

15. Non-financial information

15.1 About this Report GRI 102-1, GRI 102-5, GRI 102-45

This section of the Directors' Report is produced in compliance with the provisions of Law 11/2018, of 28 December, concerning non-financial information and diversity (preceded by Royal Decree-Law 18/2017, of 24 November).

Within this framework, information is included on the activities and the main economic, social, environmental and governance impacts of the Elecnor Group, and any aspects considered relevant for the company's main stakeholders in 2021. As shown in Appendix II, "Contents index of Law 11/2018 of 28 December, on non-financial information and diversity", the essential options of the international standards of the Global Reporting Initiative (GRI) have been followed in the drafting process and the requirements identified as material for the business have been taken into consideration.

The scope of the information reported in this report is the entire Elecnor Group (Elecnor, S.A. and subsidiaries), and also includes, where applicable, information on the joint venture Celeo Concesiones e Inversiones, S.L. With regard to environmental data, the scope is limited to those countries where the organisation has a permanent presence. Social information concerning the Elecnor Group and the Elecnor Foundation is included.

15.2 Progressing in our commitment to sustainability

The Elecnor Group considers it has an inherent responsibility in every aspect of the implementation of its activities and its business strategy, as well as its relations with stakeholders. This commitment is set out in its Strategic Sustainability Plan, which lays down the core areas of its social responsibility and the basis for ongoing improvement in sustainability management.

The Elecnor Group's 2021-2022 Strategic Sustainability Plan is based on five pillars that reflect the company's DNA and its purpose of generating change and well-being in the territories in which it operates. This strategy conveys to the Group's stakeholders its commitment to people, society and the environment, always based on ethical and responsible management.

The Strategic Sustainability Plan has been prepared by the Sustainability Committee, supervised by Management and submitted to the Appointments, Remuneration and Sustainability Committee, which has taken on the duties of promoting, monitoring and assessing all actions and policies on ESG issues undertaken in the company. Lastly, it has been approved by the Board of Directors.

Elecnor Group Sustainability Strategy



Main strategic lines

Profitable and forward-looking company

It comprises one of the core building blocks of sustainability seeking the long-term projection of the company in terms of financial solvency, efficiency and competitiveness. These are its lines of action:

- Sustainable financing linked to the performance of ESG goals and indicators
- Consolidating quality and strengthening client satisfaction
- Driving digital transformation and innovation

Solid governance structure

Geared towards making further progress in the Good Governance principles and continuing to strengthen the structure of good governance. These are its lines of action:

- Progressing in Corporate Governance

- > Strengthening compliance
- > Ongoing and preventive risk management and supervision

Develop sustainable infrastructures

Being one of the key agents in the development and progress of society through infrastructure, renewable energy, energy efficiency, water and environmental projects. These are its lines of action:

- > Guaranteeing quality and sustainable infrastructures with future projection
- > Undertaking projects and services that contribute to cutting greenhouse gases and facilitating access to renewable energy
- > Progressing towards becoming a carbon neutral company

Improve the quality of life of people

Fostering the development and progress of society. These are its lines of action:

- > In constant dialogue with stakeholders
- > Supporting the communities where the Group operates

Promoting a culture of belonging and respect

The importance of people's health and safety, as well as aspects resulting in the motivation and personal and professional enrichment of the teams is particularly linked to the company's DNA. These are its lines of action:

- > Strengthening the commitment to health and safety
- > Attracting and retaining talent
- > Strengthening equality and diversity
- > Promoting work-life balance

Similarly, in the area of ongoing improvement, the company has outlined actions geared towards the more efficient management of sustainability that strengthens the Group's commitment in this area and achieves its full integration into the business.

Sustainability Committee

The Sustainability Committee of Elecnor Group, set up in 2020, is a cross-cutting body with representation from the company's various corporate and business areas. Its goal is to design the tools needed to manage sustainability throughout the Group, foster a coordinated strategy, ensure that it is properly adopted and followed, and monitor progress achieved with a view to nurturing best practices.

This year, the Sustainability Committee met on 4 occasions.

The Committee's actions are supervised by Management and referred to the Appointments, Remuneration and Sustainability Committee of the Board of Directors.

Alignment of the material issues, the Sustainable Development Goals and the Sustainability Strategy [GRI 102-42](#), [GRI 102-43](#), [GRI 102-44](#), [GRI 102-46](#), [GRI 102-47](#)

In 2020, the Elecnor Group conducted a Materiality Analysis with the dual purpose of defining significant issues in connection with sustainability and prioritising the contents of this section of the Directors' Report.

The materiality analysis is prepared with the same frequency as the Group's Strategic Sustainability Plan.

In this regard, the process implemented consisted of:

- 1. Identification of material issues**, for which purpose the company performed a benchmarking of major players in the sector and of its competitors based on their materiality matrices, as well as an analysis of the main public announcements and initiatives both in Spain and abroad. In addition, it considered sustainability standards such as SASB, GRESB and GRI, as well as regulations governing non-financial information.

A total of 25 issues were identified, and grouped into five dimensions: Economy, People, Governance, Environment and Society.



ECONÓMICO

- Calidad del servicio y orientación al cliente
- Oportunidades de negocio
- Transformación digital
- Gestión financiera (desempeño económico)
- Ciberseguridad
- Contexto regulatorio
- Gestión de la cadena de suministro
- Innovación
- Inversión socialmente responsable



GOBERNANZA

- Ética y compliance
- Derechos Humanos
- Gestión de riesgos no financieros
- Buen Gobierno



PERSONAS

- Seguridad y salud laboral
- Desarrollo del capital humano
- Conciliación
- Gestión de la igualdad y la diversidad



MEDIO AMBIENTE

- Transición energética
- Eficiencia de los recursos
- Cambio climático
- Biodiversidad
- Economía circular
- Huella hídrica



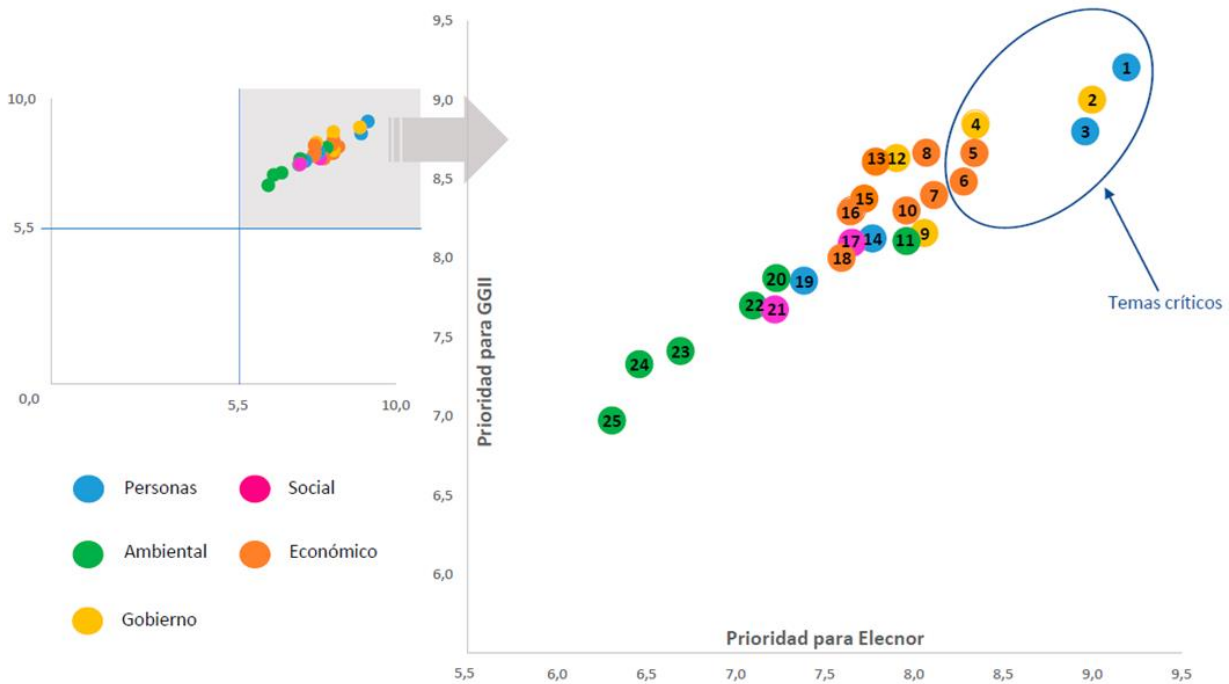
SOCIEDAD

- Diálogo con las comunidades locales
- Gestión del diálogo con los grupos de interés

- 2. Consultation with internal and external stakeholders.** The Elecnor Group sent a questionnaire to both its main stakeholder groups and the Group's Management in order to obtain their assessment of the issues identified in the preliminary phase. The Management's perspective reflects the relevance of the issues in the business and management of the Elecnor Group; and the stakeholders' perspective provides their view of the impact of the various matters on their decisions regarding the Group.
- 3. Prioritisation of material issues.** Based on the assessments by the stakeholder groups and Management, a list of priority material issues was compiled, ordered from highest to lowest significance.
- 4. Compilation of a materiality matrix** based on the results obtained. Said matrix contains the issues arranged by significance for the Elecnor Group and its stakeholders. The results were validated by Management.

In the process of preparing the Group's Sustainability Strategy, the Sustainability Committee did not identify any additional sustainability aspects, ratifying the validity of these material issues for 2021.

In 2022, the company will conduct a new materiality analysis taking into account the new universal standards of the Global Reporting Initiative, GRI.



















Temas críticos	Temas prioritarios	Temas relevantes
1 Seguridad y salud laboral	7 Transformación digital	19 Gestión de la igualdad y la diversidad
2 Ética y compliance	8 Gestión financiera (desempeño económico)	20 Eficiencia de los recursos
3 Desarrollo del capital humano	9 Gestión de riesgos no financieros	21 Diálogo con las comunidades locales
4 Derechos Humanos	10 Ciberseguridad	22 Cambio climático
5 Calidad del servicio y orientación al cliente	11 Transición energética	23 Biodiversidad
6 Oportunidades de negocio	12 Buen Gobierno	24 Economía circular
	13 Contexto regulatorio	25 Huella hídrica
	14 Conciliación	
	15 Gestión de la cadena de suministro	
	16 Innovación	
	17 Gestión del diálogo con los grupos de interés	
	18 Inversión socialmente responsable	

All the issues identified were considered to be material for the Elecnor Group and this is reflected in this Non-Financial Information Statement which provides on all of them.

Because of the significance of critical issues, below is an outline of their relationship with GRI standards, the Sustainable Development Goals, and the Sustainability Strategy:

Critical material matters	GRI Content	SDGs	Internal impact	External impact	Sustainability strategy
Occupational health and safety	403-1 403-2 403-3 403-4 403-5 403-6 403-7 403-8 403-9 403-10		✓	✓	
Ethics and Compliance	102-16 102-18 205-2 205-3 307-1		✓	✓	
Developing human capital	401-1 404-1 404-3		✓		

Critical material matters	GRI Content	SDGs	Internal impact	External impact	Sustainability strategy
Human rights	102-16 406-1	  	✓	✓	 
Service quality and customer focus	Elecnor Group own indicator.	  		✓	 
Business opportunities	Elecnor Group own indicator. GRI does not include indicators linked to this aspect.	   	✓		 

Social dialogue with stakeholders GRI 102-40

The Elecnor Group is in fluent and constant dialogue with its various stakeholder groups through a number of channels, through which it aims to ascertain and respond to their needs and expectations.

In 2020, within the framework of the Sustainability Committee, the list of the Group's stakeholders was updated so as to continue enhancing management of relations with these groups.

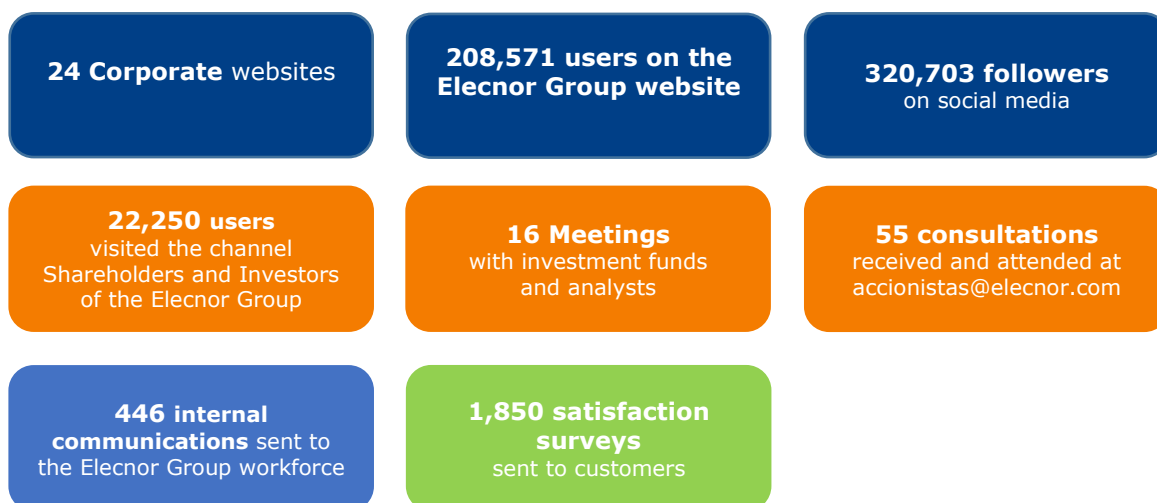
The main stakeholders and communication channels with them are outlined below:

Stakeholder group	Communication channel
Shareholders and investors	General Shareholders' Meeting Corporate and financial reporting: Corporate Governance Report, Annual Accounts, NFIS, Integrated Report, Elecnor Foundation Report, etc. Meetings Corporate websites Shareholder services channel Shareholder forum
Customer	Periodic visits Periodic communications Individual and consolidated annual and half-yearly accounts Satisfaction surveys Comprehensive report Elecnor Foundation report Corporate websites

	<p>Social media Trade fairs</p>
Employees	<p>Periodic meetings Work groups Comprehensive report Elecnor Foundation report Communication campaigns Training sessions and courses Corporate websites Social media Buenos Días Elecnor intranet eTalent Ethical Code whistleblower channels E-mail igualdad@elecnor.com</p>
Public Entities and regulatory bodies	<p>Official filings Corporate and financial reporting: Corporate Governance Report, Annual Accounts, NFIS, Integrated Report, Elecnor Foundation Report, etc. Corporate websites Social media</p>
Suppliers	<p>Meetings and work groups Conventions, fairs and congresses Audits Management platforms Comprehensive report Corporate websites Social media Ethical Code whistleblower channels</p>
Social environment	<p>Social projects Comprehensive report Elecnor Foundation report Sponsorships and patronage Corporate websites Social media Specific project websites</p>
Opinion generation	<p>Press releases Information briefings Individual and consolidated annual and half-yearly accounts Integrated Report Elecnor Foundation report Corporate websites Social media</p>
Partners	<p>Collaboration agreements Forums, fairs and congresses Corporate and financial reporting: Corporate Governance Report, Annual Accounts, NFIS, Integrated Report, Elecnor Foundation Report, etc. Corporate websites Social media</p>
Unions	<p>Information briefings Meetings with workers' representatives Comprehensive report Corporate websites Ethical Code whistleblower channel</p>

Lenders/Insurers	Meetings Corporate and financial reporting: Corporate Governance Report, Annual Accounts, NFIS, Integrated Report, etc. Corporate websites Social media
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These are some key figures in the communication with the various stakeholders in 2021:



Other actions in the field of sustainability management



The Elecnor Group is undergoing certification in accordance with the IQNet SR10 Corporate Social Responsibility standard, which is expected to be completed during the first half of 2022. This seal certifies that companies have all the necessary elements for correct sustainability management, endorsing their level of commitment in this field.

15.3 Business model GRI 102-2

Information on the company's business model is contained in the Purpose, vision and business model section of this Directors' Report. Information concerning the outlook for 2022 can be found in the section with the same name.

Strategic goals

The strategy of the Elecnor Group is in line with its purpose and is backed by a multidisciplinary, qualified and diverse team that enables it to take advantage of opportunities and drive growth.

Thanks to a solid, durable business model with strong synergies between its businesses, the Elecnor Group is committed to diversification, internationalisation and technological excellence in order to drive the development of essential services and renewable energies.

In that regard, the Group's strategy is based on the protection and safety of its people and its activity, as well as on technical and financial solvency, efficiency and control. All this with the focus on generating value for all of its stakeholder groups.

Nuestro propósito, nuestra razón de ser



Somos generadores de cambio y bienestar: llevamos infraestructuras, energía y servicios a territorios de todo el mundo para que puedan desarrollar su potencial



Implementation of the European Taxonomy on Sustainable Finance

The European Taxonomy is a classification system for environmentally sustainable economic activities. This classification outlines what is considered sustainable and which activities are sustainable. In order to facilitate the classification of sustainable activities, the Taxonomy Regulation was published.

In 2020, the European Parliament and the Council of the European Union adopted the Taxonomy Regulation (TR), Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investments, amending Regulation (EU) 2019/2088 of 27 November 2019 on sustainability-related disclosures in the financial services sector (RSFDR).

The requirements on how and to what extent the activities of companies are associated with economic activities that are deemed environmentally sustainable are specified in Article 8 of the TR which, in its first two paragraphs, states:

1. Any company required to disclose non-financial information pursuant to Article 19a or 29a of Directive 2013/34/EU will include in its consolidated non-financial statement information on how and to what extent the activities of the company are associated with economic activities that are deemed to be environmentally sustainable in accordance with Articles 3 and 9 of this Regulation.
2. In particular, non-financial companies will disclose the following information:
 - a. The proportion of their turnover that comes from products or services related to economic activities that are deemed environmentally sustainable pursuant to Articles 3 and 9.
 - b. The proportion of its capital expenditure and the proportion of its operating expenses related to assets or processes associated with economic activities that are deemed environmentally sustainable pursuant to Articles 3 and 9.

Furthermore, two delegated regulations have been published to implement the TR:

- Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives.
- Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by specifying the content and presentation of information to be disclosed by undertakings subject to Articles 19a or 29a of Directive 2013/34/EU concerning environmentally sustainable economic activities, and specifying the methodology to comply with that disclosure obligation.

Therefore, pursuant to the foregoing, the Elecnor Group is subject to the obligation to disclose in the Non-Financial Information Statement (NFIS) for 2021, information on the manner and extent to which the company's activities are associated with economic activities that are considered environmentally sustainable in relation to goals to mitigate and adapt to climate change.

Thus, in this section of the NFIS, the Elecnor Group publishes the proportion of its eligible and non-eligible activities according to the taxonomy in its total turnover, its capital expenditure (CapEx), and its operating expenses (OpEx).

Methodology for the identification of eligible activities

Identification of activities conducted by the Elecnor Group

The Elecnor Group classifies its activities and sub-activities using an internal coding system. According to this coding, the Group gathers its activities into the following main activities:

- **Electricity:** designing, constructing and operating and any other type of action on distribution networks, transmission lines and transformation substations.
- **Energy efficiency:** undertaking of projects to improve energy efficiency both in public lighting installations in municipalities and in the tertiary and industrial sectors (financing, energy management, maintenance and full warranty during the concession period and the mixed supply and service contract).
- **Power generation:** executing turnkey projects mainly for wind and solar photovoltaic power generation facilities, as well as their operation and maintenance.
- **Gas&Oil:** designing, constructing and any other type of action on gas-associated facilities, ranging from transport to distribution.
- **Telecommunications and Systems:** developing telecommunications infrastructures and systems for operators (mainly engineering, construction, installing customer equipment and maintenance).
- **Railways:** turnkey projects for electrification, signalling, interlocking, communications and control systems in the area of railways, underground railways, trams and trolleybuses.
- **Maintenance:** customised solutions for the rendering of technical, commercial and auxiliary services in the field of public services for electricity, communications, gas, water and installations.
- **Installations:** comprehensive solutions for large installations (design, construction and commissioning and operation and maintenance).
- **Construction:** civil works, building and hydraulic works.

- **Water:** multidisciplinary projects for both hydrological planning and water transport and distribution networks, developing water treatment solutions and water purification and treatment projects for urban and process water supplies.
- **Environment:** turnkey solutions with own developments in waste treatment and waste management engineering, forestry activities, maintenance of green areas, street cleaning and infrastructure maintenance and conservation.
- **Space:** design, engineering, solution development and systems integration for the areas of space and information and communication technologies.

Categorisation of activities into eligible and non-eligible activities

The above activities and their corresponding sub-activities have been analysed using the classification of economic activities included in the delegated acts corresponding to the goals to mitigate and adapt to climate change, and which are based on the NACE (Statistical Classification of Economic Activities in the European Community) classification.

The correspondence of the Elecnor Group's economic activities with the NACE codes included in the two delegated acts has been analysed. Following the exercise conducted, it has been concluded that the following Elecnor Group activities are deemed eligible according to the taxonomy:

ACTIVITY	SUB-ACTIVITIES	NACE Code	Taxonomy		
			Taxonomy Activity	Activity Description	Activity Goal and Type
Electricity	Distribution and transmission networks, substations, transformer stations and live working	3512: Electricity transmission 3513: Electricity distribution	4.9. Transmission and distribution of electricity	Construction and operation of: transmission systems that transport electricity on the very high voltage and high voltage interconnected system; and distribution systems that transport electricity on high, medium and low voltage distribution systems	Mitigation (enabling activity) Adaptation (direct contribution activity)
Energy efficiency	Street lighting	3312: Machinery repair	7.3. Installation, maintenance and repair of energy-efficient equipment	Individual renovation measures comprising installation, maintenance or repair of energy-efficient equipment	Mitigation (enabling activity) Adaptation (direct contribution activity)
Power generation	Wind farms, solar photovoltaic, power generation plants, self-consumption and online distribution and sale of photovoltaic products	3511: Wind, hydroelectric and other electricity production 4321: Electrical installations 2711: Manufacture of electric motors, generators and transformers	4.1. Generation of electricity using solar photovoltaic technology 4.2. Electricity generation by concentrating solar-power technology 4.3. Electricity generation from wind energy 4.5. Electricity generation from hydropower 4.8. Electricity generation from bio-energy	Construction and operation of solar photovoltaic (PV), concentrating solar-power, wind, hydro or biomass-only, biogas or bioliquid electricity generation facilities, installation, maintenance and repair of renewable energy technologies, in situ, and manufacturing of renewable energy technologies	Mitigation (direct contribution activity) Adaptation (direct contribution activity)

			Taxonomy		
ACTIVITY	SUB-ACTIVITIES	NACE Code	Taxonomy Activity	Activity Description	Activity Goal and Type
			7.6. Installation, maintenance and repair of renewable energy technologies 3.1. Manufacture of renewable energy technologies		
Railways	Catenary, traction substations, signalling and interlocking, and communications	4212: Construction of aboveground and underground railway lines 4321: Electrical installations	6.14. Rail transport infrastructure	Construction, modernisation, operation and maintenance of aboveground and underground railways, bridges and tunnels, stations, terminals, railway service facilities, safety and traffic management systems, including the rendering of architectural, engineering, draughting, building inspection, surveying and mapping services, in addition to services performing physical, chemical and other analytical testing of all types of materials and products	Mitigation (enabling activity) Adaptation (direct contribution activity)
Maintenance	Urban services	3811: Non-hazardous waste collection	5.5. Collection and transport of non-hazardous waste in source-segregated fractions	Separate collection and transport of non-hazardous waste in individual or mixed fractions to prepare it for reuse or recycling	Mitigation (direct contribution activity) Adaptation (direct contribution activity)
Facilities	Electricity and instrumentation, air-conditioning, HVAC, PCI and plumbing and comprehensive installations	4321: Electrical installations 4322: Plumbing, heating and air-conditioning systems installations	7.5. Installation, maintenance and repair of instruments and devices for measuring, regulating and controlling the energy efficiency of buildings	Installation, maintenance and repair of instruments and devices for measuring, regulating and controlling the energy efficiency of buildings	Mitigation (enabling activity) Adaptation (direct contribution activity)
Construction	Non-residential buildings	4120: Construction of buildings	7.2. Renovation of existing buildings	Construction and civil engineering works or preparation of such works	Mitigation (transition activity) Adaptation (direct contribution activity)

ACTIVITY	SUB-ACTIVITIES	NACE Code	Taxonomy		
			Taxonomy Activity	Activity Description	Activity Goal and Type
Water	Water treatment plants	4299: Construction of other civil engineering projects n.e.c.	5.1. Construction, expansion and operation of water catchment, purification and distribution systems 5.2. Renewal of water collection, purification and distribution systems 5.3. Construction, expansion and operation of waste-water collection and treatment systems	Construction, expansion and operation of water collection, purification and distribution systems and centralised waste-water systems, including collection (sewerage) and treatment and their renewal	Mitigation (direct contribution activity) Adaptation (direct contribution activity)
Environment	Environmental works	0210: Silviculture and other related activities 0240: Silviculture support services	1.1. Forestry 1.2. Rehabilitation and restoration of forests, including reforestation and natural regeneration of forests after extreme events 1.3. Forest management 1.4. Conservation silviculture	Establishment of forest by planting, deliberate seeding or natural regeneration on land that was hitherto under other use or unused, forest rehabilitation and restoration, forest management and other forest management activities seeking to preserve one or more habitats or species	Mitigation (direct contribution activity) Adaptation (enabling activity)

Furthermore, the following activities of the Elecnor Group do not appear in the taxonomy and have therefore been catalogued as ineligible activities:

ACTIVITY	SUB-ACTIVITIES	NACE Code
Power generation	Combined cycle thermal power plants	3516: Production of conventional thermal electricity
Gas&oil	Distribution and transmission, infrastructure operations (domestic grid), domestic services and miscellaneous facilities and oil	3522: Distribution of gaseous fuels through pipelines 3523: Trade in gas by pipeline 4950: Pipeline transport 0610: Extraction of crude oil
Telecommunications and systems	Network creation, customer registration, internal plant and equipment, network engineering and maintenance, projects and maintenance of communications, security and automation and control systems, special and unique installations, product engineering	4222: Construction of electrical grids and telecommunications networks 6110: Cable telecommunications 6120: Wireless telecommunications 6130: Satellite telecommunications 6190: Other telecommunications activities 8020: Security systems services

	and development, smart cities (systems)	
Maintenance	Comprehensive maintenance of buildings, electrical and instrumentation, air conditioning, HVAC, plumbing, mechanical, industrial maintenance and maintenance of transport infrastructure and green areas	3314: Repair of electrical equipment 3320: Installation of industrial machinery and equipment 4211: Construction of roads and motorways 4213: Construction of bridges and tunnels 4322: Plumbing, heating and air-conditioning systems installations 8130: Landscaping activities 9104: Activities of botanical gardens, zoos and nature reserves
Facilities	Interior design	7410: Specialised design activities
Construction	Non-residential buildings	4211: Construction of roads and motorways 4213: Construction of bridges and tunnels 2361: Manufacture of concrete elements for construction purposes
Water	Waste disposal plants, waterworks and water distribution systems	4299: Construction of other civil engineering projects n.e.c. 4291: Waterworks 4221: Construction of fluid power networks
Space	Space	6190: Other telecommunications activities 8030: Research activities

Estimation of the indicators for eligible activities: Turnover, capital expenditure (CapEx) and operating expenses (OpEx)

After cataloguing the activities of the Elecnor Group as eligible and non-eligible, the indicators (KPIs) required by the abovementioned regulations have been calculated.

In order to calculate them, and pursuant to the applicable regulations, the scope of the Elecnor Group's companies and organisations that comprise its consolidation scope for in order to prepare the consolidated annual accounts was considered. This includes all those consolidated using the full or proportionate consolidation method, and therefore does not include the figures relating to other organisations over which the Elecnor Group exercises joint control or significant influence, which are included in the annual accounts using the equity method. As a consequence, the figures relating to the Celeo Group have not been considered when calculating these indicators, even though its activities, which mainly comprise the development, third-party financing, construction and operation and management of electricity transmission lines and photovoltaic and solar thermal farms, have been classified as eligible.

The methodology used to calculate each of these indicators and the results obtained are outlined below.

Proportion of turnover from products or services related to environmentally sustainable economic activities

The Elecnor Group has a highly developed, mature and consolidated analytical accounting and works/project management system (the latter hereinafter referred to as the *works system*) that allows it to precisely allocate its costs, both direct and indirect, to the various works in progress. These systems are common to practically all the organisations comprising the Elecnor Group and its consolidation scope, facilitating the process of managing and monitoring its activity.

The Elecnor Group recognises its turnover using the stages of completion or percentage of completion method, as established in the applicable accounting legislation. Therefore, on a

monthly basis, using the information on the costs of each project reported by the works system and taking into account the best estimate of the expected margin at the close of the project at any given time, the project managers estimate and record in the aforementioned system the production corresponding to the allocated costs. Based on this production, the turnover is recorded monthly in the accounts.

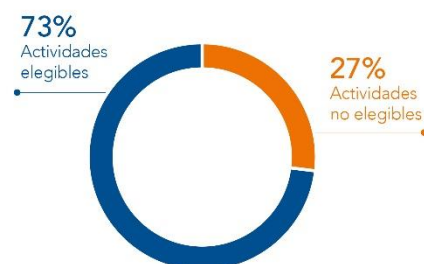
As stated previously, the Elecnor Group has a commercial management system in which all bids submitted are recorded. Each of these bids must be assigned to one of the activities set out in its internal activity coding system. If the project is ultimately awarded to the Group, and in order to be able to properly manage it (cost allocation, production recording, invoicing, etc.), the corresponding work is created in the works system, which must be associated with a bid recorded in the commercial management system. Thereby, each and every work registered in the system is associated with an activity code.

As stated previously, the works systems of the various subsidiaries and organisations comprising the Elecnor Group integrate all the information related to the economic figures of the works in progress (chiefly turnover, expected margin at the end of the works and allocated costs). This information is consolidated and grouped by activity.

Taking this into account, the Elecnor Group has calculated the turnover indicator for 2021 that comes from eligible activities as follows:

- Numerator: turnover for 2021 ("Net turnover") that comes from activities that have been deemed eligible activities according to the regulations in force pursuant to the analysis conducted – Euros 2,284,377 thousand.
- Denominator: The Elecnor Group's "Net turnover" included in the consolidated annual accounts for 2021 prepared by the Board of Directors on 23 February 2022 – Euros 3,122,421 thousand.

Cifra de negocio
según la Taxonomía Europea



Therefore, the percentage of the Elecnor Group's turnover for 2021 that comes from environmentally sustainable activities (eligible activities) amounts to 73%.

As previously stated, the turnover of the Celeo Group, which is accounted for using the equity method, has not been taken into account for the calculation of this indicator, even though its activities are eligible activities. The turnover of the Celeo Group for 2021 amounted to Euros 197,646 thousand.

Proportion of capital expenditure (CapEx) related to assets or processes associated with sustainable environmental economic activities

The nature of the Elecnor Group's main capital expenditure, without taking into account investments made through its subgroup Celeo (mainly electricity transmission lines and facilities generating photovoltaic and solar thermal energy) is as follows:

- Wind power generation facilities and rights of use over associated assets.
- Machinery, tools and equipment, transport equipment and other assets necessary for the rendering of services and execution of works and projects, in addition to rights of use over assets of this nature (hereinafter, *assets for the execution of projects*).
- Other supporting property, plant and equipment not directly related to business activities, such as computer systems or furniture and fixtures.

The Elecnor Group keeps a register, through the various fixed asset systems or modules of its subsidiaries and organisations, of all its property, plant and equipment. This system makes enables each of these assets to be identified individually, to be managed appropriately (maintenance, recording additions and disposals and estimating their depreciation and amortisation, among other aspects) and to ensure that they are properly recorded in the accounting systems.

These assets are not individually assigned to any of the activities established in the internal activity coding system or to the different works in progress, as they, and in particular the assets for the execution of projects, are used in a cross-cutting manner in various works and even in different activities. The cost of the use and utilisation of these assets, materialised through their systematic depreciation and amortisation and other costs directly related to them, is allocated to the various projects through the corresponding *equipment utilisation reports* and *vehicle utilisation reports* (cost allocation rates of equipment per day of use), which are completed monthly by the operators.

In such circumstances, the Elecnor Group deems the best approximation of the extent to which its investments in this type of asset are related to sustainable activities is the abovementioned allocation of the consumption of the assets (depreciation and other costs related to their use and utilisation) to the various projects and works. This means, with the due precautions, that the percentage of these costs associated with eligible activities is represented by the indicator relating to turnover estimated in the above section. Therefore, in order to avoid duplication when calculating the various indicators, as laid down in the regulations in force, investments in assets for the execution of projects have not been included as part of the numerator for the purposes of calculating this indicator, even though, as previously stated, a very significant part of them is consumed in projects related to eligible activities.

Among the strategic objectives of the Elecnor Group in the field of climate change, the renewal of the fleet for more efficient vehicles and the development of projects by country for the switch to more sustainable fuels are prominent.

Furthermore, investments in wind power generating facilities and associated rights of use, which are incurred in their entirety by the Enerfín subgroup, have been categorised as related to sustainable activities.

Taking this into account, the Elecnor Group has calculated the capital expenditure (CapEx) indicator for 2021 associated with eligible activities as follows:

- Numerator: capital expenditure made in 2021 by the Enerfín subgroup (investments in wind power generating facilities and associated rights of use), calculated as the sum of the consolidated "Additions" for the financial year under the headings "Intangible assets – Other intangible assets", "Right-of-use assets" and "Property, plant and equipment" of the Enerfín subgroup that comprise the consolidated Elecnor Group – Euros 40,826 thousand.
- Denominator: sum of the "Additions" for the year under "Intangible Assets - Other Intangible Assets", "Right-of-Use Assets" and "Property, plant and equipment" of the Elecnor Group included in the related explanatory notes to the consolidated annual accounts for 2021 prepared by the Board of Directors on 23 February 2022 – Euros 147,881 thousand.

Therefore, the percentage of the capital expenditure (CapEx) of the Elecnor Group for 2021 relating to assets or processes associated with environmentally sustainable economic activities (eligible activities) amounts to 28%.

Proportion of operating expenses (OpEx) related to assets or processes associated with sustainable environmental economic activities

The regulations in force establish that in order to calculate this indicator, only the percentage of certain operating costs that are related to assets or processes associated with eligible activities should be considered as a percentage of the total operating costs. Specifically, and as a basis of calculation of the indicator, only the costs of research and development, building renovation, leases, maintenance and repair and other direct costs related to the day-to-day operation of fixed assets (exclusively property, plant and equipment) necessary for their ongoing and correct functioning must be taken into account. The Elecnor Group recognises these costs under "Research and development expenses", "Leases" and "Repair and maintenance", as identified in the related note to its annual accounts, under "Other operating expenses" in the income statement.

As stated in the above section, the subsidiaries and organisations included in the consolidation scope of the Elecnor Group do not generally own fixed assets other than assets required for the execution of projects, wind power generating facilities and other support assets not directly related to business activities.

As regards the assets necessary for the execution of projects, and as previously stated in relation to the depreciation thereof, the various related operating costs are allocated to the projects through the corresponding *equipment utilisation reports* and *vehicle utilisation reports*. For this reason, and once again, the Elecnor Group deems the best measure to establish how the operating expenses referred to in this section are associated with sustainable activities to be through this allocation, which is already represented by the indicator corresponding to turnover.

Furthermore, all of the operating expenses of this nature incurred by the Enerfín subgroup are directly related to the wind power generation facilities it owns. In that regard, and in relation to 2021, the expenses incurred by the Enerfín subgroup recorded under the headings "R&D&I expenses", "Leases" and "Repair and maintenance" amounted to a total of Euros 5,450 thousand.

The Elecnor Group's total operating expenses included under the headings stated in this section for 2021 amounted to Euros 130,263 thousand. Therefore, the percentage of the abovementioned expenses incurred by the Enerfín subgroup as a percentage of the total amounts to 4%.

15.4 Our people, our best asset

The Elecnor Group has a team of more than 21,000 people and more than 60 nationalities. It is these people who set us apart, through their effective and efficient work, and they are therefore the cornerstone of the Group's activity.

Integrated Human Resources Management System [GRI 103-1](#), [GRI 103-2](#), [GRI 103-3](#)

The Group's Integrated Human Resources Management System is geared towards attracting the best talent available, as well as deploying, fostering and developing the existing talent in the organisation.

Acquiring and attracting the best available talent in the market, prioritising internal talent.	10% Increase in new hires	21,431 employees
Performance Process of analysis of the actions and results of each person in their post, as well as the identification of improvement areas.	3,142 people evaluated	
Compensation Focused on fair remuneration, that rewards and recognises merits.	Salary surveys Social benefits	
Development This means a maximum commitment to existing potential in order to offer employees opportunities for growth and improvement over the course of their career.		
Training Aimed at developing skills and broadening knowledge to achieve optimal suitability of person to post.	352,936 Training hours 16.47 Hours of training/employee GRI 404-1	

Selection

The Elecnor Group strives for the utmost fairness in the duties, remuneration and recognition of posts of equal value within the Group, regardless of the characteristics of the person occupying the post. In this connection, it has established selection guidelines to achieve maximum equality in these aspects.

Moreover, the Group has an internal selection and mobility policy aimed at attracting and retaining the best available talent in the market.

Aware of the difficulties inherent to international selection processes and the level of competition in some countries due to the scarcity of skilled profiles, work is ongoing to boost the Group brands as a standard-bearing company for professional development. In this regard, a LinkedIn profile Elecnor Talento is mainly used to coordinate job vacancy postings in the international market. This year, a boost was given using specific campaigns on LinkedIn and other employment websites in order to identify talent among those who are not actively seeking work. This year's campaigns have been geared towards boosting the brand image and identifying profiles for renewable projects.

2021 has been characterised by the need to recruit a large number of national and international profiles for renewable energy projects, both wind and photovoltaic, in Spain, Brazil, Colombia and Australia. In Africa, within the framework of the Group's expansion plan, its goal has been to select various profiles for the start-up of activities in new markets, such as Zambia.

The Elecnor Group actively partners with universities and vocational schools in order to attract students and new graduates. Thus, it has taken part in various employment forums, both on-site and virtual, as a result of the current health situation. In order to attract site personnel for the electricity activity, the Group has been present in vocational training institutes in Spain.



As regards the international scholarship programme, thanks to Basque Government scholarships, 12 students from this programme are going to join the Group's companies in the United States, Scotland, Portugal and Italy. Furthermore, we are exploring with universities the possibility of incorporating domestic talent, which will subsequently be transferred to African countries and Lithuania.

The ICEX scholarships in Chile, Lithuania and Mexico are also upheld.

