

15. Non-Financial Information Statement

15.1 About this report GRI 2-1, GRI 2-2

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 2023. As shown in Appendix II, "Contents index of Law 11/2018 of 28 December, on non-financial information and diversity", the compliance 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. And in relation to corporate information, it includes information on the Elecnor Group, the Elecnor Foundation and the joint venture Celeo Concesiones e Inversiones, S.L.

15.2 Progressing in our commitment to sustainability GRI 2-23, GRI 2-24

The Elecnor Group considers it has an inherent sustainability of its activities and its business strategy, as well as its relations with stakeholders.

The Elecnor Group has various policies, approved by the highest level of the organisation, that set out and clarify its principles and values and its commitments, both to its employees and to the business environment and society in general. These policies include, besides the Code of Ethics and Conduct and the Compliance Policy, the Sustainability Policy, Integrated Management System, the Anti-Corruption Policy, the Anti-Trust Policy, the Human Rights Policy, the Local Community Relations Policy, the Equality Plan and the Tax Policy, among others. All these policies are published on the Elecnor Group's websites and on its corporate intranet "Buenos Días".

In 2023, the Elecnor Group approved the Internal System Policy on Integrity and Regulatory Compliance and the Procedure for Managing Communications received through the Group's Ethics Channel. This resulted in the updating of the Integrated Management System Policy and the Information Communication Policy, contacts and engagement with shareholders, institutional investors, asset managers, financial intermediaries, proxy advisers and other stakeholders.

In turn, the Group passes these commitments on to its operational management both through its Strategic Sustainability Plan and the various management systems it has in place, including the Corporate Social Responsibility Management System, the Compliance System and the Integrated Management System, which integrates the quality, environment, health and safety, energy management, R&D&I management, information security systems and risk management.

Sustainability governance [GRI 2-13](#), [GRI 2-14](#), [GRI 2-16](#)

Board of Directors

The Board of Directors of Elecnor Holding is the body with the most wide-ranging powers and faculties to manage and represent the company, and it carries out its functions with unity of purpose and independence of criteria, guided by the corporate interest, which it understands as the achievement of a profitable and sustainable business in the long term, in order to foster its continuity and the maximisation of its economic value.

Pursuant to Article 14 of the Bylaws and Article 5 of the Board of Directors' Regulations, the Board of Directors' policy is to focus its activity on the general function of laying down the strategic and management guidelines of the company and its Group, as well as on supervising their implementation, deciding on matters that are strategically relevant at Group level, entrusting the governing bodies and management functions of the companies that go to make up the Group to their management and governing bodies, while also overseeing the reconciliation of Elecnor corporate interest with the said entities.

In particular, in the field of sustainability, the Board of Directors is responsible, among other functions and responsibilities, for determining and approving the Sustainability Policy in environmental and social matters; supervising the process of drawing up and presenting the financial information and the Directors' Report, which includes the mandatory non-financial information; and drawing up the Non-Financial Information Statement for presentation to the General Shareholders' Meeting. It also approves the initiatives of the Elecnor Group's Strategic Sustainability Plan that contribute to its business strategy and long-term interests and sustainability.

Similarly, the Board supervises the effective functioning and performance of 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.

Appointments, Remuneration and Sustainability Committee

The Appointments, Remuneration and Sustainability Committee, in connection with the review of corporate governance and sustainability, is responsible for:

- Assessing and periodically reviewing the corporate governance system and the company's Sustainability Policy in environmental and social matters, with a view to ensuring that they fulfil their mission of furthering the social interest and take into account the legitimate interests of stakeholders.
- Overseeing that environmental and social practices are in line with the strategy and policy set.
- Overseeing and assessing the processes of relations with the different stakeholders.

The members of the Appointments, Remuneration and Sustainability Committee are appointed with the know-how, skills and experience required for the duties they are called upon to perform. The dynamics and practices set up to strengthen the Directors' knowledge of ESG matters notably include the incorporation of a specific agenda item on sustainability issues at meetings of the Board of Directors, the Executive Committee and other major committees.

The Appointments, Remuneration and Sustainability Committee has designated the Sustainability Committee as the Group's key operational body on sustainability issues.

The Appointments, Remuneration and Sustainability Committee holds quarterly meetings to track and evaluate the Group's sustainability actions.

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

Elecnor Group Sustainability Strategy

At the Elecnor Group, sustainability is regarded as essential both in the implementation of its activities and its business strategy, as well as in its relations with its stakeholders. A commitment that is embodied 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 new 2023-2025 Strategic Sustainability Plan, submitted to the Appointments, Remuneration and Sustainability Committee and approved by the Board of Directors, maintains a continuity with respect to the previous 2021-2022 Strategic Sustainability Plan. The new Plan reflects, through different objectives and initiatives, the following strategic challenges of the Elecnor Group: management excellence, strengthening the company's identity, expanding sources of financing, strengthening control, efficiency, technology, cybersecurity, quality, environment, communication and reputation systems. This strategy conveys to the Group's stakeholders its commitment to people, society and the environment, always based on ethical and responsible management.

The five strategic pillars of the previous Strategic Plan have been maintained in the current one, although "Promoting a culture of belonging and respect" is now called "Elecnor Group's identity" for greater alignment with the Group's strategy. In addition, two new lines of action have been added regarding supply chain and biodiversity, and initiatives related to human rights and environmental taxonomy.

The Strategic Sustainability Plan 2023-2025 and the traceability of its core strategies to the Group's material topics is shown below:



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
- > Service quality and customer satisfaction
- > Responsible supply chain
- > Technology and innovation

Solid governance structure

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

- > Corporate Governance
- > Compliance

Elecnor Group's identity

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

- > Health and safety
- > Enhancing team commitment and loyalty

Develop sustainable infrastructures

Being one of the key players in the development and progress of society through infrastructure, renewable energy, energy efficiency, water and environmental projects, as well as the commitment to being a Net Zero company in 2050. These are its lines of action:

- > Develop projects and services that contribute to decarbonising the economy.
- > Carbon-neutral company
- > Biodiversity

Improve the quality of life of people

With the aim of generating change and well-being, Elecnor Group is committed to fostering the development and progress of society. These are its lines of action:

- > Constant dialogue with stakeholders
- > Supporting the communities where the Group operates

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

2022-2023 Strategic Plan Milestones

Some achievements of the 2023-2025 Strategic Plan are set out below:

- Progress continued to be made in the area of sustainable financing, with the registration of a Multi-currency Promissory Note Programme on the Alternative Fixed Income Market (MARF) for up to Euros 400 million. This is the Elecnor Group's second Programme linked to sustainability that includes targets for reducing greenhouse gas emissions and accidents at work.
- Major progress has been made in the renewable energy projects of wind farm repowering and the green hydrogen pilot project.

