
- 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 in the Group's activities with a preventive approach that enables it to anticipate, manage and control the risks, both its own and those of third parties, to which the Group is exposed.

3. ACTION PRINCIPLES 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 efficient 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 action principles:

- 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.

- Promote the protection and conservation of biodiversity and the natural environment, actively prevent or mitigate any adverse impact on the environment that could be caused by its direct operations and activity chain, as well as promote opportunities that generate positive impacts on the environment.
- Integrate environmental due diligence into the Risk Management System in order to identify, assess, prevent, cease or minimise actual or potential adverse environmental impacts, as well as to monitor and evaluate the effectiveness of the measures implemented and to report and, where appropriate, correct them.
- 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.

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 action principles:

- 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.

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 action principles:

- 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.

Energy Management

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

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

- 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 business partners regarding the importance of efficient and responsible energy use and consumption.

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 action principles:

- Promotion of the systematic generation of innovative ideas within the Group 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 the Elecnor Group's 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 at Elecnor Holding.
- Analysing legal requirements and regulations which could affect the area of the R&D&i Management System.
- At the same time, implementing measures to manage and protect the Elecnor Group's various intangible assets.

Information Security, Cybersecurity and Artificial Intelligence

The Elecnor Group understands information security and cybersecurity as a comprehensive process that is continuously improved over time. This security must be equipped with all the technical, human, material and organisational resources necessary to guarantee adequate protection of networks, systems, artificial intelligence tools and the information contained therein.

Thus, security measures are articulated to ensure digital resilience, reducing the possibility of cyberthreats materialising and that cybersecurity incidents that may occur are detected, treated and reported in time. This will be taken as a basis for testing and improving the continuity of the services provided by the Elecnor Group.

To this end, the action principles are as follows:

- Define, develop and implement the technical, legal and management controls necessary to ensure compliance, at all times, with the applicable regulations in this area, and with good security practices and the ethical use of the Group's resources, thus maintaining the risk levels approved for the Elecnor Group.
- Create a "culture of information security, including cybersecurity and artificial intelligence", both internally throughout the Elecnor Group and externally to customers and suppliers. In particular, to promote this security culture and its implementation in the services that the Elecnor Group offers its customers.
- Permanently manage information security, cybersecurity and artificial intelligence, for which purpose the security roles or functions have been formally designated, the Head of Information Security has been appointed and the Information Security and Artificial Intelligence Committee has been set up, the structure, scope of action and

functions of which have been defined internally.

- All the security documentation included in the Management System is structured and managed in accordance with the documented procedures developed by the Elecnor Group, taking into account the national and international regulations and standards applicable in each case.
- In turn, a monitoring system has been established to measure the Elecnor Group's state of maturity in this area, which is reported to Senior Management.

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, both own risk and third-party risk, in all of the business processes.
- Performance knowledge through the measurement of indicators and their reporting.
- Integration of non-financial risks, including sustainability risks, into the Risk Management System.
- 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 their impact.
- Transparent information and communication in relation to the whole Group and other interested parties.
- Continuous improvement through regular review of the management framework.

4. ENTRY INTO FORCE

Approved by the Board of Directors of Elecnor, S.A. on 27 November 2024
Effective from 01 January 2025