As described in greater detail in the Equality and diversity section of this NFIS, this year emphasis has been placed on publicising the commitment of the Elecnor Group to including people with disabilities in the workplace. This commitment has materialised in the form of support for the Adecco Foundation's #EmpleoParaTodos (JobsForEveryone) programme. This is an organisation that has been working for over 20 years to foster the employability of people at risk of exclusion. Furthermore, we have launched the Aflora project, which seeks to normalise disability in the company by informing and orienting people who, due to certain health conditions, are eligible to obtain a disability certificate.

Performance management GRI 404-3

One of the Elecnor Group's main lines of action comprises developing its human capital, working on attracting, retaining and developing it.

The Group is committed to managing talent by identifying key posts and talent groups (high potential, key people and successors), thereby helping to devise specific development and career plans.

Performance Management provides relevant, objective and transparent information with a view to establishing remuneration, training and development plans.

In the Performance Management process started in 2020 and closed in January 2021, 612 managers have assessed 3,142 employees (2,424 in the previous year), representing upwards of 92% of the people subject to this process.

Each manager assessed the people directly under them, evaluating a series of skills to identify whether the person is eligible for promotion, such as commercial performance, production performance, relationship with employees and the rest of the organisation, commitment to prevention and support for the Group's projects.

There follows a breakdown by gender and category of employees who have received a professional performance assessment:

	Male	Female	Total
Structure	2,187	955	3,142
Management	106	17	123
Executive	670	156	826
Technician	1,411	782	2,193
Works	0	0	0
Basic	0	0	0

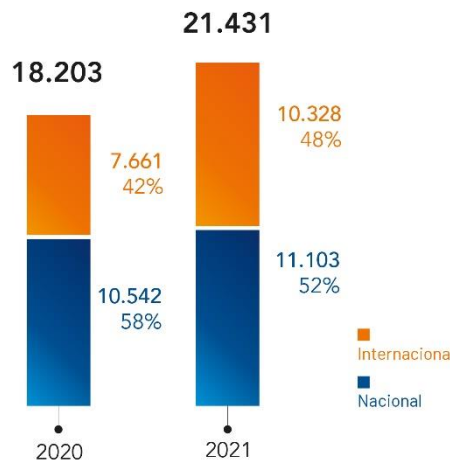
Total	2,187	955	3,142
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Profile of the workforce GRI 102-4, GRI 102-8, GRI 405-1

The Elecnor Group has an international, multicultural and diverse profile with a presence in more than 50 countries across five continents. The international workforce accounts for 48% of the total, and the domestic workforce 52%.

At the end of 2021, the Elecnor Group employed 21,431 people, a 18% increase on the previous year (18,203 employees). This increase chiefly comes from the international market, where the workforce has grown by 35% compared to 2020, with the rise most noteworthy in Australia, Africa and Latin America. In the domestic market, there was an increase of 5%.

Plantilla por mercados



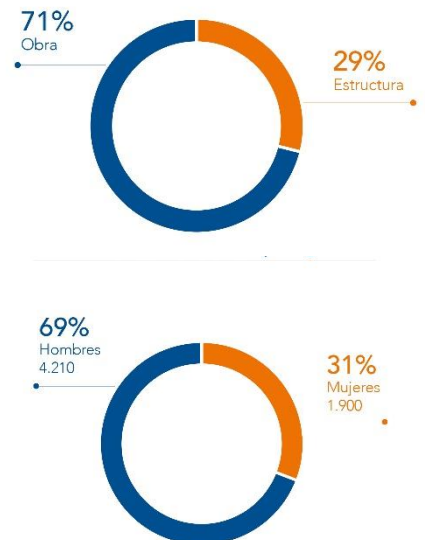
The Elecnor Group's workforce comprised 29% **Structure** staff and 71% **Works** staff.

In line with the historical trend in the sector, men have a greater presence in the Group, as they account for more staff in Works, where women only account for 5%. However, in the Structure category, there is a greater balance between men and women (the latter accounting for 31%, and numbering 1,900).

The company's commitment to equality and diversity fosters growth in the number of women at the organisation, and there has been a 21% increase at Group level in the last year. Note also that 43% of women in the workforce hold degree qualifications or above and they increasingly occupy positions of responsibility in the Group.

It is also worth highlighting the effort made by the company to recruit female engineers as the Group's most demanded profile. At present, in Spain, 46% of the Group's graduates are female engineers or architects, a figure that contrasts with 7.3% of the total number of female graduates from all Spanish universities.

Desglose de plantilla



Over the course of this chapter and in Appendix I hereto, the workforce figures by employee type (Structure and Works) are broken down in the gender information so as to adequately represent the profile of the workforce.

Staff in Structure

	2020	2021	% Change
	5,327	6,110	15%
Male	3,749	4,210	12%
Female	1,578	1,900	20%

Staff in Works

	2020	2021	% Change
	12,876	15,321	19%
Male	12,305	14,620	19%
Female	571	701	23%

Below is a breakdown of the Structure staff by geographical area and gender:

Geographic area	2020		2021	
	Male	Female	Male	Female
Spain	2,402	1,047	2,559	1,159
Europe	207	118	246	175
North America	221	43	233	48
Latin America	671	272	794	365
Africa	194	90	226	112
Asia	22	4	80	7
Oceania	32	4	72	34
Total	3,749	1,578	4,210	1,900

The Elecnor Group is committed to improving employment quality. Thus, in spite of the adverse circumstances generated globally by the health crisis, the Group has increased the number of open-ended contracts by 27% compared to the figure for 2020. It is worth highlighting the increase in the number of open-ended contracts in the Works personnel, reaching 33%, compared to 20% last year. Furthermore, 99% of the Group's contracts are full time. All the information broken down by type of contract and type of employment can be found in Appendix I to this report.

In 2021, the number of hours of absenteeism in the Elecnor Group totalled 2,206,895 (1,959,662 hours in 2020), implying an absenteeism⁶ ratio of 4.9% (5.7% in 2020).

In Spain's case, it was found that, due to COVID-19, a total of 121,172 working hours were lost (156,935 hours in 2020), equivalent to 0.3% of total hours worked in Spain.

⁶ The absenteeism ratio is calculated as hours of absenteeism including all absences (unjustified, remunerated and non-remunerated leave, illness, accident, maternity and paternity)/actual hours worked.

This year, the impact of COVID-19 on employment was much lower than in the previous year in the Group.

Workforce turnover ⁷ GRI 401-1

Workforce turnover this year was 39% compared to 33% the previous year. The turnover figures in segment are due mainly to contracts ending due to project completions over the course of the year. Appendix I of this report contains in-depth figures on workforce turnover.

New hirings GRI 401-1

In order to implement projects, 9,271 new recruitments were made in 2021, which implies a 10% increase compared to 2020 (8,397).

By gender and type of employee

	Structure			Works	
	Male	Female	Total	Male	Female
2020	961	425	8,397	6,698	313
2021	1,060	513	9,270	7,366	331

Training and development GRI 404-1

The Elecnor Group has a procedure in place for training management which defines the way to pinpoint and meet the training needs of all the workforce. The training needs identified, and the training and awareness actions to be implemented, are outlined in the Training Plan.

The Training Plan is designed by the Training Department based on the needs detected by the Delegates, Managers and Area Heads of each Directorate or General Sub-Directorate.

The Group pays special attention to training intended to ensure that staff are aware of the suitability and importance of their activities and how they contribute to achieving its growth, competitiveness and profitability goals, as well as aspects of occupational risk prevention, quality, environmental management, energy management, information security, R&D&I and compliance management.

In 2021, the Elecnor Group continued in its commitment to the training and developing its employees as key factors for the organisation's success, expanding on training and professional growth opportunities.

Thus, of note are the following training itineraries, designed according to existing positions and needs.

> Executive itineraries

In 2021, three people took part in a Senior Management Programme (SMP).

Furthermore, a Management Development Programme has been designed for occupying the position of Delegate. The first edition, in which 25 people will take part, started in December 2021 and will end in April 2022. Advanced Negotiation is another new itinerary for Delegates

⁷ Turnover is determined as total departures (sum of voluntary redundancies, leaves of absence, retirements, deaths, dismissals, end-of-contract and other kinds of departure)/average employment * 100

in which 48 people have taken part, which will continue in 2022 with the rest of the organisation.

Furthermore, for Production Centre Managers, the company has developed upon Building Stable Relationships with Customers, a new itinerary attended by 106 people.

› Events in the delegations

At these events, the head of a branch, the delegate, conveys the business messages to key professionals and places special emphasis on the critical aspects for their organisation.

The first of these meetings was held in 2021 and will continue next year.

› Itineraries on management skills

They include courses related to leadership, finance, sales, negotiation and professional productivity strategies and techniques (new itinerary in 2021). A total of 520 attendees took part.

› Specialised itineraries

Courses related to the more specific aspects of each position, attended by 314 people.

› Office automation/technical IT

216 attendees have taken a course to update or learn new office automation tools.

› Safety Excellence Project (SEP)/Risk Factor

Two courses were taken to convert 29 people into trainers in "The Risk Factor".

Besides classroom training, the Elecnor Group offers training courses using the following methodologies:

- Online live: live training where attendees interact with the speaker and participants.
- Online: various training contents are hosted on digital platforms. On the online platform Pharos, 342 participants have completed some of the available courses on technical or specific training.

It is worth highlighting two initiatives that demonstrate the Group's commitment to the training and professional development of its workforce. On the one hand, a Development/Career Plan has been designed for new university graduates, which will be launched in 2022; and, on the other hand, the Manager School. This project will provide the necessary knowledge to people who occupy or will occupy the position of manager, to enable them to carry out their duties and achieve the established goals.

Training indicators⁸

Item	2020	2021	Changes
Investment in training (€)	5,933,227	8,445,224	42%
Training hours	251,529	352,936	40%
No. of attendees*	29,161	34,951	20%
Training hours/employee	13.82	16.47	19%

*The number of attendees measures the number of people who have received training, and one person may have completed several courses.

⁸ *The figures correspond to 91.4% of the Group's workforce

Structure and Works training tailored to the needs of their job descriptions:

- **Structure.** In 2021, 7,602 people attended training events, such as: management, technology, IT, languages, quality and environment, and occupational risk prevention.
- **Works.** Works personnel receives training in connection with electricity, installations, maintenance, gas, telecommunications, vehicle and machine operators, quality and environment, and occupational risk prevention. This continuous training makes it possible to acquire and maintain the necessary qualifications to perform specialist tasks involving execution risk. In total, 27,349 people have received some of the aforementioned training.

2020

Staff in Structure

Area	No. of courses	Attendees			Hours		
		Male	Female	Total	Male	Female	Total
Management	61	1,360	531	1,891	4,040	2,108	6,148
Technology	90	321	48	369	5,523	1,193	6,716
IT	61	238	126	364	2,946	1,516	4,462
Languages	313	251	132	383	2,338	786	3,124
Quality and Environment	211	797	261	1,058	2,956	1,196	4,152
Occupational health and safety	276	3,301	1,057	4,358	24,884	8,047	32,931
Total	1,012	6,268	2,155	8,423	42,687	14,847	57,533

Staff in Works

Area	No. of courses	Attendees			Hours		
		Male	Female	Total	Male	Female	Total
Management	14	532	19	551	630	2	633
Technology	833	5,628	19	5,647	73,338	243	73,581
IT	6	34	6	40	425	58	482
Languages	3	5		5	63		63
Quality and Environment	35	743	29	772	774	43	817
Occupational health and safety	1,833	13,419	304	13,723	116,057	2,365	118,422
Total	2,724	20,361	377	20,738	191,286	2,710	193,996

2021

Staff in Structure

Area	No. of courses	Attendees			Hours		
		Male	Female	Total	Male	Female	Total
Management	136	1,219	507	1,726	7,975	3,264	11,239
Technology	115	537	151	688	6,701	1,479	8,180
IT	58	218	146	364	2,519	2,052	4,571
Languages	282	166	118	284	1,957	1,513	3,470
Quality and Environment	72	292	131	423	1,410	863	2,274
Occupational health and safety	361	2,961	1,156	4,117	25,800	9,902	35,703
Total	1,024	5,393	2,209	7,602	46,363	19,073	65,435

Staff in Works

Area	No. of courses	Attendees			Hours		
		Male	Female	Total	Male	Female	Total
Management	8	279	19	298	232	29	261
Technology	1,418	10,357	30	10,387	124,759	307	125,066
IT	10	53	14	67	739	280	1,019
Languages	2	2	0	2	274	0	274
Quality and Environment	12	448	2	450	602	4	606
Occupational health and safety	1,956	15,838	307	16,145	157,840	2,435	160,275
Total	3,406	26,977	372	27,349	284,446	3,055	287,501

Training hours and attendees by professional category and type of employee

Professional category	2020		2021	
	Attendees	Hours	Attendees	Hours
Structure	8,423	57,479	7,607	65,472
Management	180	1,032	150	1,459
Executive	1,743	11,555	1,466	12,813
Technician	6,500	44,892	5,991	51,201
Works	20,738	194,050	27,344	287,464
Basic	20,738	194,050	27,344	287,464
Total	29,161	251,529	34,951	352,936

Training hours by gender and type of employee

	Structure			Works	
	Male	Female	Total	Male	Female
2020	42,687	14,847	251,529	191,285	2,710
2021	46,363	19,073	352,936	284,446	3,055

Average hours of training by category and gender

2020

Category	Male		Female		Total	
	Number	Average	Number	Average	Workforce	Average
Structure	3,748	11.38	1,578	9.38	5,326	10.79
Management	145	6.57	21	3.79	166	6.22
Executive	1,102	9.05	231	6.85	1,332	8.67
Technician	2,502	12.69	1,326	9.91	3,828	11.73
Works	12,305	15.55	571	4.82	12,877	15.07
Basic	12,305	15.55	571	4.82	12,877	15.07
Total	16,054	14.57	2,149	8.17	18,203	13.82

2021

Category	Male		Female		Total	
	Number	Average	Number	Average	Workforce	Average
Structure	4,210	11.01	1,900	10.03	6,110	15.55
Management	141	8.26	20	14.73	161	9.06
Executive	1,110	9.26	233	10.87	1,343	9.54
Technician	2,959	11.81	1,647	9.86	4,606	11.12
Works	14,620	19.45	701	4.36	15,321	18.76
Basic	14,620	19.45	701	4.36	15,321	18.76
Total	18,830	17.57	2,601	8.51	21,431	16.47

With a view to continuous improvement, the Group assesses each training itinerary considering the opinion of trainees by means of an anonymous questionnaire. In the global satisfaction survey, 91% of trainees rated the training as good (41%) or very good (50%).

Note also in this connection the personalised training and updating programme in specific skills for the members of the Group's Board of Directors.

Compensation and benefits GRI 401-2

Elecnor's job chart clarifies and simplifies its organisational structure, the responsibilities of each post and the profiles required. This definition of jobs and responsibilities makes it easier to adapt remuneration in a more objective and fair way, rewarding and recognising merit where due. In 2021, the job mapping was completed for the entire Group.

The Elecnor Group offers its employees social benefits that are described in more detail in the Work-Life Balance section of this chapter. In 2021, progress was made to prepare country reports on the benefits offered to expatriate staff and their salary conditions.

Remunerations policy GRI 405-2

In the framework of the Integrated Human Resources Management System, the Elecnor Group seeks to ensure that its remuneration policy respects the criteria of objectivity, fairness and non-discrimination, recognising and rewarding merits.

The Group uses salary surveys as a benchmark to obtain information relating to the salaries and social benefits in the sector or at similar companies. These surveys are a tool to gauge how competitive positions are as compared to the same positions in the market. Furthermore, the Group also accesses other market research to achieve this purpose.

In order to gathering all the necessary information on employee payrolls in a uniform, agile and effective manner, in 2021, the SAP Success Factors tool was implemented. This tool enables the information from the payroll systems of subsidiaries and branches in the foreign market to be obtained by automation.

A remuneration register was also prepared this year to adapt to the requirements of Royal Decree 902/2020 of 13 October on equal pay for men and women.

The Elecnor Group's wage policy is for men and women performing jobs with equal responsibility to receive equal pay. As outlined in its Equality Plan, The Group implements a remuneration system that guarantees neutrality at all times with no conditioning factors whatsoever on the basis of gender, a circumstance that will continue over time.

The table below details the wage gap ratio which represents the salary difference between men and women by professional category and employee type in the Elecnor Group. The wage gap has been calculated as the difference between the median wage of men and of women, over the median wage of men.

This year, the salary gap has been reduced in all the markets in which the Group is present, as is shown in the tables of fixed average remuneration in Appendix I of this Report.

Category	2020	2021
Management	18.1%	16.1%
Executive	8.1%	7.5%
Technician	20.8%	16.3%
Basic	27.4%	78.3%
Employee type	2020	2021
Structure	24.3%	20.4%
Works	27.4%	78.3%

Moreover, it is worth representing the wage gap in Spain, where 52% of the workforce is located. In this market, the wage gap has narrowed in all categories, and it is worth noting that in the Works personnel (Base category) the median wage of men is lower than that of women.

Spain

Employee type	2020	2021
Structure	18.4%	17.2%
Works	1.7%	-4.4%
Category	2020	2021
Management	14.2%	9.9%
Executive	3.7%	3.6%
Technician	15.9%	10.8%
Basic	1.7%	-4.4%

Work-life balance

The Elecnor Group organises working hours in accordance with sector-specific and conventional standards applicable to the company and by means of negotiations with the Employee Representatives at each work centre, and this is materialised in various work schedules.

The company considers that the concept of work-life balance encompasses measures to improve quality of employment, support for families, professional development, equality of opportunities and flexibility in accordance with framework agreements such as family-friendly company. In this connection, the Group is working to improve each aspect based on the circumstances of the company, country and individual worker.

Although there is currently no formal policy to facilitate disconnection from work, the company encourages the implementation of policies, wherever possible, that facilitate a work-life balance, such as avoiding late meetings, scheduling training during work hours, having flexible working hours, compressed work schedules every Friday and in summer or, where applicable, shorter working days, with all measures provided in the various applicable regulations being implemented.

With respect to digital disconnection, the Elecnor Group has an agenda system marking the workforce's rest and availability periods to prevent any meetings or actions of any kind being scheduled during this period.

Furthermore, "scheduled sending" has been enabled in the email system to ensure that, if an email is sent, the recipient receives it during their working hours. The whistleblowing channel and the post office box that the company makes available to employees accepts complaints, reports or observations on this matter.

The Elecnor Group has a Flexible Compensation Plan to which Structure personnel in the domestic market with open-ended contracts have access. This plan includes health insurance (employees may include their spouse and children), training, IT, dinner vouchers and cards, transport and kindergarten. 698 people joined in 2021.

Moreover, there is a study support programme available to all Group staff in Spain who have children aged 4 to 16, regardless of their contract and work hours. The only requirement is to have been at the company for at least one year. In 2021, 3,141 employees have benefited from this assistance for a total cost of Euros 570 thousand. Study support is also available for disabled children of employees, which varies depending on the school year.

Other social benefits granted by the company are life insurance and accident insurance, travel insurance for employees who travel, medical insurance for employees in positions of responsibility, medical check-up for all employees, company car for those whose work requires them to travel by car and a retirement plan for Management.

Note also that the Más Elecnor digital platform includes special offers and discounts on products and services for the entire workforce and their direct relatives.

In aspects related to health and well-being, there are several initiatives: agreements with physiotherapy clinics and insurance companies, weekly mailing with health tips and good practices, etc. Furthermore, the company seeks to foster and encourage sport among its employees, and has therefore subsidised their participation in running events.

Equality and diversity GRI 103-1, GRI 103-2, GRI 103-3, GRI 406-1

The Group's Gender Equality Plan reflects its commitment to equal opportunities for men and women and non-discrimination in its guiding principles.

Furthermore, Elecnor's commitment to equal opportunities is enshrined in its Code of Ethics and Conduct: "The Group Elecnor applies criteria of non-discrimination and equal opportunities in its selection processes as well as in the development of the professional careers of its employees. Race, colour, nationality, social origin, age, sex, marital status, sexual orientation, ideology, religion and kinship are excluded as factors for professional assessment. The only professional differentiation features used are merit, effort, the results of hard work, training, experience and future potential. Promoting equality entails a special area concerning gender balance, as evidenced in the selection and recruitment practices, professional promotion procedures, training and general work conditions.

The Equality Plan establishes various working areas to boost equality between men and women in the following axes of action: selection and recruitment, professional classification, training, promotion, work conditions, work-life balance, female representation and remuneration.

Moreover, the Group has a Compliance Policy and internal controls to ensure all forms of discrimination are prevented; these controls include workplace harassment, sexual harassment and pregnancy risk protocols, among others.

The e-mail in-box igualdad@elecnor.com is a communications channel for employees to submit suggestions of any kind or to resolve conflicts. In 2021, no complaints have been received in terms of equality or discrimination of treatment on the grounds of sex or similar matters.

In line with historical trends regarding gender in the sector, men are more widely represented in the Group, especially among Works personnel. Staff in Structure, however, are more balanced: at 31 December 2021, 31% were women and 69% men; while in Works, 5% were women and 95% men.

In the year, 407 male employees were entitled to paternity leave and 99% took said leave; 79 female employees were entitled to maternity leave and all of them took said leave.

Diversity in Governing Bodies GRI 405-1

The Elecnor Group's Policy for the Selection of Directors and for Board Diversity outlines all the measures adopted in relation to the selection of directors, diversity policy in relation to gender, age, experience, etc., as well as the procedures for said selection so as to foster a diversity of experience, knowledge, competencies and gender and so as to ensure that, in general, they do not entail implicit biases that might imply any kind of discrimination.

Furthermore, the Appointments, Remuneration and Sustainability Committee regularly examines the Policy so as to make further improvements on an ongoing basis.

Similarly, the company has an Equality Plan, applicable not only to the Board of Directors but also to the Management Team and all Group personnel, which lays down specific actions to be conducted for persons holding positions of responsibility in each of the aforementioned fields of work.

This Equality Plan is one of the main tools used by the Appointments, Remuneration and Sustainability Committee to foster inclusion and diversity among the Group's employees, including its executives.

With regard to the recommendation of ensuring that the number of female directors represents at least 40% of members of the Board of Directors by the end of 2022 and thereafter, and no lower than 30% before then, the company intends to continue fostering an increased presence of female directors on the Board so as to fulfil the recommendation without affecting the normal functioning of the Board and the suitability of its members as a whole to discharge their duties.

Representation of women in executive positions	2020	2021
Women in executive positions *	12.7%	12.4%
Women in the Board of Directors **	13.3%	13.3%

* Considering Management category of Elecnor Group

**The Board in December of the reporting year

The Policy for the Selection of Directors and for Board Diversity and the Equality Plan are available on the Group's corporate website.

Disability

The Elecnor Group is committed to having diverse and inclusive teams comprising people with different competencies, skills, perspectives and experiences.

In Spain it employs a total of 84 people with various disabilities, accounting for 0.76% of the national workforce and for 0.4% of the total workforce. The Group combines the hiring of personnel with disabilities with the adoption of alternative measures pursuant to Spain's Disabled Persons and Social Inclusion Act (LGD).

In particular, in Spain, the company resorted to alternative measures by acquiring raw materials, tools, PPE and procuring various services from special employment centres for a value of more than Euros 3.7 million.

Suppliers	
P&M SL	€ 2,438,189
Comercial Mathius	€ 318,084
CEE Apta	€ 2,596
Integra PMC	€ 52,094
I.L. Sijalon	€ 788,365
Iturri CEE	€ 396
Gelim	€ 102,732
Total	€ 3,702,456

In the interests of data confidentiality, no information is reported regarding differently-abled persons in the rest of countries in which the Group is present.

In 2021, a collaboration agreement was signed with the Adecco Foundation to foster the company's commitment to the labour inclusion of people at risk of exclusion. In that context, the Aflora Plan was launched with the goal of normalising disability in the Group, seeking to identify employees who are eligible to obtain a disability certificate. A series of awareness-raising campaigns were conducted for this purpose.

The Group does not currently have a formal policy on universal accessibility.

About our people

Internal communication is essential in the Elecnor Group. Its core goal is to maintain a constant connection between the company and the team comprising it. The ongoing dissemination of corporate information and aspects related to the company's social responsibility were the main axes on which internal communication was based in 2021.

As is customary in the Group's culture of ongoing improvement, this year new initiatives were launched and those started in the previous year were advanced. The Group's more than 20,000 people are interconnected through the communication channels set up, the main one being the corporate intranet, Buenos Días Elecnor.

Some notable initiatives implemented include:

Aflora Plan, #EmpleoParaTodos (JobsForEveryone)

The Elecnor Group decided to support the Adecco Foundation's #EmpleoParaTodos (JobsForEveryone) project to help the most vulnerable people find work and avoid social exclusion.

The Aflora Plan is a corporate strategy comprising actions based on commitment, awareness, information and advice, the goal of which is to normalise disability in the company. Through this strategy, fears, mistrust, mental barriers and lack of knowledge around disabilities are reduced, fostering normalisation and corporate dialogue.

Accomplice or Protector?

As part of World Day for Safety and Health at Work, the Elecnor Group holds an annual event on Occupational Risk Prevention that seeks to raise awareness, foster and reward occupational prevention actions in all fields and spheres. Historically, this event was held in person with a large number of attendees, but this year it became an online event broadcast to all countries where the Group operates, with more than 3,700 people connected live.

This year's campaign launched a reflection on being an "Accomplice or Protector?" in the face of health and safety breaches, concluding with the guidance of the defence of prevention in all circumstances.

Helping to Help

This initiative was launched on World Environment Day and seeks to acknowledge and help drive projects of non-profit entities (NGOs and associations) that contribute to improving our natural heritage through the protection of biodiversity, the preservation of environmental and ecosystem quality, the sustainable use of natural resources and the fight against climate change.

Digital transformation

Digital transformation, one of the Elecnor Group's strategic projects, was created to effect cultural change, enhance processes, and boost operating efficiency and competitiveness. This year, a campaign called *Mi yo digital* (My digital self) was conducted to allow all the people in the Group to associate the digital transformation of the company with an opportunity to become more effective in their skills, digitally updated, gain professional value and achieve more advantages personally. To do so, it was proposed to use gamification to create an avatar for each person, enabling them to experience a digital transformation of themselves. Each stages of the campaign enabled people to transform their current SELF into their DIGITAL SELF.

In parallel, a monthly video was broadcast throughout the year by Group employees from various fields, in which they shared their experience of how the digital transformation has enhanced their area of work, improving processes, boosting capacities and gaining efficiency.

Cybersecurity is also particularly relevant area in the digital sphere as a result of the increase in attacks on companies in the most digitalised economies and the greater need for connectivity which has occasionally generated greater risk and vulnerability of systems. Therefore, in 2021, the awareness-raising and training initiatives for the entire workforce begun in previous years were upheld and new ones were developed in order to maintain a high level of protection against external threats.

You make Elecnor

With a view to recognising the commitment of the people who have been with the Elecnor Group for the longest time, a meeting called *Tú haces Elecnor* (You make Elecnor) was held, attended by people who joined the company in the 1970s and 1980s.

The Quality League

Following the success of the first edition of this initiative in 2020, the second edition was launched this year in order to raise awareness around the importance of quality and its processes. This time around, more than 1,300 people from 18 countries of the Group took part.

Being healthy

This Human Resources initiative, as part of the TuneIn initiative (the communication channel geared towards people), seeks to improve the physical and emotional well-being of the people comprising the Elecnor Group.

A healthy well-being plan that consists of disseminating content in various formats (audiovisual, infographics, reports, etc.) that combine three areas of knowledge: nutrition, emotional well-being and physical activity.

Company Race

The Elecnor Group believes in the importance of adopting healthy habits inside and outside the workplace, building a safe and healthy workplace filled with energy. Therefore, this year the proposal to take part in the Company Race held in Madrid was launched for all the Group's employees. The goal is to increase participation in the multitude of races that are held for this purpose.

Furthermore, throughout 2021, various awareness-raising campaigns have remained ongoing, such as the campaign for International Women's Day and the International Day of Women and Girls in Science.

Social dialogue GRI 102-41

In Spain, 100% of the workforce is covered by collective bargaining agreements. In the other countries where the Group is present, employees are supported by the labour relations framework established in the relevant local labour legislation.

The Elecnor Group also has Human Resources Departments to ensure compliance with and application of the current legislation throughout all the countries where it operates.

The work centres in Spain with between 10 and 49 employees have staff delegates, with Workers' Committees representing employees at centres with 50 workers or more.

Both the staff delegates and the Committee members are chosen in trade union elections, in which both unions and independent groups may field candidates. At present, the majority union is Comisiones Obreras (CCOO), but others are also represented: UGT, ELA, LAB, USO, ESK, CSIF and independent groups. In the rest of countries the Group is compliant with legislation in force.

Labour relations at the Group are managed on the basis of provincial collective bargaining agreements within the sector. In certain cases, specific agreements are signed with particular groups. The company holds quarterly meetings with each and every one of the Workers' Legal Representations (RLT), in which it provides the information required by both the Workers' Statute and the Organic Law on Trade Union Freedom. Nonetheless, extraordinary meetings may be held at the request of both the Group and the RLTs themselves.

In 2021, the iron and steel agreements in Almería, Barcelona, Burgos, Córdoba, Gerona, Huesca, Jaén, Lleida, Madrid, Orense, Palencia, Pontevedra, Salamanca, Segovia, Soria, Tarragona, Valladolid and Ceuta, in addition to the construction agreement in Córdoba, were revised.

The Group has various channels for employee dialogue and participation, such as meetings with workers' representatives, Equality Plan Monitoring Committee, the Buenos Días Elecnor intranet, the platform eTalent and the email addresses codigoetico@elecnor.com and igualdad@elecnor.com, among others.

15.5 We look after our people

Our commitment to employee health and safety has been a priority for the Elecnor Group since the outset. Along these lines, the Group conducts work to achieve the goal of zero accidents, zero tolerance to any breaches of preventive measures and the continuous fostering of safe conduct among employees.

This commitment is formalised in the Group's Integrated Management System, which comprises the aspects of environment, quality, health and safety, energy management, R&D&I management and information security, with the latter being integrated this year. These six vectors comprise the Elecnor Group's Integrated Management Policy, each with its specific objectives and strategies, but all with a common mission: the ongoing improvement of the organisation.

As regards health and safety, the principles of action reflected in the Integrated Management System Policy are as follows:

- Provision of the necessary material resources.
- Focus on training in prevention techniques.
- Development of awareness campaigns for the entire Group.
- Continuous performance of inspections and audits on site and adoption of the appropriate remedial actions to rectify the origin of the deficiencies.

In the Elecnor Group, the Health and Safety Area is structured based on the Joint Prevention Service (JPS), which is broken down into Central and Health and Safety Technicians. The latter have a presence in the various countries where the Group operates.

The Central JPS comprised 14 people at the end of the year, structured as follows:

- Technical Office Department. Prepares and maintains the Group's occupational risk prevention (OPR) documentation, campaigns, etc., as well as ensuring that internal audits are conducted in Spain and some countries in the international market.
- Internal Work Audit Department. Which conducts this kind of control in Spain as well as certain other countries.
- International OPR Coordinator Coordinating with all the Group's international organisations by means of reviewing reports, conducting meetings, monitoring implementation of the Safety Excellence Plan and software rollout, among other things.
- Technicians. Who coordinate and unify actions at broad implementation customers in Spain.

Health and Safety Technicians provide services to the various units on a day-to-day basis. Their duties include, inter alia, technical support to customers, inspections and training, and coordinating the application of the Management System in their business unit.

In the national market, there are 123 technicians⁹, with different levels (chiefly senior level) and specialities (most of them have the three specialities required by Spanish legislation), mainly dedicated to health and safety tasks. Abroad, there are 264 technicians in various categories in accordance with the legislation of each country.

For the undertaking of Health and Safety activities in 2021, the company allocated a budget of more than Euros 12.3 million euros in Spain alone, which was expanded by more than Euros 1.3 million due to investments related to the pandemic (the figure for the international market is not available, although it is estimated that the figure may have been similar).

Health and safety management GRI 403-1, GRI 403-2, GRI 403-3

Health and safety management in the Elecnor Group is conducted with the conviction of minimising or eliminating the main risk that may occur as a result of undertaking a project: a major or fatal accident. This risk is mainly related to working at heights, electrical risk, handling large loads, confined spaces, etc.

The Elecnor Group has implemented a Health and Safety Management System encompassed within the Integrated Management System, which applies to all workers, activities and places of work. Its goal is to remove or minimise the risk situations that people might face when executing their activity. To this end, the following actions are conducted:

⁹ They do not include health technicians hired specifically for large projects.

- Safety inspections and internal work audits to monitor the conditions in which work is executed.
- Information and training on health and safety for all workers.
- Monitoring and awareness meetings.
- Campaigns to increase awareness and change behaviours.

All Management System activities have been strengthened during the year with the implementation of the Digital Transformation and Safety Excellence projects, which continue to make positive progress.

The Management System includes the initial risk assessment procedures (adapted to the legal requirements of each country) identifying the risks associated with activities, the probability of those risks emerging and the severity of the consequences of their materialising. Below are the corrective/preventive measures to eliminate or reduce risk.

By means of controlling work conditions (safety inspections, internal work audits, system audits, principal risk permits or spontaneous observations), the environment in which activities are conducted is monitored and remedial measures are implemented, which may include the re-assessment of the work to be executed. If there has not been a re-assessment the risk assessment is reviewed and, where applicable, it is modified every 3-5 years.

The risk assessments are performed by health and safety technicians. The safety inspections involve the entire hierarchical structure to foster integration of health and safety in people's everyday routines. Those directly responsible for projects are in charge of the principal risk permits, observations and other activities. In addition, all these aspects are monitored in conjunction with the Group's Management.

The Elecnor Group's Health and Safety Policy, formalised in the Integrated Management System, includes the right of workers to refrain from performing work where there is grave or imminent risk, requesting that execution of the work should halt and consulting their managers or the Safety Technician to perform the work in a safe way, without being subject to any type of penalty. Employees can report such situations through various mechanisms such as spontaneous risk observations, PRP, safety inspections, etc.

The Management System contains a procedure to investigate workplace accidents and incidents that define the responsibilities and actions, including the application of the remedial measures to avoid the repetition of the event or minimise its consequences. The findings of accident and incident investigations are analysed on a monthly basis, and the advisability of reviewing the System is assessed.

In 2021, the system was adapted to the requirements of the ISO 45001:2018 standard, replacing the previous standard OHSAS 18001. The certification was conducted in Spain and in other subsidiaries whose system was certified by the previous standard, except Elecnor Mexico, Brazil and Canada, which had already migrated to the new standard in 2020.

70% of turnover is certified in accordance with international ISO 45001 standard.

In 2021, 20 internal audits were performed in Spain in accordance with ISO 45001 standards. As regards external audits on the same standard, these were carried out for Elecnor and the subsidiaries included in the Multisite Certificate Adhorna, Atersa, Deimos Space, Deimos Engineering, Ehis, Elecnor Infrastrutture and Jomar Seguridad, all with satisfactory results. Similarly, Audeca and Enerfín, which have independent certification, obtained satisfactory results in their audits.

Abroad, 15 internal audits were conducted in accordance with ISO 45001 requirements. Additionally, 9 external audits were conducted in various countries, also with satisfactory results.

Among other actions, 85,590 safety inspections were conducted throughout the Group, as a result of which 66,759 remedial measures were implemented, and 1,192 internal works audits were implemented as a means of control and in-depth analysis of the safety environment at projects.

Health and safety committees [GRI 403-4](#), [GRI 403-8](#)

93% of the Group's employees are represented in formal health and safety committees, in which aspects such as work procedures, protection equipment, etc. are discussed. In Spain the committees are specific to work centres and in other countries they may be specific to work centres or project sites.

Generally speaking, in almost all the countries where the Elecnor Group operates, there are worker participation committees, in which the workers' chosen representatives and representatives of the company intervene.

They are equal consultative and participatory bodies. The frequency of the meetings is that established in applicable legislation, but they normally meet monthly or quarterly.

In work places or countries where there is no worker representation, consultation and participation is by means of other mechanisms (awareness meetings, notice boards, circulars, e-mails, etc.).

Training in workplace occupational health and safety [GRI 403-5](#)

In 2021, the Elecnor Group continued with health and safety training activities to further foster a culture of prevention in the workplace. Depending on the activity, training is given on the following aspects:

- Management systems.
- Ab initio or induction when joining the company or project.
- Significant specific risks: height, electrical hazards, machinery, confined spaces, etc.
- Action in case of emergency: first aid, evacuation, fire prevention, etc.

The attendees who have received health and safety training, as well as the hours dedicated by type of market, are set out below:

	Attendees			Hours		
	2020	2021	Changes	2020	2021	Changes
Spain	15,750	28,280	80%	112,141	159,338	42%
International	45,012	226,625	403%	140,140	452,344	223%
Total	60,762	254,905	320%	252,281	611,682	142%

Training actions were held in Spain for a collective of 28,280 attendees (27,319 men and 961 women), most of whom attended more than one training action, resulting in 80% growth compared to 2020. A total of 159,338 training hours were provided (150,936 hours by men and 8,402 hours by women), 42% up on last year. There are also other technological and

management training, which also have a clear impact on prevention, and which are not included in this total (qualifications/electrical permits, machinery operators, etc.). This increase is largely due to the increase in activity and the reduced impact of COVID-19 on training activities.

The most notable training actions in Spain are:

Courses	Participants	Hours
Basic course	736	44,150
First cycle of the TPC	1,441	11,528
Second cycle of the TPC	2,588	17,686
Working at heights	2,937	24,397
Confined spaces	1,535	12,448
First aid	1,149	5,541
The Risk Factor course	2,732	14,126
Total	13,118	129,876

Internationally, it is worth noting the increase in both the number of participants and the number of training hours given. Training actions were conducted specifically for a collective of 226,625 attendees (223,498 men and 3,127 women), most of whom attended more than one training action, compared to 45,012 in 2020. In terms of total training hours, the figure stood at 452,344 hours (437,488 hours by men and 14,856 hours by women), compared to 140,140 hours in the previous year. These figures include the induction actions given for entry to the major projects.

One of the most significant initiatives in 2021 was the World Day for Safety and Health at Work campaign, titled "Accomplice or Protector", which was held on 28 April to commemorate the event. This year, the campaign's presentation event was organised globally over streaming for all the countries in which the Group operates, which featured the participation of Management and which more than 3,700 people streamed live.

In line with the health and safety awareness-raising of all employees, it is worth highlighting the implementation of the Safety Contacts. This entails —at all meetings, training sessions, etc.— the person in charge of the meeting beginning by talking about health and safety. The topics addressed can be related to both occupational safety and the non-occupational sphere, since the goal is to raise the level of risk perception in general and to generate a behavioural change towards an interdependent safety culture.

Occupational health services GRI 403-3

The Elecnor Group is committed to the health of its workers, providing them access to health services at work so as to identify and eliminate hazards and minimise risks. As a result of the monitoring of these services, actions considered necessary are taken and, in extreme cases, may lead to a change of service.