- The Digital Transformation index has reached 97% on 2023 projects.
- Within the framework of the Climate Change Strategy, the carbon footprint for Scopes 1, 2 and 3 has been verified and the analysis of climate-related risks and opportunities has been updated following the recommendations of the TCFD.
- The CDP score of A- has been maintained. The renewal of this rating endorses Elecnor's leadership in terms of sustainability, adaptation and mitigation of climate change.
- Progress was made in the deployment of the Quality and Environment System, most notably with the certification of Elecnor Peru.
- In Health and Safety, the Group's frequency rate remained the best since the series commenced

Elecnor Group material topics [GRI 2-29](#), [GRI 3-1](#), [GRI 3-2](#)

The Elecnor Group identifies material topics by preparing its own materiality study, conducted jointly with an external advisor. At the close of 2022, this study was undertaken in order to define the Group's relevant sustainability issues that have formed the basis of the new 2023-2025 Strategic Sustainability Plan and to prioritise the contents included in this section of the Directors' Report.

For the first time, this exercise was conducted according to the concept of dual materiality, which involves assessing both the risks and opportunities related to ESG issues that may influence the Group's value (financial materiality), and the impacts of ESG issues on people and the planet (impact materiality).

The process used to identify material topics consisted of the following:

1. **Identification of potentially material ESG issues.** Sector benchmarking was conducted by analysing publicly available information from companies in the sector, along with regulations and news related to ESG issues. Furthermore, the material topics for the infrastructure and renewable energy sectors were analysed according to SASB, Sustainalytics and S&P Global. As a result of this process, 24 ESG issues were identified.
2. **Consultation with internal and external stakeholders.** A consultation was launched with the key stakeholders via a questionnaire asking their opinion on the relevance level that each of the 24 ESG issues that were identified should have for the Elecnor Group. Similarly, with a view to approaching the concept of dual materiality with stakeholders, questions were added to identify their views on the positive and negative impacts of the Elecnor Group on people and the planet, as well as on the financial risks and opportunities for the company arising from each of the ESG issues.

In this phase, 175 online surveys were sent to all stakeholders: shareholders and investors, customers, employees, suppliers and subcontractors, regulators and administration, lenders and insurers, partners, trade unions, social environment and opinion makers.

3. **Assessment of ESG issues by the Sustainability Committee based on the concept of dual materiality.**
 - > Each of the 24 ESG issues identified in the initial phase were assessed according to the dual approach:
 - Financial materiality. The risks and opportunities that could impact the company's value were analysed.

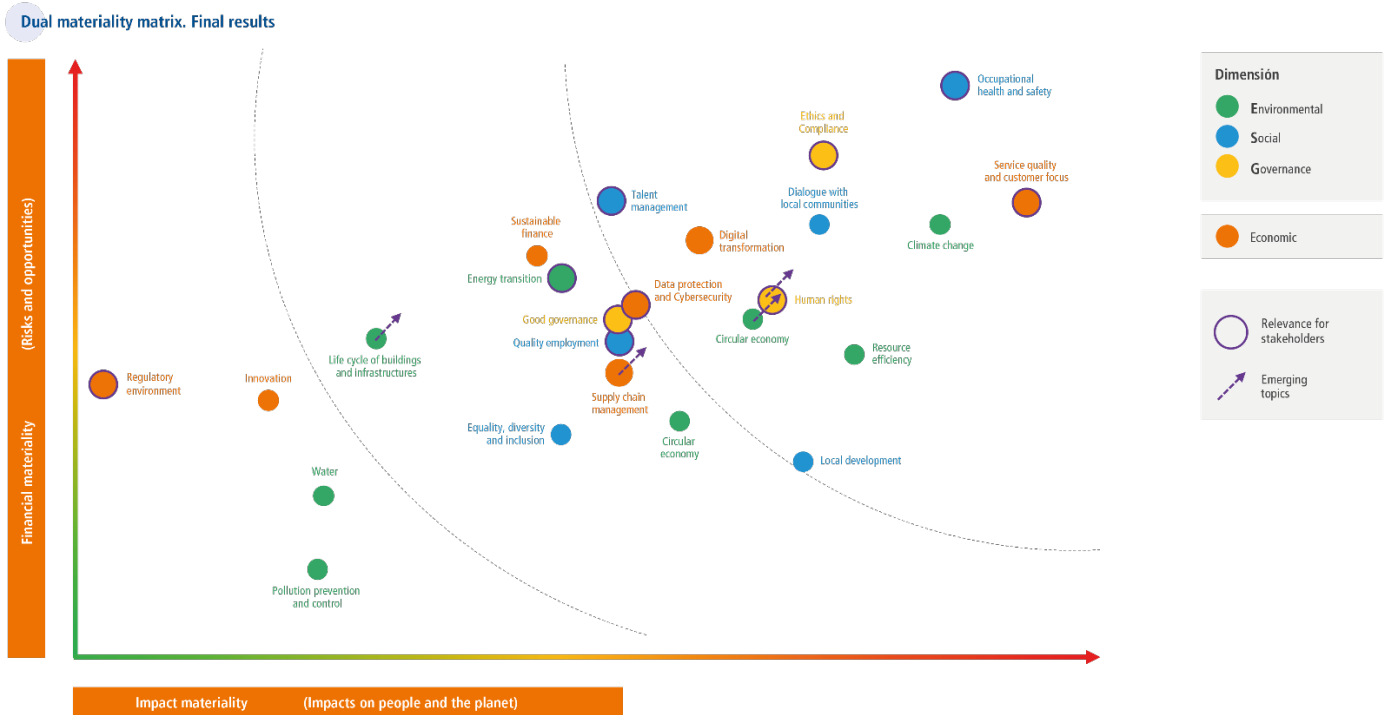
- Financial risk, taking into consideration variables such as importance (analysing potential impacts on the income statement, reputation, survival, etc.) and probability.
 - Financial opportunity based on its potential impact on the income statement and reputation.
- Impact materiality. The real and potential positive and negative impacts of the Elecnor Group on people and the planet were evaluated:
 - Negative impacts based on variables such as severity (analysing the scale, extent and irremediability) and probability.
 - Positive impacts based on their contribution to sustainable development.
- > Prioritisation of ESG issues. On the basis of the above criteria, following the analysis, ESG issues were classified as high, medium and low impact issues. Based on these results, high impact issues are further classified into critical and priority issues. In addition, among the medium-impact issues, other issues that are considered more strategic for the company are identified as relevant.
4. **Preparation of the materiality matrix** on the basis of the results obtained in the assessment exercise conducted by the Sustainability Committee and stakeholder consultation. The results have been validated by the Appointments, Remuneration and Sustainability Committee in 2023.