Depending on where the activity is conducted, a different type of service is offered:

- Presence of an adequate medical service on site (doctor, nurse, paramedic or trained personnel).
- If necessary, workers may be transported in their own vehicles if their injuries permit or via ambulance to the nearest hospital.
- If workers use their own transport, the resulting expenses will be reimbursed.

In any event, workers are given the necessary information for their use in the local language or, where applicable, in the language in which said indications are understandable to them.

For workers who are in another country (expatriates/travelling), an emergency notification service has been contracted that channels the action to enable the worker to receive information on where to go wherever they are. Furthermore, the care service for other non-medical emergencies is also included: security events, natural catastrophes, etc. In extreme cases, this service includes the necessary actions for individual or collective repatriation.

Occupational Health and Safety in the workplace with customers and subcontractors GRI 403-7

The Elecnor Group applies to subcontracted staff the same health and safety controls and measures as it applies to its own workers, conducting inspections, training, meetings, etc.

As part of the Safety Excellence Project, there is a specific line of action for subcontractors.

In Spain, there is a procedure for subcontractor assessment and a model for tracking their health and safety performance using the computer software Evalu@.

This procedure enables the actions of subcontractors to be analysed and the action plans to be established in the event that they fail to meet the health and safety standards established by the Elecnor Group.

Within the activities conducted in order to continuously improve the health and safety of subcontractors, in October the 1st Aliado Awards were presented, seeking to encourage and reward good practices undertaken by subcontractors, in order raise their level of prevention and collaborate in achieving the goal of zero accidents. The awards were presented as part of European Week for Safety and Health at Work.

The origin of these awards lies in the framework of the Safety Excellence Project, within the line of action seeking to improve the performance of subcontractors, and in the High Level Risk Map Task Force, which identified the actions of subcontractors in the field of health and safety as crucial.

The awards were announced in two categories, "Self-employed workers and companies with less than 50 workers" and "Companies with more than 50 workers", and involved more than 7,500 subcontractors active on the e-coordina platform.

The 19 finalist applications were analysed by a jury of health and safety experts, who selected the winner and the two runners-up in each of the two categories.

With regard to customers and other stakeholders (for example, third parties present at the workplace, with or without a contractual relationship with the customer), business health and safety coordination initiatives are implemented to eliminate or reduce to a minimum the potential hazards due to interference.

For the public in general, demarcation, signalling and surveillance helps avoid injury to third parties.

Accident rates GRI 403-9, GRI 403-10

In 2021, the Group's frequency rate was 2.7, the same figure as in 2020, and the severity score was 0.11, compared with 0.10 in 2020. The frequency rate value is once again the best value since these indices began to be drawn up in 1967, while the severity score is the second best ever obtained, only bettered by the score in 2020.

	2020	2021
Frequency rate	2.7	2.7
Severity	0.10	0.11
Incident rate	5.14	5.1

Frequency rate = (number of accidents involving more than one day's leave, not counting those on way to or from work/hours worked) $\times 10^6$

Severity = (number of days lost/hours worked) $\times 10^3$

Incident rate = (number of accidents involving more than one day's leave/Average number of employees) $\times 10^3$

In Spain, the frequency rate stands at 3.4, which is the best figure in the historical series, compared to 3.5 in 2020, and the severity score was 0.16 compared to 0.15 in 2020. There were no fatal work-related accidents in 2021 and there were 79 accidents, compared with 69 in 2020.

In the international market, the final frequency rate was 1.9, the second lowest since the series commenced, compared with 1.6 in 2020. The severity rate was 0.07, down from 0.04 in 2020. This year, there was an increase in accidents (40 compared to 24 in 2020) as a result of increased activity in the international market.

Figures broken down by gender

	2020		2021	
	Male	Female	Male	Female
Frequency rate	3.0	0.0	3.0	0.2
Severity	0.12	0.0	0.12	0.0
Occupational illness rate*	0.10	0.0	0.32	0.0

* Occupational illness rate = (number of occupational illnesses/hours worked) $\times 10^6$

In general, figures are compiled using IT tools, varying from payroll software, intranet, health and safety management tools (Notific@, SegurT, Delt@, etc.), spreadsheets, monthly reports, follow-up meetings, etc.

Employee accident rate

Geographic area	No. of injuries due to workplace accidents			No. of workplace accidents with serious consequences ⁽¹⁾			Hours worked		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Spain	79	0	79	1	0	1	20,424,031	2,939,079	23,363,110
Europe	8	0	8	0	0	0	2,269,756	310,435	2,580,191
North America	6	0	6	0	0	0	1,611,188	110,718	1,721,906
Latin America	16	0	16	1	0	1	10,516,904	1,091,927	11,608,831
Africa	9	1	10	0	0	0	4,322,313	681,192	5,003,505
Asia	0	0	0	0	0	0	287,715	560	288,275
Oceania	0	0	0	0	0	0	224,759	63,460	288,219
Total international	39	1	40	1	0	1	19,232,635	2,258,292	21,490,927
Total	118	1	119	2	0	2	39,656,666	5,197,371	44,854,037

(1) Injury due to workplace accident leading to death or so severe that the employee cannot recover or fully recover their state of health as it was prior to the accident, or is not expected to fully recover their state of health as it was prior to the accident within a period of 6 months.

The most significant workplace hazards with serious consequences are determined based on the record of accidents at the company:

- Working at heights (risk of falling to another level from, in many cases, considerable height).
- Work involving electrical hazard (risk of electrical contact, arc flash, fire or spatter from incandescent material).
- Handling large loads (risk of objects falling or of becoming trapped by objects).
- Work in confined spaces (risk of suffocation or explosion).
- Traffic accidents (risk of crashes, being run over, fire).

There were two fatal commuting accidents involving the Group's own staff in 2021.

Accident rate at subcontractors

Geographic area	No. of injuries due to workplace accidents			Hours worked		
	Male	Female	Total	Male	Female	Total
Spain	55	0	55	10,560,839	0	10,560,839
Europe	4	0	4	1,177,965	0	1,177,965
North America	0	0	0	7,865	0	7,865
Latin America	20	0	20	6,263,697	0	6,263,697
Africa	8	0	8	3,042,755	0	3,042,755
Asia	1	0	1	290,343	0	290,343
Oceania	1	0	1	350,130	0	350,130
Total international	34	0	34	11,132,755	0	11,132,755
Total	89	0	89	21,693,594	0	21,693,594

There were 2 fatal accidents involving subcontracted staff in 2021.

Health surveillance GRI 403-6, GRI 403-10

In general terms, the Elecnor Group employees do not perform activities with a high rate or risk of occupational illnesses. In those activities in which there might be a risk of developing an occupational illness (work at nuclear plants, involving asbestos, phytosanitary products, etc.) the necessary preventive measures are implemented and health monitoring performed, including checking physiological parameters that may help detect any problems in those tasks that may harm employees' health and safety. There were no significant cases in 2021.

When Elecnor employees are working in areas where there are endemic diseases (malaria, dengue, yellow fever, typhoid, AIDS, etc.), these are tackled through vaccines or preventive/prophylactic measures, backed by the relevant information campaigns.

In 2021, awareness initiatives have focused on conducting campaigns to combat AIDS and sexually transmitted diseases in various countries, with actions and campaigns to foster healthy habits (avoiding cardio-respiratory disease and musculoskeletal disorders, nurturing a healthy and balanced diet, etc.), back training, and prevention of endemic diseases in the international market, etc.

Furthermore, campaigns were conducted to coincide with World Breast Cancer Day and World Prostate Cancer Day, and the physiotherapy programme to prevent musculoskeletal injuries has been upheld in various cities in Spain.

Similarly, various actions were also implemented to raise awareness among workers and their families regarding the risk of COVID-19 infection.

Employee occupational illnesses

Geographic area	No. of occupational medical conditions and illnesses			Hours worked		
	Men	Women	Total	Men	Women	Total
Spain	4	0	4	20,424,031	2,939,079	23,363,110
Europe	0	0	0	2,269,756	310,435	2,580,191
North America	0	0	0	1,611,188	110,718	1,721,906
Latin America	0	0	0	10,516,904	1,091,927	11,608,831
Asia	0	0	0	287,715	560	288,275
Africa	9	0	9	4,322,313	681,192	5,003,505
Oceania	0	0	0	224,759	63,460	288,219
Total international	9	0	9	19,232,635	2,258,292	21,490,927
Total	13	0	13	39,656,666	5,197,371	44,854,037

The most significant workplace hazards that present a risk of medical condition or illness are determined on the basis of their past record at the Group:

- Endemic diseases in certain countries where the company operates: malaria, dengue fever, etc.
- Asbestosis in places where there is asbestos.
- Musculoskeletal diseases at construction sites.

In 2021, there were 13 cases of occupational illnesses, all of them in men (9 cases of malaria in expatriate personnel in Africa that were not serious, and 4 cases of musculoskeletal origin in Spain), although these figures are partial as there are countries where they are not registered as such due to their legislation. Cases among local staff in countries with endemic diseases are not considered to be occupational illnesses.

Safety Excellence Project (SEP)

This year, progress has been made in the second stage of the SEP in Spain, although it has been slowed down due to the COVID-19 pandemic.

Similarly, the work groups in Angola, Argentina, Chile and Uruguay have adapted and implemented many of the actions defined in the SEP in Spain, in accordance with the characteristics of each country.

Furthermore, in Italy, work has been conducted to implement all the lines of the project, as not all the actions defined in the PES had previously been implemented, and in Brazil and Mexico, work has begun and progress has been made on the majority of the lines of action, which are expected to be completed in the first four months of 2022.

The digital transformation of occupational health and safety

The digital transformation in health and safety enables the optimisation of processes, the most appropriate technology to be applied and efficiency to be gained.

In 2021, initiatives were launched and consolidated within the framework of the Group's Digital Transformation project. Some of the most notable of these are:

- The Principal Risk Permit (PRP) tool is fully implemented in Spain. This year, a total of 316,000 PRPs were conducted in this market.
- Development of various modules of the new CORE tool, which groups together the processes of the Integrated Management System: planning, goals, risks and action plans, improvement management, internal audits, monitoring of corrective measures, etc.
- Completion of the development of the new Segurplan, which will allow risk assessments and health and safety studies and plans to be conducted more quickly.
- Continued improvement of SegurT and PRP for application in the international market.
- Progress in the process of implementing the various Health and Safety IT tools (SegurT, Notific@, PRPs, e-coordina) in various countries (Australia, Brazil, Mexico, etc.), adapting them to current legislation and their specific characteristics. This process will be completed in successive years throughout the international market.
- Other noteworthy initiatives have included restructuring of the health and safety documentation on the Buenos Días Elecnor intranet; unifying documents and criteria on the e-coordina platform as regards access and payment requirements; implementing the new e-pocket app, which facilitates on-site consultation of data on our subcontractors with a view to conducting better control, etc.

Health and safety management during COVID-19

The COVID-19 pandemic has continued worldwide during 2021. Therefore, the Elecnor Group continues to face this threat with the aim of limiting the spread among its own workers and subcontractors in the workplace to the extent possible.

The Group's priority has been to guarantee the health of its employees, customers and suppliers; to maintain production so as to ensure the maintenance of critical infrastructure in the energy, telecommunications, water, gas and transport sectors; and to boost the Group's financial strength.

As a measure of the Group's efforts, note that in Spain alone it has invested more than Euros 1.3 million in measures to prevent or minimise COVID-19 infections within the organisation.

Following the actions conducted in 2020, the Group continues the following Action Plan established, which is enabling it to effectively manage the pandemic with a low number of cases in the workplace:

- Holding Monitoring Committee meetings made up of the Group's Management, Prevention Service and Corporate Development.
- Adapting the specific protocols for both construction sites and fixed work centres (warehouses, offices, factories, etc.), following the spread of the pandemic towards the new normal.
- Maintaining preventive equipment: masks, gloves, disposable suits, watertight goggles, sanitisers, thermometers at entrances to work centres, screens separating work stations, disposable tissues, waste paper baskets, specific disinfectants, etc.
- Continuing with the protocol to protect workers who are most vulnerable due to their specific physical conditions.
- Conducting serological tests, PCRs, and antigens.
- Management of confirmed cases and close and casual contacts of confirmed cases.

Throughout the pandemic, the company paid special attention to the development of information and awareness-raising work for workers and their families, generating ongoing communications from the Buenos Dias Elecnor intranet which, under the slogan *Cuidate, cuidame* (Care for you, care for me) launch clear and practical messages to prevent the spread.

The Elecnor Group monitors the number of cases of personnel affected by COVID-19, as well as the quarantines decreed for both Works and Structure personnel in all the countries in which it operates. This process is conducted using a system developed by Human Resources.

15.6 Operational excellence GRI 102-11, GRI 103-1, GRI 103-2, GRI 103-3

As introduced in the section on We look after our people in this NFIS, the Elecnor Group has an Integrated Management System that includes the aspects of environment, quality, health and safety, energy management, R&D&I management and information security. All of them comprise the Group's Integrated Management Policy and encompass the organisation's common goal of ongoing improvement.

The Integrated Management System is set up around the following guiding principles, which are reflected in its Integrated Policy:

- Strict compliance with applicable legislation and any other requirements binding upon the Group in the markets in which it operates.
- Customer satisfaction.
- The prevention of any injuries to and deterioration in the health of the Group's workers, improving work conditions to provide them greater health and safety protection.
- Pollution prevention.
- Efficient energy use and consumption.
- The activities having a favourable impact on the social environment.
- Improvement in competitiveness through R&D&I.
- Effective and efficient protection by way of a preventive, detective, reactive and dynamic approach to the use of information.

Based on these principles, specific commitments and action lines are established for each sphere.

In 2021, the scope of the Integrated Management System Policy has been expanded to include the Information Security sphere on the basis of the ISO 27001 standard, in order to ensure the protection of the Group's assets while preserving the confidentiality, integrity and availability of information. This policy is available on the corporate websites of the various Group companies and on the Buenos Días Elecnor intranet.

As outlined in the section "Progressing in our commitment to sustainability", the Elecnor Group is in the process of implementing the Corporate Social Responsibility Management System based on the IQNet SR10 standard. This standard specifies the requirements for integrating sustainability and social responsibility throughout the organisation; contributing to sustainable development, taking into account the needs and expectations of stakeholders; and showing the organisation's ability to meet the requirements, through ethical and transparent behaviour.

This System has international coverage and certification is expected to be obtained in the first half of 2022.

In 2021, multisite certification audits were conducted according to ISO standards 9001:2015 and 14001:2015. This is a single certificate for all of the organisations in the Elecnor that contains all of the scopes of the various activities and all of the work centres. Internationally, the Quality and Environmental Management System has been implemented and certified in Elecnor Angola pursuant to these standards and has been included in the Group's Multisite Certification.

73% of turnover is certified in accordance with international ISO 9001 standards.

The information regarding the rest of the certifications of the Integrated Management System is explained in each of the corresponding sections of this report (We look after our people, Committed to the environment and Technology and innovation).

Quality management

The Elecnor Group's quality strategy consists mainly of strengthening client satisfaction, consolidating the continuous improvement in the organisation's processes through risk management and opportunities and implementing opportunities for improvement and lessons learned, and involving the workforce in this process.

Within this framework, the initiatives implemented in 2021 have consisted of:

- Launching the Quality and Environment Management System internationally. In particular, Elecnor Angola has been incorporated into the Group's Multisite Certificate

and the implementation and alignment of the IQA and Hawkeye systems in Elecnor Mexico has continued.

- Optimising processes through the CORE tool, which encompasses the digitalisation of Integrated System processes. The Improvement Management and Audits modules are available at present. The Improvement Management process is one of the most crucial in the Management System, since it enables knowledge to be shared throughout the company.
- Implementing CRM in all businesses incorporating quality processes.
- Undertaking actions to improve the satisfaction of customer needs and expectations.
- Identifying, documenting and providing 255 opportunities for improvement and 60 lessons learned.
- Launching the second edition of The Quality League campaign, which featured the participation of more than 1,300 people from 18 of the Group's countries. Its aim is to raise awareness around the importance of quality and its processes.
- Introducing improvements into the Central Regional Office warehouses to optimise supply and dispatch logistics by reducing the loss of components.

Customers, at the heart of the business

Customer satisfaction is a priority goal for the Elecnor Group. For this reason, different activities and initiatives are undertaken to strengthen its management.

The Group continues to measure customer satisfaction through digital surveys, enabling it to gauge the degree of satisfaction with the services offered, as well as to identify strengths and areas for improvement.

This year, 1,828 customer satisfaction surveys were sent, with a response rate of 64% (1,169 responses). The results show that Elecnor’s average score among its customers has improved compared to 2020, rising from 8.53 to 8.56.

Satisfaction survey	2020	2021
Number of surveys	1,089	1,169
Average score	8.53	8.56
The most highly valued aspects	<ul style="list-style-type: none"> • Compliance with the safety requirements • Global valuation • Response and attention to need for changes 	<ul style="list-style-type: none"> • Compliance with the safety requirements. • Training and technical capacity. • Attention and communication.

As proof of the Elecnor Group’s commitment to customer satisfaction, a methodology has been set up for surveys that obtain a score under 7 in order to find out in detail the causes of this score and to analyse how to improve it. This is implemented by means of improvement management reports defining the necessary corrective actions to remedy the cause of the score obtained. Once these actions have been implemented, the customer is asked again about these less satisfactory aspects to assess the client’s conformity with the action plans.

As for customer claims or complaints, they are managed in accordance with the “Internal and External Communication and Consultation” and “Improvement Management” procedures that

outline the system to be applied for their management, analysis of causes and definition of efficient remedial actions.

Furthermore, the Elecnor Group acts with due diligence when addressing complaints through the following actions:

- Designating persons responsible for assessing client complaints and coordinating their resolution on the basis of improvement management reports.
- Annual recording and monitoring of the number of complaints received.
- Measuring the degree of resolution of closed/pending complaints and the time invested in this.
- Outlining action plans and/or improvement actions when considered necessary.
- Assessing client satisfaction once the improvement action has been implemented following the complaint.

In 2021, 255 customer complaints were filed, most of which were linked to technical management (48%), materials and equipment (23%) and environment (13%). All complaints were fielded within a defined period and 70% of them were closed with a satisfactory result.

Supply chain GRI 102-9 GRI 103-1, GRI 103-2, GRI 103-3, GRI 308-1, GRI 408-1, GRI 409-1, GRI 414-1

Guaranteeing the most stringent quality standards to customers requires optimal supplier management. For this reason, the company affords priority to those suppliers of materials and services that can have a significant impact on the final quality provided by the Group to its customers.

Whenever possible, priority is afforded to contracting local suppliers to boost the area's economy. The "Social Impact" chapter of this Report provides details of the Group's procurements from local suppliers.

From a risk standpoint, the Elecnor Group works on two different levels. On the one hand, they are analysed at a high level by Management and, on the other, the analysis is conducted at an operational level after identifying those responsible for the different processes.

In the supply chain, in 2021, the main risk identified in both high-level and operational risks was the late delivery of supplies, both equipment and materials. In order to curb these risks and have a more resilient network of suppliers and contractors, the Elecnor Group has an action plan based on fostering digital transformation in procurement management.

Therefore, this year, progress was made in implementing the Fullstep procurement platform nationally. This platform enables all parties involved in the procurement process to view the status of their processes in real time. Some relevant figures are set out below:

- More than 12,200 suppliers have registered with Fullstep, accepting the General Terms and Conditions of Procurement in which ethical, labour, social and environmental criteria, among others, are established.
- More than 2,900 internal procurement users.
- More than 50 training sessions have been given to more than 1,400 internal users.
- More than 259,000 procurement orders have been placed for approximately Euros 600 million.

The Materials/Services Supplier Management procedure forms the basis for managing the supply chain.

The Elecnor Group deems major suppliers to be all the materials and services that, as a result of their effect on the safety of the installation and/or continuity of service, seriously affect the final quality of the installations it carried out.

Approval as a major supplier is granted after its documentation is analysed using the criteria of quality, environment, energy management, occupational risk prevention, compliance, R&D&I, information security and sustainability. This year, the sustainability criterion has been added, positively rating the contribution of SR10, SGE21, SA 8000 and the Family-Friendly Company Model Certificates.

Currently, the Elecnor Group has a total of 5,652 approved suppliers: 4,877 in Spain and 775 internationally across 15 countries. In 2021, 1,988 suppliers have been approved, of which 680 (34.21%) have been proven to be aligned with environmental requirements and 22 (1.11%) with the social requirements required by the Group.

It is also worth noting that by including Scope 3 of the carbon footprint in the company, environmental performance data has been requested from certain suppliers and subcontractors, with 119 responses obtained.

The re-assessment of suppliers remains ongoing using 3 tools: surveys to assess procurement, supplier complaints and audits of critical suppliers.

The Elecnor Group has selected its critical suppliers, which represent 48% of its procurement volume, and audits them applying quality, environmental and compliance criteria. In 2021, 9 audits were conducted on critical suppliers, the result of which directly affects their approval as a major supplier. This is why the relationship with critical suppliers is ongoing.

It is worth noting that, in 2021, the Elecnor Group has not suspended its commercial relationship with any of its suppliers due to irregularities detected in both the procurement of materials and the management of services supplied.

For the purpose of maintaining optimal relations and processes with suppliers, the Group has several communication channels:

- > Fullstep (procurement platform)
 - soporteprovedores@elecnor.es
 - Manuals for suppliers
- > E-coordina (platform for the coordination of business activities)
 - soporte@e-coordina.com
 - Library for suppliers
- > Whistleblowing channel
 - codigoetico@elecnor.com
 - Apartado de Correos nº 266-48080

15.7 Committed to the environment

The commitment of the Elecnor Group to environmental sustainability is inherent to the undertaking of its activities and its business strategy. On the one hand, the Elecnor Group contributes to building a sustainable, low-carbon future through its renewable energy generation, energy efficiency, water and environmental activities; and, on the other hand, reducing its carbon footprint and undertaking appropriate environmental management.

Environmental management GRI 102-11, GRI 103-1, GRI 103-2, GRI 103-3

The Elecnor Group's General Services Area is responsible for managing the Integrated Management System, which encompasses the quality management, environmental management, occupational risk prevention, energy management, R&D&I and information security systems of all the company's organisations.

In order to monitor the areas of Quality and Environmental Management, there is a team of 101 people distributed between the General Services Area and the various organisations of the Group, both in Spain and internationally.

The principles of the Environmental Management of the Elecnor Group are set out in the Integrated Management System Policy, the scope of which was updated in 2021. These principles of action are described below:

- Incorporating environmental considerations into the decision-making processes regarding investments and execution of activities, encouraging their being taken into account in cost-benefit analyses.
- Fostering the protection and conservation of biodiversity and the natural environment, implementing the necessary measures in order to mitigate, offset and even avoid the negative impacts produced by the Group's activities, promoting those that generate positive impacts.
- Making sustainable use of resources, fostering responsible consumption, waste minimisation and the circular economy.
- To responsibly and efficiently manage water resources, based on the fully integrated cycle, nurturing social development and the conservation of ecosystems.
- Involving all stakeholders (employees, shareholders, customers, suppliers and society at large) in the joint quest for useful solutions to the challenges of preserving and developing the environment and using natural resources sustainably.

The Elecnor Group's activity is framed by its Environmental Management System and Energy Management, certified in accordance with ISO 14001:2015 and ISO 50001:2018 standards, respectively, as well as its Climate Change Strategy. The Environmental Management System defines a procedure to identify, assess and record the environmental aspects originating in its activities in order to determine which are significant and to be able to take measures on them to minimise possible impacts. Thereby, the most relevant aspects have been identified as waste generation, impact on the natural environment, use of natural and energy resources, and impact on flora and fauna.

In 2021, the company has mainly advanced in three lines of environmental action:

- Launching the Environmental Management System internationally. Elecnor Angola has been incorporated into the Group's Multisite Certificate and the implementation and alignment of the IQA and Hawkeye systems in Elecnor Mexico has continued.
- Optimising processes through the CORE tool, which encompasses the digitalisation of Integrated System processes, with the Improvement Management and Audits modules available.
- Cutting greenhouse gas emissions through adherence to the SBT (Science Based Targets) initiative. The Elecnor Group is committed to cutting Scope 1 and 2 emissions by 38% and Scope 3 emissions by 18% by 2035. The Elecnor Group's Climate Change Strategy has been updated based on these goals.

This year, multisite certification audits were conducted according to ISO standards 9001:2015 and 14001:2015. This is a single certificate for all of the organisations in the Group's infrastructures area that contains all of the scopes of the various activities and all of the work centres. Furthermore, certificates were maintained at the subsidiaries Audeca, Elecnor Deimos, Hidroambiente, Enerfín, Elecnor México, Elecnor do Brasil, Elecnor de Argentina, IQA and Montelecnor.

73% of turnover is certified in accordance with ISO 14001 standard.

The Elecnor Group has renewed the AENOR Environment CO₂ Verified Certificate pursuant to the ISO 14064-1:2018 standard, and extended the scope of the certification of the UNE-EN ISO 50001:2018 standard to the activity of rendering comprehensive operation, maintenance, conservation and energy efficiency services in water treatment systems (drinking and wastewater).

In 2021, the Group has allocated a total of Euros 4.5 million to managing environmental impacts, broken down as follows:

Activity	Investment (€)
Actions to minimise environmental impacts (climate change strategy, waste management, others)	1,446,000
Environmental awareness-raising	12,000
People dedicated to environmental activity	3,030,000
Environmental certifications	25,775
Environmental consultancy and advice	47,000
Total	4,560,775

The Elecnor Group has an environmental liability policy in force until 30 September 2022 covering the activities of Elecnor, S.A. and its subsidiaries, and the general limit of the policy stands at Euros 20 million. This policy guarantees compensation required from the policyholder for environmental damage, pursuant to the terms established therein.

The fight against climate change GRI 103-1, GRI 103-2, GRI 103-3

The Elecnor Group actively and decisively contributes to building a low-carbon society. Climate change is a challenge on which the company has been working for years by undertaking various initiatives that have a positive impact on reducing its environmental footprint:

- Calculating its carbon footprint in accordance with internationally recognised standards and implementing actions to reduce GHG emissions within the scope of its activity.
- Verifying, for the seventh consecutive year, the inventory of greenhouse gas emissions pursuant to the ISO 14064-1 standard.
- Obtaining the "Calculo y Reduzco" seal awarded by the Spanish Office for Climate Change (OECC).
- Taking part for the fourth consecutive year in the Carbon Disclosure Project (CDP).

In 2021, the Group continued progress in its commitment to decarbonisation by joining the SBT (Science Based Targets) initiative. This initiative identifies and fosters innovative approaches to setting science-based corporate emission reduction targets.

Climate change strategy GRI 201-2

The Elecnor Group has conducted a strategic diagnosis of adaptation to climate change, in order to identify opportunities and risks in that connection. The analysis of opportunities concludes that Angola, Brazil, Spain and Mexico are the countries that have the best opportunities in the electricity, power generation, construction, environment and telecommunications businesses. As regards risk analysis, business lines focusing on power grid and wind energy concessions are most affected, with those located on the American continent presenting the highest levels of climate risk.

Owing to the results obtained from the diagnosis, the Elecnor Group designed its 2030 Climate Change Strategy, which established greenhouse gas emission reduction targets that were reached between 2019 and 2020.

Following the Group's adherence to the Science Based Targets (SBT) initiative, the Climate Change Strategy for 2035 has been revised.

SBT is an initiative led by CDP, United Nations Global Compact, the World Resources Institute (WRI), the WWF and We Mean Business, in order to help companies set ambitious science-based climate targets in order to cut greenhouse gas emissions and limit global warming to below 2°C, taking advantage of opportunities during the transition to a low-carbon economy.



The new Strategy is structured into four overall areas of action: Governance, Strategy, Risk Management, Metrics and Targets, included in three cross-cutting lines: People, Assets and Knowledge, seeking to align with best disclosure practices in line with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). The TCFD's goal is to foster the quality of financial reporting on the potential impacts of climate change with a view to improving the ability of investors to assess climate-related risks and opportunities.

The new Climate Strategy will contribute to ensuring lower costs and, at the same time, more effective responses to climate change. Similarly, it is set to be the basis for a profitable and growing business, making the Elecnor Group a strong, competitive and sustainable company. The Group's resilience to climate change will be defined by its ability to address the risks and take advantage of the opportunities arising from this phenomenon.

The 2035 Climate Change Strategy, establishes the framework for all the Group's actions to reduce greenhouse gas emissions, adapt to climate change impacts and tap into the associated opportunities. Therein, the Elecnor Group establishes the commitment to cutting Scope 1 and 2 emissions by 38%, and Scope 3 emissions by 18% by 2035. This endeavour will enable work to be carried out along four lines of action:

- Fuels:
 - Renewing the fleet for more efficient and less carbon-intensive vehicles.
 - The most sustainable fuels will be analysed for the changeover, according to the country.
- Renewable energy:
 - Procuring 100% renewable energy electricity by 2035 internationally.
- Value chain:

- Setting up a collaboration programme with the main suppliers as regards carbon, focusing on obtaining primary information and subsequently accompanying them on their reduction path.
- Risk management:
 - Managing the short, medium and long-term risks and opportunities linked to climate change.
 - Establishing an internal carbon price as a tool to support the integration of climate aspects within the company.

In 2022, once a GAP analysis has been conducted in order to determine the starting point with respect to the TCFD recommendations, the Group will focus on formalising the processes for monitoring and controlling climate risks and opportunities in order to secure business continuity and management support.

Similarly, it will also advance in formalising the processes for assessing and quantifying the financial impact associated with the climate risks and opportunities identified in the short, medium and long term, to enable this analysis to be used as a useful tool in the associated management processes.

Monitoring, evaluation and review of the climate change strategy for 2020

GRI 302-4

Below is a description of the main results obtained in 2020 according to the document "Monitoring of the Elecnor Group's Climate Change Strategy", finalised in July 2021.

Strategic line	Investment (€)	Shares	Emissions avoided tCO ₂ e
Fuel and energy	817,612.98	<ul style="list-style-type: none"> > Conference calls encouraged to avoid journeys. > Giving courses in efficient driving practices. > Acquiring sustainable and efficient vehicles. > Acquiring sustainable and efficient machinery and tools > Acquiring efficient tools (computers, tablets, etc.) > Improvements in renewable energy generation facilities and the acquisition of green power. > Installation of timers for electronic devices and automatic off switches. LED 	2,987.32

		lighting to replace existing fixtures.	
		> Controlling air-conditioning.	
Water	58,614.96	> Developing a plan to reduce water consumption.	2,223.81
		> Implementation of awareness campaigns.	
Paper	3,500	> Developing a plan to reduce paper offices.	41.46
Total	879,727.94		5,252.61

Emissions GRI 305-1, GRI 305-2, GRI 305-4, GRI 305-5

Carbon footprint

Each year, the Elecnor Group calculates its carbon footprint pursuant to international standards using a tool that enables each organisation in the Group to report the consumption data associated with Scopes 1, 2 and 3.

In February 2021, the Elecnor Group verified greenhouse gas emissions in accordance with UNE ISO 14064-1 standard, linked to the direct and indirect emissions relating to its activities. Within the framework of carbon footprint registration, offsetting and CO₂ absorption by the Ministry for Ecological Transition (MITECO), the Group also renewed the "Calculo y Reduzco" seal granted by the Spanish Office for Climate Change (OECC). This seal acknowledges the calculation and verification of GHG emissions and recognises the Elecnor Group as one of the organisations to effectively reduce its carbon footprint for more than 4 consecutive years.

This seal acknowledges the calculation and verification of GHG emissions and recognises the Elecnor Group as one of the organisations to effectively reduce its carbon footprint for more than 4 consecutive years. In 2021, it upheld the score of A- achieved in 2020, a score that positions the Group yet again at the highest level in terms of sustainability, adaptation and mitigation of the impact of climate change.

In 2021, the Elecnor Group's carbon footprint was 63,959 tCO₂e for Scope 1 and Scope 2 (57,070 in 2020). Factoring in Scope 3 emissions, deriving from the value chain both upstream and downstream, the Group's total emissions amounted to 360,416 tCO₂e (214,181 in 2020).

Emissions (t CO₂e) GRI 305-1, GRI 305-2, GRI 305-3

Scope	2020	2021	Changes (%)
Scope 1			
Stationary and mobile combustion*	53,394	61,721	15%
Scope 2			
Consumption of electricity	3,676	2,238	-39%
Scope 1 & 2 totals	57,070	63,959	12%

Scope 3**	157,111	296,457	89%
Total	214,181	360,416	68%

*Fugitive emissions were counted, but not reported since they are only reported every three years due to their representing less than 1% of the total carbon footprint.

** Scope 3 emissions for 2020 come from an in-depth study of all the relevant categories and they are not verified.

Scope 3 of the carbon footprint refers to processes associated with the Elecnor Group's value chain, but which take place in sources that do not belong to it and which it does not control. The categories are calculated according to the "GHG Protocol Corporate Value Chain (Scope 3) Standard". This protocol classes Scope 3 emissions into 15 subcategories. Those applicable and relevant to Elecnor are as follows:

- Supply chain (procurement of products and services).
- Capital goods (reported in conjunction with supply chain).
- Life cycle of fuels and energy consumed.
- Transport and distribution of goods (upstream).
- Management of waste generated.
- Business travel by air, train and car (private, rental and taxi), in addition to stays at hotels.
- Employee commuting to and from the workplace.
- Leases (downstream).
- End of life of products sold.
- Investments.

Scope 1 emissions have increased by 15% compared to the previous year, due to an increase in activity in Chile which mainly resulted in a rise in fuel consumption.

Meanwhile, more Group organisations have committed to using electricity from renewable sources in Spain, which has led to a 39% reduction in Scope 2 emissions.

At 2021 year-end, for Scopes 1 and 2 the ratio of emissions generated per hour worked was 1.75 kgCO_{2e}/hour, 6% down on 2020 (1.86 kgCO_{2e}/hour). Nevertheless, taking 2014 as the basis for comparison, the ratio has clearly improved, having fallen by 29% (2.4 kgCO_{2e}/hour in 2014 vs. 1.75 kgCO_{2e}/hour in 2021).

Scope 3 emissions account for 82% of total emissions.

Scope 3* emissions	2020*	2021	Changes (%)
Acquisition of goods and services and capital goods	124,859	252,090	102%
Energy-production-related activities (not included in Scope 1 or 2)	14,207	11,197	-21%
Upstream transport and distribution	2,151	1,552	178%
Waste generated during the operation	732	3,321	354%
Work trips	6,233.6	7,677	23%
Home-work-home commuting of employees	3,392	13,937	311%

Assets leased by the organisation	360	1,502	318%
Waste deriving from products sold by the organisation	72	77	5%
Investments**	5,104	5,104	0%
Total	157,111	296,457	68%

* Scope 3 emissions for 2020 come from a detailed study of all relevant categories and are not verified.

** The investments correspond to Celeo.

It is worth highlighting the partnership with the Spanish Quality Agency (AEC) in the Climate Change task force, exchanging experiences and generating useful documentation for all the AEC's members and partners. The matters addressed relate to actions to combat climate change (carbon footprint, energy efficiency, decarbonisation, etc.) and related legal developments.

Offsetting emissions

The Elecnor Group has several programmes in motion to offset emissions through reforestation. In particular, it is worth mentioning the programme launched by Elecnor do Brasil consisting of planting Atlantic forest seedlings as part of the Green Initiative's Carbon Free Programme. The planting began in December 2020 and will offset 30% of the carbon footprint in 2019.

Mitigation through activities. Emissions avoided

The Group's power generation activity using renewable sources avoids the emission of greenhouse gases. The company undertakes projects in the areas of wind, solar PV and solar thermal power, hydroelectric and biomass plants.

By means of its Concessions Business, the Group has holdings in 1,700 MW of renewable energy facilities in operation and construction in Spain, Brazil, Canada and Colombia (1,694 MW in 2020), broken down as follows:

Renewable energy (MW)	2020	2021
Wind energy	1,349	1,335
Solar thermal energy	150	150
Solar PV energy	195	195
Total	1,694	1,700

As part of its commitment to diversification, the Group's wind power subsidiary Enerfín, is implementing innovative projects that include, among others, the hybridisation of wind energy and photovoltaic energy and storage, or generation, storage and supply of green hydrogen. In an initial phase, these projects are centred in Spain in light of the new regulation (Royal Decree Law 23/2020) and the National Recovery and Resilience Plan.

This kind of project responds to the need to decarbonise the economy, enabling, on the one hand, greater penetration of renewables in the electricity system (hybridisation, storage); and, on the other hand, reaching sectors with high emissions such as heavy goods transport or cogeneration. Along these lines, the administrative processing of two hybridisation projects and an innovative green hydrogen production project began in 2021. In particular, through its subsidiary Renovables del Cierzo, S.L., it has started to process the solar wind hybridisation projects of the Corral del Molino I and El Montecillo wind farms, with an installed solar power of 3.4 and 6.2 MWp respectively.

It is worth highlighting that the Elecnor Group sent 5,986,189 tonnes of waste to clean points in 2021, and that the generation of renewable energy at Enerfín reached 3,064,060 MWh in 2021.

The table below shows the greenhouse gas emissions that were avoided as a result of the two abovementioned initiatives.

Initiatives	Emissions avoided (tCO ₂ e)
Waste management on clean points	22,115
Renewable energy generation	1,367
Total	23,482

Source: prepared by the authors using a comparison with a trend scenario. The equivalent in tCO₂e has been calculated by comparing the avoided emissions using a trend scenario, in other words, what the associated emissions would have been if the waste had not been processed at a clean point or if the energy had not been generated from renewables.

Below are some of the most significant renewables projects awarded in 2021:

Wind energy

Spain

Cometa I and II wind farms, 64 MW
 Solans wind farm, 50 MW
 Loma de los Pinos wind farm, 40 MW
 Barroso wind farm, 22.5 MW
 Cantadal and La Serma wind farms, 20 MW
 Expansion of Gecama wind farm, 16 MW

International

Cajuina II wind farm, 312 MW, Brazil
 Sao Fernando IV wind farm, 85 MW, Brazil
 WESP wind farm, 10 MW, Colombia

Solar PV energy

Domestic

Brovales solar PV farm, 250 MW

International

Casablanca solar PV farm, 239 Mwp, Brazil
 Esperanza solar PV farm, 90 MW, in Dominican Republic
 Rio do Peixe I e II solar PV farm, 70 MW, Brazil
 Cedro & Caoba solar PV farm, 26 Mwp, Panama

Consumption management GRI 103-1, GRI 103-2, GRI 103-3

Energy consumption GRI 302-1

In 2021, energy consumption totals 712.46 TJ, 10% down on the previous year (788.41 TJ).

It is worth highlighting that 100% of the electricity consumed by the Elecnor Group's facilities in Spain in 2021 comes from renewable sources.