The Y axis of the matrix shows the results of the financial materiality assessment (risks and opportunities that affect or may affect the Elecnor Group's value creation). The X axis displays the results of the materiality of impact (real and potential impacts of the Elecnor Group on people and the planet).

Furthermore, the stakeholders' perspective is represented by the different size of the bubble that visually represents each ESG issue, depending on the relevance attributed by the respondents.

Lastly, certain issues were identified that are likely to become more relevant in the medium and long term: human rights, supply chain and biodiversity, so they have been included in the new strategy. The life cycle of buildings and infrastructures is also considered to be an area that will need further attention, given the potential market demand for such projects.

Elecnor Group's dual materiality matrix











Results obtained

ESG	Classification	Material topics	Financial materiality	Impact materiality
S	Critical	Occupational health and safety	x	x
G		Service quality and customer focus	x	x
G		Ethics and Compliance	x	x
E		Climate change	x	x
S	Priority	Dialogue with local communities	x	x
G		Digital transformation	x	x
S		Management of skilled people	x	
S		Human rights		x
E		Resource efficiency		x
E		Biodiversity		x
S		Local development		x
G	Relevant	Corporate Governance	x	
E		Data protection and cybersecurity	x	
E		Sustainable finance	x	

This year, in addition to the material topics identified in 2022 (Critical and Priority), Relevant topics have been incorporated as a material aspect.

The impacts associated with the material topics are detailed in the following tables

Positive impacts

MATERIAL TOPIC	DESCRIPTION	TIME HORIZON	LEVEL	SDGs	LINKAGE TO IMPACT
Service quality and customer focus	Developing reliable, sustainable, resilient and quality infrastructure that contributes to economic development and human wellbeing	Short-term	Critical	  	Direct/ indirect ownership
Climate change	The Elecnor Group's energy efficiency and renewable energy projects, as well as its climate change strategy, help build a low-carbon society	Medium-term	Critical	 	Direct/ indirect ownership
Dialogue with local communities	Listening to local communities facilitates the identification of ESG impacts (positive and negative) and their management	Short-term	Priority		Direct
Digital transformation	The implementation of digital technologies is key in the development of the business model and in identifying process improvements for greater efficiency for people and the environment	Medium-term	Priority		Direct
Local development	Infrastructure projects help improve the economic and social development of the influence areas of the projects	Short-term	Priority		Direct

Direct: The organisation is directly linked to the impact
Indirect: The organisation is linked to the impact through its business relationships

Negative impacts

MATERIAL TOPIC	DESCRIPTION	TIME HORIZON	LEVEL	LINKAGE TO IMPACT
Occupational health and safety	Affecting the health and safety of employees, subcontractors, customers due to the occurrence of accidents and/or generation of occupational illnesses.	Short-term	Critical	Direct/ indirect ownership
Ethics and Compliance	Failure to comply with the applicable regulations and/or the company's ethical principles may result in the violation of labour, environmental, etc. regulations	Short-term	Critical	Direct
Climate change	Contribution to climate change through the generation of GHG emissions.	Medium-term	Critical	Direct/ indirect ownership
Dialogue with local communities	Generation of negative impacts on the environment and local communities in the development of projects.	Short-term	Priority	Direct
Human rights	Potential violation of some basic rights and freedoms of stakeholders (e.g., rights of indigenous communities, non-discrimination...)	Short-term	Priority	Direct/ indirect ownership
Resource efficiency	Water consumption in water-stressed areas contributes to water depletion / Energy consumption generates GHG emissions.	Medium-term	Priority	Direct
Biodiversity	Impacts on biodiversity at some stage of the project life cycle.	Short-term	Priority	Direct/ indirect ownership

Alignment of the Strategic Sustainability Plan, material topics and Sustainable Development Goals

Axes of the Strategic Sustainability Plan	Material topics	GRI Content	SDGs	Chapter of this Report where answers are given
Elecnor Group's identity	Occupational health and safety	403-1 403-2 403-3 403-4 403-5 403-6 403-7 403-8 403-9 403-10	 	We look after our people
Profitable and forward-looking company	Service quality and customer focus	Elecnor Group own indicator	 	Operational excellence
Solid governance structure	Ethics and Compliance	2-9 2-23 2-27 201-4 205-1 205-2 205-3 206-1 207-1 207-2 207-3 207-4 415-1	 	Responsible management
Develop sustainable infrastructures	Climate change	201-2 305-1 305-2 305-3 305-4 305-5	 	Committed to the environment
Improve the quality of life of people	Dialogue with local communities	203-2 413-2		Social impact
Profitable and forward-looking company	Digital transformation	Elecnor Group's own indicator	 	Technology and innovation
Elecnor Group's identity	Management of skilled people	401-1 401-3 404-1 404-2 404-3	 	Our people, our best asset

Solid governance structure	Human rights	2-23 406-1 407-1 408-1 409-1 411-1	  	Responsible management
Develop sustainable infrastructures	Resource efficiency	302-1 302-3 302-4 302-5 303-1 303-5 306-1 306-2 306-3 306-4 306-5	 	Committed to the environment
Develop sustainable infrastructures	Biodiversity	304-1 304-2 304-3 304-4		Committed to the environment
Improve the quality of life of people	Local development	201-1 203-1 204-1 413-1	  	Social impact
Solid governance structure	Corporate Governance	2-9 to 2-21	 	Responsible management
Profitable and forward-looking company	Data protection and cybersecurity	Elecnor Group's own indicator	 	Technology and innovation
Profitable and forward-looking company	Sustainable finance	Elecnor Group's own indicator	 	Committed to the environment

Information related to policies, measures and monitoring indicators associated with each material topic is included in the chapters that deal with the material topics.

Social dialogue with stakeholders GRI 2-25, GRI 2-29

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.

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

Stakeholder group	Communication channel
Shareholders and investors	Shareholders' Meeting Corporate website (Shareholders and Investors Channel) email (Shareholder Services) Social media CNMV website Management Committees, Commissions, Boards of Directors and Shareholders' Meetings Informal channels (in-person dialogue, one-to-one meetings) Corporate and financial reporting: Corporate Governance Report, Annual Accounts, NFIS, Integrated Report, etc. Roadshows and forums Presentations of profit/loss Meetings
Customer	Meetings and presentations Corporate websites Trade fairs Satisfaction surveys Social media Corporate and financial reporting: Corporate Governance Report, Annual Accounts, NFIS, Integrated Report, etc.
Employees	Periodic meetings Work groups Training sessions and courses Corporate websites Social media Buenos Días Elecnor intranet eTalent Signage Awareness-raising and sensitisation campaigns Campaigns for participation in collective initiatives/projects Corporate and financial reporting: Integrated Report, etc. Code of Ethics channel

Suppliers and subcontractors	Meetings and work groups Corporate websites Social media Code of Ethics channel Audits Management platforms Corporate and financial reporting: Corporate Governance Report, Annual Accounts, NFIS, Integrated Report, etc.
Public Entities and regulatory bodies	Official filings Meetings Corporate website e-offices Social media Corporate and financial reporting: Corporate Governance Report, Annual Accounts, NFIS, Integrated Report, etc.
Lenders/Insurers	Meetings Corporate website Corporate and financial reporting: Corporate Governance Report, Annual Accounts, NFIS, Integrated Report, etc.
Partners	Meetings Collaboration agreements Forums, fairs and congresses Corporate websites Social media Corporate and financial reporting: Corporate Governance Report, Annual Accounts, NFIS, Integrated Report, Elecnor Foundation Report, etc.
Unions	Meetings Information briefings Corporate websites Social media Code of Ethics channel Corporate and financial reporting: Corporate Governance
Social environment	Social projects Corporate and financial reporting: Annual Reports, NFIS, Integrated Report, Elecnor Foundation Annual Report Sponsorships and patronage Corporate websites Social media Specific project websites Code of Ethics channel
Environment and environment-related organisations	Environmental projects Corporate and financial reporting: Annual Reports, NFIS, Integrated Report, Elecnor Foundation Annual Report Corporate websites Social media Specific project websites Code of Ethics channel

Opinion generation	Press releases Partnership agreements with the media Meetings Corporate website Corporate and financial reporting: Corporate Governance Report, Annual Accounts, NFIS, Integrated Report, etc. Social media ESG forms
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Thanks to the more than 400,000 followers on social media and the more than 20 corporate websites that the Elecnor Group has worldwide, it is possible to promote the Elecnor Group's external communication channels, the purpose of which is to disseminate the corporate culture, connect with stakeholders and promote awareness of the company's values among customers, shareholders and other stakeholders.

These are some key figures in the Elecnor Group's communication with the various stakeholders in 2023:



15.3 Business model GRI 2-6

Information on the company's business model is contained in the Purpose and business model section of this Directors' Report. Information concerning the outlook for 2024 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 technical excellence in order to drive the development of essential services, sustainable projects, concessions and its own projects.

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 robustness, efficiency and control. All this with the focus on generating value for all of its stakeholder groups and the expansion of the Elecnor Group.

Our purpose, our reason for existing

We generate change and well-being: we take infrastructures, energy and services to territories all over the world so that they can develop their potential.



Essential services

Integration of distribution services for power, telecommunications, maintenance and installations, essential for generating change and well-being in cities and feeding the sustainable project business line.



Sustainable projects

Promotion, construction, operation and maintenance of infrastructures for worldwide generation and transmission of clean energy, improving living conditions for communities and encouraging sustainable development.



Concessions and proprietary projects

Development and operation of projects aimed at long-term stability and profitability by means of concession agreements and strategic investments in proprietary projects, by strengthening the portfolio of renewable energy and power infrastructure, and increasing the value of the Group in the long term.

GROWTH DRIVERS

Efficiency, diversification and robustness

DIFFERENTIAL BASE

People and values

15.4 Our people, our best asset

People management is a key area for the Elecnor Group. Keeping a committed team, attracting the best talent and supporting their professional development, while fostering good working practices, equal opportunities and a safe and healthy working environment are the keys to the Integrated Human Resources Management.

At 2023 year-end, the Group employed more than 22,500 people of 92 nationalities. They form a committed, professional and diverse team.

Integrated Human Resources Management GRI 3-3

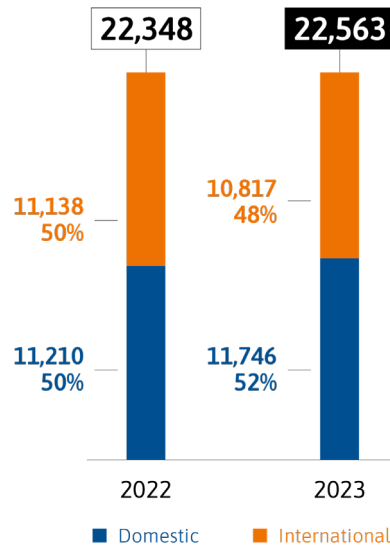
The Group's Integrated Human Resources Management is geared towards attracting the best talent available, as well as deploying, fostering and developing the organisation's existing talent, as described in the following sections on recruitment, training, performance and development.

Workforce profile GRI 2-7

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%.

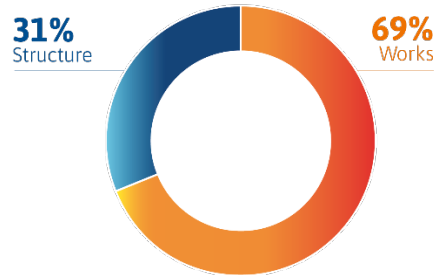
At the end of 2023, the Elecnor Group employed 22,563 people, a 1% increase compared to the previous year (22,348 employees).

Employee developments by market



Workforce breakdown

The Elecnor Group's workforce comprised 31% Structure staff and 69% Works staff.



Structure workforce by gender

In line with the historical trend in the sector, men have a greater presence in the Group, as they account for more Works staff, where women only account for 5%. However, in the Structure category, there is a greater balance between men and women (the latter accounting for 32%).



The company's commitment to equality and diversity fosters growth in the number of women at the organisation, and there has been a 3% increase at Group level in the last year. Note also that 46% 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, 41% of the Group's graduates are female engineers or architects, a figure that contrasts with 27% of the total number of female graduates from all Spanish universities.

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

Structure staff

	2022	2023	% Change
	6,572	6,944	6 %
Male	4,547	4,751	4 %
Female	2,025	2,193	8 %

Works staff

	2022	2023	% Change
	15,776	15,619	-1 %
Male	14,900	14,828	0 %
Female	876	791	-10 %

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

Geographic area	2022		2023	
	Male	Female	Male	Female
Spain	2,684	1,225	2,866	1,337
Europe	317	155	309	151
North America	229	46	275	51
Latin America	886	432	811	424
Africa	51	8	15	4
Asia	232	113	213	103
Oceania	148	46	262	123
Total	4,547	2,025	4,751	2,193

The Elecnor Group is committed to enhancing the quality of employment, which is demonstrated by the 2% increase in the number of open-ended contracts compared to the figure for 2022, reaching a permanent contract rate of 79%.

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.

Likewise, the Elecnor Group uses subcontracted staff to carry out projects. [GRI 2-8](#)

In 2023, the number of hours of absenteeism in the Elecnor Group totalled 1,937,342 (2,651,853 hours in 2022), implying an absenteeism³ ratio of 3.77% (5.09% in 2022). This ratio does not include information from the United States for data protection reasons.