The various energy consumptions are presented below:

Energy consumption (TJ)

	2020	2021
Natural gas	0.13	0.21
Diesel	29.24	48.41
Petrol	54.14	21.49
Gas oil	479.75	507.01
Biodiesel	156.41	0.13
Electricity	64.23	65
Non-renewable source	43.42	31.87
100% Renewable source	20.65	33.12
Other fuels	4.51	5.22
Total	788.41	647.47

Note. All the electricity consumed by the Elecnor Group's facilities in Spain in 2021 comes from 100% renewable sources.

Energy efficiency initiatives

Energy management is one of the Group's areas of activity Elecnor is certified as an Energy Services Company (ESC), empowering it to develop projects to boost energy efficiency in street lighting, buildings and facilities. At present, Elecnor manages 267,869 street lights in 90 Spanish municipalities.

Meanwhile, internally, over the course of 2021, a number of energy-saving and energy efficiency actions were implemented, most notably:

- Fleet renewal, including new hybrid vehicles in the organisation.
- One-off modifications to the facilities at water treatment plants to reduce electricity consumption, installing more energy-efficient machines.
- Conference calls encouraged to avoid journeys.
- Courses in efficient driving practices to drivers of vans and heavy vehicles.
- Installation of timers for electronic devices and automatic off switches.
- Replacement of existing lighting with low-consumption LED lighting (offices, wind turbines in some wind farms, etc.).
- Implementation of a "PaperCut" user register for the offices' main printers, in order to keep better control of printing by each user and minimise the number of print-outs.

- Installation of photovoltaic solar panels in one of the warehouses of the North-Eastern Regional Office.

Sustainable financing GRI 201-2

The Elecnor Group has restructured its long-term financing sources, which are now sustainable.

In that regard, the company **renewed its Syndicated Financing Contract**, arranged in 2014, previously renewed in 2015, 2016, 2017, 2018 and 2019 enabling successive extensions of the maturity and improved conditions. This latest novation extends the maturity until September 2026 and has been executed by Santander (Agent), Caixabank, Abanca, BBVA, Kutxabank, Sabadell, Barclays, Société Générale, Unicaja, Crédit Agricole, Banco Cooperativo and Bankoia.

This financing complies with the requirements laid down by the Sustainability Linked Loan Principles and, therefore, it has been classified as sustainable.

Furthermore, the Group signed three long-term private placements totalling Euros 100 million:

- 50 million at 10 years, in sustainable loan format, coordinated by Banca March.
- 20 million at 10 years, which additionally fulfils the Green Loan Principles, as the funds are used for projects classified as green, executed by ICO and with Banco Sabadell as coordinator.
- 30 million at 14 years, in the form of a sustainable bond issued in the MARF, with an Elecnor Group rating (investment grade; BBB-, issued by Axesor) and structured and placed by Banco Sabadell.

The new funding facilities will contribute to the intention to boost Sustainable Development Goal 13 "Climate Action" of the United Nations Global Compact, by encouraging the development of sustainable and environmentally friendly projects.

Consumption of renewable energy

The electricity consumed by the Elecnor Group's facilities in Spain in 2021 comes from 100% renewable sources.

Celeo in Brazil generates photovoltaic energy for its own consumption at its maintenance base in Uberlândia. Similarly, Celeo in Chile has photovoltaic panels at the new Atacama maintenance base, with an estimated generation capacity corresponding to 92.8 kWh/day (2,783 kWh/month).

Water consumption GRI 303-1, GRI 303-2

The Elecnor Group's water consumption as a result of its activities is as follows:

- Own consumption. Water used in the facilities and to conduct the Group's various activities.
- Water treatment for customer. Water captured from waste water treatment facilities or water supply services, or discharged water from treatment plants operated by Elecnor and processed to attain human consumption quality or a degree of treatment as established by law.

The Elecnor Group deems the water footprint to be a material issue with low criticality and that it does not generate a significant impact on the water resource in the undertaking of its activities. However, it is aware of the importance of this limited resource and that some of its activities are performed in areas where there is a high risk of water stress. Therefore, it drives initiatives to reduce and optimise the consumption of this resource.

Similarly, the environmental administration establishes preventive measures to curb possible effects on river ecosystem species and other bodies of water, as well as to fulfil the environmental flow regime and the technical requirements laid down by the administration itself. The processes that ensure compliance with water collection and discharge requirements are part of the environmental management systems that the company implements, verifies and certifies pursuant to the international standard ISO 14001.

Through the Environmental Management System, the Group identifies its own water consumption as a non-material environmental aspect. Even so, the possible impacts related to water consumption in the activities conducted are assessed and monitored at the permanent facilities and in the works executed. This monitoring is conducted through:

- Monitoring of consumption
- Identification and compliance with legal requirements
- Standard environmental management procedures
- Location of areas at high risk of water stress (WRI)

The control mechanisms are related to the implementation of good practices in order to encourage cutting consumption to a minimum.

Initiatives to reduce and optimise water consumption are described below:

- Conducting awareness campaigns related to water saving.
- In Angola, a rainwater harvesting system was built for an (alternative) tank and the normal intakes were replaced with pressure or sensor intakes.
- Continuing to measure consumption and assess annual results for the purpose of planning targets for improvement and reduction of consumption.
- Several initiatives have been implemented in the AH Natchigal project (Cameroon), including a method for harvesting rainwater at various points in the project's life base. The stored non-drinking water can be used for watering gardens, vehicle cleaning or other possible needs.

Moreover, the company ensures compliance with all legislation in the areas where it performs its activities. The Elecnor Group avoids collecting water in areas of high water stress where it operates.

GRI 303-3, GRI 303-5	2020	2021
Mains water consumption (hm ³)	0.094	0.102
Water consumption in areas of high water stress (hm ³)	0.057	0.043
Water consumption in areas without water stress (hm ³)	0.037	0.059

Note. Water-stress areas have been identified using the "WRI Aqueduct 2019" database, specifically areas of "high" or "extremely high" water stress.

While total water consumption has risen in 2021, water consumption in areas of water stress has decreased.

The Elecnor Group ensures compliance with legislation, which guarantees that the discharges conducted are within the limits stated in the corresponding authorisations or permits. Thus, no anomalous circumstances have been detected that could significantly affect water resources and related habitats.

Other consumption

The Elecnor Group uses the following raw materials: steel, cables, insulators, electrical panels, cells, pumps and pipelines. The company currently implements initiatives to recycle and re-use some of these, such as cables and steel.

Waste management GRI 306-1, GRI 306-2

The Elecnor Group's Environmental Management System includes the protocol for managing waste generated in order to ensure adequate protection of people's health and the environment, as well as compliance with applicable legislation. The waste generated is treated in accordance with current legislation for authorised management, seeking the best available techniques for recycling, wherever possible. Moreover, in 2021 the company generated a total of 38,012 tonnes of waste (32,981 tonnes in 2020), 75% of which was recovered (re-use, recycling, soil treatment or other means) (73% in 2020).

The Elecnor Group also contributes to waste recovery by managing municipal recycling centres and recovering silt at the water treatment plants (WWTP and DWTP) it manages.

Below are details of the amounts of waste generated in its operations:

Waste generation by type	2020	2021
Hazardous waste	713,193	397,436
Non-hazardous waste	32,267,427	37,614,204
Total	32,980,620	38,011,640

GRI 306-4, GRI 306-5

	Hazardous waste (Kg)	Non-hazardous waste (Kg)
Waste not destined for disposal	127,097	28,327,827
Reuse/Preparation for reuse	22,868	6,910,599
Recycling	17,000	11,749,117
Other recovery operations	87,229	9,668,110
Waste destined for disposal	270,339	9,286,377
Incineration (with energy recovery)	342	64,220
Incineration (no energy recovery)	9,568	37,100
Transfer to landfill	211,639	9,050,489
Other elimination operations	48,790	134,569
% Destined for recovery	75%	
Total	38,011,640	

Other initiatives

Certain major initiatives implemented to prevent waste generation (recycling, reuse, etc.) are described below.

Celeo continued with the "Celeo Recicla" (Celeo Recycles) campaign which is aimed at fostering separation and recycling at work centres by providing separate bins, placing information signs and conducting awareness campaigns.

Enerfín is committed to circular economy initiatives, which can be highlighted with the increasing repowering of old wind farms and the consequent dismantling of existing wind turbines. Along these lines, Enerfín is taking part in a business partnership project with AIN Circular Platform, whose aim is to develop a circular economy strategy to integrate it into management, and to provide a collaborative approach between the participating companies. The subsidiary Atersa has improved the efficiency of photovoltaic panels marketed in year 2021. Here, efficiency means the amount of Watts used in a solar panel expressed in W/m². This improvement entails fewer product units needed to achieve the same installation power, resulting in reduced waste generated.

Environmental awareness

The Elecnor Group involves its employees and all other stakeholders in environmental awareness programmes and campaigns.

Some of the most notable initiatives include:

- Helping to Help competition. In order to acknowledge and promote projects by non-profit organisations that contribute to improving natural heritage through biodiversity protection, the preservation of environmental quality and ecosystems, the sustainable use of natural resources and combating climate change, the Elecnor Group launched the first call for entries for this competition, with a prize of Euros 12,000.

The Sustainability Committee selected the three finalist projects (Fenix, Recicla + and La Mar de Limpio) from among the six candidates. The employees chose the winning project through the Buenos Días Elecnor intranet: "*La Mar de Limpio: de ti depende*" (Clean sea: its down to you), an environmental volunteer project by Fundación Oxígeno to clean seas and beaches.

- Climate Action Day. As part of this celebration, internal and external communications were sent to raise awareness around the Elecnor Group's participation in building a sustainable, low-carbon future.
- *Calculo y Reduzco* (I calculate and reduce). Through the renewal of the Calculo y Reduzco seal, internal and external communications were sent to reinforce the message that the Elecnor Group is an organisation committed to reducing its carbon footprint.
- In the context of the SE Jurupari project by Elecnor do Brasil, various awareness-raising campaigns were conducted in World Environment Week with the river community of Praia Verde, close to the project, on forest preservation, composting and artisan production using reusable wooden pallets.
- "*No hay excusas para no reciclar*" (No excuses for not recycling) awareness campaign. The environmental department of Algete Council, in collaboration with Audeca, continues with the public awareness campaign to encourage residents to recycle and use each container correctly. The Council seeks to raise awareness around the

importance of recycling using an audiovisual campaign, on the internet and social networks.

- Similarly, in Santa Margalida Council (Spain) another awareness-raising campaign has been conducted by Audeca, where besides carrying out a selective collection of household waste fractions, it has raised awareness door to door on the best waste separation practices.
- Environmental awareness and information programme on renewable energies, conducted at the Cofrentes wind farm, seeking to raise awareness among the region's population and stakeholders around respect for the environment, its conservation and protection. In particular, an environmental and renewable energy awareness day was held at the Cofrentes wind farm for children aged 9, 10 and 11 from the Maestre Caballero school in Cofrentes.
- The PAREP Project by Green Light Contractors is conducting an awareness-raising programme involving the public. In this case, the scout group of Port Augusta, a town close to the project, regularly removes packaging waste, obtaining a contribution for this removal, which they then use for materials for their activities.
- Environmental awareness campaign to improve the management of hazardous waste at wind farms.
- Delivering glass bottles to employees to reduce the use of plastic bottles and cups.
- Undertaking various initiatives in the offices to recover waste and foster the circular economy: selective collection and recovery of masks in order to obtain fuels and lubricants, and collection of coffee capsules and coffee grounds to make catering utensils, buckets and flowerpots, as well as agriculture fertiliser.
- Undertaking various initiatives in the works for the recovery of waste or materials and fostering the circular economy (the projects AH Nachtigal (Cameroon), Brovales Clúster (Spain), Forest Line (Finland): donation of surplus wood or materials to local companies to be used for other purposes.

Management of biodiversity and protection of the natural environment

GRI 103-1, GRI 103-2, GRI 103-3, GRI 304-1, GRI 304-2, GRI 304-3

The Elecnor Group's human-induced impact on bioversity refers to the potential effects on flora and fauna due to disturbances, loss of habitat and even loss of species. The Group identifies and assesses this impact from all its activities, either for legal compliance or at the own initiative of the organisation or its customers. As a result, it undertakes activities and measures that reduce the impact on biodiversity to a minimum or even generate a positive impact on biodiversity.

Some of the mitigation actions conducted in 2021 to minimise and limit the impact on biodiversity are described below:

Related to fauna conservation

- Photovoltaic solar plant Fotón I-II-III (Manzanares, Ciudad Real). The declarations request the development of environmental proposals to integrate the works and improve the habitat of fauna (lesser kestrel, owl and steppe-land birds). To that end, the company has conducted interior and perimeter planting, landscape integration measures and actions to increase the populations of kestrels and owls.

- Baza – Caparacena 400 kV Transmission Line Project (Spain). A conservation programme for birds of prey is being conducted using biological recovery periods, following the survey on fauna and the installation of deterrents in a critical area for the conservation of birds of prey living among the rocks.
- Guajira I wind farm (Colombia) In order to reduce the impact on wildlife to a minimum as a result of the works, a fauna management programme has been undertaken that includes measures to repel, rescue and relocate vertebrate fauna found in the area under the jurisdiction of the wind farm works. The programme also features staff training on interactions and management of fauna and potential risks.

Other complementary strategies were also developed, such as daily grazing of vertebrate species of medium to high mobility (e.g. goats and sheep) to maintain the current vegetation, training project staff on the care and protection of biodiversity and ecosystem services, in addition to designing and developing 20 double-sided informative and preventive signs, both in Spanish and Wayuunaiki, to reduce the number of accidents and deaths of wildlife and domestic species.

- Llanos del Viento wind farm project (Chile). Actions have been taken to prevent contingencies and emergencies related to the risk of wildlife being run over.
- Enerfín's Ribera de Navarra wind farms (Montecillo, Corral I, Corral II, and Vollandín). Actions have been implemented to avoid affecting steppe-land birds.
- Enerfín's Aerosur wind farm (Spain). Environmental monitoring during the operating phase, meaning specialised monitoring in detecting birds and shutting down wind turbines that could pose a risk to them.
- PATE- LT230 kV Oriximiná-Juruti-Parintins e Subestações Associadas (Brazil). Various mitigation and compensation actions are being conducted, such as the rescue of plant germplasm, the fauna rescue programme, the raptor conservation programme and the environmental education programme for workers.

Related to flora conservation

- Complexo Solar Fotovoltaico Lar do Sol (Brasil) – Casablanca. Mitigation measures are conducted, such as rescuing plant germplasm and the programme for scaring, managing and rescuing fauna.
- New England Solar Farm (Australia). The project has a Biodiversity Management Plan conducted by specialists, with measures such as marking sites identified as habitats of interest for diversity in order to avoid altering or removing them without proper supervision by a specialist.
- Coromuel wind farm (Mexico). During the construction of the project, shredding and composting is being conducted. This is considered a good practice for the generation of substrates rich in vegetative material and germplasm, which are subsequently used in reforestation activities in areas impacted by the project's various activities.

The Elecnor Group develops wind power projects through its subsidiary Enerfín. In the pre-operational (construction) phase, exhaustive environmental impact studies are conducted in agreement with the administration and lasting at least one year, for the purpose of characterising the bird species and populations existing in the area and their behaviour in the different seasons (identifying nesting and roosting areas, determining flight heights, etc.). The findings of these studies are crucial for the project's viability.

Once the facility enters operation, the concessionary subsidiary conducts birdlife monitoring plans, in addition to various checks for the conservation of ecosystems existing in the project area, reporting the data from this monitoring to these administrations in due course.

Restoration projects conducted in 2021. The most important ones are described below:

- Restoration of Lake Yaoundé (Cameroon). The purpose of this project is to carry out Phase One of the Project for the Tourism and Economic Development of the Municipal Lake and Development of the Mingoa Valley in Yaoundé on behalf of the Urban Community of Yaoundé, in the Republic of Cameroon.

This initial phase includes the cleaning and sanitation of the lake, reinforcement of the banks, purification of the lake water and waste water from the buildings erected or to be erected in the vicinity, construction of restorative water lily area, the development of paths, trails and car parks around the perimeter of the lake, the urbanisation and/or restoration of green spaces around the lake.

- Restoration project of the Zapardiel river as part of the integrated project Life16 IPE/ES/019 (Spain). The project consists of the fluvial restoration of 70 km of the Zapardiel river.

This development is included among the actions of Life IP-RBMP Duero, a project that will enable the management of water resources of the Duero river basin through innovative, sustainable, participatory solutions that can be exported to the rest of the river basins.

- Reforestation work on the SA DUAIA public estate (Artá-Mallorca) for Endesa (Spain). This initiative is part of the Endesa Forest initiative, which endeavours to contribute to the restoration of degraded and burnt land in Spain by planting and sowing native forest species, thereby contributing to absorbing greenhouse gases from the atmosphere and regulating the local climate.
- 56 MW Coromuel wind farm. The reforestation activities include the propagation and germination of endemic flora for the project. Its goal is to conserve the biological diversity of the ecosystem and sustainable management, seeking to repopulate the areas affected by the ongoing civil and electromechanical construction work on the project.
- PAREP (Australia). A rehabilitation plan has been implemented to start revegetating the areas once the construction works have been completed. The plan consists of trialling the planting of small areas with native Australian seeds of plants that grow in the area and, depending on the results of the trial, finalising the plan for the entire 60 ha site.

The purpose of the site restoration and rehabilitation work is to return the disturbed areas to a functional ecosystem that can once again support grazing. Restoration and rehabilitation activities on the disturbed areas will be conducted in stages as the construction works progress.

At Celeo, the main biodiversity impacts identified of the activity of the electricity transmission lines in Brazil and Chile include, but are not limited to, the stifling or loss of vegetation, disturbance of fauna due to noise and dust, and the alteration of rainwater. The impacts are managed through an environmental impact assessment that defines mitigation, repair and compensation measures. The mitigation of impacts relating to the operation of electricity distribution lines is achieved through the optimisation and reduction of interventions to the minimum necessary, as well as the environmental regeneration of the areas affected.

Furthermore, the Elecnor Group includes projects located in or near protected areas of great value, the information on which is set out in Appendix I of this report.

Similarly, the Group and its subsidiaries also monitor species that appear on the International Union for Conservation of Nature (IUCN) Red List and on national conservation lists whose habitats are in areas affected by the organisation's operations, by level of risk of extinction. Appendix I of this report lists the projects that conduct this monitoring.

15.8 Technology and innovation

The digital transformation in the Elecnor Group: processes, technology and people

The strategic project on Digital Transformation addresses the design, digitalisation and deployment of an innovative management model seeking to improve processes, operational efficiency, cultural change and competitiveness.

Along these lines, the Elecnor Group has developed a transversal technological innovation process for management that is now in a mature phase.



The now-consolidated Digitalisation Office is the driving force behind this innovation and is in charge of providing it with a structure, method and a governance model that is responsible for fulfilling the goals set and measuring progress using two complementary indices: the Digital Development Score and the Implementation Rate.

Through various initiatives, the Digitalisation Office coordinates the progress of innovation in processes, technologies and people. Each initiative involves the required number of people within the organisation to reach a decision on which process to implement and the most suitable IT medium.

The decisions adopted are assessed by the Digital Transformation Committee, which includes representation from all areas of the company and contributes a transversal business approach.

Achievements 2021

- The initiatives implemented obtained a Digital Development Score (DDS) of 96.23% and an Implementation Rate (IR) of 95.43%.
- Progress in the digitalisation of transversal and business processes: procurements management, fleet management, financial reporting, various spheres of occupational risk prevention, consolidation of financial statements, insurance management, estimated closures, clocking in, document management, overseeing of major construction projects, framework agreement management, time sheets, CRM, etc.
- Deployment and adoption throughout the Group of the different processes and their applications. 40 deployments have been conducted in 13 countries.

- Increased levels of involvement: +3,000 participants, +6,000 users, +7,000 third parties, 600 working sessions, +80 training sessions and 19 committee meetings held.
- Dissemination sessions and internal case studies on applications have been initiated, obtaining the following results of interest:



Information security GRI 103-1, GRI 103-2, GRI 103-3

In 2021, the Elecnor Group has included the information security aspect in its Integrated Management System, as well as in the Integrated Policy. Furthermore, the Information Security Management System has been certified pursuant to the ISO 27001 standard. Through this system, security measures are conveyed in order to reduce the possibility of threats materialising and to ensure that the security incidents detected are resolved as soon as possible to prevent them from affecting the information processed or the services provided by the Elecnor Group.

Cybersecurity continues to be a relevant area for the company as a result of, on the one hand, the increase in attacks on companies in the most digitalised economies, and on the other, the greater need for connectivity in companies as a result of the pandemic, which has occasionally generated greater risk and vulnerability of systems.

In that regard, the Elecnor Group has undertaken the following projects:

- Start of the International Cybersecurity Plan.
- Implementing secure Wi-Fi and other projects seeking to guarantee security in facilities and plants (OT).
- Awareness and training to the entire workforce, crucial to maintain a high degree of protection against external threats.

Tackling COVID-19 by means of the digital transformation

From a technology standpoint, managing the pandemic in 2020 was a major challenge that was successfully overcome and which is ongoing this year in terms of guaranteeing the continuity of employees' work in tasks that can be carried out remotely.

In that regard, the difficult circumstances arising from COVID-19 have facilitated the digital transformation process and have considerably accelerated the adoption of digital habits in the Group. These include video conferencing, which remained at around 20,000 per month in 2021.

Similarly, the Group has a Contingency Plan encompassing the possible circumstances that might affect the availability of information systems, such as power outages, internet and server failures, impossibility of accessing buildings, etc.

Innovation and new business opportunities

Innovation in the Elecnor Group contributes greater added value to the services it provides to its customers with the guarantee of sustainability, competitiveness and differentiation of the company.

The Group's main strategic lines of RDI target the following areas of activity. Elecnor, S.A. and its subsidiary Audeca are currently certified in accordance with UNE 166002 standard.

The Group's main strategic lines of RDI target the following areas of activity:

Infrastructure	Energy	Facilities
<ul style="list-style-type: none"> Railway Electricity transmission/distribution Gas transmission/distribution Roads Construction and building solutions 	<ul style="list-style-type: none"> Renewable/conventional generation Substations Energy storage systems Hybrid fossil fuel + solar PV systems Biomass Construction solutions Improvements in efficiency, O&M and management of generation plants 	<ul style="list-style-type: none"> Electrical installations Energy services Safety Buildings and large facilities (ports, airports, industry, hospitals, etc.) Construction solutions <i>Smart cities</i>
Environment	Water	Singular projects
<ul style="list-style-type: none"> Management and treatment of waste and waste-to-energy Carbon capture systems (CCS) Soil decontamination Improvements in efficiency, O&M and management of plants 	<ul style="list-style-type: none"> Systems for desalinating sea water and brackish water Waste water treatment systems Drinking water purification systems Water transport and distribution networks Improvements in efficiency, O&M and management of plants and water networks 	<p>Development of projects in which innovation provides a significant qualitative leap</p>

Achievements 2021

- Maintenance of UNE 166002 certification for RDI Management Systems of Elecnor, S.A. and Audeca.
- Launch of INNOVA 2021 call for proposals for RDI project funding.
- Development of projects for the hybridisation of wind power with photovoltaic energy and studying the possibility of integrating a storage system in hybrid farms.
- The production of renewable hydrogen is being promoted —through the subsidiary Enerfín— as a vector towards ecological transition and decarbonisation.
- Integration of circular economy criteria into wind farm components, mainly turbine blades.
- Collaboration agreement with two hydrogen production technology manufacturers: Fusion Fuel and Ohmium.
- Design and manufacture of an auxiliary metal structure for assembling lighting on high-rise towers.
- Approval of three projects with the participation of the Group's technological subsidiary, Elecnor Deimos, within the scope of the EU's European Defence Industrial Development Programme (EDIDP). These projects are intended to develop new techniques for observing objects in Earth orbit, a command and control system for space defence systems and to outline a space system for the early detection of intercontinental ballistic missiles.
- Approval by the Provincial Council of Bizkaia of two innovative projects in the HAZITEK call for proposals: Genio Project in the Railway Department and QR Project for the activity of industrial plants.
- Training of staff for site and construction managers, tender and BIM personnel for lean construction.
- In 2021, the total figure of expenditure on all the Group's R&D&I projects amounted to Euros 6.3 million.

Innovation projects

In the year, the Elecnor Group was involved in a huge number of innovation projects that, in many cases, it performs in collaboration with various universities and technological centres and institutes, such as Railway Innovation Hub, University of Valladolid, Madrid's Polytechnic University, University of Burgos, ICAI Institute of Technological Research, CENES in France, UKSA in the United Kingdom, POLSA in Poland, CENER (National Renewable Energy Centre); the company Tekiner or aerospace agencies such as Spain's Institute of Aerospace Technology (INTA) and Tecnalía, among others.

Highlighted projects

Green Hydrogen Project

This project by Enerfín, the Group's wind power subsidiary, endeavours to design, develop, implement and validate a 1 MW green hydrogen generation, storage and supply plant (Green

H2 Langosteira) for subsequent use in heavy goods transport, public transport fleets and industrial use.

The green hydrogen produced will be used to supply a plant that currently consumes natural gas.

The project involves various partners and has been submitted to the Ministry for Ecological Transition and Demographic Challenge.

Enerfín is partnering with Spain's National Hydrogen Centre (CNH2), whose highly qualified staff specialise in the design and optimal sizing of hydrogen facilities.

SIGIDEL Project

The goal of this project is to implement an advanced electrical supervision and control system for an aerial installation. It endeavours to develop the necessary technology to provide facilities of these characteristics with a series of systems at the cutting edge of technology that fulfil the conditions for the correct management of the facilities in real time.

The purpose is to study and develop new SCADA modules, with a view to improving the current contingency criteria between the supervision systems between buildings, as well as the implementation of the different peripherals, remote units, communication systems, application software, etc. of the SCADA system (control, supervision and data acquisition system), comprising newly developed elements.

Smart cities

This project is geared towards the design, development and integration of a new model of smart cities by means of automating irrigation and lighting systems.

The project seeks to integrate autonomous watering systems in parks by means of a centralised system, allowing local operation in each park and in the command centre. Accordingly, resources are optimised and, using historical data, it is possible to make suitable tweaks to ensure continuous improvement in efficiency terms.

Moreover, the system can also read 100 temperature and humidity sensors over a Siemens IoT 2040 gateway through its open source programming system. This programming consists of capturing signals and processing and delivering data to the cloud by means of the SIGFOX protocol.

In addition, the project also tackles the control aspect of street lighting and pilot plans for waste integration via an online platform with global access.

The Genio project

The Main goal of the project is to develop a smart system to support planning and execution of maintenance. To do so, Elecnor's Railway Department has implemented a complex asset management system based on information management so as to gain competitiveness and market share, in particular in Spain.

The technological solution is geared towards industrial maintenance, and its goal is to further the knowledge and application of various technologies linked to artificial intelligence within this field.

Predictive Maintenance

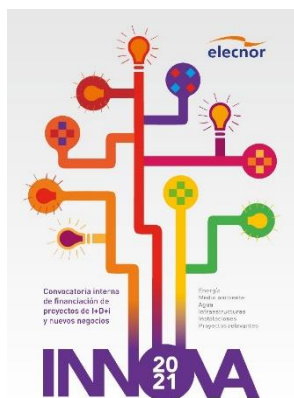
The increase in the operating portfolio and ageing of wind assets is resulting in the updating of management processes in wind farm operation and maintenance towards a predictive-type management model.

As Enerfín is aware of this situation, it is developing a multi-year project to equip its resources with tools that enable early detection of faults that may occur in wind turbines' main mechanical and electrical elements. This project endeavours to digitalise predictive maintenance processes, applying artificial intelligence and big data technologies and developments with the help of companies specialising in advanced data analytics.

Thermographic inspection using an uncrewed aerial vehicle (UAV)

In Spain, the joint venture Celeo has implemented thermographic inspection using an uncrewed aerial vehicle (UAV) for photovoltaic plants of more than 1 MW. The images obtained are processed using artificial intelligence, providing an accurate and rapid analysis of the condition of the installed photovoltaic panels.

Innova 2021 calls for proposals



The Elecnor Group, through its Innova programme for funding RDI projects proposed, aims to align RDI with the development of new business for the Group, to boost competitiveness, achieve early identification of RDI projects and enhance internal collaboration.

All Elecnor Group organisations based in Spain and foreign subsidiaries can apply for funding for RDI projects.

Innova 2021 featured projects

Data analytics for improved processes

This project enables Elecnor's Systems Area to propose the integration of data analytics in automated processes. Until now, automation systems have been limited to collecting data, but have not been dedicated to using them, which could bring a competitive advantage in the integration of new installations or the expansion of existing ones.

The project proposes the following goals:

- To store the facility's data in a secure environment in the cloud, fulfilling security protocols, while accessing it from any device and location with the necessary permissions.
- To improve the data management and analytics process.
- Data use and statistical analysis in a visual and user-friendly manner, facilitating interaction with the results, extending exploratory capabilities in a visual interface to understand data and build models.

iSignal

iSignal is a trailblazing solution that uses artificial intelligence in road maintenance work. This project enhances road safety because it fulfils the dual function of, on the one hand, warning road users (drivers) of the existence of an incident on the road and, on the other, warning and alerting road maintenance workers of the existence of a hazard in real time. All of this is conducted with a robot that travels autonomously on the hard shoulder of the road, without affecting traffic and using artificial intelligence for the early detection of possible risks.

This innovative project is also co-funded through the CDTI (Spain's Centre for Industrial Technological Development of the Ministry of Science and Innovation) funds.

Mobile-terminal monitoring of control systems in industrial plants with augmented reality, geolocation and QR code

This project is an innovative application in the areas of augmented reality, geolocation and QR code reading. It comprises control systems that enable the optimisation of monitoring and remote control of industrial plants, thus achieving increased efficiency, productivity and agility in process management.

Innovating through startups

Collaboration with startups enables the Elecnor Group to access greater knowledge, develop innovative solutions and create new business opportunities that may contribute added value to customers.

In that regard, the Group has been conducting initiatives with disruptive or exponential technology in partnership with innovative start-ups. In the context of the Bind 4.0 programme, a public-private acceleration programme seeking to encourage the development of the best start-ups in the field of Industry 4.0 by fostering projects with leading industrial companies and a comprehensive support programme, the following projects have been conducted

- Asimob. Proof of concept in the monitoring of traffic signs and road surface irregularities at a road maintenance centre on the Iberian Peninsula using artificial vision.
- Codecontract. Two proofs of concept on the traceability of IT developments and the traceability of the company's insurance applications using blockchain technology.
- Grabit. Proof of concept of PPE inventory control through artificial vision.

Membership of RDI associations and platforms

- Associate member of Eraikune Construction Cluster in the Basque Country. Eraikune helps boost the competitiveness of companies in the Construction Industry by means of training, innovation and internationalisation.
- Associate member of the Asturias Innovation Club (Innovasturias).
- Platinum member of the Efficient Energy Cluster of Catalonia.
- Member of the Interior Air Quality Cluster (IAQ), an association of businesses that cooperate and share synergies with the main goal of leading future decisions on how to improve interior air quality in buildings and infrastructure.
- Members of the R&D committees of Spain's Association of Technological Aeronautics, Space and Defence Companies (TEDAE), the European Association of Remote Sensing Companies, the European Association of Space Companies Eurospace and the Open Geospatial Consortium.
- Elecnor Deimos is a member of the Spanish Aerospace Platform, which comprises all the players in this sector, including companies, public and private research centres and universities, and submits the proposed strategic RDI agenda to administrations.
- Enerfín is a member of AEPIBAL, Batteries, Cells and Energy Storage Business Association; AeH2, Spanish Hydrogen Association; AIN, Navarre Industry Association; and REALTEC, Innovation Platform within the Spanish Wind Energy Association.

Participation in forums, congresses and awards

Forums and conferences

- Digital debate "New technologies applied to road maintenance", held by the Spanish Road Association.
- 16th Conference on Road Maintenance "The Road: Essential Infrastructure", held by ACEX and the Technical Road Association.
- 8th Solar Forum, UNEF.
- *European Space Policy Conference.*
- *International Astronautical Conference*, in Dubai.
- *International Conference of Astrodynamics Tools and Techniques*, from ICATT.
- *International Geoscience and Remote Sensing Symposium*, from IGARSS.
- GEO Week.
- *Earth Observation Phi-Week*, of the ESA.

- *RailLive, Technology, Innovation & Strategy for the entire rail supply chain.*
- International Defence Trade Fair, by FEINDEF.
- *European BIM Summit.*
- 2nd International Congress for Ecological Transition.
- AIN Circular Platform.
- Presentation of the Navarre Green Hydrogen Agenda.
- Cluergal Conference "Green hydrogen in the energy transition: challenges and opportunities".

Awards

17th National ACEX Award for Safety in Conservation

The project SMS+ of the subsidiary Audeca has won the 17th National ACEX Award for Safety in Conservation, in the general category.

The SMS+ system comprises an emergency and first aid communications network, and a platform to support this network in areas where there is no mobile phone coverage and with special emphasis on extreme weather phenomena.

Its goal is to establish communication by means of text messages between terminals or to send an SOS by pressing a button on a communication component. This development endeavours to facilitate the communication of personnel when conducting public service, within tolerable safety margins, enabling intervention in an exact location and with the necessary means, all in the shortest possible time. Shortening the response time in the event of incidents means resolving them more quickly and efficiently, reducing unforeseen consequences.

15.9 Responsible management

Corporate governance GRI 102-18

The Elecnor Group meets the requirements established in Spanish Companies Act and is guided by the recommendations in the Code of Good Governance of Listed Companies issued by the National Securities Market Commission¹⁰.

Corporate structure

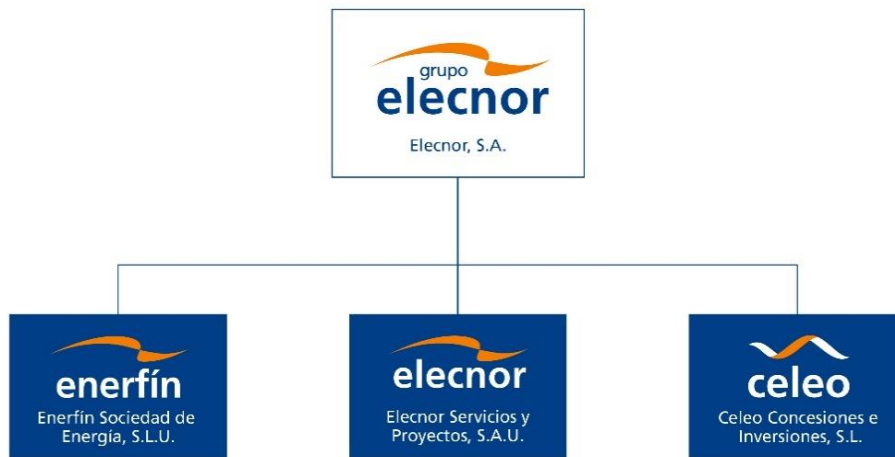
In 2021, the General Shareholders' Meeting of Elecnor, S.A. (the "Spun-off Company") and that of Elecnor Servicios y Proyectos, S.A.U. (the "Beneficiary Company") have approved the joint spin-off project formulated by their management bodies, pursuant to the provisions of Law 3/2009, of 3 April, on structural modifications of commercial enterprises ("LME").

The partial spin-off operation involves the separation of the part of the assets of the Spun-off Company dedicated to the services and projects business activity, which undertakes the execution of all kinds of engineering, renewable energy, construction and services projects and which is conducted both directly and through branches and companies established in Spain and abroad in relation to the following sectors: electricity, power generation, gas,

¹⁰ This information is available under Corporate Governance in the Shareholders and Investors section of the Elecnor Group corporate website.

telecommunications and systems, railways, maintenance and energy efficiency, installations, construction, water, environment and space.

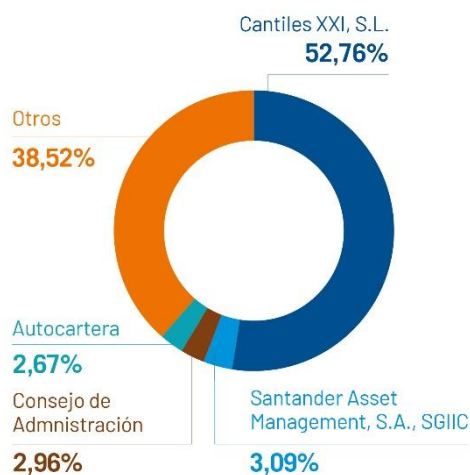
Elecnor, S.A. continues to be the Group's listed parent company and the subsidiaries Elecnor Servicios y Proyectos, S.A.U. and Enerfín Sociedad de Energía, S.L.U., as well as the partner company Celeo Concesiones e Inversiones, S.L., report to it.



The purpose of this spin-off is to adapt the Group's corporate structure to the organisational reality in which the company has been working for years, as well as to enable the risks, assets employed or profits of the activities conducted by each of them to be adequately individualised and, in consequence, the added value of each of the Group's activities to be suitably differentiated.

Ownership structure

Participación accionarial



The company Cantiles XXI, S.L., comprising various family groups, holds a 52.76% interest in Elecnor, S.A., which gives it control of the company within the meaning of article 42 of the Code of Commerce.

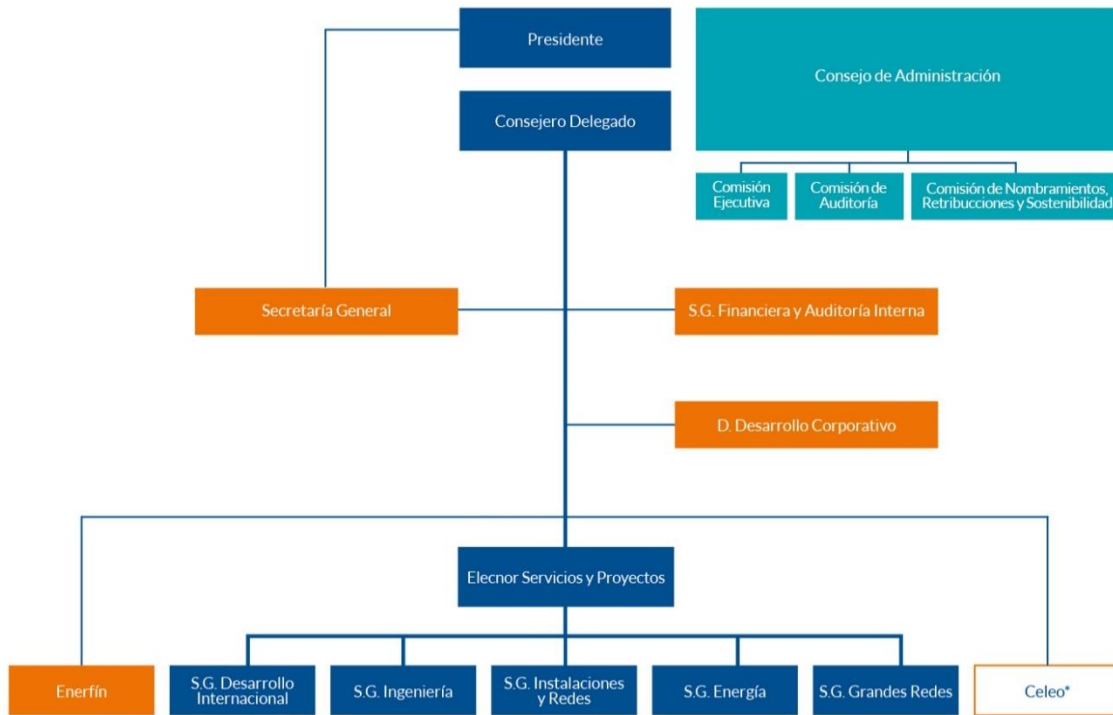
The heading "Other" in the chart includes shareholders with a non-material shareholding (less than 3%).

Governance structure

The governing bodies of the parent company (Elecnor, S.A.) are its General Shareholders' Meeting and the Board of Directors. The Executive Committee, Audit Committee and Appointments, Remuneration and Sustainability Committee report to the Board of Directors.

In 2021, the General Shareholders' Meeting was held exclusively online on 23 June, with an attendance rate of 80.31%.

Organisational structure at 31 December 2021 GRI 102-18



*Company co-managed by the Elecnor Group (51%) and APG (49%).

Board of Directors

15 directors

12 Meetings

Board of Directors

100% attendance

2 Female directors

10 Proprietary directors

3 Independent directors

1 Executive Director

1 External Director

Director name	Position on the Board	Category	Date last appointed
Jaime Real de Asúa Arteche	President (non-executive)	Proprietary	01 June 2018
Ignacio Prado Rey-Baltar	Vice-Chair	Proprietary	01 June 2018

Rafael Martín de Bustamante Vega*	Director and Chief Executive Officer	Executive	23 June 2021
Cristóbal González de Aguilar Alonso-Urquijo	Deputy-Secretary	Proprietary	22 May 2019
Fernando Azaola Arteche	Member	Other External	01 June 2018
Miguel Cervera Earle	Member	Proprietary	01 June 2018
Isabel Dutilh Carvajal	Member	Independent	22 May 2019
Joaquín Gómez de Olea y Mendaro	Member	Proprietary	20 May 2020
Irene Hernández Álvarez	Member	Independent	01 June 2018
Juan Landecho Sarabia	Member	Proprietary	01 June 2018
Santiago León Domecq**	Member	Proprietary	23 June 2021
Miguel Morenés Giles	Member	Proprietary	01 June 2018
Gabriel de Oraa y Moyúa	Member	Proprietary	01 June 2018
Rafael Prado Aranguren	Member	Proprietary	01 June 2018
Emilio Ybarra Aznar	Member	Independent	22 May 2019
Pedro Enrile Mora-Figueroa	Secretary non-director		24 June 2020

* Reappointed for four more years

** Appointed by cooptation by the Board of Directors on 28/10/2020. Ratified by the General Shareholders' Meeting on 23/06/21

Board of Directors' Committees

Executive Committee

The core functions of the Executive Committee are to prepare information on the issues to be addressed by the Board of Directors and the drafting of proposed resolutions; monitoring the implementation of the Elecnor Group's policies; and monitoring of the business of the company and its Group, which comprises confidential information due to its competitive sensitivity, which must be treated with the utmost safeguards on confidentiality. All of the foregoing is pursuant to the rules of operation of this Committee, as set forth in the deed of incorporation of the Committee.

Name	Position	Type
Jaime Real de Asúa Arteche	President	Proprietary
Fernando Azaola Arteche	Secretary	External
Cristóbal González de Aguilar Alonso-Urquijo	Member	Proprietary
Rafael Martín de Bustamante Vega	Member	Executive
Miguel Morenés Giles	Member	Proprietary
Ignacio Prado Rey-Baltar	Member	Proprietary
Executive Committee	Number	% of total
Executive directors	1	16.7%
Proprietary directors	4	66.6%
External directors	1	16.7%
Committee meetings	21	

The following matters were raised at the meetings of the Executive Committee during the year:

- Spin-off project of the services and projects branch of activity.
- Processes of the possible onboarding of partners into certain projects.
- Main investment and divestment operations of the Elecnor Group.
- Progress of the Elecnor Group's main business subsidiaries, i.e., Elecnor Servicios y Proyectos, S.A.U. and Enerfín Sociedad de Energía, S.L.U., and the partner company Celeo Concesiones e Inversiones, S.L., including their priority issues and the monitoring of their goals.
- Reviewing impacts and managing risks arising from the COVID-19 pandemic.
- Actions on sustainability and climate change.
- Analysing changes in the regulatory environment.
- Studying the restructuring of the Elecnor Group's long-term financing sources, placing special emphasis on its sustainable and/or green rating.
- Monitoring the multi-currency promissory note programme in the MARF, amounting up to Euros 300 million.
- Dividend proposals.
- Assessment of the Committee itself.
- Progress of the Company's share price and shareholding

Comprehensive information of the Report on the Activities of the Executive Committee is contained in the Annual Corporate Governance Report, available in the Shareholders and Investors section on the Group's corporate website.

Audit Committee

The Audit Committee provides support to the Board in the supervision of financial and non-financial reporting, internal control and internal and external auditing, risk management and control, compliance with the company's corporate governance rules and internal codes of conduct, and it reports, among other matters, on related-party transactions.

Name	Position	Type
Irene Hernández Álvarez	President	Independent
Miguel Morenés Giles	Secretary	Proprietary
Isabel Dutilh Carvajal	Member	Independent
Ignacio Prado Rey-Baltar	Member	Proprietary
Emilio Ybarra Aznar	Member	Independent
Audit Committee	Number	% of total
Independent directors	3	60%
Proprietary directors	2	40%
Female directors	2	40%
Committee meetings	11	

The following matters were raised at the meetings of the Audit Committee during the year:

- The review of regular financial and non-financial information published in markets and the goals and forecasts at year end

The Committee supervises the preparation process and the integrity of the financial and non-financial information of the Company and the consolidated group. It reports favourably to the Board in that regards for subsequent submission to the authorities and the market, as well as for submission to the shareholders for approval at the General Meeting.

Prior to its submission to the Board of Directors, the Committee reviews the quarterly (March and September), half-yearly (June, subject to limited review by the Group's auditor) and annual (December, subject to review by the Group's auditor) financial information (and in the case of annual information, it also reports non-financial information) to be reported to the CNMV and published on the markets (key figures, evolution compared to the previous year, evolution of the main businesses and geographic areas, etc.). The annual report on non-financial information is also subject to independent verification by KPMG.

The Finance and Internal Audit General Sub-Directorate provides the Audit Committee with the appropriate explanations regarding the accounts. The accounting treatment of extraordinary transactions and the tax treatment of significant transactions are analysed, conferring with the Group's auditors and/or advisors.

The re-appraisals of targets and year-end forecasts are presented throughout the year, and deviations from targets are explained.

- The monitoring of the main risks with the potential impact on the income statement and other material matters relating to the annual accounts, the Risk Management System and the Internal Audit system.

The Committee performs ongoing monitoring on the main risks with a potential impact on the income statement, which, in order to analyse them better, are structured by general sub-directorates and business divisions and quantified in terms of exposure for the Group, as well as contingent balances with customers and debtor balances with public bodies. After reporting the risks, the suitability of their possible provisioning for accounting purposes is analysed on a case-by-case basis.

The Audit Committee also monitors the most relevant judgements and estimates impacting financial information, specifically those relating to impairment tests on goodwill, intangible and tangible assets, deferred tax assets and the recording, control and measurement of derivative financial instruments.

The Audit Committee monitors the main risks relating to tax matters and the effective application of the corporate tax policy and reviews the tax treatment of transactions with particular importance in this respect. The Group's transfer pricing policy has also been reviewed this year.

As regards related-party transactions, besides those related to the spin-off project of Elecnor, S.A.'s branch of activity to Elecnor Servicios y Proyectos, S.A.U., there were no related-party transactions in 2021 that had to be reviewed by the Committee.

The main risks to which the Group is exposed (governance, strategic and environmental, operational, information and compliance) are subject to ongoing monitoring through the supervision of the Risk Management System and, specifically, the risks identified, the assessment of their potential impact, the likelihood of their materialisation and the action plans outlined to improve their management.

The Audit Committee has adequately supervised the Internal Audit function, approving and monitoring its annual work plan and monitoring its monitoring and review of the main risks affecting the organisation, its processes and controls. The Audit Committee also receives, reviews and approves the corresponding Activity Report from Internal Audit annually.

- Monitoring and supervising the spin-off project of the branch of activity of Elecnor, S.A. in favour of Elecnor Servicios y Proyectos, S.A.U.

The Audit Committee has regularly and exhaustively monitored the spin-off project of the branch of activity of Elecnor, S.A. to Elecnor Servicios y Proyectos, S.A.U., supervising the progress of the various action plans established and the main risks of the project. In particular, at its meeting held on 1 March 2021, after an appropriate review, the Audit Committee decided to report favourably to the Board of Directors on —inter alia— the spin-off balance sheet (31 December 2020) and on the spin-off project itself, both of which were prepared by the Board of Directors at its meeting held on 2 March 2021.

- The relationship with the Group's external auditors, supervision of their independence and approval of fees.

The Audit Committee met three times with the Group's external auditors in 2021, all without the presence of other members of the Company or its Group.

The main matters addressed with the external auditors at these meetings are:

- Planning and strategy of the annual audit of the Company's individual accounts and the Group's consolidated accounts (materiality, scope, main audit risks identified, schedule, etc.).
- Outcome of the annual audit of the individual and consolidated annual accounts and of the limited review of the Group's half-yearly abridged financial statements.
- Internal control shortcomings identified and, where applicable, recommendations for improvement.
- Declaration and written confirmation by the external auditors of their independence and in-depth information on services additional to the audit.

The Audit Committee assesses the performance of the external auditor and its contribution to audit quality and the integrity of financial reporting on an annual basis.

As regards the supervision of the appropriate independence of the external auditor, according to the internal procedure established in that regard which regulates the process for the approval —from an independence perspective— of non-audit services to be provided by the external auditor, the Audit Committee delegates to the Group's head of internal audit the due approval of all such services, provided that such services are not prohibited by current legislation or do not compromise the auditor's independence, except in cases in which the amount of the fees proposed for the provision of the services submitted for approval represent a specific percentage of the fees for audit services rendered by the main auditor in the immediately preceding year, in which case the approval is made directly by the Audit Committee. The head of Internal Audit has regularly informed the Audit Committee of the services approved according to this procedure and always prior to the submission by the external auditor of its annual declaration of confirmation of independence, in which the external auditor sets out the fees charged to the Company and its related companies, broken down by item, both for audit and non-audit services, in the year in question both by the auditor itself and by other firms in its network.

For the approval of the corresponding non-audit services, the Audit Committee or, where applicable, the head of Internal Audit, relies on specific documentation, which should at least comprise a draft of the corresponding proposal for services and documentation accrediting the independence analysis conducted by the external auditor and its conclusion in that regard. Occasionally, and depending on the nature and the fees proposed, the Audit Committee seeks the appropriate explanations from both Internal Audit and other Group managers. In all cases, besides the determination of whether or not the proposed service is a prohibited service, the assessment process involves analysing threats to independence (self-interest, self-review, advocacy, familiarity or trust and intimidation) and, where applicable, the safeguards to be applied in that regard.

The Committee has concluded that the auditor of the Company's individual and consolidated accounts has performed its audit work independently and has reported to the Board of Directors in a timely manner.

The Audit Committee has also ensured that the external auditor has held a meeting with the full Board of Directors in order to report on the work conducted and on the development of the Company's accounting and risk situation.

The Audit Committee reviewed KPMG's proposal of fees to audit of the individual and consolidated annual accounts for 2021 and decided to submit it to the Board of Directors for approval.

Lastly, in view of the legal obligation to replace the Group's current auditor as from 2023, the Audit Committee decided at its September meeting to start the selection process for a new auditor for the years 2023 to 2025. Following the process conducted, at its meeting in December 2021, the Audit Committee decided to submit its proposal for appointment to the Board meeting held in the same month for submission to the General Shareholder's Meeting.

- Supervision of the Compliance System and the activities of the Compliance Committee

In line with the Group's comprehensive commitment to this matter, this is one of the activities to which it devotes an especially important effort. The Group's head of Compliance was present at six of the Committee meetings held in 2021, reporting on the activities of the Compliance Committee and the initiatives, actions and/or incidents that have taken place in the field of Compliance, seeking the approval of the Committee when necessary.

In short, the tasks conducted by the Audit Committee in this field in 2021 were as follows:

- Reviewing and approving the Annual Compliance Report for 2020.
- Monitoring the main compliance risks to which the Group is exposed.
- Approving and monitoring the compliance goals for 2021.
- Approving and monitoring the Compliance Training Plan for 2021.
- Reviewing the Elecnor Group's Code of Ethics and Conduct and its Compliance Policy, which have been reviewed and updated in 2021, and of the new policies undertaken in terms of anti-corruption and anti-trust, and submitting them to the Board for approval.
- Monitoring the processes of adapting the Group's Compliance System to the special circumstances and requirements of the various countries in which it operates (organisations and subsidiaries).
- Monitoring the complaints and/or concerns communicated through the Ethics Channel, analysing conclusions and deciding upon the measures to be taken.

Throughout 2021, the Audit Committee has conducted special monitoring of the operation of the new Compliance organisation, which was approved by it at the end of 2020 in order to strengthen, improve and continue to keep the Compliance System permanently operational.

Similarly, the Committee monitors the evolution of the various judicial and administrative proceedings with potential impact on the legal entities forming part of the Elecnor Group.

- Monitoring of the Group's Digital Transformation Project

The head of the Group's IT and Technology Area, together with the heads of the Financial General Sub-Directorate and Internal Audit, reported on the degree of progress of the key project on process re-engineering and digitalisation that has been under way since 2016 and that seeks operational excellence, meaning the capacity of the organisation, processes and systems to contribute to efficiency, information control, service quality and regulatory compliance.

Similarly, the Audit Committee has been kept informed of the key advances and projects in the area of Information Systems security, highlighting the progress made in the field of cybersecurity, both nationally and internationally, and the attainment of ISO 27001 certification for Information Security Systems in March 2021.

Additionally, the Audit Committee monitored the progress of the project headed by the Consolidation area to implement a computer application to support the Group's entire financial reporting and consolidation process, a project that was successfully completed within the established time frames.

- Information to the General Shareholders' Meeting

As a result of the special circumstances that occurred in 2021 due to the health crisis, the General Shareholders' Meeting held on 23 June 2021 was held online. Notwithstanding these limitations, Irene Hernández Álvarez, in her capacity as Chair of the Audit Committee, reported at the General Shareholders' Meeting on the activity conducted by the Committee in 2020 and up to that date.

- Supervision of compliance with the Company's Corporate Governance rules and internal codes of conduct. Assessment of the Committee

In the field of Corporate Governance, the Audit Committee has analysed the issues deriving from the assessment of the Committee by the Board of Directors, establishing its proposals for action in relation to this assessment. Similarly, the Audit Committee adequately supervises compliance with the Company's corporate governance rules and its internal codes of conduct.

It is also worth highlighting the work of the Audit Committee to review, update and amend several of the Company's operating Policies and Regulations in order to adapt them to the recommendations outlined in the Code of Good Governance of Listed Companies and other standards. In particular, during the year, the Committee reviewed the Regulation of the Audit Committee, reporting favourably on the proposed amendments in order for them to be definitively approved by the Board of Directors.

Comprehensive information of the Report on the Activities of the Audit Committee is contained in the Annual Corporate Governance Report, available in the Shareholders and Investors section on the Group's corporate website.

Appointments, Remuneration and Sustainability Committee

This committee, which changed its name from Appointments and Remuneration Committee to its current name by resolution of the Board of Directors on 24 November 2021, assesses the skills, knowledge and experience required on the Board. Additionally, it proposes and reviews the remuneration policy for Directors and Management, and reviews the corporate governance and sustainability of the company.

Name	Position	Type
Emilio Ybarra Aznar	President	Independent
Jaime Real de Asúa Arteche	Secretary	Proprietary
Miguel Cervera Earle*	Member	Proprietary
Isabel Dutilh Carvajal	Member	Independent

*Appointed 22/03/2021

Appointments, Remuneration and Sustainability Committee	Number	% of total
Proprietary directors	2	50%
Independent directors	2	50%
Female directors	1	25%
Committee meetings	8	

The following matters were raised at the meetings of the Appointments, Remuneration and Sustainability Committee during the year:

Over the course of the year, the Appointments, Remuneration and Sustainability Committee performed the following actions:

- With regard to the composition of the Board of Directors and its Committees

The Committee has reviewed the category of each of the Directors, concluding that the current categories remain fully in line with their circumstances.

Each year, the Committee conducts an ongoing process of analysing and studying the structure, composition and operation of the Board of Directors, and, in this regard, in 2021, the Committee has been advised by the Professor of Commercial Law Alberto Alonso Ureba, to continue the analysis conducted in 2017 by Spencer Stuart, as a leading international external consultant, and for the purpose of progressing with adapting said structure to the best practices and recommendations of good governance.

- With regard to selecting Directors and members of the management team

The Appointments, Remuneration and Sustainability Committee has performed a preliminary analysis of the needs of the Board of Directors including competencies, know-how and experience required by the Board, all of which was taken into account when compiling proposals and reports submitted to the Board concerning the appointment and re-election of Directors.

In particular, at the request of the Board of Directors, the Committee reported favourably on the proposal to re-appoint Rafael Martín de Bustamante Vega as Director, with the category of executive, for a four-year term, in addition to the proposal to ratify the appointment by cooptation, in October 2020, of Santiago León Domecq, as proprietary Director of the Company.

- With regard to Board positions

The Committee approved the Succession Plan for the Chairman of the Board of Directors and the Chief Executive Officer, and also reviewed the Succession Plan for the management team.

- With regard to the remuneration of Directors and members of the management team

The Appointments, Remuneration and Sustainability Committee proposed the annual fixed and variable remuneration for the Executive Director and compiled the 2020 Annual Report which the Board of Directors presented to shareholders at their General Meeting for an advisory vote.

Similarly, the Committee proposed the remuneration policy for the management team and its application, including its variable remuneration proposal, both short-term (yearly) and the long-term incentive system for the period 2020-2022.

Similarly, an external comparative analysis was conducted on the management team's remuneration, with the help of consultant Willis Towers Watson, WTW, a project that comprises a quantitative analysis of the remuneration to the Chief Executive Officer and the management team, and a diagnosis of the current policy in relation to the market and corporate governance best practices.

- With regard to reviewing corporate governance and sustainability

The Appointments, Remuneration and Sustainability Committee has been no stranger to the drive for sustainability on a global level and has taken measures associated with this field under its remit, following the creation of the Sustainability Committee comprising people from various business areas of the Company.

Similarly, as previously stated, the amendment to the Regulations of the Committee itself has been proposed to the Board, as well as the approval of the Elecnor, S.A. Corporate Governance Policies and of the Elecnor Group Structure Definition and of a new Related-Party Transactions Protocol, in order to adapt these texts to the abovementioned Spanish Companies Act reform.

- Other functions

The Committee has reviewed the situation in issues related to COVID-19, such as the influence on the Company's personnel and its performance in certain areas.

In relation to the self-assessment of the Board, the Committee has reviewed the templates for assessing the Board, the Chairman and its Committees in 2020, and conducted the assessment of the Committee itself, concluding that the applicable composition and operational requirements have been satisfactorily fulfilled.

Furthermore, as regards these assessment for 2021, and as three years have elapsed since the last time this process was conducted with an external consultant, the Commission has agreed to undertake this matter with the firm Russell Reynolds.

In the same way, it reviewed the questionnaire sent to all Directors in connection with possible conflicts of interest in 2021.

When necessary, the Commission has received consultancy from external experts, having previously analysed in these cases the potential conflicts of interest existing with them, and no risk situation has been detected.

Comprehensive information of the Report on the Activities of the Appointments, Remuneration and Sustainability Committee is contained in the Annual Corporate Governance Report, available in the Shareholders and Investors section on the Group's corporate website.

Diversity of the Board of Directors and Director selection GRI 405-1

The Elecnor Group's Policy for the Selection of Directors and for Board Diversity, available on the Group's website, outlines all the measures adopted in relation to the selection of Directors, diversity policies in connection with gender, age, experience, etc.

In December 2020, the Board of Directors agreed to amend this Policy to bring it in line with the reform of the Code of Good Governance of Listed Companies approved by the CNMV in June of the same year.

The Policy is governed by the following guiding principles:

- Adequate composition of the Board of Directors, for which purpose the Director selection processes must be grounded on a prior analysis of the competencies required by the Board.
- Fostering diversity in the Board and its Committees, among other aspects, in relation to know-how, experience, age and gender.
- Non-discrimination and equal treatment, whether on the grounds of race, gender, age, disability or any other reason.
- Transparency in selecting candidates for Directors, with the Board of Directors being obliged to provide all significant information in this regard, duly documenting the selection processes and including the main conclusions in the reports and proposals by competent bodies that must be made available to shareholders at their General Meeting.
- Compliance with applicable regulations and the principles of good corporate governance.

Said Policy establishes that the bodies in charge of ensuring the diversity of the Board of Directors and its Committees as well as of the processes of selection of members of the Board will be the Board of Directors and the Appointments, Remuneration and Sustainability Committee, without prejudice to the appointment powers of the General Meeting of Shareholders.

With regard to the recommendation of ensuring that the number of female directors represents at least 40% of members of the Board of Directors by the end of 2022 and thereafter, and no lower than 30% before then, the company intends to continue fostering an increased presence of female directors on the Board so as to fulfil the recommendation without affecting the normal functioning of the Board and the suitability of its members as a whole to discharge their duties.

In compliance with legal stipulations, the Board of Directors of Elecnor, S.A. compiled the Annual Corporate Governance Report for the year ended 31 December 2021. Said document is available on the websites of the CNMV and the Elecnor Group.

Remuneration Policy

On 27 March 2019, at the proposal of the Appointments, Remuneration and Sustainability Committee, the Board of Directors of Elecnor approved the Remuneration Policy corresponding to the years 2020, 2021 and 2022, which is a continuation of the Remuneration Policy in force until 2019.

As the foremost measure of the Remuneration Policy, the Board of Directors, after studying the prevailing legal and legislative context, agreed to amend the Bylaws (article 12) and the Regulations of the Board of Directors in relation to Directors' remuneration. Article 12 establishes that the General Shareholders' Meeting will determine and approve the maximum remuneration to be received as compensation by Directors for all items and all duties they perform, including both executive and non-executive functions.

This Policy aims to reduce mercantile and tax risks emerging in the future in relation to the remuneration of Directors in the event of a change of legislation, as occurred at non-listed companies.

The Policy is governed by the following guiding principles:

- **Moderation:** remuneration must be reasonable, in accordance with trends and references of similar companies and in proportion to the Company's situation and the economic context at each given time.
- **Suitability:** the Policy is designed to attract, motivate and retain directors. It rewards directors' quality, dedication, responsibility and knowledge of the business, as well as their professional track record and commitment to the Company.
- **Profitability and sustainability:** remuneration to directors performing executive duties will provide an incentive for performance and reward value creation in the long term.
- **Transparency:** the design, establishment and application of the Policy will be implemented in strict observance of transparency. In particular, the Company will make available to shareholders, at the General Meeting, this Policy and the related Report, and it will be outlined in both the notes to the Company's annual accounts and its Annual Corporate Governance Report.
- **Safeguarding shareholders' interests.**

Without prejudice to the foregoing, the Board of Directors of Elecnor, S.A. intends to present to the upcoming Ordinary General Shareholders' Meeting in 2022 the proposal to amend the Directors' remuneration policy to expressly incorporate the new provisions of the Code of Good Governance approved by the CNMV in June 2020 and of Law 5/2021, of 12 April, amending the revised text of the Spanish Companies Act, with regard to promoting long-term shareholder involvement in listed companies.

Total remuneration accrued by the Board of Directors in 2021 amounted to Euros 4,789.6 thousand (Euros 4,938.1 thousand in 2020), including remuneration deriving from their executive functions (CEO) and their non-executive functions.

The table below shows a breakdown of this amount, in thousands of Euros, on an individual basis for each member of Elecnor, S.A.'s Board of Directors. This breakdown is also available in the Annual Report on Remuneration to the Directors of the Company, published by the CNMV and on the Group's corporate website.

Director name	Remuneration accrued within the Company				Remuneration accrued within companies in the Group						
	Total cash remuneration	Gross profit on vested shares or financial instruments	Remuneration from savings schemes	Other items of remuneration	Total in 2021	Total cash remuneration	Gross profit on vested shares or financial instruments	Remuneration from savings schemes	Other items of remuneration	Group total in 2021	Company + Group total in 2021
Jaime Real de Asúa Arteche PROPRIETARY	481.5				481.5	20.0				20.0	501.5
Ignacio Prado Rey-Baltar PROPRIETARY	214.0				214.0	20.0				20.0	234.0
Rafael Martín de Bustamante Vega EXECUTIVE	1,690.0			5.2	1,695.2	20.0				20.0	1,715.2
Joaquín Gómez de Olea y Mendaro PROPRIETARY	174.0				174.0	20.0				20.0	194.0
Cristóbal González de Aguilar Alonso-Urquijo PROPRIETARY	199.0				199.0	20.0				20.0	219.0
Fernando Azaola Arteche EXTERNAL	197.5			2.5	200.0						200.0
Miguel Cervera Earle PROPRIETARY	183.4				183.4	20.0				20.0	203.4
Isabel Dutilh Carvajal INDEPENDENT	189.0				189.0						189.0
Irene Hernández Álvarez INDEPENDENT	181.5				181.5						181.5
Juan Landecho Sarabia PROPRIETARY	161.5				161.5	20.0				20.0	181.5
Santiago León Domecq PROPRIETARY	167.7				167.7	10.0				10.0	177.7
Miguel Morenés Giles PROPRIETARY	214.0				214.0	20.0				20.0	234.0
Gabriel Oraa y Moyúa PROPRIETARY	161.5			1.8	163.3	20.0				20.0	183.3
Rafael Prado Aranguren PROPRIETARY	161.5				161.5	20.0				20.0	181.5
Emilio Ybarra Aznar INDEPENDENT	194.0				194.0						194.0
Total	4,570.1			9.5	4,579.6	210.0				210.0	4,789.6

Board of Directors' Evaluation

The Company's Board of Directors evaluates, by means of various questionnaires to be completed by all of its members, its own activity and that of its Committees, as well as the activity and actions of its Chair, Secretary and Chief Executive Officer, pinpointing the

strengths and areas for improvement and applying the adequate remedial measures. These questionnaires are reviewed by the respective Committees.

They include the evaluation of areas such as the degree of compliance with targets, value creation and strategy, composition and dynamic of the Board, risk management, transparency and relations with shareholders, Corporate Governance and corporate social responsibility, the operation of the Board Committees and the performance of the duties of the Chairman and Secretary of the Board and the Chief Executive Officer.

Pursuant to the recommendations of the Code of Good Governance, it is worth noting that for the 2021 assessment, the external consultant Russell Reynolds has again been hired to review and update the assessment system, conducting individual interviews with each of the members of the Board of Directors as part of the assessment process.

Progress on the principles of good governance

The Group has a "Policy on communication of information, contacts and engagement with shareholders, institutional investors, asset managers, financial intermediaries, proxy advisers and other stakeholders" through which the Board of Directors of Elecnor, S.A. endeavours, in the corporate interest, to encourage the Company's ongoing dialogue with these groups, on the basis of transparency.

This Policy, which is published on the corporate website, establishes the Group's general information and communication channels, as well as specific channels that enable dialogue and participation of shareholders, institutional investors, asset managers, financial intermediaries and proxy advisers, to ensure that they have adequate and up-to-date information concerning the Company.

The General Shareholders' Meeting of Elecnor, S.A. held exclusively online in Madrid on 23 June 2021, approved the amendment to the Company's Bylaws and the Regulations of the General Shareholders' Meeting.

At its meeting on 24 November, the Board of Directors unanimously agreed to approve the change of the current name of the Appointments and Remuneration Committee to "Appointments, Remuneration and Sustainability Committee", thus strengthening the Company's commitment to sustainability and pursuant to Recommendation 53 of the Code of Good Governance of Listed Companies.

In that regard, it is worth noting that this year, the aforementioned Appointments, Remuneration and Sustainability Committee submitted the Elecnor Group's Sustainability Strategy to the Board of Directors for approval. This strategy includes the company's commitments in ESG matters. Along these lines, the Committee has scheduled meetings to monitor and assess this matter in 2022.

Also on 24 November 2021, the Board of Directors unanimously approved the amendment to the Regulations of the Board of Directors, the Regulations of the Audit Committee and the Regulations of the Appointments, Remuneration and Sustainability Committee, in order to adapt them to the new provisions implemented by Law 5/2021, of 12 April, on the promotion of the long-term involvement of shareholders in listed companies, which transposes into Spanish law Directive (EU) 2017/828 of the European Parliament and of the Council of 17 May 2017, and which has amended, in addition to other regulations, the revised text of the Spanish Companies Act.

On 29 November 2021, the Elecnor Group sent its Equity Story to the CNMV, which encapsulates its value project and future investment proposal. This document is a tool for transparency and market positioning.

Lastly, according to the provisions of article 529 ter.1, sections c) and e) of the revised text of the Spanish Companies Act, the Board of Directors, at its meeting held on 15 December 2021, unanimously agreed to approve two new corporate policies, which are available on the Company's website: Elecnor Group Structure Definition Policy and Corporate Governance Policy.

Risk management GRI 205-1

Elecnor Group is exposed to various risk factors linked to the sectors in which it operates and the long list of countries in which it is present, either consistently or by means of one-off projects.

The Group continually manages and prevents these risks, reducing to acceptable levels the probability of their materialising and mitigating their potential impact, where applicable, on business volume, profitability and efficiency, reputation and sustainability.

For this purpose, the Group has a structured and dynamic Risk Management System the main pillars of which are as follows:

- Continuous risk identification and evaluation and prioritisation.
- Identification of the management and control mechanisms and tools in place in connection with the main risks and assessment of their efficacy.
- Continuous improvement of risk management by means of the development and implementation of initiatives and projects aimed at enhancing management mechanisms and tools.
- Permanent supervision and monitoring of the System.

These management and control mechanisms and tools are integrated in the organisation's various processes so as to operate continuously in the daily course of business, without prejudice to other standalone initiatives and actions that may be determined for each individual case.

The Elecnor Group's main risks are grouped into five broad categories:

- **Governance risks.** Relating to the organisation's governance structure and method (structure and composition of the governing body, risk management, social responsibility and sustainability strategy and management of stakeholders' expectations).
- **Strategic, planning and economic environment risks.** Those linked to the main strategic variables and decisions, with the manner in which the strategy is executed and with movements or changes in the economic environment that might have a material impact on the organisation's activities and compliance with its goals. These include:
 - Business model
 - Managing and fulfilling the changing requirements of customers
 - Growth
 - Sub-contracting strategy

- Business concentration
- Changes in the market, industry and competition
- Public health
- Laws and regulations
- Political or social situation
- Changes in exchange and interest rates
- **Operating risks.** Comprising the manner in which the organisation carries out its activity and administers its resources in accordance with the established processes and procedures. These include risks relating to the management of projects, management and maintenance of assets, supply chain, commercial management, financing, credit, liquidity, financial and budget planning, legal aspects, human resources, information systems, etc.
- **Reporting risks.** Risks relating to information at both internal and external level, including risks ranging from the capture and processing of information to the preparation of reports and distribution thereof to designated recipients, whether management reports or mandatory reports (annual accounts, reports and tax filings, etc.).
- **Compliance risks.** Relating to the mechanisms in place to ensure compliance with laws and regulations and with the organisation's policies and procedures, emphasising areas such as the promotion and consolidation of the culture of compliance, management of risks of this kind, communications or incident management.

As part of the process of review and ongoing improvement of the Risk Management System, in 2021 the Group has conducted an internal reflection and scheduled a series of actions geared towards making the system more operational and effective, chiefly with a greater focus on business risks and improving certain systematics for monitoring the main risks, identifying and reviewing the main associated management and control procedures and tools, and monitoring the related improvement projects.

As regards the risks arising from COVID-19, in 2020, the Group reviewed its Risk Management System and raised the level of importance of the public health risk, conducting an analysis of the potential impacts resulting from the outbreak and of the management mechanisms available. This enabled the Group to enhance monitoring of the various action plans put in place to manage the crisis, identify potential impacts with sufficient advance notice and design new prevention mechanisms.

Ethical management and regulatory compliance GRI 102-16 GRI 103-1, GRI 103-2, GRI 103-3

The Elecnor Group's responsible management and ethical, honest and transparent conduct with stakeholders is underpinned by a firm commitment, solid corporate values and the implementation of robust ethical management and regulatory compliance systems. At present the company has the necessary tools to ensure compliance with legislation in force and responsible management in its relations with shareholders, employees, customers, suppliers, competitors and social representatives.

Our mission

We generate change and bring about progress by deploying infrastructure, energy and services to territories all over the world in order to develop their potential.

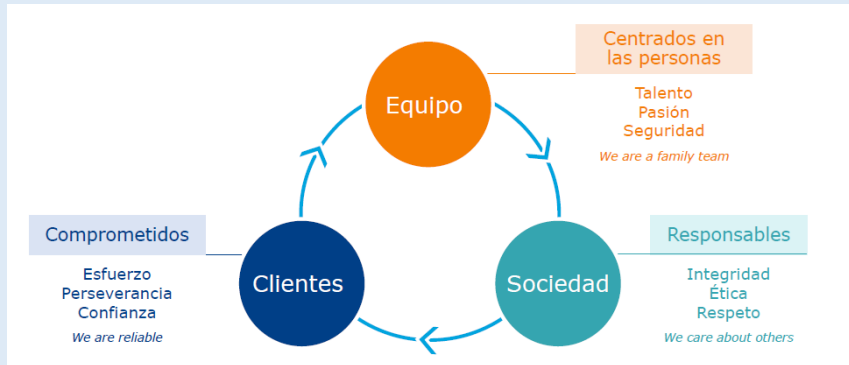
We place engineering and technology at the service of people's well-being.

Vision

A global enterprise whose purpose is developed through a people-centric business model and that believes in generating shared value and sustainability.

Efficiency, diversification and robustness are our levers for growth and expansion.

Values



From the outset, the Elecnor Group has remained unwaveringly committed to implementing the highest ethical standards in the course of its activities, a commitment that is the embodiment of its business culture and philosophy and the abovementioned solid values upon which its way of conducting business and relating to the environment rest.

The Elecnor Group's Code of Ethics and Conduct is the cornerstone of its ethical and compliance culture and is designed to serve as a guide for the personal and professional behaviour of everyone belonging to the organisation, as well as the rest of persons and companies collaborating and having relations with the Elecnor Group in the course of its activities.

This commitment to ethical behaviour and doing the right thing is not optional. No specific business circumstance may ever justify acting unlawfully or behaving in a manner that is contrary to its ethical values and standards. Everyone at the Elecnor Group must accept and foster the values and principles laid out in this Ethical Code.

Compliance system [GRI 205-3](#), [GRI 408-1](#), [GRI 409-1](#)

With a view to preventing and adequately managing the compliance-associated risks, the Elecnor Group has a fully operational Compliance System that is designed and operates according to the best national and international practices. This Compliance System applies to all the Group's subsidiaries and employees, and the company also expects all its business partners to act pursuant to its principles and values, which are mainly laid down in the abovementioned Code of Ethics and Conduct, and in the Group's Compliance Policy. The Elecnor Group takes a zero tolerance approach to malpractice in connection with ethics and integrity.

The Compliance System is certified according to the UNE-ISO 37001 anti-bribery management system standard and the UNE 19601 criminal compliance management system standard.

**Certification to
UNE-ISO 37001 anti-bribery
management system standard**



This is the most updated and stringent international standard on anti-bribery management systems and the adoption of compliance protocols in general.

**Certification to UNE 19601 criminal
compliance management system
standard.**



A national standard based on the requirements of UNE-ISO 37001. This standard establishes the requirements to implement, maintain and continuously improve the criminal compliance management system in order to prevent crimes being committed inside the organisation and to reduce criminal risk by fostering a culture of ethical behaviour and compliance.

The main elements of the Compliance System



Código Ético y de Conducta



Política de Cumplimiento, Anticorrupción y en materia de Defensa de la Competencia



Manual del Sistema de Gestión de Cumplimiento



Comité de Cumplimiento



Mapa de Riesgos de Cumplimiento y Procedimientos y Controles internos de obligado cumplimiento



Canal del Código Ético



Política Anticorrupción



Política en Materia de Defensa de la Competencia



Guía de Cumplimiento en Materia de Competencia



Código Ético y de Conducta de proveedores subcontratistas y colaboradores

The main policies and documents in relation to the Compliance System are available on the Group's various websites and on the corporate intranet.

The Compliance System of the Elecnor Group is based on and structured using the appropriate identification of compliance risks and the controls established or necessary to ensure their correct management.

As a basis for identifying these risks, the Group analyses, firstly, those situations in which, in accordance with the provisions of Spain's current Criminal Code and equivalent local regulations, legal persons may be criminally liable for certain offences committed by their employees or by certain related parties. Similarly, for each of them, the main areas in which the organisation may be exposed to them are identified, with the Group conducting impact and probability analyses in order to establish the degree of criticality associated with each of these areas of exposure, which facilitates the appropriate design of the corresponding procedures and controls and the effective allocation of resources for their management. In that regard, and in relation to corruption-related risks, for instance, special importance is given to tender processes (especially in the public sector), to those related to managing claims or collection procedures (for instance, with customers), and those related to administrative procedures or claims before public entities or the courts, in addition to others. With regard to human rights, the Group places special emphasis on working and employment conditions, both for Group employees and subcontracted workers who carry out work on the various projects under way.

The main risks associated with these offences potentially imputable to legal persons and that could potentially affect the Group are described below:

Type of risk (*)	Impact
Foreign citizens and human trafficking	Imposition of forced labour or services, slavery or similar practices and helping persons to remain unlawfully.
Bribery and corruption	Inducement to lack of impartiality or obtaining undue benefits by delivering or promising gifts, favours, etc.
Natural resources and environment	Failure to comply with laws, legal provisions or regulations.
Taxation authorities and Social Security	Evading taxes or Social Security contributions (including false accounting) and improperly obtaining grants, aid or funds.
Money laundering	Using, performing transactions with or concealing the unlawful origin of goods obtained through criminal activity.
Financing of terrorism	Performing activities with goods or securities in the knowledge that they will be used in terrorist activities.
Market and consumer fraud	Incurring in antitrust practices, deceiving in order to make a profit, changing prices, disseminating, revealing or passing on trade secrets and using insider information.
Industrial and intellectual property	Profit from goods protected by industrial and/or intellectual property rights without the rights holder's consent.
Discovery and revelation of secrets	Discovering secrets or breaching privacy or using private information without permission.
IT damage	Erasing or damaging computer data or hampering the operation of systems.
Illegal financing of political parties	Performing donations or making contributions to political parties or similar organisations in breach of the law.