Workforce turnover ⁴ [GRI 401-1](#)

Workforce turnover this year reached 51%. The turnover figures in segment are due mainly to contracts ending due to project completions over the course of the year. However, if we analyse the voluntary turnover of the Structure staff in 2023, it is significant to note that it is 8.5%, compared to 11.1% in 2022.

Appendix I of this Report contains in-depth figures on the whole workforce turnover.

New hirings [GRI 401-1](#)

In order to implement projects, 12,001 new recruitments were made in 2023, which implies a 3% increase compared to 2022 (12,412).

These data include subrogated staff and interns joining the Group during the year.

³ 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.

⁴ 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

By gender and type of employee

	Structure			Works	
	Male	Female	Total	Male	Female
2022	1,316	614	12,412	9,865	617
2023	1,226	587	12,001	9,565	623

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. The objective is to capture and attract the best talent available in the market, giving priority to internal talent and following the Group's Internal Selection and Mobility Policy.

This year, the selection of qualified profiles in the various business areas of the Group was strengthened in order to attract talent according to the specific needs of each area. The goal is to build a multidisciplinary team that operates with a global vision of the business.

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, the LinkedIn profile Elecnor Talento is mainly used to coordinate job vacancy postings. In 2023, impetus continued to be given to capturing skilled staff using specific campaigns on LinkedIn and other employment websites in order to identify talent among those who are not actively seeking work.

This year has continued to be marked by the need to recruit national and international profiles for renewable energy projects, both wind and photovoltaic.

Similarly, with the aim of attracting students and recent graduates, the Elecnor Group actively collaborates with the university environment and vocational training schools, taking part in different employment forums, both on-site and virtual. In 2023, 633 interns joined the team at the Elecnor Group.

Regarding the international scholarship programme, the Group maintains its collaboration with the Basque Government. The ICEX scholarships in various countries are also upheld.

As described in greater detail in the Equality and diversity section of this Report, the Elecnor Group is committed 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 collaborate through 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.

Developing human capital

One of the Elecnor Group's main lines of action of integrated human resources management is to develop its human capital, working on training, retaining and developing it.

The **Identity Reinforcement Project**, designed the previous year, outlines the lines of work in various areas of people management geared towards attracting, developing and retaining talent in the Elecnor Group.

In 2023, the project continued to make progress with initiatives framed within its main lines of action:

- Initial steps geared towards welcoming new recruits, from welcome to monitoring and evaluation after the probationary period.
- Training for new recruits over the first three years. This year, the following training sessions were provided:
 - New graduates (first year): 229 attendees.
 - Negotiation techniques (second year): 113 attendees.
 - Negotiation with the property (third year): 84 attendees.
- Monthly and quarterly project monitoring meetings where we foster communication between those in charge and their teams and monitor the achievement of objectives.
- Holding workshops intended to increase motivation and listen to people's needs:
 - Continuity conferences held every two years and aimed at graduates with between 4 and 5 years of seniority from the General Sub-Directorates and Business Divisions. This year, the conference was called *Tune In* and was attended by 254 people.
- Compensation/Performance evaluation and monitoring plan. In 2023, the new Job Map and the new Performance Evaluation process for Structure staff was defined.
- Career plans. Valencia has joined the Development/Career Plan for new university graduates. This Plan defines the salary aspects for the first three years, which are linked to their annual performance.
- Training. We continue with the possibility for each professional to request more personalised training.
- Emotional salary. The Elecnor Group supports the carrying out of activities that promote the well-being of the workforce, as detailed in the Work-Life Balance section of this Report.
- Active listening by drawing up an exit questionnaire for the company that collects information in this respect and interviews between managers and their teams to deal with the different needs on an individual basis.

Training and development GRI 3-3, GRI 404-2

The Elecnor Group has a policy in place called Procedure 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.

In 2023, 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

The third edition of the ESADE Management Development Programme was held, aimed at those holding the position of Delegate, and the Senior Management Programme (SMP) at IESE continued with the "High Impact Communication" training for Managers.

- Itineraries on management skills

They include courses related to leadership, finance, sales, communication, negotiation and strategies, work, project management, quality and Manager School, among others. A total of 1,223 attendees took part.

- Specialised itineraries

They consist of courses related to the most specific aspects of each position, which have been attended by 802 people (598 through the Pharos digital training tool).

- Office automation/technical IT

68 attendees have taken a course to update or learn new office automation tools. Additionally, 30 Office training sessions were held for 1,059 people and 12 Google Workspace sessions for 420 participants.

Besides classroom training, the Elecnor Group offers training courses with 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, 598 participants have completed some of the available courses on technical or specific training.

On the Buenos Días intranet, Elecnor Group employees can access a catalogue of training courses.

Furthermore, Elecnor Group continues with the Manager School initiative, whose objective is to provide the necessary know-how to people who occupy or will occupy the position of manager, to enable them to carry out their duties and achieve the established goals.

To this end, a Training Plan has been established that addresses the following skills: management functions, digital, technical, occupational risk prevention and management systems. In 2023, the following courses were given to Managers and Skilled Workers Team Leaders:

- It is also up to me. Sessions on occupational risk prevention aimed at works managers with a participation of 110 attendees in 7 sessions.
- Being a manager at Elecnor. Sessions on key issues, challenges and performance skills. 9 sessions were held with a total of 144 attendees.

Training indicators

Item	2022	2023	Changes
Investment in training (€)	9,839,989	11,413,657	16%
Training hours	344,005	393,607	14%
No. of attendees*	35,123	35,914	2%
Training hours/employee	15.39	17.44	13%

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

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

- **Structure.** In 2023, 9,257 people attended training events, such as: management, technology, IT, languages, quality and environment, and occupational risk prevention.
- **Works.** Works staff receives training in connection with electricity, installations, maintenance, gas, telecommunications, vehicle and machine operation, 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, 26,657 people have received some of the aforementioned training.