* There have been no material changes in compliance risks this year

Due to the very nature of these risks, inasmuch as they imply a potential criminal liability, their possible impacts would be both short- and long-term, so the Group lays particular emphasis on preventive management in this regard.

With a view to reducing the Group's exposure to such risks and areas to an acceptable level, the Elecnor Group has specific controls, such as the publication and dissemination of the Code of Ethics and Conduct and Compliance, Anti-Corruption Policy and Anti-Trust Policy; specific compliance training; the Ethics Channel; procedures for procurement, payment management, comprehensive management of major projects, setting up temporary business associations/consortiums/joint ventures, etc.; compulsory models for contracts with subcontractors and collaboration agreements for joint bidding; centralised management and control of powers of attorney; various corporate policies; centralised process for selecting and hiring personnel; a supplier evaluation system, etc.

All these procedures and controls can be classified as financial and non-financial. The latter includes certain due diligence procedures, both in relation to Group employees and third parties.

The main due diligence measures for employees mainly involve the design of the personnel recruitment process and compliance training and awareness-raising activities. Similarly, the Elecnor Group has a well-defined structure of powers and responsibilities.

With regard to the third parties with which the Group has relations (business partners), the corresponding due diligence measures are devised according to the assessment of the risk associated with each of them. Thus, at present, the main due diligence measures with third parties are intended for possible partners with whom collaboration agreements, temporary business associations or joint ventures are signed, for consultants of a commercial nature and for subcontractors.

As regards the first two groups, the Elecnor Group has specific procedures for requesting the contracting or agreement, due diligence, approval and contracting or signing the agreement. The main characteristics of such procedures are as follows: i) making a centralised request for contracting or agreement through the legal counsel; ii) obtaining compliance reports on the third party through a specialised external entity; iii) obtaining express statements from the third party with regard to its adherence to Elecnor's Code of Ethics and the highest ethical standards; iv) having models of contracts and agreements with specific clauses on ethics and anti-corruption; v) gaining approval for the contract or agreement at the highest level following a report prepared by legal counsel; and vi) restrictive powers of attorney for signing the corresponding contracts or agreements.

As regards subcontractors, the Elecnor Group has a specific contracting, control and monitoring procedure, the main characteristics of which are as follows: i) centralised request for the preparation of contracts through the respective management areas of the various business units; ii) models of contracts and agreements with specific clauses on ethics and anti-corruption; iii) restrictive powers of attorney for signing the corresponding contracts; and iv) centralised control, validation and monitoring of the necessary documentation to be provided by subcontractors.

With respect to other suppliers, the Elecnor Group's General Procurement Conditions, which must be signed by all suppliers, include a specific clause on ethics and anti-corruption.

Similarly, and when circumstances may determine the existence of a higher-than-normal risk with regards to the supply chain (for instance, in certain projects in new countries), in each case, Elecnor assesses the advisability of strengthening such procedures for suppliers and subcontractors.

In any case, and within the framework of the policy of ongoing improvement of its processes and procedures, the Elecnor Group is in the process of completing a project conducted mainly during 2021 intended to improve its compliance due diligence procedures in relation to its supply chain. The measures designed within the framework of this project are expected to be fully operational during the first six months of 2022. It is worth highlighting, in that regard, the recent publication of the Elecnor Group's Code of Ethics and Conduct for Suppliers, Subcontractors and Collaborators and its incorporation into the Group's procurement platform to be accepted by suppliers and subcontractors.

The Compliance System of the Elecnor Group is subject to an ongoing improvement process to guarantee the adequate management of the risks identified in terms of prevention and detection, correction and monitoring, which, among other matters, encompasses the implementation and/or review and ongoing improvement of its procedures and controls. The

Elecnor Group uses certain KPIs to conduct better monitoring on the correct operation and performance of its Compliance System. The key indicators in that regard are geared towards aspects such as training and the activity of the Ethics Channel, without prejudice to the indicators that may be established each year in order to better monitor the annual goals in the field of compliance.

The head of Compliance and the Compliance Committee are responsible for the ongoing improvement and correct operation of the Compliance System, by delegation of the Audit Committee and the Board of Directors.

The Compliance Committee, which functionally reports to the Audit Committee, is entrusted with the duties of ongoing improvement and ensuring the correct operation of the Compliance Management System, through its appropriate supervision, monitoring and control. The Committee is headed by the Group's head of Compliance and currently comprises him and eight other members representing the fields of general services, human resources and legal counsel. In 2021, the Compliance Committee held a total of 5 meetings.

The main actions that guarantee the ongoing improvement and correct operation of the Compliance System are as follows:

- Establishing on an annual basis and conducting ongoing monitoring on compliance goals, which are reported to and approved by the Audit Committee.
- Regularly reporting to the Audit Committee on any aspect or matter related to compliance (ongoing projects, initiatives, etc.).
- Designing, developing and deploying the annual compliance and awareness training plan.
- Operating the whistleblowing channel and regularly reporting to the Audit Committee regarding the communications received and, where applicable, the investigations in progress and the conclusions reached.
- Conducting an ongoing review and audit of identified key controls related to compliance risks.
- Two annual external audits of the Compliance System conducted by two different audit/consultancy firms.

The Compliance Committee compiles an Annual Compliance Report describing the main actions conducted during the year in the spheres of prevention and monitoring of and response to compliance risks, which is submitted to the Audit Committee and the Management to help them in their duties of supervision of the System.

The Elecnor Group provides its professionals and/or third parties with a legitimate interest with a confidential channel through which to report any questions regarding the interpretation of this Code of Ethics and Conduct or its implementing regulations, to propose improvements in the existing internal control systems, and to report in good faith any conduct that is unlawful or contrary to the provisions of the abovementioned Code, the regulations on which it is based, its implementing policies and/or procedures or the prevailing legislation.

All Elecnor Group professionals are obliged to immediately report any irregular practice or unlawful or unethical conduct of which they become apprised or which they witness. This channel may be accessed via the email address codigoetico@elecnor.com or post office box 26-48080.

In 2021, no complaints were received in the sphere of human rights, in particular, in connection with respect for freedom of association and the right to collective bargaining, the abolition of forced or compulsory labour or the effective abolition of child labour through the Ethics Channel

or other available channels. Likewise, neither were any complaints received through the Ethics Channel in connection with corruption, bribery or money laundering.

The fourteen complaints received in 2021 via the Ethics Channel and managed by the corresponding people on the Compliance Committee refer mainly to job-related issues. At the time of completing this report, there were no complaints pending resolution.

Actions 2021 GRI 205-2, GRI 412-2

- Review of the Code of Ethics and Conduct and the Compliance Policy, and issuance of the Elecnor Group's Anti-Corruption Policy and Anti-Trust Policy. All these documents were approved by the Board of Directors of the company at its meeting on 28 July and communicated to the entire organisation. They are available on the Group's various websites and corporate intranet.
- Preparing and disseminating the Quick Guide to Anti-Trust Compliance, in order to facilitate the organisation's understanding of competition law regulations and the corresponding compliance risks.
- Compliance Training:
 - In 2021, and without prejudice to other training actions conducted in the Group's various organisations and subsidiaries, a total of almost 250 professionals corresponding to the Group's management team, both nationally and internationally, received specific anti-trust training. For the preparation and delivery of these training sessions, the company partnered with a specialised firm (Deloitte).
 - Furthermore, a specific digital training module on compliance that must be completed by all new Structure personnel in Spain in the on boarding phase, has been in operation since April. In 2021, a total of 457 employees have completed this training module.

The Elecnor Group allocates significant investment to raising awareness and training its staff in connection with compliance issues. Below are details of the number of employees who have received this kind of training in the last 3 years (from the end of 2018 up to the present), broken down by professional category and geographical area:

	Management		Executive		Technician	
	No. employees	%	No. employees	%	No. employees	%
Spain	125	94.0	712	83.9	2,014	93.5
Europe	2	1.5	23	2.7	18	0.8
America	5	3.8	51	6.0	47	2.2
Africa	1	0.7	41	4.8	64	3.0
Asia	-	-	5	0.6	3	0.1
Oceania	-	-	17	2.0	8	0.4
Total (*) (**)	133	100.0	849	100.0	2,154	100.0

(*) Compliance training is intended for staff in Structure. Staff in Works, given their lower exposure to compliance risk, are not included in these specific training plans.

(**) Includes a total of 457 employees (chiefly geographical area "Spain" and professional category "Technician") who have joined the Elecnor Group in Spain since April and who have received specific training on compliance as part of the on boarding phase training.

- Review and improvement of the compliance risk assessment and due diligence procedures in relation to third parties (mainly suppliers and subcontractors). The following actions, inter alia, have been conducted throughout 2021:
 - Preparing and disseminating the Elecnor Group's Code of Ethics for Suppliers, Subcontractors and Collaborators, which must be accepted by suppliers and subcontractors through the procurement platform.
 - Incorporating a specific compliance due diligence questionnaire (in the process of being implemented), as part of the supplier approval process.
 - Enhancing the capabilities and scope of the platform for conducting third-party compliance risk analysis.
- Executing the IE-Elecnor work plan Observatory on Sustainable Compliance Cultures, notably featuring:
 - Preparing the first study on "Radiography of the sustainable compliance culture in Spanish SMEs. Current status and drivers".
 - Holding two events broadcast via streaming and featuring the participation of various compliance experts from both the business and academic spheres.
 - Consolidating the Observatory website.
 - Launching a new initiative consisting of the recording and broadcasting of videopodcasts ("Compliance Matters") with various personalities from the business, academic and legal worlds, etc. in order to discuss various aspects related to business ethics, compliance and sustainability, culture in organisations, etc.

This initiative has been acknowledged by the 3rd edition of Expansión's "Compliance" Awards as one of the five finalist initiatives in the Best Ethical Initiative Category.

- Reviewing compliance indicators (KPI) and improving the review and monitoring process.
- Reviewing and strengthening the procedure for participation in associations.
- Consolidating the large projects integrated management procedure (opportunity, bid and contract), aimed at improving the system, risk assessment (including compliance risk) and coordination between departments as soon as a major project opportunity arises and until the relevant contract is signed.
- Continuing the consolidation and improvement of the Compliance System at the various subsidiaries and organisations belonging to the Group, in accordance with the Compliance System Rollout Plan. In that regard, the progress made in the wind power subsidiary Enerfín is noteworthy.

Goals in 2022

In 2022, work will be continued in relation to the following goals in terms of compliance, among others:

- Consolidating the improvements implemented in 2021 in relation to compliance risk analysis and due diligence procedures of third parties (mainly suppliers and subcontractors).
- Improving the system for outlining training needs and for designing, developing and implementing training initiatives.

- Improving the systematic approach to the design, development and implementation of awareness-raising initiatives.
- Preparing and publishing the second study as part of the collaboration with the IE Law School through the IE-Elecnor Observatory on Sustainable Compliance Cultures and implementing the rest of the planned activities.
- Completing the project to improve systems relating to the preparation, issuance and approval, dissemination, review and monitoring of the mandatory Corporate Policies and Procedures.
- Improving integration between the Compliance and Integrated Management Systems.
- Continuing the Compliance System Rollout Plan.

The Elecnor Group has partnered various sector associations in order to continue driving the sectors of activity in which it operates. In accordance with its Compliance System, it does not make financial contributions that are unlawful or aimed at obtaining special treatment. In 2021, the Elecnor Group contributed Euros 1.2 million to sector associations (Euros 1.1 million in 2020).

Committed to fighting corruption, bribery and money laundering

The Elecnor Group's Compliance System is its main tool to combat corruption, bribery and money laundering. The effectiveness of the system has led to the company being certified in accordance with the UNE-ISO 37001 and UNE 19601 standards, as mentioned above.

Pursuant to the principles and values in force since its incorporation in 1958, the Elecnor Group is firmly committed to ensuring strict compliance with anti-bribery and anti-corruption regulations, and one of its priorities is to develop a solid corporate culture of regulatory compliance that permeates the daily decision-making processes by its Directors, executives and employees, as well as any other natural or legal persons acting on behalf of the Group, enabling them, within the scope of their respective functions and responsibilities, to detect and prevent practices that might constitute acts of corruption or bribery.

This commitment is not optional. The Elecnor Group implements the principle of zero tolerance to practices that contravene any provisions concerning ethics and integrity, and in particular concerning bribery and corruption, and expects its professionals and third parties with whom it has dealings to always act and behave in a manner consistent with the principles and values established in its Code of Ethics and Conduct, in its Compliance Policy and, specifically, in the Group's Anti-Corruption Policy.

Under no circumstances shall the employees of the Elecnor Group and its partners resort to unethical practices that could be construed as being conducive to a lack of impartiality, transparency and integrity in the decisions of any third party with whom they have dealings, whether they belong to the public sector (authorities, civil servants or persons involved in the performance of public duties) or the private sector.

In particular, the Elecnor Group strictly prohibits:

- Offering, promising or granting, directly or indirectly, bribes to any third party, whether in the public or private sector.
- Offering, promising or granting, directly or indirectly, facilitation payments to commence or facilitate administrative processes or procedures.

- Offering, promising or granting, directly or indirectly, gifts, presents or courtesies to any third party who breaches the provisions of the "Elecnor Group's Policy on Gifts, Presents and Courtesies".
- Offering, promising or performing, directly or indirectly and on behalf of the Elecnor Group, contributions for political purposes.
- Using sponsorships or donations as a means of obtaining favourable treatment.
- Requesting, accepting or receiving any kind of unwarranted benefit or advantage with a view to unduly favouring a third party in the acquisition or sale of products, contracting of services and any other commercial or business dealings.
- Establishing business relationships with third parties without complying with the duty of minimum due diligence in getting to know them.

In order to promote respect for these action principles, the Elecnor Group is firmly committed to:

- Acting and requiring others to act at all times in accordance with the provisions of the applicable legislation on combating bribery and corruption, its Anti-Corruption Policy and the rest of regulations, policies and complementary internal procedures, applying, where necessary, the applicable disciplinary framework, in accordance with labour regulations and collective bargaining agreements in force, in the event of non-compliance in this sphere.
- Disseminating the organisation's commitment to strict compliance with legislation, in particular in combating bribery and corruption, among both its employees and its partners.
- Disseminating among its employees, by means of suitable communication and training programmes, the importance of discharging their duties and responsibilities in accordance with the highest ethical standards and in strict compliance with the law.
- Providing Elecnor Group employees the necessary knowledge and tools to detect, prevent and properly manage any situations that may lead to a breach of the law or that may contravene the principles and values of the Elecnor Group and the Anti-Corruption Policy.
- Encouraging and requiring its partners to have the utmost respect for the principles and values of the Elecnor Group.
- Making available to its employees proper communication channels to enable them to convey any queries they may have in connection with the Anti-Corruption Policy and to fulfil their duty to report and inform of any irregular conduct of which they are aware or which they suspect.

In that regard, and among the dynamics and practices established to foster and disseminate this commitment among employees, it is worth noting that all meetings of the Board of Directors, Executive Committee, Management Committee and other major committees have included a specific item on the agenda on compliance issues ("Compliance Contact") since the end of 2018, at the proposal of the Board of Directors.

As regards money laundering, and as previously stated, the corresponding associated risks are identified among the risks that are monitored by the Elecnor Group's Compliance System. In that regard, the Elecnor Group's Code of Ethics and Conduct expressly states that "*The Elecnor Group is firmly committed to the prevention of money laundering. Under no circumstances will we engage in activities aimed at affording the appearance of legitimacy or legality to property or assets obtained through criminal actions*".

In the same manner, the Compliance Policy states that *"...under no circumstances shall the Elecnor Group's staff or the related persons acquire, own, use, convert or transfer goods if it is known that they arise from crime, irrespective of whether the criminal activity was carried out on national territory or abroad. Likewise, the performance of any act to hide or conceal its illegal origin, or to help someone who has participated in such breach by avoiding the legal consequences of his actions, is expressly prohibited. Elecnor Group's staff shall therefore be extremely cautious and diligent in their transactions with third party providers of goods and services, to assure that they do not arise from a criminal activity."*

The Elecnor Group has procedures and controls in place to prevent and manage such risk.

Human Rights GRI 102-12, GRI 103-1, GRI 103-2, GRI 103-3

Since it commenced its activities, the Elecnor Group has been fully committed to supporting, respecting and safeguarding human rights in all spheres of action, based on its ethical principles and its corporate social responsibility.

As outlined in its Human Rights Policy, all the Group's companies are unwaveringly committed to compliance with and defence of human rights in developing their activities in all of the countries where they operate. Moreover, this Policy extends to all the Company's stakeholders with a view to sharing and requiring the same exacting level of commitment in its relationships with them.

This Policy is fully aligned with the Group's Corporate Social Responsibility Policy and its Ethical Code, as well as with the UN Universal Declaration of Human Rights, the principles of the UN Global Compact and the Sustainable Development Goals, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises.

The Human Rights Policy lays particular emphasis on equality of opportunities regardless of people's characteristics, as well as the abolition of child labour and forced labour and respect for the rights of ethnic or indigenous minorities.



APOYAMOS
EL PACTO MUNDIAL

Furthermore, as a Signatory of the United Nations Global Compact, the Group has undertaken to incorporate the 10 principles in relation to human rights, labour, environment and anti-bribery into its corporate strategy, and to promote the Sustainable Development Goals (SDGs).

The companies co-owned by the Elecnor Group, Celeo Redes in Chile and Brazil, have also subscribed to the Global Compact.

Fiscal transparency GRI 207-1, GRI 207-2, GRI 207-3

The Elecnor Group's Board of Directors decided to approve a governance framework for tax matters in order to ensure that the Group's actions and operations are governed by clear principles, values and standards, to enable any employee, person or entity having a relationship with the Group, when appropriate, and the Board itself to adopt suitable decisions so as to comply with tax legislation. This framework is fully aligned with the principles and criteria on which the Group's Risk Management and Control System is based.

Accordingly, the Elecnor Group's Tax Policy reflects the Group's fiscal strategy and its commitment to the application of best tax practices. The strategy consists of ensuring compliance with applicable tax regulations and seeking to properly coordinate the fiscal practices followed by Group companies, for the corporate interest and in support of a long-term business strategy that avoids tax risks and inefficiencies in executing business decisions.

The Group's tax strategy is based on the following principles:

1. Fulfilling their tax obligations with the utmost diligence in the various countries and territories in which the Group operates.
2. Submitting all the Group's tax filings in a timely manner, including those that do not involve tax payments.
3. Paying in a proper and timely manner all taxes payable in accordance with the applicable laws.
4. Making tax decisions on the basis of a reasonable interpretation of the regulations, refraining from taking material tax risks, without relinquishing legitimate tax efficiency to maximise the Group's value for shareholders.
5. Paying particular attention, when applying tax law, to the interpretation thereof emanating from the courts in relation to each of the operations or matters that have a tax impact.
6. Preventing and minimising, to the extent possible, the tax risks associated with the Group's strategic operations and decisions.
7. Defining and implementing frameworks for the supervision, review and control of the tax function.
8. Informing the management bodies in regard to the main tax implications of the operations or matters submitted for their approval, when they constitute a significant factor in determining their intentions.
9. Fostering an open relationship with the tax authorities based on respect for the law, loyalty, trust, professionalism, collaboration, reciprocity and good faith, without prejudice to any legitimate disputes that, upholding the above principles and in defence of the corporate interest, may emerge with said authorities in connection with the interpretation of the regulations.

The Elecnor Group's Tax Policy is available on the corporate website and intranet.

The Elecnor Group publishes its tax information in an exercise of reporting transparency. The taxes paid by the Group in the countries and territories where it operates constitute one of its main contributions to society.

In 2021, the Elecnor Group has submitted the 2020 Country by Country Report, which can be found in Appendix I hereto. The full list of Elecnor Group companies and their main activities is published annually in Appendix I of the Consolidated Annual Accounts.

Profit before tax by country

Figures in thousands of Euros

Country	2020	2021
Germany	219	-69
Angola	11,777	6,352
Algeria	9,561	-1,625
Argentina	1,299	1,231
Australia	-325	11,704
Belgium	-3,636	1,228
Bolivia	-178	-23
Brazil	65,936	83,400
Cameroon	-2,064	2,679
Canada	2,734	-121

Country	2020	2021
Chile	18,611	4,931
Colombia	-1,345	-4,062
Ivory Coast	-2	-1,404
Ecuador	1,469	571
El Salvador	741	88
Spain	2,144	-2,864
United States	8,128	12,317
Finland	919	-321
France	-20	-15
Ghana	-1,647	-1,556
Guatemala	47	-
Guinea	-	-76
Honduras	2,737	2,985
Italy	-2,446	-4,161
Jordan	-1,248	310
Kuwait	-5	-15
Lithuania	1,460	3,278
Morocco	-33	-17
Mauritania	-1,171	-1,283
Mexico	8,888	11,497
Mozambique	-135	-898
Norway	6,634	8,256
Oman	-2,316	3,883
Panama	-1,729	-2,896
Paraguay	2	-23
Peru	206	2,405
Portugal	-2,185	2,695
UK	4,375	2,795
Dominican Republic	-1,001	390
Romania	60	70
Senegal	-1,234	185
South Africa	1	8
Uruguay	1,062	391
Venezuela	-359	-203
Zambia	-	31
Total	125,931	142,049

Payment of income tax

Figures in thousands of Euros

Country	2020	2021
Angola	1,128	1,163
Argentina	429	445
Australia	483	-3
Bolivia	50	0
Brazil	17,274	19,593
Cameroon	4	0
Canada	86	0
Chile	760	952
Colombia	3	239
Ecuador	227	376

Country	2020	2021
El Salvador	28	69
Spain	1,206	11,202
United States	57	1,001
France	140	0
Ghana	6	17
Equatorial Guinea	6	10
Honduras	13	-55
Italy	18	109
Jordan	73	0
Kuwait	13	25
Lithuania	0	6
Morocco	0	435
Mauritania	229	68
Mexico	-225	1,552
Mozambique	0	4
Norway	0	1,080
Panama	656	0
Peru	0	0
Portugal	153	102
UK	36	-116
Dominican Republic	263	0
Romania	2	5
Senegal	2	0
Uruguay	274	207
Venezuela	0	46
Total	23,394	38,532

The Elecnor Group has made its best estimate of the breakdown of results by country, as well as the payments made in income tax by country, based on the data available at the time of preparing these Annual Accounts. For this breakdown by country, the same criteria were used as those applied to preparing the Consolidated Annual Accounts, likewise breaking down harmonisations and removals as required for the presentation of the Consolidated Income Statement.

Estimated corporate income tax payments in countries in which the Group operates, correspond mainly to the final settlement of taxes accrued in 2020, and to payments on account of taxes accrued in 2021 which will be settled in 2022.

Public grants received GRI 201-4

In 2021, the Elecnor Group received public grants amounting to Euros 3,307 thousand, compared with Euros 3,744 thousand in the previous year, as detailed below.

Figures in thousands of Euros

Country	2020	2021
Spain	2,499	2,348
Canada	117	178
Italy	-	29
UK	340	110
Portugal	788	491
Romania	30	151

Total	3,774	3,307
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15.10 Social impact

Through its various initiatives, the Elecnor Group has a direct impact on employment, progress and social welfare. It also acts as a driving force for development in the countries in which it operates, while contributing to resolving specific major global challenges reflected in the 2030 Agenda, such as the fight to combat climate change, the reduction of the energy gap and secure access to essential resources such as energy and drinking water, among others.

Furthermore, the Elecnor Group generates value and distributes it among its main stakeholders as a result of its sustained growth.

The Group's social commitment is chiefly coordinated through the Elecnor Foundation with social infrastructure projects in the places most in need and through a commitment to the training, research and employability of young people.

Moreover, by means of the main Group companies, numerous social and/or environmental programmes are implemented with local communities.

Value creation GRI 102-7, GRI 103-1, GRI 103-2, GRI 103-3, GRI 203-2

Direct financial value generated and distributed GRI 201-1

The information continued in this report concerning the creation and distribution of the financial value shows how the Elecnor Group continues to generate wealth for its stakeholders.

In thousands of Euros	2020	2021
Generated financial value	2,549,406	3,165,816
Income ¹	2,549,406	3,165,816
Distributed financial value	2,485,785	3,028,382
Operating costs ²	1,683,196	2,035,937
Personnel expenses ³	708,571	868,281
Payments to capital providers ⁴	70,017	84,981
Tax contribution ⁵	23,394	38,532
Investment in the community ⁶	607	652

Source. Figures from the income statement in the Consolidated Annual Accounts for 2021, except for dividend payments and income tax payments shown in the statement of cash flows included in the Consolidated Annual Accounts.

1 Includes: Amount of turnover + change in inventories + self-constructed assets + other operating income + finance income.

2 Includes: Materials consumed + external services + taxes + other management expenses.

3 Includes: Personnel expenses.

4 Includes: Finance expenses + dividend payments (statement of cash flows).

5 Includes: Income tax payments (from the statement of cash flows).

6 Includes: Contributions to the Elecnor Foundation and to various non-profit organisations, associations and foundations.

Job creation

With a team of more than 21,000 people in over 50 countries, people are the main asset for the Elecnor Group, being crucial to the optimum execution of its activities.

At the end of 2021, the Group's workforce had increased by 3,228 people (up 18% on the previous year).

Workforce	2020	2021	Changes
Domestic	10,542	11,103	5%
International	7,661	10,328	35%
Total	18,203	21,431	18%

The Elecnor Group contributes to the development and well-being of local communities by means of direct job creation by contracting local employees and suppliers.

Local employment

Location	2020		2021	
	Employees	Local employment	Employees	Local employment
Spain	10,542	95%	11,103	94%
Europe	1,033	78%	1,253	79%
America	4,861	97%	6,396	97%
Africa	1,683	93%	2,378	95%
Asia	44	82%	188	43%
Oceania	40	58%	113	73%
Total	18,203	94%	21,431	94%

Procurements from local suppliers [GRI 204-1](#)

As introduced in the chapter on Operational Excellence of this NFIS, the Elecnor Group is focused on the ongoing optimisation of the supply chain. In that regard, and whenever possible, it gives priority to hiring local suppliers to foster the economy in the countries in which it operates.

The table below shows the percentage of the volume of purchases made from local suppliers:

	2020	2021
Spain	88%	93%
Brazil	95%	100%
Chile	54%	74%
United States	100%	100%
Mexico	81%	87%
UK	66%	80%
Other	75%	77%
Total	87%	90%

Profitability for shareholders

Elecnor, S.A.'s shares are traded in Spain's SIBE electronic trading system, where shares in the leading Spanish companies are traded, and the market with the largest trading volume in Spain.

The Company has been able to consistently create value for its shareholders in the last few years. In 2021, the dividend yield has been maintained compared to the previous year.

Stock market indicators	2020	2021
Closing share price (€)	11.00	10.50
Dividend yield	3.1%	3.1%

In 2021, two dividends were paid to shareholders: a supplementary dividend against 2020 profit in a gross amount of Euros 0.27455644 per share (Euros 0.28207889 including the pro-rata distribution of treasury shares); and an interim dividend against 2021 profit in a gross amount of Euros 0.05961779 per share (Euros 0.06125324 including the pro-rata distribution of treasury shares).

The Elecnor Group's social action GRI 103-1, GRI 103-2, GRI 103-3, GRI 203-1, GRI 413-1

The Group's social action is mainly coordinated by means of the Elecnor Foundation.

In 2021, the Elecnor Group donated a total of Euros 651,604 to various associations, foundations and non-profit entities to support a range of social causes (Euros 607,479 in 2020). Of that amount, the Group contributed Euros 600,000 to the Elecnor Foundation (600,000 in 2020).

Elecnor Foundation. Generators of change and well-being

Since its launch, the Foundation's mission has been closely linked to the Elecnor Group's own activities, with the aim of helping to improve people's living standards and powering the economic and social progress of the communities in which Elecnor has a stable presence.

Throughout its history spanning more than 60 years, the Elecnor Group has built a corporate culture based on conducting its activity in a responsible and committed manner, voluntarily incorporating social and environmental criteria into business practice.

With the Elecnor Foundation, the company took another step forward in this strategy, expanding the scope of its commitment to the environments in which it operates and to key aspects of today's society, such as training and research. In that regard, the work of the Foundation is strongly tied to the Elecnor Group's own activity, with the priority areas of action being countries in which the company is present and projects related to its lines of business.

Since its creation in 2008, the Elecnor Foundation has been projecting the more human side of engineering with solid values through all its actions, geared towards:

- › The development of water and energy infrastructure for social purposes to benefit those who most need it as well as the environment.
- › Fostering training and research to nurture the professional development and projection of young people.

Since its incorporation, the Foundation has been present in Spain, Honduras, Dominican Republic, Ghana, Chile, Uruguay, Peru, Angola, Nicaragua, Cameroon, Mexico, Senegal and Republic of Congo. The Elecnor Group has allocated funds amounting to Euros 6.7 million. Moreover, the Foundation has obtained other funds totalling Euros 5.8 million. Accordingly, the Elecnor Foundation has led projects worth a total of Euros 12.5 million.

In 2021, the Foundation invested Euros 674,769 in the various projects.

Social infrastructure projects

In 2021, the Foundation has worked on four social infrastructure projects in Spain, Ghana, Senegal and Brazil. Two of them will be executed during 2022.

› *Nos importa el aire que respiras, Spain*

This project (titled “We care about the air you breathe”) is an indoor air treatment project at the Ronald McDonald House in Madrid with the goal of boosting the health of particularly vulnerable children living in the house and minimising their possible exposure to COVID-19 to the extent possible.

Along with its technological partner Aire Limpio, the Foundation has implemented a project chosen by the CDTI in its call for proposals for “RDI and Investment projects to tackle the health emergency declared as a result of COVID-19”.

The innovative project also includes smart systems for counting people and taking temperatures and, once executed, it will be scalable for deployment at elderly care homes, hospitals, etc.

The Elecnor Foundation has been a member of the Board of Trustees of the Ronald McDonald House in Madrid since 2013, the year in which Elecnor built this home for 30 families and implemented an energy efficiency project at the facility. Fundación Infantil Ronald McDonald offers a “home away from home” to families who have travelled from their habitual place of residence so that their children can receive medical treatment.

› Solar for health. Ghana

In 2013, the Elecnor Foundation, along with the Congregation of Sisters of Charity of Saint Anne and Congregation of Sisters Hospitaliers of the Sacred Heart of Jesus, launched the Solar Back-Up Systems project. The aim of this initiative was to strengthen the electricity supply and mitigate the severe problem facing hospitals and health centres due to the obsolescence of their electrical installations, resulting in a high risk of disruption or deficient operation of equipment due to a faulty electricity supply.

As a result of this project, both institutions have identified the need to implement new photovoltaic systems in order to improve healthcare, especially in the ICUs of the following hospitals, which benefit more than 200,000 people per year.

Congregation of the Sisters Hospitaliers of the Sacred Heart of Jesus:

- St. Francis Xavier Hospital in Assin Fosso (60 kWp).
- Adjacent training centre (25 kWp).
- Benito Menni health centre in Dompouse (25 kWp).

Congregation of Sisters of Charity of Saint Anne

- Our Lady of Grace Hospital in Asikuma (60 kWp).
- Our Lady of Rocío Clinic in Walewale (25 kWp).

The Solar for health project was launched in November 2021.

Looking ahead to the upcoming year, two more projects combining water and energy are being undertaken. On the one hand, Heath Energy, in Senegal, a solar photovoltaic project seeking

to reduce energy consumption and ensure a sustainable and adequate electricity supply to the medical services of Hospital St Jean De Dieu in the city of Thiés.

And on the other, in Brazil, a second implementation of the H₂OMe project is being designed (the first was in Angola), which seeks to improve the standard of living of the Quilombola community around a rural school located in the municipality of Óbidos. H₂OMe will filter and purify the school's groundwater, relying on green and environmentally friendly energy from a photovoltaic solar farm.

Training and Research Projects

- › IE - Elecnor Observatory on Sustainable Compliance Cultures

This Observatory was created at the end of 2019 by the Elecnor Foundation and the Instituto de Empresa Foundation, in partnership with the law firm Eversheds Sutherland. It is geared towards fostering a compliance culture and progress in the fight to combat corruption in business, in the defence of competition law, human and labour rights and respect for the environment, placing special emphasis on small and medium-sized enterprises.

This year, the following actions were performed:

- "Compliance in times of uncertainty" event. An event that brought together experts and professionals to discuss, on the one hand, the specific challenges facing small and medium-sized enterprises to foster a culture of compliance and, on the other hand, the various strategic ways to implement it.
- Presentation of the report "Radiography of the sustainable compliance culture in Spanish SMEs", current status and drivers. This report sheds light on the incipient state of the management of aspects relating to ESG and compliance in companies of this size, the need for basic tools, such as the code of conduct and whistleblowing channels, people's feeling of psychological security, as a key factor, besides other conclusions.
- › Corporate Leadership in Entrepreneurship and Innovation programme. Deusto Business School.

The Elecnor Foundation has a collaboration agreement with Deusto Business School and Icade Business School to collaborate in the development of this programme, which includes the most innovative entrepreneurial initiatives of major corporations explained by the executives who have led them.

- › Growing in prevention: the journey of emotions.

Growing in Emotional Prevention is intended for 3rd, 4th and 5th year Primary School pupils and their teachers. It undertakes an educational project on emotional risk prevention through the digital environment and classroom activities.

These are its goals:

- Raising awareness among pupils and the education community regarding the importance of educational orientation and the prevention of emotional risks in all the areas and facets of their lives, so that they can integrate these lessons into their daily routines and future careers.
- Providing educational resources to teachers and students in order to work on the importance of emotional risk prevention in students' most everyday contexts: home, outside and school.

- Fostering emotional risk prevention in the family context by families being involved and participating in students' educational and training process.

By 2021, 14,000 children in the Madrid and Extremadura regions will have benefited from this educational project.

- › Specialist course in medium- and low-voltage electrical installations. Vocational training at Colegio Salesianos Deusto

In 2021, the Elecnor Foundation continued to collaborate with Colegio Salesianos Deusto's vocational training. The ninth edition of the course was held this year.

Currently, three students who have completed this training are working at the Elecnor Group in the field of electrical distribution.

- › Advanced qualification in renewable energies. Dual vocational training.

Dual vocational training enables students to train both in the classroom and in the company under the supervision of a tutor. With this programme, the Elecnor Foundation fosters the development of young people who could later occupy leadership positions in the Group's projects.

Thus, two agreements have been signed with two centres of the Regional Government of Extremadura:

- IES Javier Garcia Téllez (Cáceres). One student has completed his internship at the Astexol-2 Solar Thermal Power Plant.
 - IES Cuatro Caminos (Don Benito, Badajoz). In 2022, five students are expected to carry out internships at Elecnor Group facilities.
- › Master's thesis grants. Valencia's Polytechnic University (UPV).

The Elecnor Foundation, as part of its collaboration with the UPV spanning more than 30 years, has awarded five scholarships for 2020-2021, acknowledging the talent of students who have developed their work in various areas of knowledge linked to the Elecnor Group's activities.

- › Agreement with the Jaime I University of Castellón.

The Jaime I University of Castellón, the Elecnor Foundation and Elecnor signed a general collaboration agreement to establish and develop academic, cultural and scientific relations between the three entities.

Other social projects

The Elecnor Group has a clear commitment to the communities where it operates, and programmes to foster social, environmental and economic development in the surrounding communities have become especially significant. Furthermore, it has continued to actively contribute to the health and social emergency caused by COVID-19.

Below are some of the initiatives launched by the Concessions companies Celeo and Enerfín.

Brazil

The Group's wind power subsidiary, Enerfín, approved by the Brazilian government and in compliance with tax incentive legislation, has contributed to social development, culture and

sport. Some of these initiatives were being undertaken in 2020 and have been maintained during 2021.

- › Visitors' centre at the Osorio wind complex.

Following the visitor centre's construction in 2016, visits are received each year from different groups, mainly schoolchildren between 7 and 18 years of age, and content is provided on wind energy and the sustainability of this wind farm complex. In 2021, 168 visitors were received.

- › Banco do Nordeste's Together for Life Campaign

Action undertaken by Banco do Nordeste seeking to collect food and hygiene items for communities in need living in the regions surrounding the Ventos de São Fernando wind farm complex. This initiative had the backing of the complex, which donated 200 food baskets and 200 hygiene and cleaning kits purchased from small businesses in the region.

- › Brasil Brasileiro - Popular Art

This is a project designed by a leading Brazilian photographer in order to showcase the popular art produced from the south to the north of the country.

- › Annual activities schedule with Fundação Iberê Camargo

The Iberê Camargo foundation is a highly representative cultural institution in Porto Alegre. Its goal is to foster the interaction of the general public with art, culture and education through interdisciplinary programmes. Currently, the Foundation conserves its collection, fosters the study and dissemination of Iberê Camargo's work, and also presents temporary exhibitions of modern and contemporary art and a permanent parallel programme.

- › Restoration and conservation of the Military Brigade Museum's bibliographic collection

This is a project undertaken by the Military Brigade, an institutional body responsible for public security, and the Rio Grande do Sul State Highway Police. The goal is to restore and conserve the Museum's bibliographic collection. It is also hoped that the information can be digitalised and made available on the website.

- › The saga of Giuseppe Garibaldi in Capivari do Sul

This project coordinated by the municipality of Capivari do Sul, a region of interest for wind purposes, consists of recreating the saga of Giuseppe Garibaldi and its representation throughout the region.

- › Projeto Virada Sustentável POA

This is a very popular event in Porto Alegre, especially among young people, which tackles topics relating to conservation and environmental sustainability. This year's edition of Festival Virada Sostenible Porto Alegre consisted of visual art actions and urban art interventions, concerts and musical shows, and a number of theatrical and artistic-literary representations.

Furthermore, numerous social projects were conducted throughout 2021, including the following are examples:

- › Hospital São Lucas da PUC (RS)

The Physical Activity Incentive Programme for the Elderly (PIAFI) comprises a set of actions intended for people over 60 years of age to take physical exercise, in order to foster and

improve the physical condition of the elderly and their quality of life. This project seeks to fulfil the new and growing demands arising from the ageing of the population.

› Checkmate for All - Brazilian Chess Federation for the Visually Impaired (Porto Alegre/RS)

This project seeks to foster the practice of chess for 80 visually impaired people throughout Brazil, between 8 and 80 years of age, seeking to improve individual health and well-being. Besides to the activities planned in the various stages of the project, an integration event will be held for the fellowship of all participants. The event is set to be held at the Centro Paralímpico de São Paulo, a venue that will be assigned to the entity.