2022

Structure staff

Area	No. of courses	Attendees			Hours		
		Male	Female	Total	Male	Female	Total
Management	98	666	226	892	5,846	2,101	7,947
Technology	156	1,133	469	1,602	10,880	2,930	13,810
IT	42	166	119	285	2,112	1,328	3,440
Languages	378	321	185	506	5,420	3,826	9,246
Quality and Environment	129	422	265	687	1,877	1,987	3,864
Occupational health and safety	325	2,954	1,110	4,064	26,363	9,123	35,486
Total	1,128	5,662	2,374	8,036	52,498	21,294	73,792

Works staff

Area	No. of courses	Attendees			Hours		
		Male	Female	Total	Male	Female	Total
Management	18	173	3	176	1,430	23	1,453
Technology	1,222	8,507	28	8,535	117,906	411	118,317
IT	2	24	3	27	268	31	299
Languages	0	4	0	4	3	0	3
Quality and Environment	22	426	31	457	735	53	787
Occupational health	1,951	17,598	290	17,888	147,520	1,836	149,355
Total	3,215	26,732	355	27,087	267,861	2,353	270,214

2023

Structure staff

Area	No. of courses	Attendees			Hours		
		Male	Female	Total	Male	Female	Total
Management	137	1,268	581	1,849	17,800	6,123	23,922
Technology	386	1,474	659	2,133	13,106	3,910	17,016
IT	18	70	38	108	927	505	1,432
Languages	643	402	258	660	9,772	6,713	16,484
Quality and Environment	119	439	238	677	2,347	1,592	3,938
Occupational health and safety	938	2,897	933	3,830	34,792	9,961	44,753
Total	2,241	6,550	2,707	9,257	78,743	28,802	107,544

Works staff

Area	No. of courses	Attendees			Hours		
		Male	Female	Total	Male	Female	Total
Management	46	441	15	456	7,980	1,871	9,851
Technology	1,455	9,922	56	9,978	124,492	412	124,904
IT	9	27	3	30	294	60	354
Languages	9	13	1	14	226	21	247
Quality and Environment	31	374	9	383	1,622	26	1,648
Occupational health and safety	2,045	15,583	213	15,796	146,548	2,512	149,060
Total	3,595	26,360	297	26,657	281,162	4,902	286,064

Training hours and attendees by professional category and type of employee

Professional category	2022		2023	
	Attendees	Hours	Attendees	Hours
Structure	8,036	73,791	9,257	107,545
Management	133	1,638	143	2,111
Executive	1,520	13,056	1,649	21,161
Technician	6,383	59,098	7,465	84,273
Works	27,087	270,214	26,657	286,063
Basic	27,087	270,214	26,657	286,063
Total	35,123	344,005	35,914	393,608

Training hours by gender and type of employee

	Structure			Works	
	Male	Female	Total	Male	Female
2022	52,498	21,294	344,005	267,861	2,353
2023	78,743	28,802	393,608	281,162	4,901

Average hours of training by category and gender [GRI 404-1](#)

Category	Male		Female		Total	
	Number	Average	Number	Average	Workforce	Average
Structure	4,547	11.55	2,025	10.52	6,572	11.23
Management	143	10.02	18	11.39	161	10.17
Executive	1,184	8.11	225	15.33	1,409	9.26
Technician	3,220	12.88	1,782	9.90	5,002	11.82
Works	14,900	17.98	876	2.69	15,776	17.13
Basic	14,900	17.98	876	2.69	15,776	17.13
Total	19,447	16.47	2,901	8.51	22,348	15.39

2023

Category	Male		Female		Total	
	Number	Average	Number	Average	Workforce	Average
Structure	4,751	16.57	2,193	13.13	6,944	15.49
Management	141	13.84	19	8.37	160	13.19
Executive	1,270	13.51	261	15.36	1,531	13.82
Technician	3,340	17.86	1,913	12.88	5,253	16.04
Works	14,828	18.96	791	6.20	15,619	18.32
Basic	14,828	18.96	791	6.20	15,619	18.32
Total	19,579	18.38	2,984	11.29	22,563	17.44

With a view to continuous improvement, the Group assesses each training itinerary considering the opinion of trainees by means of an anonymous questionnaire.

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

Performance management GRI 404-3

Performance management is the process of analysis of the actions and results of each person in their job, as well as the identification of improvement areas. The aim is a maximum commitment to existing potential in the Group in order to offer employees opportunities for growth and improvement over the course of their career.

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.

In 2023, the performance management process continued to be implemented for new university graduates from Madrid and Barcelona within the framework of the Career Plan, being joined this year by new university graduates from Valencia. In total, 259 graduates took part in the evaluation process.

Progress was also made in the design of the Group's new performance management model based on the achievement of business objectives and competencies.

During 2023, 4,015 people were assessed (process completed in January 2024), taking into account the aspects of job development and attitudes towards customer service, teamwork and communication/interaction.

Professional category	Male	Female	Total	% of assessment*
Structure	2,707	1,262	3,969	57%
Management	114	14	128	80%
Executive	761	166	927	61%
Technician	1,832	1,082	2,914	55%
Works	35	11	46	0.3%
Basic	35	11	46	0.3%
Total	2,742	1,273	4,015	18%

*Calculated on the total of each professional category

Remuneration and benefits

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 2023, a new job map was defined for Structure staff.

The Elecnor Group offers its employees social benefits that are described in more detail in the Work-Life Balance section of this chapter.

Remunerations policy GRI 2-19

Within the framework of Integrated Human Resources Management, the Elecnor Group's 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.

The Elecnor Group has a remuneration register adapted 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 fixed average wage of men and of women, over the average wage of men.

Category	2022	2023
Management	13 %	14 %
Executive	17 %	16 %
Technician	21 %	22 %
Basic	47 %	38 %
Employee type	2022	2023
Structure	33 %	32 %
Works	47 %	38 %

Moreover, it is worth representing the wage gap in Spain, where 52% of the workforce is located.

Spain

Category	2022	2023
Management	8 %	9 %
Executive	2 %	3 %
Technician	10 %	10 %
Basic	0.3 %	3 %
Employee type	2022	2023
Structure	21 %	21 %
Works	0.3 %	3 %

The average remunerations and its evolution thereof by gender, age and professional category are exposed in Appendix I.

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, in the form of various work schedules negotiated and approved with the Workers' Legal Representation.

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. Similarly, this concept is included in the Group's Code of Ethics and Conduct, in which it undertakes to implement steps to facilitate the reconciliation of professional obligations and personal and family life. 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 outside of the recipient's working hours, he/she receives it during his/her 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 staff in the domestic market with open-ended contracts have access. This Plan includes health insurance (employees may include their spouse and children), meal vouchers and cards, retirement insurance, transport passes, pension plans and kindergarten. 1,071 people joined in 2023.

Moreover, there is a study support programme available to all Group staff in Spain who have children aged 4 to 16. The only requirement is to have been at the company for at least one year. In 2023, 3,215 employees benefited from this assistance quantified at Euros 584,913. 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.

The Elecnor Group also supports the carrying out of activities that promote the health and well-being of the workforce, including the following in 2023:

- Agreements with physiotherapy clinics and insurance companies.
- Weekly information on health tips and good practices.
- To promote and encourage sport, the company subsidises participation in sports activities and company races. A total of 224 people took part in the races in Bilbao, Madrid, Palma de Mallorca, Seville and Valencia.
- Apartments. 108 apartments were raffled among the Structure and Works staff in Spain to enjoy during 15 days in summer.
- "Moana" surf camp in Vizcaya. 47 children, children of Elecnor Group employees, attended this surf camp for a week.

In addition, note that the Más Elecnor digital platform includes special offers and discounts on products and services for the entire workforce and their direct relatives.

Equality and diversity GRI 2-25 GRI 401-3 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 Elecnor Group 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.

Furthermore, the Group's Recruitment Policy stipulates that all candidates are given equal consideration, that equal opportunities are respected, that the process is treated with the utmost confidentiality and that the positions in the various fields of activity are filled by the most suitable people, within a framework of equal treatment and without discrimination of any kind.

If employees want to send any type of suggestion or resolve a conflict, the following mailbox is available as a communication channel: codigoetico@elecnor.com. In 2023, no complaints have been received in terms of equality or discrimination of treatment on the grounds of sex or similar matters. [GRI 406-1](#)

In line with historical trends regarding gender in the sector, men are more widely represented in the Group, especially among Works staff. However, Structure staff is of great balance: at 31 December 2023, 32% were women and 68% men; while in Works, 5% were women and 95% men.

During this year, 381 male employees (524 in 2022) were entitled to paternity leave and 85 female employees (110 in 2022) were entitled to maternity leave. 100% of these groups (98% in 2022), took the leave.

In Spain, out of the 327 people who took leave (265 men and 62 women), 320 returned at the end of their leave (261 men and 59 women), which corresponds to a return rate of 98% (98% men and 95% women).

On the other hand, out of the 320 employees who returned, 310 were in active employment at the end of the year (255 men and 55 women), corresponding to a retention rate of 97% (98% men and 93% women).

Entidad adherida a la alianza



The Elecnor Group has maintained the "Empresa adherida a la Alianza #CEOPorLaDiversidad" seal. This accreditation acknowledges the Elecnor Group as a company committed to researching, sharing, developing and fostering strategies and good business practices for diversity, equity and inclusion in order to turn Spain, its companies and its leaders into drivers of an innovative model centred on the dignity of all people, on fundamental rights and on the advantages and opportunities that diversity management can offer to companies and their different stakeholders.

Diversity in Governing Bodies

The Elecnor Group counts with the Policy for the Selection of Directors and for Board Diversity accessible on the Group's website, outlining 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.

This Policy, amended in December 2020 in order to adapt it to the reform of the Code of Good Governance approved in June 2020 by the CNMV, is regularly reviewed by the Appointments, Remuneration and Sustainability Committee in order to make progress in improving this aspect.

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.

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.

Similarly, the Group 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 performed for persons holding positions of responsibility in each business area.

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 the Code of Good Governance of ensuring that the number of female directors represents at least 40% of members of the Board of Directors, 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*	2022	2023
% of women in executive positions*	11.2 %	11.9 %
% of women on the Boards of Directors**	21.4 %	21.4 %

* 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 92 people with various disabilities (90 in 2022), accounting for 0.78% of the national workforce and for 0.4% of the total workforce of the Group. 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 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 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 5.4 million.

Suppliers	Amount
Protec & Marti, S.L.	€3,817,262
Comercial M. Unceta	€282,989
Integra PMC	€57,860
Gelim	€146,358
I.L. Sijalon	€334,574
Apunts	€1,427
Cemi Norte	€118,776
S. Arza	€716,131
Total	€5,475,377

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.

Since 2021, the Elecnor Group has had a collaboration agreement with the Adecco Foundation to foster the company's commitment to the labour inclusion of people at risk of exclusion, through the #EmpleoParaTodos (JobsForEveryone) programme. 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.

In addition, the company is committed to creating inclusive, barrier-free spaces that facilitate participation.

About our people

Internal communication is key in the Elecnor Group as it is the link between the company and its people. The main objective is to foster dialogue, collaboration and understanding between the different areas of the Group, as well as staff involvement.

During 2023, the Group launched new initiatives in addition to those started in the previous year. Thanks to these actions, the more than 22,000 people who today make up the Elecnor Group can stay connected through the different communication channels, both internal (Buenos Días) and external (social networks).

Noteworthy initiatives

To get home

As part of World Day for Safety and Health at Work, the Elecnor Group held an annual event on occupational risk prevention that sought to raise awareness, foster and reward occupational prevention actions in all fields and spheres.

The event, which was broadcast in all countries where the Group operates, aimed to highlight the importance of complying with safety regulations in order to return home with one's family through the slogan "Return home".

Hackers vs Locky

The Cybersecurity area launched a campaign with the aim of raising awareness of the importance of improving digital security skills. It was implemented through a game, so that people could learn about the reality of cybersecurity by playing.

GoodBye Plastic

This year's World Environment Day focused on the importance of providing solutions to plastic pollution, encouraging people to inspire others to join the cause and providing a channel where each participant could send a video with plastic-free actions. This initiative has also sought to demonstrate the great impact of individual choices.

The Q team

On the occasion of World Quality Week, the Corporate Services area launched The Q Team campaign, with the aim of raising awareness of the lessons learned on the Elecnor Group's path to excellence and disseminating the importance of quality in all its processes.

Being healthy

This Human Resources initiative 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.

Carrera de las Empresas

The Elecnor Group encourages the adoption of healthy habits inside and outside the workplace, achieving a safe and healthy workplace filled with energy. The Company Race ("Carrera de las Empresas") is an initiative that also encourages teamwork, a good atmosphere and camaraderie.

Advent Calendar

This initiative provided the opportunity to discover, by opening a window in the calendar each day, an inspirational message about sustainability, together with related information about the Group. A daily raffle was held among all participants who opened a window.

Let's talk about Safety

As part of the Elecnor Group's commitment to health and safety, a video has been sent out every week in which, in a simple and accessible way, a lesson learned about a specific accident or incident that occurred in the past has been shown to raise awareness of the importance of learning in order to avoid a repetition.

Social dialogue GRI 2-30

In Spain, 100% of the workforce is covered by collective bargaining agreements. Considering that the concept of the Collective Bargaining Agreement stems from the Spanish Constitution and is developed by the Workers' Statute, and is therefore local and difficult to extrapolate, in the rest of the countries where the Group is present, employees are not covered by such agreements, but they are all under the framework of labour relations set out in the corresponding local labour legislation. Comparable legislation exists in Argentina, Brazil, Cameroon, Lithuania, Portugal, Italy, Uruguay and the USA, under which employees are covered, although it is not of the same nature as in Spain.

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 Committees 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 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 periodically 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 2023, two agreements were signed with workers' representatives to improve conditions (on-call and standby, bonuses, working hours, etc.) for Eastern Andalusia and Vizcaya Distribution. Likewise, the Metal Collective Bargaining Agreement of Córdoba, Castellón, Valencia, Balearic Islands, Valladolid, Albacete, Pontevedra, Murcia, Palencia, Soria, Granada, Lleida, Lugo, Cáceres, Gipuzkoa, Vizcaya, Jaén, Almería, Navarre, Barcelona, Gerona, Zaragoza and Burgos has been reviewed.