Celeo implemented several social actions, including the following:

- › Launch of the Celeo in the Community programme seeking to contribute to the quality of life and the development of local human capital by undertaking social projects. For the years to come, a youth education project is scheduled in São João do Piauí (Piauí), and a project on environmental education and the SDGs in practice in Atibaia (São Paulo), an area of influence of the CANTE transmission line.
- › Completion of the Viver bem em Caetetuba project comprising the renovation and construction of an annex to the Caetetuba train station (Atibaia, São Paulo) in order to install a social assistance centre (CRAS) that will also be used to provide vocational training courses. It will benefit around 20,000 people in situations of high social vulnerability.
- › Launch of the initiative #Cestou Celeo. Internal campaign for the donation of hampers of basic necessities to support the most vulnerable people in the health crisis. In total, 186 hampers were collected from employees, added to another 186 purchased by Celeo, which had committed to make a contribution equivalent to that made by the employees.
- › Donation of hospital equipment to the municipalities of São João do Piauí (Piauí) and Parintins (Amazonas).

Canada

Enerfin performed the following actions:

- › Guided tours of the L'Erable wind farm. These visits are organised in partnership with the local tourism office, but in a new format for small, independent groups as a result of the health restrictions.
- › Providing support to community organisations and events in the municipalities of Saint Ferdinand, Saint-Pierre-Baptiste and Sainte-Sophie-d'Halifax. Although many of the events that received support have been cancelled due to the health measures in place to combat COVID-19, support has been given to these entities this year in order to maintain assistance for schoolchildren with difficulties, and to build a permanent stage where concerts and exhibitions can be held.

Chile

Celeo's social projects are mainly geared towards environmental education. In 2021, the environmental education programmes were continued in the Corel and Charrúa schools, and the programme was launched in two further schools, with workshops on environmental awareness, flora, fauna and conservation.

Furthermore, in coordination with the Celeo Sports Club, 80 sanitary material kits for protection against COVID-19 were delivered to various organisations in the commune of Colbún and Rincón de Pataguas.

Spain

As part of its corporate social responsibility, Celeo Spain has agreed the following two actions to be implemented in the first quarter of 2022. Both initiatives have been duly reviewed and authorised by the Compliance Committee.

On the one hand, it will make a contribution to the Madrid Food Bank; and, on the other, to the Padre Piquer Training Centre to collaborate with its Scholarship School programme.

Dialogue with local communities

Communication, ongoing dialogue and proper management of impact on local communities are essential to maintain social legitimacy and ensure the success of the Group's projects.

In the context of the Environmental Assessment Studies of the projects, there are stakeholder outreach processes, the goal of which is to outline the main characteristics of projects, their design and planning to communities that might be affected. Queries are also fielded and their comments taken on board so as to minimise the projects' impact on their territory.

Chile

For the Los Lagos wind farm project, Enerfín has conducted a social impact assessment, which is necessary to complete the Environmental Impact Study. Nine indigenous communities and stakeholders close to the project have been identified in this process. The company has held interviews and informative meetings to inform the communities about the project and its progress, and the latter have raised their concerns, doubts and expectations with the company, discussing voluntary commitments associated with the possible impacts arising from the project.

Having initiated the meetings, work will continue through negotiation tables with the communities until the Environmental Impact Study is presented and approved by the corresponding administrations.

In turn, Celeo conducted a Community Diagnosis in the Diego Almagro area in order to generate links with the community through the development of a project for the benefit of the community. Thanks to this exercise and the development of strategic lines of social investment, the first social investment projects of Celeo Chile were conducted in the commune. The first edition of the Water and Energy Efficiency Workshop was held with the support of EcoGen Recycling, a local enterprise, and an agreement was signed with the fire brigade of the city of Diego de Almagro.

Furthermore, in the context of the CASTE and MATE projects, certain social initiatives will be implemented on the basis of results obtained from the PAC (Citizen Participation Process), which are currently in the assessment phase.

Canada

Through its various subsidiaries, Enerfín belongs to various associations that foster renewable energy and optimise its integration into the environment and rural communities. At a national level, these initiatives include the Canadian Renewable Energy Association (CANREA), and at a provincial level L'Association des Producteurs d'Énergie Renouvelable du Québec (AQPER).

Mexico

Enerfín held informative meetings with the Agreement Monitoring Committees of the five Mayan communities in the area of influence of the projects it has in progress in Yucatan.

Brazil

Celeo has a stakeholder engagement process called the Integra Project. This voluntary project is chiefly geared towards:

- Minimising risks.
- Fostering stakeholder awareness of environmental conservation, burning and forest fires.
- Training the Operation and Maintenance teams in approaching and communicating with local stakeholders.
- Increasing transparency.
- Understanding stakeholder concerns and interests and bringing them into its processes and activities.
- Enhancing the way it communicates and interacts with stakeholders.

The main channels of communication are open meetings with the local community, landowners and other people affected by the projects.

Respect for indigenous communities

The Elecnor Group sometimes executes projects close to indigenous communities or areas with other social minorities. In these cases the social and/or environmental impacts on the affected areas are analysed and, where necessary, measures are implemented to mitigate them.

Chile

As part of the preparation of the Environmental Impact Study for the Los Lagos Project, Enerfín is analysing the area of influence and determining the degree of impact on indigenous communities.

Colombia

In the context of the El Ahumado, Musichi, Trupillo, Dividivi and Brisas del Caribe wind farm projects, since 2018, Enerfín has achieved 82 Preliminary Consultation processes and obtained the free and informed consent of them.

In 2021, agreements have been obtained in 17 processes with Wayuu indigenous communities for the Brisas del Caribe Wind Farm project. These participatory processes were conducted in several meetings and were accompanied by various Colombian state entities.

In order to guarantee the social participation of the communities in the various projects, the company has held more than 70 meetings in the territory, opening permanent communication channels with the local communities.

Similarly, follow-up meetings have been held by the Colombian government on the agreements reached at the El Ahumado wind farm, demonstrating compliance with the commitments and the company's socially responsible actions with the communities.

Pursuant to ILO Convention 169 (Right to Preliminary Consultation), Enerfín conducted 23 consultation processes for the Brisas del Caribe wind farm, of which 20 reached an agreement and 3 remain ongoing. As a result of the Preliminary Consultation process, actions to prevent, mitigate, correct or offset each of the impacts identified were outlined together with the community.

Furthermore, in 2021, various activities were conducted to provide support to the 90 indigenous communities with which there is a relationship due to the projects being undertaken in the Colombian department of La Guajira. These notably include the following:

- Social and cultural support. Donation for the purchase of food, medicines, materials, biosecurity (COVID-19), etc.
- Giving of Christmas gifts. 2,300 gifts were given to the children of the indigenous communities.
- Providing support to the Mayor's Office of Uribia (Guajira). Food and gifts were donated for distribution among the indigenous communities in the area.

In the social dialogue processes with the Colombian indigenous communities, strict compliance with the security protocols laid down by the government remains in place.

Brazil

IN the context of its environmental legislation, Celeo Brazil conducted Indigenous Component Studies (ICS) or Quilombola Component Studies (QCS), to gauge the specific impacts of the project on these communities. Subsequently, control and mitigation measures are conducted for each impact identified in a Basic Indigenous Environmental Plan (BIEP) or Quilombola (BQEP).

During the year, the company has been monitoring the studies and plans pending assessment and approval by the corresponding bodies.

Elecnor, committed to the SDGs GRI 102-12

The goal of the Elecnor Group is to ensure that its actions, together with those of the Foundation, are in keeping with the challenges presented by the 2030 Agenda Sustainable Development Goals.

Because of the nature of its activity, the Elecnor Group is a key player in society's development and progress. Its infrastructure, renewable energy, water and environmental projects contribute solutions to some of the current and future challenges such as climate change, the reduction of inequalities, and the energy gap, among others.

Contribution to SDGs deriving from the main businesses



Contribution to the SDGs deriving from the Elecnor Foundation's social action



SDGs

Some projects and initiatives by the Elecnor Group and Elecnor Foundation

	<p>Enerfín Social projects Celeo Social projects Elecnor Foundation Social infrastructure projects</p>
	<p>Celeo Social projects</p>
	<p>Elecnor Group Certification Safety Excellence Project (SEP) ISO 45001 certification Awareness campaigns Health and safety training plan Elecnor Foundation Social infrastructure projects</p>
	<p>Elecnor Group Collaboration with universities and vocational training centres Enerfín Training programmes in various projects Celeo Social initiatives Elecnor Foundation Education projects</p>
	<p>Elecnor Group Equality plan</p>

**Elecnor Group**

Services specialising in water infrastructure

Audeca

Water and waste water treatment projects

Hidroambiente

Water treatment solutions

Elecnor Foundation

Social infrastructure projects

**Elecnor Group**

Renewable energy generation projects

Promotion of renewable energy

Energy efficiency projects and initiatives

Atersa

Development, production and distribution of solar photovoltaic products

Enerfin

Wind farms

Celeo

Energy transportation projects

Solar PV farms

Solar thermal plants

Elecnor Foundation

Social infrastructure projects

**Elecnor Group**

Creation and promotion of local employment

Hiring local suppliers

Signatories of the UN Global Compact

Elecnor Foundation

Training and research projects

**Elecnor Group**

Infrastructure development

Initiatives involving start-ups

Digital Transformation Plan

Innova calls for proposals

Innovation projects

**Elecnor Group**

Equality plan

Enerfin

Social projects

Celeo

Energy transportation projects

Social projects

Elecnor Foundation

Social infrastructure projects

Training and research projects

**Elecnor Group**







Energy efficiency projects

Smart Cities Projects

Managing street lighting

Audeca

Urban waste collection projects

	<p>Elecnor Group Energy efficiency projects Smart Cities Projects Managing street lighting</p> <p>Audeca Urban waste collection projects</p> <p>Enerfín Wind farms</p> <p>Celeo Energy transportation projects Solar PV farms</p>
	<p>Elecnor Group Renewable energy projects: wind, solar PV, hydroelectric and biomass Climate change strategy Calculation and verification of the carbon footprint Emission reduction plan</p>
	<p>Audeca Water and waste water treatment projects Projects to preserve natural spaces</p> <p>Hidroambiente Water treatment solutions</p>
	<p>Elecnor Group Initiatives to foster biodiversity</p> <p>Audeca Projects to preserve natural spaces</p> <p>Enerfín Plan to monitor bird life in wind projects</p> <p>Celeo Environmental initiatives</p>
	<p>Elecnor Group Certification to UNE-ISO 37001 anti-bribery management system standard Certification to UNE 19601 criminal compliance management system standard Compliance Training</p> <p>Elecnor Foundation The IE-Elecnor Observatory on Sustainable Compliance Cultures</p>
	<p>Elecnor Group Partnerships and collaborations with entities and associations - Participation in forums</p> <p>Elecnor Foundation Partnerships and collaborations with entities and associations</p>

Other channels for engagement with society

Participation in associations [GRI 102-13](#)

The Elecnor Group is actively involved in flagship associations in the industries and countries where it operates. There follows a list of the most important of these for the Group:

Spain

ACEX, Asociación de Empresas de Conservación y Explotación de Infraestructura
ADEMI, Asociación de Empresas de Ingeniería, Montajes, Mantenimientos y Servicios Industriales
AEDYR, Asociación de Desalación y Reutilización del Agua
AEE, Asociación Empresarial Eólica
AeH2, Asociación Española del Hidrógeno
AELEC, Asociación de Empresas de Energía Eléctrica
AESPLA, Asociación Española de Servicios de Prevención Laboral
AIN, Asociación de Industria de Navarra
ANDECE, Asociación Nacional de la Industria del Prefabricado de Hormigón
ANESE, Asociación Nacional de Empresas de Servicios Energéticos
APIEM, Asociación Profesional de Instaladores Eléctricos y de Telecomunicaciones de Madrid
APPA Renovables - Asociación de Empresas de Energías Renovables
ASAGUA, Asociación Española de Empresas de Tecnologías del Agua
ASEALEN, Asociación Española de Almacenamiento de Energía
ATC, Asociación Técnica de Carreteras
CEOE, Confederación Española de Organizaciones Empresariales
CETRÉN, Asociación de Acción Ferroviaria
CONFEMETAL, Confederación Española de Organizaciones Empresariales del Metal
Enercluster, Cluster Eólico de Navarra
Plataforma enerTIC
EGA, Asociación Eólica de Galicia
FEMEVAL, Federación Metalúrgica Valenciana
FVEM, Federación Vizcaína de Empresas del Metal
Sedigás, Asociación Técnica Española de la Industria del Gas
SERCUBE, Asociación Nacional de Fabricantes de Bienes de Equipo
UNEF, Unión Española Fotovoltaica

Brazil

Spanish Chamber of Commerce in Brazil

Canada

Canadian Chamber of Commerce

Ecuador

Spanish Chamber of Commerce in Ecuador

Mexico

Spanish Chamber of Commerce in Mexico
Cámara Nacional de Manufacturas Eléctricas

Portugal

Associação Portuguesa Ind. Eng. Energetica
Associação Emp. Construção Obras Publicas e Serviços
Camara Comercio e Industria Luso Espanhola

Participation in forums

Throughout 2021, the Elecnor Group took part in various forums and events related to its fields of activity. Some of the most noteworthy ones are listed below:

- > Africa 2023 Focus

Chief Executive Officer of the Group, Rafael Martín de Bustamante, took part in the presentation of the "Africa 2023 Focus" action programme held at La Moncloa.

The event was attended by the President of the Spanish Government, the President of Ghana, the President of the African Development Bank, the Government of Spain's Minister of Foreign Affairs, European Union and Cooperation, and the Minister of Foreign Affairs of Senegal.

Having spent four decades on the African continent, the Elecnor Group was the company chosen to talk about its experience in Africa and provide a Spanish business vision of the opportunities that this programme will promote.

- > Energyyear Mediterránea

This forum, held in Madrid, provided an in-depth examination of the challenges and opportunities of the Spanish renewable energy market. The Elecnor Group, as a leading player in this field, took part in the debate on the role of wind energy in reactivating Spain's economy.

- > Summit Canal CEO

This congress, held by Canal CEO, brought together eighteen figures who have created their own style for leading and transforming the business horizon, achieving excellence in one of the ten essential competencies in the leaders of the future. The Chief Executive Officer of the Elecnor Group took part in a masterclass on well-being.

- > *IE-Elecnor Observatory on Sustainable Compliance Cultures*

The Elecnor Group, together with IE, held two events broadcast via streaming and featuring the participation of various compliance experts from both the business and academic spheres.

Similarly, the Group's various subsidiaries have been present at forums in their sectors of activity. Some of the most relevant ones are set out below:

Spain

In Spain, it is worth highlighting Enerfín's participation in the following events:

- > AIN Circular Platform. Event organised by AIN on circular economy, presenting the conclusions of the programme co-funded by the Government of Navarra and AIN. Enerfín was one of the five companies selected to participate in the programme and took part in the round table.
- > CITE 2021: 2nd International Congress for Ecological Transition. Enerfín provided support the congress as a gold sponsor and participated in a round table together with other major companies (Nordex Acciona, Siemens Gamesa and Ingeteam).

Enerfín has also attended several events both in person (6th Spanish Wind Energy Congress - AEE in Madrid, 8th Solar Forum - UNEF in Madrid, Green Hydrogen Day in Galicia in Ferrol, Next Generation EU: Opportunities for the participation of local entities, GT NEGA: encuentros de transferencia e innovación, the Navarre Green Hydrogen Agenda, etc.), as well as online (webinar by REE on access and connection, webinar on how to design a more profitable PV

in difficult terrain, webinar ECOVOLTAICA: The path towards developing sustainable photovoltaic plants, webinar Decarbonisation of the industry: green hydrogen, in addition to others).

The subsidiary Audeca took part in the following initiatives:

- › 16th Conference on Road Maintenance "The Road: Essential Infrastructure". Audeca took part in the trade fair held by ACEX and the Technical Road Association. It also collaborated with an informative talk on the SMS+ system that it has developed and won the 2021 ACEX Award.
- › Digital Debate "New technologies applied to road maintenance". Audeca took part in this debate held by the Spanish Road Association, communicating its main R&D&I projects.
- › National Symposium on Roads and Local Administration Works. Audeca has collaborated in this symposium held by the Spanish Road Association (AEC).
- › Ecofira international event. This event is an international meeting point where companies and public bodies display the latest advances in efficient environmental management.

Brazil

In Brazil, Enerfín took part in WindPower 2021, the country's leading congress that brings together companies, federal bodies and other agents operating in the country's electricity sector, and in Enase 2021, a national meeting of professionals and agents in the Brazilian electricity sector.

Celeo also took part in Intersolar South America, the continent's largest solar sector event. The core goal of the event is to foster a space for global and local brands to present their cutting-edge technologies and to display the possibilities of profiting, saving and keeping up with the advances in the solar market. Celeo Brazil's head of business development, together with other specialists, discussed: "Large-scale solar PV projects - the main competitive factors: maximising return on investment - CapEX and OpEX".

Canada

Enerfín was present at the annual colloquium of the Quebec Association for the Production of Renewable Energy, theme of which was "Boosting our renewable energies, relaunching our economy".

Chile

Celeo took part in the FECI Science Festival, associated with the Explora programme, which is part of the science and society division of Chile's Ministry of Science, Technology and Innovation, implemented by the University of Atacama. The core goal of the project is to foster scientific culture in the school community and among the general public. At the fair, Celeo presented its Water Efficiency Workshop held in the community of Diego de Almagro.

Colombia

Enerfín was noteworthy with its participation as a panellist at:

- › "Auctions: reactivating investment for renewables", within the International Renewable Energy Congress and Business Roundtable.
- › "Sustainable transport and energy infrastructure as a pillar of economic recovery", in the context of the event held by the Colombian government through Procolombia "Colombia Investment Summit"

- › “Wind energy: a driver of economic and social development in Colombia”, as part of the Latam Future Energy Colombia 2021 event.

Africa

Enerfín was present at regular meetings held by the African Task Force of GWEC, congresses and talks organised by ALER and AMER, and several webinars held by ICEX, the Exporters Club and other foreign organisations on investments and the renewable energy sector in African markets.

Mexico

Enerfín took part in the 2021 Expo Foro Energía Yucatán, making a different-scale analysis of the electricity sector in Mexico. The purpose of the forum was to present the opportunities and challenges of the clean energy generation sector in the country for distributed generation, as well as for industry suppliers.

It was also present in the project “The challenges of graduates and students of renewable energy engineering” at the TecNM Campus Progreso, the goal of which is for the course graduates to present to students their study and work experience in the field of engineering.

Recognition

- › The IE-Elecnor Observatory on Sustainable Compliance Cultures has been acknowledged by the 3rd edition of Expansión's “Compliance” Awards as one of the five finalist initiatives in the Best Ethical Initiative Category.
- › The Elecnor Group has been recognised by Iberia in its 13th edition of the Awards for its best partners in 2021.
- › Audeca was the winner of the 17th National ACEX Award for Safety in Conservation in the general category for its SMS+ project. Audeca has been a finalist 16 times and winner 7 times, proving its commitment to safety and innovation.
- › Celeo Brazil and Celeo Chile took first and second place, respectively in their sector “Americas | Electricity Transmission Network | Maintenance and Operation” in the GRESB 2021 Sustainability Ranking.
- › Celeo Chile has obtained the 2021 PEC Safety Excellence recognition and the Mutual COVID-19 Seal for its commitment and management associated with the health of all its workers.
- › 3rd IBAMA Forum. Celeo’s Environmental Education Programme (PEA) in Cantareira was acknowledged by IBAMA (Brazilian Institute of Environment and Renewable Natural Resources) as a national benchmark in the category of best socio-environmental impact mitigation programmes as part of environmental licensing.
- › In the 17th Premios Corresponsables Awards, the Elecnor Foundation was a finalist in the category of non-profit organisations and social economy, with its initiative Growing in Prevention.

Appendix I

Supplementary information

Our people, our best asset GRI 102-8, GRI 405-1

Workforce data (year-end)

Geographical area and country	2020	2021	Changes
Spain	10,542	11,103	5%
Europe	1,033	1,253	21%
Germany	0	1	-
Belgium	1	1	0%
Finland	0	3	-
The Netherlands	0	1	-
Italy	396	627	-28%
Lithuania	16	19	3819%
Norway	65	68	-71%
Portugal	189	224	-64%
UK	350	286	-36%
Romania	16	23	44%
North America	805	759	-6%
Canada	5	6	20%
United States	800	753	-6%
Latin America	4,056	5,637	39%
Argentina	96	94	-2%
Brazil	2,461	4,283	74%
Chile	612	611	0%
Colombia	17	33	94%
Ecuador	3	3	0%
El Salvador	133	48	-64%
Honduras	42	41	-2%
Mexico	85	99	16%
Panama	168	75	-55%
Paraguay	1	1	0%
Peru	1	0	-100%
Dominican Republic	190	112	-41%
Uruguay	228	218	-4%
Venezuela	19	19	0%
Africa	1,683	2,378	41%
Angola	975	1,622	66%
Algeria	1	1	0%
Cameroon	346	473	37%
Ivory Coast	0	6	-
Ghana	300	113	-62%
Guinea Conakry	0	1	-

Geographical area and country	2020	2021	Changes
Mauritania	5	5	0%
Mozambique	31	140	352%
Senegal	25	17	-32%
Asia	44	188	327%
India	0	1	-
Jordan	5	3	-40%
Oman	39	184	372%
Oceania	40	113	183%
Australia	40	113	183%
Total	18,203	21,431	18%

Professional category	2020			2021		
	Male	Female	Total	Male	Female	Total
Structure	3,749	1,578	5,327	4,210	1,900	6,110
Management	145	21	166	141	20	161
Executive	1,102	231	1,333	1,110	233	1,343
Technician	2,502	1,326	3,828	2,959	1,647	4,606
Works	12,305	571	12,876	14,620	701	15,321
Basic*	12,305	571	12,876	14,620	701	15,321
Total	16,054	2,149	18,203	18,830	2,601	21,431

*The "Basic" professional category comprises mainly men as it corresponds to Works personnel.

By age

Staff in Structure	2020			2021		
	Male	Female	Total	Male	Female	Total
>50	576	158	734	653	189	842
From 30 to 50	2,443	1,018	3,461	2,733	1,212	3,945
<30	730	402	1,132	824	499	1,323
Total	3,749	1,578	5,327	4,210	1,900	6,110

Staff in Works	2020			2021		
	Male	Female	Total	Male	Female	Total
>50	2,430	55	2,485	2,930	86	3,016
From 30 to 50	7,937	376	8,313	9,209	439	9,648
<30	1,938	140	2,078	2,481	176	2,657
Total	12,305	571	12,876	14,620	701	15,321

Breakdown of information by contract type

By age	2020	2021	Changes
Open-ended	11,150	14,160	27%
>50	2,298	2,971	29%
From 30 to 50	7,257	9,039	25%
<30	1,595	2,150	35%
Temporary	7,053	7,271	3%
>50	921	887	-4%
From 30 to 50	4,517	4,554	1%
<30	1,615	1,830	13%
Total	18,203	21,431	18%

Average by age	2020	2021	Changes
Open-ended	10,451	12,705	22%
>50	2,292	2,929	28%
From 30 to 50	6,857	8,122	18%
<30	1,302	1,655	27%
Temporary	6,314	7,929	26%
>50	888	1,222	38%
From 30 to 50	4,139	5,107	23%
<30	1,287	1,600	24%
Total	16,765	20,634	23%

By geographical area	2020	2021	Changes
Open-ended	11,150	14,160	27%
Spain	6,182	7,487	21%
Europe	676	838	24%
North America	290	297	2%
Latin America	3,493	5,105	46%
Africa	472	375	-21%
Asia	4	5	25%
Oceania	33	53	61%
Temporary	7,053	7,271	3%
Spain	4,360	3,616	-17%
Europe	357	415	16%
North America	515	462	-10%
Latin America	563	532	-6%
Africa	1,211	2,003	65%
Asia	40	183	358%
Oceania	7	60	757%
Total	18,203	21,431	18%

By professional category	2020	2021	Changes
Open-ended	11,150	14,160	27%
Management	166	161	-3%
Executive	1,139	1,160	2%
Technician	2,597	3,220	24%
Basic	7,248	9,619	33%
Temporary	7,053	7,271	3%
Management	0	0	-
Executive	194	183	-6%
Technician	1,231	1,386	13%
Basic	5,628	5,702	1%
Total	18,203	21,431	18%

Average by professional category	2020	2021	Changes
Open-ended	10,451	12,705	22%
Management	170	162	-5%
Executive	1,058	1,147	8%
Technician	2,441	2,931	20%
Basic	6,782	8,465	25%
Temporary	6,314	7,929	26%
Management	0	0	-
Executive	169	192	14%
Technician	1,083	1,405	30%
Basic	5,062	6,332	25%
Total	16,765	20,634	23%

By gender

Staff in Structure	2020	2021	Changes
Open-ended	3,902	4,541	16%
Male	2,681	3,072	15%
Female	1,221	1,469	20%
Temporary	1,425	1,569	10%
Male	1,068	1,138	7%
Female	357	431	21%
Total	5,327	6,110	15%

Staff in Works	2020	2021	Changes
Open-ended	7,248	9,619	33%
Male	6,893	9,173	33%
Female	355	446	26%
Temporary	5,628	5,702	1%
Male	5,412	5,447	1%
Female	216	255	18%
Total	12,876	15,321	19%

Average by gender

Staff in Structure	2020	2021	Changes
Open-ended	3,678	4,240	15%
Male	2,538	2,901	14%
Female	1,141	1,339	17%
Temporary	1,203	1,597	33%
Male	886	1,175	33%
Female	317	423	33%
Total	4,881	5,837	20%

Staff in Works	2020	2021	Changes
Open-ended	6,773	8,465	25%
Male	6,452	8,063	25%
Female	321	402	25%
Temporary	5,111	6,332	24%
Male	4,915	6,075	24%
Female	195	257	32%
Total	11,884	14,797	25%

Breakdown of information by employment type

By age	2020	2021	Changes
Full-time	17,981	21,209	18%
>50	3,068	3,713	21%
From 30 to 50	11,730	13,544	15%
<30	3,183	3,952	24%
Part-time	222	222	0%
>50	151	145	-4%
From 30 to 50	44	49	11%
<30	27	28	4%
Total	18,203	21,431	18%

Average by age	2020	2021	Changes
Full-time	16,535	20,333	23%
>50	3,015	3,999	33%
From 30 to 50	10,955	13,126	20%
<30	2,565	3,208	25%
Part-time	230	301	31%
>50	165	152	-8%
From 30 to 50	41	103	151%
<30	24	47	96%
Total	16,765	20,634	23%

By geographical area	2020	2021	Changes
Full-time	17,981	21,209	18%
Spain	10,339	10,915	6%
Europe	1,020	1,227	20%
North America	800	755	-6%
Latin America	4,055	5,635	39%
Africa	1,683	2,378	41%
Asia	44	187	325%
Oceania	40	112	180%
Part-time	222	222	0%
Spain	203	188	-7%
Europe	13	26	100%
North America	5	4	-20%
Latin America	1	2	100%
Africa	0	0	-
Asia	0	1	-
Oceania	0	1	-
Total	18,203	21,431	18%

By professional category	2020	2021	Changes
Full-time	17,981	21,209	18%
Management	165	160	-3%
Executive	1,317	1,329	1%
Technician	3,760	4,531	21%
Basic	12,739	15,189	19%
Part-time	222	222	0%
Management	1	1	0%
Executive	16	14	-13%
Technician	68	75	10%
Basic	137	132	-4%
Total	18,203	21,431	18%

Average by professional category	2020	2021	Changes
Full-time	16,535	20,333	23%
Management	167	160	-4%
Executive	1,213	1,324	9%
Technician	3,461	4,260	23%
Basic	11,694	14,589	25%
Part-time	230	301	31%
Management	3	2	-33%
Executive	15	16	7%
Technician	63	75	19%
Basic	149	208	40%
Total	16,765	20,634	23%

By gender

Staff in Structure	2020	2021	Changes
Full-time	5,242	6,020	15%
Male	3,701	4,160	12%
Female	1,541	1,860	21%
Part-time	85	90	6%
Male	48	50	4%
Female	37	40	8%
Total	5,327	6,110	15%

Staff in Works	2020	2021	Changes
Full-time	12,739	15,189	19%
Male	12,176	14,503	19%
Female	563	686	22%
Part-time	137	132	-4%
Male	129	117	-9%
Female	8	15	88%
Total	12,876	15,321	19%

Average by gender

Staff in Structure	2020	2021	Changes
Full-time	4,801	5,744	20%
Male	3,377	4,018	19%
Female	1,424	1,726	21%
Part-time	81	93	15%
Male	47	57	21%
Female	34	36	6%
Total	4,881	5,837	20%

Staff in Works	2020	2021	Changes
Full-time	11,734	14,589	24%
Male	11,228	13,952	24%
Female	506	637	26%
Part-time	149	208	40%
Male	139	187	35%
Female	10	22	120%
Total	11,884	14,797	25%

Workforce turnover ¹¹ GRI 401-1

By age range, gender and geographical area

Location	Departures	Average employment	Turnover in 2021	Turnover in 2020	Change in Turnover 2021 vs. 2020
Spain	1,964	11,014	18%	16%	2%
Male	1,793	9,658	19%	17%	2%
>50	341	2,685	13%	15%	-2%
From 30 to 50	1,100	6,098	18%	16%	2%
<30	352	875	40%	28%	12%
Female	171	1,356	13%	10%	3%
>50	15	201	7%	7%	0%
From 30 to 50	107	923	12%	9%	3%
<30	49	232	21%	18%	3%
Europe	571	1,252	46%	25%	21%
Male	461	1,063	43%	26%	17%
>50	82	246	33%	29%	4%
From 30 to 50	269	601	45%	24%	21%
<30	110	216	51%	26%	25%
Female	110	189	58%	18%	40%
>50	18	34	53%	31%	22%
From 30 to 50	60	108	56%	15%	41%
<30	32	47	68%	19%	49%
North America	262	795	33%	48%	-15%
Male	252	741	34%	49%	-15%
>50	40	181	22%	49%	-27%
From 30 to 50	157	430	37%	44%	-7%
<30	55	130	42%	62%	-20%
Female	10	54	19%	32%	-13%
>50	1	7	14%	88%	-74%
From 30 to 50	5	34	15%	22%	-7%
<30	4	13	31%	20%	11%
Latin America	4,424	5,231	85%	82%	3%
Male	4,202	4,752	88%	86%	2%
>50	439	626	70%	72%	-2%
From 30 to 50	2,640	3,062	86%	82%	4%
<30	1,123	1,064	106%	103%	3%
Female	222	479	46%	44%	2%
>50	12	33	36%	52%	-16%
From 30 to 50	128	298	43%	43%	0%
<30	82	148	55%	45%	10%
Africa	710	2,142	33%	20%	13%
Male	636	1,827	35%	21%	14%

¹¹ Turnover is determined as total departures (sum of voluntary redundancies, leaves of absence, retirements, deaths, dismissals, end-of-contract and other kinds of departure)/average employment * 100

Location	Departures	Average employment	Turnover in 2021	Turnover in 2020	Change in Turnover 2021 vs. 2020
>50	33	93	35%	20%	15%
From 30 to 50	454	1,335	34%	21%	13%
<30	149	399	37%	21%	16%
Female	74	315	23%	14%	9%
>50	2	10	20%	22%	-22%
From 30 to 50	42	213	20%	12%	8%
<30	30	92	33%	18%	15%
Asia	4	111	4%	38%	-34%
Male	3	105	3%	43%	-40%
>50	1	11	9%	0%	9%
From 30 to 50	0	72	0%	55%	-55%
<30	2	22	9%	43%	-34%
Female	1	6	17%	20%	-3%
>50	0	0	0%	0%	0%
From 30 to 50	1	4	25%	100%	-75%
<30	0	2	0%	0%	0%
Oceania	33	89	37%	13%	24%
Male	28	67	42%	15%	27%
>50	14	19	74%	0%	74%
From 30 to 50	12	39	31%	18%	13%
<30	2	9	22%	20%	2%
Female	5	22	23%	0%	23%
>50	1	6	17%	0%	0%
From 30 to 50	4	11	36%	0%	36%
<30	0	5	0%	-	-
Total Group	7,968	20,634	39%	33%	6%

By geographical area, gender and type of employee

2020

Structure			Works	
Male	Female	Location	Male	Female
9%	8%	Spain	19%	18%
26%	19%	Europe	26%	9%
22%	16%	North America	57%	129%
24%	28%	Latin America	99%	86%
19%	18%	Africa	21%	12%
0%	33%	Asia	100%	0%
11%	0%	Oceania	0%	50%
14%	13%	Total	41%	30%

2021

Structure		Location	Works	
Male	Female		Male	Female
13%	11%	Spain	20%	21%
36%	56%	Europe	45%	0%
17%	23%	North America	41%	0%
36%	34%	Latin America	99%	75%
25%	14%	Africa	36%	28%
0%	17%	Asia	6%	0%
40%	20%	Oceania	60%	0%
20%	19%	Total	46%	38%

New hirings GRI 401-1

By gender and geographical area

Staff in Structure

Location	2020	2021	Changes
Spain	579	645	11%
Male	419	450	7%
Female	160	195	22%
Europe	146	166	14%
Male	93	79	-15%
Female	53	87	64%
North America	86	45	-48%
Male	71	38	-46%
Female	15	7	-53%
Latin America	377	485	29%
Male	242	314	30%
Female	135	171	27%
Africa	144	100	-31%
Male	93	70	-25%
Female	51	30	-41%
Asia	22	48	118%
Male	14	46	229%
Female	8	2	-75%
Oceania	32	84	163%
Male	29	63	117%
Female	3	21	600%
Total	1,386	1,573	13%

Staff in Works

Location	2020	2021	Changes
Spain	1,707	1,476	-13%
Male	1,662	1,441	-13%
Female	45	35	-22%
Europe	323	503	56%
Male	295	437	48%
Female	28	66	136%
North America	545	237	-57%
Male	532	233	-56%
Female	13	4	-69%
Latin America	3,545	4,353	23%
Male	3,446	4,220	22%
Female	99	133	34%
Africa	868	1,106	27%
Male	747	1,016	36%
Female	121	90	-26%
Asia	19	14	-26%
Male	14	14	0%
Female	5		-100%
Oceania	4	8	100%
Male	2	5	150%
Female	2	3	50%
Total	7,011	7,697	10%

By gender and age range

Staff in Structure

Age	2020	2021	Changes
>50	96	104	8%
Male	86	85	-1%
Female	10	19	90%
From 30 to 50	709	807	14%
Male	510	552	8%
Female	199	255	28%
<30	581	662	14%
Male	365	423	16%
Female	216	239	11%
Total	1,386	1,573	13%

Staff in Works

Age	2020	2021	Changes
>50	792	812	3%
Male	768	776	1%
Female	24	36	50%
From 30 to 50	4,301	4,718	10%
Male	4,115	4,533	10%
Female	186	185	-1%
<30	1,918	2,167	13%
Male	1,815	2,057	13%
Female	103	110	7%
Total	7,011	7,697	10%

Dismissals

Dismissals in the Elecnor Group are displayed, referring to the non-voluntary termination of the employment contract due to application of the disciplinary code governing the employee, regardless of whether it is declared proper or whether the company acknowledges that the dismissal is improper when so declared by a court.

The following data includes information from Angola, Argentina, Brazil, Cameroon, Chile, Colombia, Ivory Coast, El Salvador, Ghana, Italy, Mauritania, Mozambique, Norway, Panama, Peru, Portugal, Senegal, Spain, the United Kingdom and the United States.

By gender and professional category

Category	2020			2021			Changes
	Male	Female	Total	Male	Female	Total	
Structure	78	17	95	85	41	126	33%
Management	4	0	4	6	1	7	75%
Executive	17	3	20	20	4	24	20%
Technician	57	14	71	59	36	95	34%
Works	363	9	372	718	35	753	102%
Basic	363	9	372	718	35	753	102%
Total	441	26	467	803	76	879	88%

By gender and age

Staff in Structure

Age	2020			2021			Changes
	Male	Female	Total	Male	Female	Total	
>50	15	2	17	19	4	23	35%
From 30 to 50	48	10	58	56	28	84	45%
<30	15	5	20	11	9	20	-5%

Total	78	17	95	86	41	127	33%
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Staff in Works

Age	2020			2021			Changes
	Male	Female	Total	Male	Female	Total	
>50	62	3	65	84	3	87	34%
From 30 to 50	237	5	242	491	17	508	110%
<30	64	1	65	142	15	157	143%
Total	363	9	372	717	35	752	102%

Remunerations Policy

Fixed average remuneration by gender, age and professional category

2020

Age	Structure						Works	
	Management		Executive		Technician		Basic	
	Male	Female	Male	Female	Male	Female	Male	Female
Spain								
>50	143,087	98,460	56,647	57,662	34,262	29,820	23,151	22,697
From 30 to 50	96,868	92,929	47,470	46,521	31,636	27,504	21,577	21,624
<30	-	-	36,356	38,159	27,449	25,575	19,194	19,808
Europe (Italy, Norway, Portugal, United Kingdom and Romania)								
>50	-	-	51,677	49,260	41,897	29,445	29,409	33,588
From 30 to 50	-	-	50,318	33,785	37,692	31,770	27,941	28,031
<30	-	-	26,463	21,173	30,758	23,295	22,692	26,021
North America (United States and Canada)								
>50	164,073	*	106,262	*	111,685	54,211	84,125	*
From 30 to 50	151,599	-	101,544	72,185	70,050	49,788	80,684	69,663
<30	-	-	70,170	43,565	51,469	39,959	67,400	51,775
Latin America (Argentina, Bolivia, Brazil, Chile, Colombia, Ecuador, Honduras, Mexico, Panama, Peru, Dominican Republic and Uruguay)								
>50	-	-	44,942	34,248	24,145	8,160	9,589	7,273
From 30 to 50	-	-	41,151	35,849	19,749	13,886	7,612	4,713
<30	-	-	*	-	11,738	6,996	5,403	6,571
Africa (Angola, Algeria, Cameroon, Ghana, Mauritania and Senegal)								
>50	-	-	*	-	17,974	10,666	5,637	2,000
From 30 to 50	-	-	36,526	28,317	16,838	5,555	5,917	1,938
<30	-	-	*	5,093	4,614	5,251	2,733	1,795
Asia (Jordan and Oman)								
>50	-	-	-	-	52,372	-	28,280	-
From 30 to 50	-	-	78,867	-	25,542	*	16,307	-
<30	-	-	-	-	19,979	20,495	15,227	*
Oceania (Australia)								
>50	-	-	71,359	*	59,476	*	*	-

From 30 to 50	-	-	91,270	-	80,877	44,324	-	46,158
<30	-	-	-	-	57,983	-	*	-

* This information is not shown in the interest of protecting the data of the persons represented, since there is only one employee in that professional category.

2021

	Structure						Works	
	Management		Executive		Technician		Basic	
	Men	Women	Men	Women	Men	Women	Men	Women
Spain								
>50	141,357	111,793	54,599	55,235	32,021	28,277	22,816	21,749
From 30 to 50	98,311	88,054	48,637	47,491	32,234	27,856	21,713	21,458
<30			36,273	38,423	27,609	26,271	19,312	19,864
Europe (Italy, Norway, Portugal, United Kingdom and Romania)								
>50			71,381	62,575	41,064	32,959	27,546	36,345
From 30 to 50			47,055	38,293	35,717	32,968	27,160	33,377
<30			25,250	19,854	28,584	23,988	21,212	35,014
North America (United States and Canada)								
>50	173,089		119,846	90,056	125,808	58,139	92,419	77,757
From 30 to 50	178,111	149,966	109,555	81,168	79,149	50,556	86,975	69,556
<30			80,165	51,862	52,708	43,405	77,476	60,728
Latin America (Argentina, Bolivia, Brazil, Chile, Colombia, Ecuador, Honduras, Mexico, Panama, Peru, Dominican Republic and Uruguay)								
>50			51,344	38,646	22,778	10,734	8,547	8,177
From 30 to 50			41,299	35,250	17,813	12,405	6,722	5,019
<30			20,784		9,092	6,365	4,494	3,912
Asia (Jordan and Oman)								
>50					62,689		23,546	
From 30 to 50			45,322		19,459	21,575	13,454	
<30					14,244	17,836	11,756	
Africa (Angola, Algeria, Cameroon, Ghana, Mauritania and Senegal)								
>50			71,246		28,868	14,350	6,262	2,626
From 30 to 50			35,136	36,202	13,272	7,536	5,036	2,376
<30			4,131	5,237	4,530	5,110	2,517	2,315
Oceania (Australia)								
>50			88,634	46,793	100,581	63,297		*
From 30 to 50			105,652		79,719	49,154	87,488	
<30					51,936	51,406	59,183	

* This information is not shown in the interest of protecting the data of the persons represented, since there is only one employee in that professional category.

Fixed average remuneration by geographical area, gender and type of employee

2020

	Structure		Works	
	Male	Female	Male	Female
Spain	40,795	32,018	21,791	21,549
Europe (Italy, Norway, Portugal, United Kingdom and Romania)	38,014	29,270	27,212	28,149
North America (United States and Canada)	90,125	55,734	84,199	60,575
Latin America (Argentina, Bolivia, Brazil, Chile, Colombia, Ecuador, Honduras, Mexico, Panama, Peru, Dominican Republic and Uruguay)	21,992	12,627	7,226	5,506
Africa (Angola, Algeria, Cameroon, Ghana, Mauritania and Senegal)	15,630	6,786	5,041	1,894
Asia (Jordan and Oman)	31,565	18,908	18,934	12,083
Oceania (Australia)	72,167	46,758	71,061	46,158

2021

	Structure		Works	
	Male	Female	Male	Female
Spain	40,565	31,731	21,851	21,348
Europe (Italy, Norway, Portugal, United Kingdom and Romania)	35,991	30,809	26,144	34,521
North America (United States and Canada)	112,062	61,976	85,803	68,374
Latin America (Argentina, Bolivia, Brazil, Chile, Colombia, Ecuador, Honduras, Mexico, Panama, Peru, Dominican Republic and Uruguay)	19,931	11,401	6,319	4,832
Asia (Jordan and Oman)	23,837	20,507	13,966	0
Africa (Angola, Algeria, Cameroon, Ghana, Mauritania and Senegal)	13,833	8,777	4,416	2,367
Oceania (Australia)	82,336	53,708	78,053	*

* This information is not shown in the interest of protecting the data of the persons represented, since there is only one employee in that professional category.

Management of biodiversity and protection of the natural environment GRI 304-1

Projects located in or near protected and high-value areas

Country	Project/Activity	Proximity to protected areas or zones of great value for biodiversity		
		Type and name of protected area affected	Location with respect to the protected area (interior, adjacent, partial)	Area/Length affected
Spain	Baza – Caparacena 400 kV Transmission Line Project	Critical area for the conservation of birds of prey living among the rocks	Part-time	6,020 m
Spain	220 kV Trives - Aparecida Transmission Line Dismantling Project	Some support provided is located in the following protected areas: "Macizo Central" (Code ES1130002). "Pena Trevinca" (Code ES11330007)	Part-time	The area to be restored spans approximately 31,975 m ²
Spain	Gecama Wind Farm 400 kV transmission line	"Hoces de Alarcón" Site of Community Importance (SCI)	Adjacent	N/A
Australia	Bungala Solar Farm	The Dutchmans Stern Conservation Park - approximately 10 km to the North East	Adjacent	N/A
Brazil	PATE- LT230 kV Oriximiná-Juruti-Parintins e Subestações Associadas	Áreas Prioritárias para a Conservação da Biodiversidade: Várzeas do Médio Amazonas, Rio Amazonas, Várzea Médio Amazonas e Cachoeira do Aruã	Adjacent	N/A
Brazil	Complexo Solar Fotovoltaico Lar do Sol – Casablanca	Próxima a APCB Buritizeiro/Pirapora e a APCB Rio São Francisco e Grandes Afluentes	Adjacent	N/A
Spain	Malpica wind farm	Costa da Morte (ZEPA)	Adjacent	N/A
Spain	Malpica wind farm	Costa da Morte Site of Community Importance (SCI)	Part-time	The total estimated impact (interior roads, underground MV lines and control building) is 20,308 m ²

		Proximity to protected areas or zones of great value for biodiversity		
Country	Project/Activity	Type and name of protected area affected	Location with respect to the protected area (interior, adjacent, partial)	Area/Length affected
Spain	Aerosur wind farm	"La Janda" lagoon, Migratory route between Africa and Europe (Strait of Gibraltar)	Adjacent	N/A
Spain	Construction of a cage for capercaillies, in Caballes de Arriba, Villablino (León) Castile and León Natural Heritage Foundation	Valle de Laciana Biosphere Reserve	Domestic	2 ha
Spain	Conservation of the grey partridge by diversifying its natural habitat, in the Sanabria Lake Natural Park and Segundera and Porto mountain ranges	Sanabria Lake Natural Park	Domestic	45.8 ha
Spain	Regeneration of pasture land and other physical assets of forest land. Various mountains of the Sierra de Gata, Government of Extremadura	Special Protection Area for Birds "Sierra de Gata y Valles de las Pilas" and in the "Sierra de Gata" Special Conservation Area	Domestic	368 ha
Spain	Expansion of the Sevilla la Nueva WWTP, in the municipality of Sevilla la Nueva, promoted by Canal de Isabel II	Regional Park of the Middle Course of the Guadarrama River and its Surrounding Area	Domestic	10 ha
Spain	Adapting and improving the Fuenteheridos WWTP (Huelva)	Sierra de Aracena and Picos de Aroche Natural Park	Domestic	5 ha
Spain	Actions for public use in the Sierra de la Culebra Regional Hunting Reserve (Zamora)	Sierra de la Culebra Regional Hunting Reserve (Zamora)	Domestic	2 ha

Projects including monitoring of species appearing on the International Union for Conservation of Nature (IUCN) Red List [GRI 304-3](#)

Country	Project	Classification according to IUCN					
		CR*	EN*	VU*	NT*	LC*	Other
Spain	Baza – Caparacena 400 kV Transmission Line Project					2	
Spain	Gecama Wind Farm 400 kV transmission line					4	
Colombia	Guajira I wind farm					7	
Australia	Bungala Solar Farm					13	
Chile	Llanos del Viento wind farm project	1				2	
Chile	PFV Caracas Medium-Voltage Line Project					1	
Chile	PFV Sunhunter Medium-Voltage Line Project					2	
Chile	PFV Anakena Medium-Voltage Line Project					2	
Chile	Guardiamarina 110/23 - 13 kV Substation					1	
Brazil	Complexo Solar Fotovoltaico Lar do Sol – Casablanca	2			1		9
Spain	Malpica wind farm						20
Spain	Aerosur wind farm		1	1		1	
Brazil/Celeo	PATE- LT230 kV Oriximiná-Juruti-Parintins e Subestações Associadas	3	2	7	7	18	178
Brazil/Celeo	SITE and PATE		4	12		50	
Chile/Celeo	AJTE and CHATE			3	1		
Chile/Celeo	CHATE					1	
Total		6	7	23	9	104	207

*CR: Critically endangered

*EN: Endangered

*VU: Vulnerable

*NT: Near threatened

*LC: Least concern

Fiscal transparency

Country by Country Report 2020 GRI 207-4

Jurisdicción fiscal	Número de empleados	Ingresos procedentes de ventas a terceros (C)	Ingresos procedentes de transacciones intragrupo con otras jurisdicciones fiscales (C)	Beneficios o pérdidas antes de impuestos (C)	Activos tangibles distintos de efectivo y equivalentes de efectivo (C)	Impuesto sobre el beneficio pagado (C)	Impuesto sobre el beneficio devengado (C)	Diferencia entre impuesto devengado y el resultante de aplicar el tipo impositivo al resultado contable (notas explicativas*)
ALEMANIA	-	-	-	3.720,89	7,00	-	-	4
ANGOLA	975,00	37.655.054,61	-	6.190.944,31	1.188.086,18	1.127.851,45	1.990.824,24	8
ARGELIA	83,42	13.377.337,73	-	1.336.385,90	31.673,60	18.161,84	2.201.837,59	8
ARGENTINA	96,00	5.078.338,16	-	1.304.783,56	556.717,92	428.574,86	498.523,08	6
AUSTRALIA	36,00	21.460.330,18	104.318,95	220.772,44	204.838,80	483.137,46	40.670,91	6, 11, 12
BELGICA	1,00	7.496.631,86	-	1.160.500,90	-	-	60.481,47	5
BOLIVIA	-	12.420,10	-	272.873,54	9.750,91	49.906,45	49.906,45	9
BRASIL	2.458,75	158.287.217,00	155.635.783,54	58.503.944,82	344.208.173,04	11.095.640,24	16.789.201,53	10
CAMERUN	153,00	13.047.975,88	-	114.462,65	2.360.416,43	4.360,05	213.353,16	6
CANADA	5,00	28.564.184,99	905.771,26	12.228.188,38	154.270.771,53	239.189,06	996.828,81	5
CHILE	612,00	35.780.139,33	37.669.082,87	16.805.911,62	2.183.154,67	759.894,77	4.369.030,11	5
COLOMBIA	17,00	711.943,64	-	1.149.582,01	234.328,32	3.029,87	1.667,39	6
COSTA DE MARFIL	-	12.602,23	-	0,00	8.220,19	-	-	N/A
DOMINICANA	275,00	17.091.806,61	-	3.662.327,56	363.676,77	72.170,01	334.006,33	1, 6
ECUADOR	44,00	16.852.523,39	2.204.983,62	2.151.628,23	56.212.019,75	226.758,17	471.389,38	5
EEUU	800,00	226.271.575,89	529.955,72	13.747.278,72	12.497.062,98	57.444,94	1.198.398,64	5, 7
EL SALVADOR	133,00	7.523.963,78	-	584.898,72	835.397,72	55.374,26	583,52	12
ESPAÑA	7.706,50	1.410.643.514,40	141.137.135,68	75.048.782,03	212.009.293,60	962.512,61	10.467.442,97	5, 6, 7
FINLANDIA	15,00	4.518.125,58	-	919.081,46	145.369,68	-	-	12
FRANCIA	-	4.390,98	-	19.826,09	-	140.323,00	4.252,33	4, 12
GAMBIA	5,00	830.263,08	-	647.482,13	-	-	-	3
GHANA	300,00	10.531.572,47	-	511.249,89	669.431,75	6.503,42	-	4
GUATEMALA	-	43,78	-	2.274,13	-	-	-	4
GUINEA	7,50	3.284.983,27	-	24.432,41	176.591,88	6.240,00	2.688,54	1, 3
GUINEA BISSAU	4,00	1.851.008,54	-	237.552,30	67,57	-	-	3
HAITI	3,00	601.635,31	-	1.290.529,03	236.056,80	-	-	9, 12
HONDURAS	42,00	5.582.549,44	121.468,90	2.849.402,76	140.840,45	12.793,10	164.617,26	3
ITALIA	396,00	46.080.347,64	11.225,34	3.012.177,04	2.272.162,72	17.592,75	148.495,51	1
JORDANIA	5,00	2.119.201,97	689.033,58	1.447.522,49	72.190,75	72.632,91	910,15	3
KUWAIT	-	421.179,64	-	123.757,53	-	12.690,95	22.752,37	11, 12
LIBERIA	44,00	4.361.703,51	-	-	-	-	-	N/A
LITUANIA	16,00	2.977.230,01	-	1.459.714,69	89.932,20	-	-	12
MARRUECOS	-	26.163,89	-	84.973,28	-	-	277,00	1
MAURITANIA	-	2.741.095,94	303.629,48	1.212.127,67	218.067,41	228.898,05	41.556,14	1
MEXICO	21,00	45.584.689,72	5.578.029,43	19.776.927,76	1.044.180,49	224.565,13	995.816,85	11, 12
MOZAMBIQUE	31,00	1.450.987,88	-	134.516,22	320.451,51	-	-	12
NORUEGA	65,00	21.983.499,99	15.749,38	6.345.569,32	195.992,10	-	374.092,25	2
OMAN	39,00	71.499.954,92	-	1.498.384,67	60.470.826,85	32.257,83	519.539,00	11, 12
PANAMÁ	187,00	19.132.024,09	-	4.008.594,19	576.048,81	656.518,72	227.192,25	6
PARAGUAY	1,00	30,33	-	21.546,79	-	-	-	4
PERU	2,00	1.578.362,63	-	564.273,80	162.720,64	3.511,37	847,90	7
PORTUGAL	189,00	13.523.327,77	2.034.809,67	2.080.171,52	750.524,99	153.252,26	86.002,84	11, 12
REINO UNIDO	350,00	31.926.468,71	17.154.433,01	4.382.494,43	438.849,83	35.897,23	26.407,49	7
RUMANIA	16,00	789.239,37	8.961,55	59.574,47	3.065,76	1.668,22	1.499,52	7
SENEGAL	51,00	4.855.595,85	-	849.992,54	3.270.543,21	1.791,29	7.003,01	1
SUDAFRICA	-	223,97	-	1.580,39	85,81	-	-	12
URUGUAY	228,00	14.082.050,38	29.273,67	1.063.735,36	558.616,44	274.327,72	92.635,06	1, 7
VENEZUELA	19,00	91.058,20	-	164.230,17	642.817,92	22,10	44.256,32	11, 12
Total general	15.432,17	2.311.084.516,07	364.133.645,63	173.591.381,80	859.629.024,99	15.091.336,61	42.433.495,37	

*** Notas explicativas sobre las diferencias entre los tipos impositivos efectivos y los tipos nominales:**

1. Aplicación impuesto mínimo
2. Régimen especial que difere el pago del impuesto
3. Proyectos exentos de impuesto sobre el beneficio
4. País en el que no se ha ejercido actividad, o se han generado pérdidas, por lo que no se genera impuesto a pagar
5. Ajuste fiscal negativo (ingresos no tributables)
6. Ajuste fiscal positivo (Gastos no deducibles) y ajuste inflacionario
7. Aplicación de créditos fiscales
8. Aplicación de impuestos diferidos
9. Ejercicio fiscal distinto de año natural
10. Lucro presumido
11. La agrupación de sociedades de una misma jurisdicción fiscal con pérdidas antes de impuestos reduce la estimación del IS devengado
12. Ajustes por integración contable

Appendix II

Index of content required by Law 11/2018, of 28 December, concerning non-financial information and diversity.

Information required by Law 11/2018	Materiality	Page or section of the report responding to the requirement under Law 11/2018	Reporting criterion: GRI (2016 version unless otherwise stated)
General information			
A brief overview of the business model including the business environment, organisation and structure	Material	29, 128	GRI 102-2 GRI 102-7
Markets where it operates	Material	6-7, 42	GRI 102-3 GRI 102-4 GRI 102-6
The organisation's goals and strategies	Material	29	GRI 102-14
The main factors and trends potentially affecting future performance	Material	112	GRI 102-14
Reporting framework used	Material	21	GRI 102-54
Principle of Materiality	Material	24	GRI 102-46 GRI 102-47
Environmental issues			
Management approach: description and results of policies concerning these issues and the main risks relating thereto in connection with the Group's activities.	Material	70-72	GRI 103-2
Detailed general information			
Detailed information concerning current and foreseeable effects of the Company's activities on the environment and, where applicable, health and safety	Material	71	GRI 103-2
Procedures for environmental assessment or certification	Material	71-72	GRI 103-2
Resources allocated to preventing environmental risks	Material	72	GRI 103-2
Application of the precautionary principle	Material	66-67,70-71	GRI 102-11
Amount of provisions and guarantees for environmental risks	Material	72	GRI 103-2
Pollution			
Measures to prevent, reduce or remedy severe environmental emissions; taking into account any kind of atmospheric pollution specific to an activity, including noise and light pollution.	Not material	Not material	

Information required by Law 11/2018	Materiality	Page or section of the report responding to the requirement under Law 11/2018	Reporting criterion: GRI (2016 version unless otherwise stated)
Circular economy and waste prevention and management			
Prevention, recycling, re-use, other methods of waste recovery and elimination	Material	82-83	GRI 306-1 (2020) GRI 306-2 (2020) GRI 306-4 (2020) GRI 306-5 (2020)
Actions for combating food wastage	Not material	Not material	
Sustainable use of resources			
Water consumption and water supply in accordance with local constraints	Material	82	GRI 303-5 (2018)
Consumption of raw materials and measures implemented to boost efficiency in their usage	Material	82	GRI 103-2
Direct and indirect energy consumption	Material	79-81	GRI 302-1
Measures taken to boost energy efficiency	Material	79-80	GRI 103-2
Renewable energy use	Material	79-81	GRI 302-1
Climate change			
Greenhouse gas emissions generated as a result of the Company's activities, including the use of the goods and services it produces	Material	72-76	GRI 305-1 GRI 305-2 GRI 305-3 GRI 305-4
Measures implemented to adapt to the consequences of climate change	Material	72-75, 80	GRI 103-2 GRI 201-2
Targets established voluntarily in the medium and long term to reduce greenhouse gas emissions and the measures implemented for that purpose	Material	72-75, 174	GRI 305-5
Safeguarding biodiversity			
Measures implemented to preserve or restore biodiversity	Material	85-87, 163	GRI 304-3
Impacts of the activities or operations on protected areas	Material	85-87, 161-162	GRI 304-2
Social matters and issues concerning staff			
Management approach: description and results of policies concerning these issues and the main risks relating thereto in connection with the Group's activities.	Material	39-41	GRI 103-2
Employment			
Total number of employees and breakdown by country, gender, age and professional category	Material	42-43, 146-152	GRI 102-8 GRI 405-1

Information required by Law 11/2018	Materiality	Page or section of the report responding to the requirement under Law 11/2018	Reporting criterion: GRI (2016 version unless otherwise stated)
Total number and distribution of contract modalities and annual average numbers of open-ended, temporary and part-time contracts by gender, age and professional category	Material	146-152	GRI 102-8
Number of layoffs by gender, age and professional category	Material	44, 153-158	GRI 103-2 GRI 401-1
Average remuneration and evolution thereof by gender, age and professional category or equal value	Material	49, 158-160	GRI 103-2 GRI 405-2
Wage gap, remuneration of equal jobs or company average	Material	48-49	GRI 103-2 GRI 405-2
Average remuneration of directors and executives, including variable remuneration, per diem expenses, termination benefits, payments to long-term benefit schemes and any other items, broken down by gender	Material	48-49, 109-110	GRI 103-2 GRI 405-2
Policies to facilitate disconnection from work	Material	50-51	GRI 103-2
Number of disabled employees	Material	52	GRI 405-1
Organisation of work			
Organisation of work time	Material	50	GRI 103-2
Number of hours of absenteeism	Material	44	GRI 103-2
Measures aimed at facilitating work-life balance and fostering a mutually responsible approach thereto by both parents	Material	50-51	GRI 103-2
Health and Safety			
Occupational Health and Safety conditions	Material	57-65	GRI 403-1 (2018) GRI 403-2 (2018) GRI 403-3 (2018) GRI 403-4 (2018) GRI 403-5 (2018) GRI 403-6 (2018) GRI 403-7 (2018) GRI 403-8 (2018)
Workplace accidents, in particular their frequency and severity, as well as occupational illnesses; broken down by gender	Material	62-64	GRI 403-9 (2018) GRI 403-10 (2018) regarding occupational accidents, specifically their frequency and severity, as well as occupational diseases
Social relations			

Information required by Law 11/2018	Materiality	Page or section of the report responding to the requirement under Law 11/2018	Reporting criterion: GRI (2016 version unless otherwise stated)
Organisation of social dialogue, including procedures to inform and consult employees and to negotiate with them	Material	55	GRI 103-2
Percentage of employees covered by collective bargaining agreements by country	Material	55	GRI 102-41
Balance of collective bargaining agreements, especially in connection with occupational health and safety	Material	56	GRI 403-4 (2018)
Training			
Training policies implemented	Material	44-45	GRI 103-2
Total number of training hours by professional category	Material	40, 46-48	GRI 404-1
Universal access			
Universal access for disabled people	Material	52	GRI 103-2
Equality			
Measures implemented to promote equal treatment and equal opportunities for women and men	Material	51	GRI 103-2
Equality plans, measures adopted to promote employment, protocols against sexual harassment and gender-based harassment	Material	51	GRI 103-2
Policy against any kind of discrimination and, in the event, for managing diversity	Material	51-52	GRI 103-2
Respect for Human Rights			
Management approach: description and results of policies concerning these issues and the main risks relating thereto in connection with the Group's activities.	Material	123-124	GRI 103-2
Application of due diligence procedures			
Application of due diligence procedures in connection with human rights and the prevention of risks of human rights breaches and, where applicable, measures to mitigate, manage and remedy potential abuse	Material	123-124	GRI 102-16 GRI 102-17
Complaints regarding human rights breaches	Material	51, 119	GRI 103-2 GRI 406-1
Measures implemented for the promotion and compliance with the provisions of ILO fundamental conventions relating to respect for freedom of association and the right to collective bargaining; elimination of discrimination in the workplace and occupation; elimination of forced or compulsory labour; effective abolition of child labour	Material	123-124	GRI 103-2

Information required by Law 11/2018	Materiality	Page or section of the report responding to the requirement under Law 11/2018	Reporting criterion: GRI (2016 version unless otherwise stated)
Combating bribery and corruption			
Management approach: description and results of policies concerning these issues and the main risks relating thereto in connection with the Group's activities.	Material	121-123	GRI 103-2
Measures implemented to prevent bribery and corruption	Material	113-115, 121-123	GRI 103-2 GRI 102-16 GRI 205-3
Anti-money laundering measures	Material	113-115, 121-123	GRI 103-2 GRI 102-16 GRI 205-3
Contributions to foundations and non-profit organisations	Material	121.130	GRI 102-13
Company information			
Management approach: description and results of policies concerning these issues and the main risks relating thereto in connection with the Group's activities.	Material	127	GRI 103-2
The company's commitment to sustainable development			
Impact of the business on society, with regard to jobs and local development	Material	127-138	GRI 103-2 GRI 203-2 GRI 204-1
The impact of the business on local communities and territory	Material	24-25, 127-138	GRI 102-43
Relations with the stakeholders in local communities and modalities of dialogue with them	Material	24-25, 27-28, 136	GRI 102-43
Association or sponsorship actions	Material	95, 121, 128, 130-136, 142	GRI 103-2 GRI 201-1
Subcontracting and suppliers			
Inclusion in procurements policy of social issues, equality and environmental considerations	Material	69-70	GRI 103-2
Consideration, in relations with suppliers and sub-contractors, of their social and environmental responsibility	Material	69-70	GRI 102-9 GRI 308-1 GRI 414-1
Supervisory system and audits, and findings thereof	Material	69-70	GRI 102-9
Consumers			
Measures to ensure consumer health and safety	Material	67-69	GRI 103-2

Information required by Law 11/2018	Materiality	Page or section of the report responding to the requirement under Law 11/2018	Reporting criterion: GRI (2016 version unless otherwise stated)
Complaints systems, complaints received and resolution thereof	Material	69	GRI 103-2
Tax information			
Profits obtained by country	Material	125-126, 164	GRI 207-1 (2019) GRI 207-2 (2019) GRI 207-3 (2019)
Income tax paid	Material	126-127, 164	GRI 207-1 (2019) GRI 207-2 (2019) GRI 207-3 (2019)
Public grants received	Material	127	GRI 201-4
EU Regulation (202/852) - Taxonomy			
Regulation requirement	Material	30-39	Elecnor Group's own methodology based on article 8 of the European Taxonomy

Appendix III

Index of GRI indicators [GRI 102-55](#)

General contents

GRI standard	Contents	Page of the report featuring response	Omissions
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GRI 102: General disclosures 2016			
Organisational disclosures			
102-1	Name of the organisation	21	
102-2	Activities, brands, products and/or services	3, 29	
102-3	Location of headquarters	Paseo de la Castellana, 81 - Planta 20 28046 - Madrid Spain	
102-4	Number of countries where the organisation operates	42	
102-5	Nature of ownership and legal form	21	
102-6	Markets served	6-7	
102-7	Scale of the organisation	128	
102-8	Information on employees	42, 146-152	
102-9	Supply chain	69	
102-10	Significant changes in the organisation and its supply chain	There have not been any significant changes	
102-11	Precautionary principle or approach	66-67,70-71	
102-12	Support for external initiatives	123-124, 138-141	
102-13	Membership of associations	141-142	
Strategy			
102-14	Statement from senior decision-maker	The Chairman's Letter is published in the 2021 Integrated Report available at https://www.grupoelecnor.com/annual-reports	
Ethics and integrity			
102-16	Values, principles, standards and norms of behaviour	113-114	
Governance			
102-18	The organisation's governance structure	96-98	
Stakeholder engagement			
102-40	List of stakeholder groups	27-29	
102-41	Collective bargaining agreements	55	
102-42	Identifying and selecting stakeholders	24	

GRI standard	Contents	Page of the report featuring response	Omissions
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102-44	Key topics and concerns raised	24-25	
Reporting practices			
102-45	Entities included in the consolidated financial statements	21	
102-46	Defining report content and topic boundaries	24-25	
102-47	List of material topics	24-25	
102-48	Restatement of information	Not applicable	
102-49	Changes in reporting	There have not been any significant changes	
102-50	Reporting period	2021	
102-51	Date of most recent report	2020	
102-52	Reporting cycle	Annual	
102-53	Contact point for questions regarding the report	elecnor@elecnor.com	
102-54	Claims of reporting in accordance with GRI Standards	This report was prepared in accordance with the Essential option of GRI Standards	
102-55	GRI content index	171	
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Material topics

GRI standard	Contents	Page of the report featuring response	Omissions
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GRI 201: Economic performance 2016			
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201-4	Financial assistance received from government	127	
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GRI 103: Management approach 2016			
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103-2	The management approach and its components	130	
103-3	Evaluation of the management approach	130	

GRI standard	Contents	Page of the report featuring response	Omissions
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Acquisition practices			
GRI 103: Management approach 2016			
103-1	Explanation of the material topic and its boundary	128	
103-2	The management approach and its components	128	
103-3	Evaluation of the management approach	128	
GRI 204: Procurement practices 2016			
204-1	Proportion of spending on local suppliers	129	
Anti-Corruption			
GRI 103: Management approach 2016			
103-1	Explanation of the material topic and its boundary	113-123	
103-2	The management approach and its components	113-123	
103-3	Evaluation of the management approach	113-123	
GRI 205: Anti-Corruption 2016			
205-1	Operations assessed for risks related to corruption	112-113	
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GRI 207: Management approach 2019			
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207-4	Country-by-country reporting	164	
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GRI 103: Management approach 2016			
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103-3	Evaluation of the management approach	79-81	
GRI 302: Energy 2016			
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GRI standard	Contents	Page of the report featuring response	Omissions
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303-3	Water withdrawal	82	
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Biodiversity			
GRI 103: Management approach 2016			
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103-2	The management approach and its components	85	
103-3	Evaluation of the management approach	85	
GRI 304: Biodiversity 2016			
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304-2	Significant impacts of activities, products, and services on biodiversity	85	
304-3	Habitats protected or restored	85, 163	
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GRI 103: Management approach 2016			
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103-3	Evaluation of the management approach	72	
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305-4	GHG emissions intensity	75	
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GRI 103: Management approach 2016			
306-1	Waste generation and material waste-related impacts	82-83	
306-2	Management of material waste-related impacts	82	

¹² The GHGs encompassed in the Elecnor Group's carbon footprint are those which, among those considered in the Kyoto Protocol, are generated by the Group's activity. These are carbon dioxide (CO₂), methane (CH₄) and nitrous oxide (N₂O) and, additionally, hydrofluorocarbons (HFCs) associated with refrigerant gas leaks. Given that sulphur hexafluoride (SF₆), nitrogen trifluoride (NF₃) and perfluorocarbons (PFCs) are not generated within the Group's equipment or activities, they have not been considered for the scope of the current carbon footprint.

GRI standard	Contents	Page of the report featuring response	Omissions
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GRI 103: Management approach 2016			
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103-2	The management approach and its components	69	
103-3	Evaluation of the management approach	69	
GRI 308: Supplier Environmental Assessment 2016			
308-1	New suppliers that were screened using environmental criteria	69	
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GRI 103: Management approach 2016			
103-1	Explanation of the material topic and its boundary	39	
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103-3	Evaluation of the management approach	39	
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GRI 403: Management approach 2018			
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403-2	Hazard identification, risk assessment and incident investigation	57	
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¹³ The Elecnor Group is not aware of having received any notification —through the channels enabled for this purpose— of the imposition of material fines or penalties for non-compliance with environmental laws or regulations

GRI standard	Contents	Page of the report featuring response	Omissions
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GRI 403: Occupational Health and Safety 2018			
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GRI 103: Management approach 2016			
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103-3	Evaluation of the management approach	39	
GRI 404: Training and Education 2016			
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GRI 103: Management approach 2016			
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103-2	The management approach and its components	51	
103-3	Evaluation of the management approach	51	
GRI 405: Diversity and Equal Opportunity 2016			
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103-3	Evaluation of the management approach	51	
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¹⁴ There is no systematised collection of the number of occupational illnesses and diseases by subcontractors.

GRI standard	Contents	Page of the report featuring response	Omissions
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103-1	Explanation of the material topic and its boundary	123	
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103-3	Evaluation of the management approach	123	
GRI 409: Forced or compulsory labour 2016			
409-1	Operations and suppliers with a material risk of cases of forced or compulsory labour	69, 114	
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GRI 103: Management approach 2016			
103-1	Explanation of the material topic and its boundary	123	
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103-3	Evaluation of the management approach	123	
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412-2	Employee training on human rights policies or procedures	119	
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103-1	Explanation of the material topic and its boundary	130	
103-2	The management approach and its components	130	
103-3	Evaluation of the management approach	130	
GRI 413: Local communities 2016			
413-1	Operations with local community engagement, impact assessments, and development programs	130	
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GRI 103: Management approach 2016			
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Informe de Verificación Independiente del Estado de Información No Financiera consolidado de Elecnor, S.A. y sociedades dependientes del ejercicio 2021

A los Accionistas de Elecnor, S.A.:

De acuerdo con el artículo 49 del Código de Comercio, hemos realizado la verificación, con alcance de seguridad limitada, del Estado de Información No Financiera consolidado (en adelante EINF) correspondiente al ejercicio anual finalizado el 31 de diciembre de 2021 de Elecnor, S.A. (en adelante, la Sociedad dominante) y sociedades dependientes (en adelante el Grupo) que forma parte del Informe de Gestión consolidado adjunto del Grupo.

El contenido del Informe de Gestión consolidado incluye información adicional a la requerida por los estándares *Sustainability Reporting Standards* de Global Reporting Initiative (estándares GRI) en su opción esencial y por la normativa mercantil vigente en materia de información no financiera que no ha sido objeto de nuestro trabajo de verificación. En este sentido, nuestro trabajo se ha limitado exclusivamente a la verificación de la información identificada en las tablas "Anexo II. Índice de contenidos de la Ley 11/2018, de 28 de diciembre, en materia de información no financiera y diversidad" y "Anexo III. Índice de contenidos GRI" incluidas en el Informe de Gestión consolidado adjunto.

Responsabilidad de los Administradores

La formulación del EINF incluido en el Informe de Gestión consolidado del Grupo, así como del contenido del mismo, es responsabilidad de los Administradores de la Sociedad dominante. El EINF se ha preparado de acuerdo con los contenidos recogidos en la normativa mercantil vigente y siguiendo los criterios de los estándares GRI en su opción esencial, de acuerdo con lo mencionado para cada materia en las tablas "Anexo II. Índice de contenidos de la Ley 11/2018, de 28 de diciembre, en materia de información no financiera y diversidad" y "Anexo III. Índice de contenidos GRI" del citado Informe de Gestión consolidado.

Estas responsabilidades incluyen asimismo el diseño, la implantación y el mantenimiento del control interno que se considere necesario para permitir que el EINF esté libre de incorrección material, debida a fraude o error.

Los administradores de la Sociedad dominante son también responsables de definir, implantar, adaptar y mantener los sistemas de gestión de los que se obtiene la información necesaria para la preparación del EINF.



Nuestra independencia y control de calidad

Hemos cumplido con los requerimientos de independencia y demás requerimientos de ética del Código Internacional de Ética para Profesionales de la Contabilidad (incluyendo las normas internacionales de independencia) emitido por el Consejo de Normas Internacionales de Ética para Profesionales de la Contabilidad (IESBA, por sus siglas en inglés) que está basado en los principios fundamentales de integridad, objetividad, competencia profesional, diligencia, confidencialidad y profesionalidad.

Nuestra firma aplica la Norma Internacional de Control de Calidad 1 (NICC 1) y mantiene, en consecuencia, un sistema global de control de calidad que incluye políticas y procedimientos documentados relativos al cumplimiento de requerimientos de ética, normas profesionales y disposiciones legales y reglamentarias aplicables.

El equipo de trabajo ha estado formado por profesionales expertos en revisiones de Información No Financiera y, específicamente, en información de desempeño económico, social y medioambiental.

Nuestra responsabilidad

Nuestra responsabilidad es expresar nuestras conclusiones en un informe de verificación independiente de seguridad limitada basándonos en el trabajo realizado. Hemos llevado a cabo nuestro trabajo de revisión de acuerdo con los requisitos establecidos en la Norma Internacional de Encargos de Aseguramiento 3000 Revisada en vigor, "Encargos de Aseguramiento distintos de la Auditoría y de la Revisión de Información Financiera Histórica" (ISAE 3000 Revisada) emitida por el Consejo de Normas Internacionales de Auditoría y Aseguramiento (IAASB) de la Federación Internacional de Contadores (IFAC) y con la Guía de Actuación sobre encargos de verificación del Estado de Información No Financiera emitida por el Instituto de Censores Jurados de Cuentas de España.

En un trabajo de aseguramiento limitado los procedimientos llevados a cabo varían en naturaleza y momento, y tienen una menor extensión, que los realizados en un trabajo de aseguramiento razonable y, por lo tanto, a seguridad que se obtiene es sustancialmente menor.

Nuestro trabajo ha consistido en la formulación de preguntas a la Dirección, así como a las diversas unidades y áreas responsables del Grupo que han participado en la elaboración del EINF, en la revisión de los procesos para recopilar y validar la información presentada en el EINF y en la aplicación de ciertos procedimientos analíticos y pruebas de revisión por muestreo que se describen a continuación:

- Reuniones con el personal del Grupo para conocer el modelo de negocio, las políticas y los enfoques de gestión aplicados, los principales riesgos relacionados con esas cuestiones y obtener la información necesaria para la revisión externa.
- Análisis del alcance, relevancia e integridad de los contenidos incluidos en el EINF en función del análisis de materialidad realizado por el Grupo y descrito en el apartado "2. Avanzando en nuestra apuesta por la sostenibilidad" considerando los contenidos requeridos en la normativa mercantil en vigor.
- Análisis de los procesos para recopilar y validar los datos presentados en el EINF del ejercicio 2021.
- Revisión de la información relativa a los riesgos, las políticas y los enfoques de gestión aplicados en relación con los aspectos materiales presentados en el EINF del ejercicio 2021.

- Comprobación, mediante pruebas, en base a la selección de una muestra, de la información relativa a los contenidos incluidos en el EINF del ejercicio 2021 y su adecuada compilación a partir de los datos suministrados por las fuentes de información.
- Obtención de una carta de manifestaciones de los Administradores y la Dirección.

Conclusión

Basándonos en los procedimientos realizados en nuestra verificación y en las evidencias que hemos obtenido, no se ha puesto de manifiesto aspecto alguno que nos haga creer que el EINF de Elecnor, S.A. y sociedades dependientes correspondiente al ejercicio anual finalizado el 31 de diciembre de 2021, no haya sido preparado, en todos los aspectos significativos, de acuerdo con los contenidos recogidos en la normativa mercantil vigente, y siguiendo los criterios de los estándares GRI, en su opción esencial, de acuerdo con lo mencionado para cada materia en las tablas “Anexo II. Índice de contenidos de la Ley 11/2018, de 28 de diciembre, en materia de información no financiera y diversidad” y “Anexo III. Índice de contenidos GRI” del citado Informe de Gestión consolidado.

Párrafo de énfasis

El Reglamento (UE) 2020/852 del Parlamento Europeo y del Consejo de 18 de junio de 2020, relativo al establecimiento de un marco para facilitar las inversiones sostenibles, establece la obligación de divulgar información sobre la manera y la medida en que las actividades de la empresa se asocian a actividades económicas que se consideren medioambientalmente sostenibles, en relación con los objetivos de mitigación del cambio climático y adaptación al cambio climático por primera vez para el ejercicio 2021 siempre que el estado de información no financiera se publique a partir del 1 de enero de 2022. En consecuencia, en el Informe de Gestión consolidado adjunto no se ha incluido información comparativa sobre esta cuestión. Adicionalmente, se ha incorporado información para la que los Administradores de Elecnor, S.A. han optado por aplicar los criterios que, en su opinión, mejor permiten dar cumplimiento a la nueva obligación y que están definidos en el apartado “Aplicación de la taxonomía europea de finanzas sostenibles” del Informe de Gestión consolidado adjunto. Nuestra conclusión no ha sido modificada en relación con esta cuestión.

Uso y distribución

Este informe ha sido preparado en respuesta al requerimiento establecido en la normativa mercantil vigente en España, por lo que podría no ser adecuado para otros propósitos y jurisdicciones.

KPMG Asesores, S.L.

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