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 subdireccionrrhh@elecnor.com, among others.

15.5 We look after our people GRI 403-1

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, information security and risk management. These seven vectors comprise the Elecnor Group's Integrated Management System 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 guiding principles reflected in the Integrated Management System Policy are as follows:

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

Furthermore, in the Integrated Management System Policy, employees are encouraged to perform their work according to the established rules, instructions and procedures, to use the individual or collective protection equipment provided, to use equipment, tools and vehicles appropriately, not to perform work in which there is an imminent serious risk to workers and to inform their superior, and to collaborate with the company in ongoing improvement.

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.
- Activity, telecommunications and utilities (electricity and gas) coordinators. They undertake coordination tasks with customers and with the Group's organisations in the domestic market, preparing reports, monitoring, etc.

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 132 technicians⁵, with different levels and specialities (most of them have the three specialities required by Spanish legislation), mainly dedicated to health and safety tasks. In the international market, there are 253 technicians from various categories, depending on the legislation of each country, and 59 people with a health profile (including doctors, nurses, paramedics, etc.).

A total budget of Euros 26.6 million (Euros 14.6 million in Spain and Euros 12 million for the international market) was allocated for the development of health and safety activities during 2023.

Health and safety management GRI 3-3, GRI 403-2, GRI 403-3, GRI 403-7, GRI 403-8

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. Furthermore, the risk of traffic accidents is representative due to the high number of vehicles constantly on the move.

Each of the Elecnor Group's activities involves different types of risks, which are identified, minimised/eliminated with the preventive measures provided for in the risk assessment.

⁵ They do not include health technicians hired specifically for large projects.

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:

- 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 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 corrective 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 includes the right of workers to refrain from performing work where there is serious 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 corrective 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.

Additionally, there are two other procedures. On the one hand, the Improvement Management procedure, which defines the process for providing opportunities for improvement and, on the other hand, the Ideas Management+ procedure, which establishes the rewarding of employees to encourage their participation in continuous improvement.

In 2023, Spain, Argentina, Brazil, Chile, Italy, Mexico, United Kingdom and Uruguay have been audited externally and keep the certificate in accordance with the requirements of ISO 45001:2018. 59% of turnover is certified in accordance with international ISO 45001 standard (65% in 2022).

In 2023, 37 internal audits (28 in 2022) were performed in Spain in accordance with ISO 45001 standards. With respect to external audits, these were conducted for Elecnor and the subsidiaries included in the Multi-site Certificate: Elecnor Servicios y Proyectos, Adhorna, Atersa, Deimos Space, Deimos Engineering, Ehisa, Elecnor Infrastructure, Elecnor Seguridad and Jomar Seguridad, and they all ended with satisfactory results. Similarly, Audeca and Enerfín, which have independent certification, obtained satisfactory results in their audits.

In the international market, again pursuant to the requirements of ISO 45001, 28 internal audits (20 in 2022) and 14 external audits (13 in 2022) were conducted in various countries, also with satisfactory results.

Among other actions, 99,297 safety inspections (95,116 in 2022) were conducted throughout the Group, as a result of which 78,277 corrective measures (75,413 in 2022) were implemented, and 1,233 internal works audits (1,057 in 2022) 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](#)

89% of the Group's employees are represented in formal health and safety committees (93% in 2022), 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 main 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 occupational health and safety [GRI 403-5](#)

In 2023, 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		
	2022	2023	Changes	2022	2023	Changes
Spain	16,390	16,606	1 %	163,644	179,077	9%
International	66,967	760,652	1036 %	377,613	523,238	39%
Total	83,357	777,258	832 %	541,257	702,315	30%

Training actions were undertaken in Spain for a collective of 16,606 attendees (15,639 men and 967 women), most of whom attended more than one training action. A total of 179,077 training hours were provided (168,823 hours by men and 10,254 hours by women), 9% up compared to 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.).

The increase in training hours is largely due to the recovery of the activity. Furthermore, the significant increase in attendees and training hours in the international market has its origin in the increased implementation and monitoring of induction training in large projects.

The most notable training actions in Spain are:

Courses	Participants	Hours
Basic course	934	56,040
First cycle of the TPC	2,023	16,184
Second cycle of the TPC	3,995	24,174
Working at heights	3,196	27,076
Confined spaces	1,858	14,534
First aid	1,219	5,318
Leadership courses	1,075	8,487
The Risk Factor course	617	4,305
Total	14,917	156,118

Training actions were held internationally for a collective of 760,652 attendees (702,957 men and 57,695 women), most of whom attended more than one training action. In terms of total training hours, the figure stood at 523,238 hours (481,506 hours by men and 41,732 hours by women). These figures include the induction actions given for entry to the major projects.

One of the most significant initiatives in 2023 was the World Day for Safety and Health at Work campaign, titled "To get home" ("Volver a casa"), 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, which was attended by more than 4,600 people from all profiles of the organisation, including Management and other stakeholders. Furthermore, during the months following the initiative, the video obtained more than 30,000 views on the Group's social networking sites.

In line with the health and safety awareness-raising of all employees, it is worth highlighting the implementation of the named 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, GRI 403-6

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/posted), an emergency notification service has been contracted that channels the action to enable the worker to receive information on where to go. 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.

Accident rates GRI 403-9, GRI 403-10

In 2023, the frequency rate remained the same as in the previous year and was the best since the series commenced, while the severity rate was the second best since the rates were first measured. In particular, its frequency rate was 1.70 and its severity rate was 0.10.

Accident rates	2022	2023
Frequency rate	1.70	1.70
Severity rate	0.08	0.10

Frequency rate = (number of accidents involving more than one day's leave, not counting those on way to or from work/hours worked) x 10⁶

Severity rate = (number of days lost/hours worked) x 10³

In Spain, the frequency rate stands at 2.30, which is the best figure in the historical series, compared to 2.60 in 2022, and the severity score was 0.16 compared to 0.14 in 2022. In 2023, there were no fatal work-related accidents, marking a total of seven years with this important achievement. Additionally, there were fewer accidents, 54 accidents vs. 58 in 2022.

In the international market, the final frequency rate was 1.2, compared with 1.1 in 2022. On the other hand, the severity rate was 0.05, down from 0.03 in the previous year. This year there has been 35 accidents (32 in the previous year). There were no fatal accidents, while in 2022 there was one fatal accident involving own staff in Latin America. This tragedy served to spur the Group on in its firm commitment to working to reach its target of zero accidents.

Figures broken down by gender

	2022		2023	
	Male	Female	Male	Female
Frequency rate	1.95	0.00	1.94	0.31
Severity rate	0.09	0.00	0.11	0.01
Occupational illness rate*	0.04	0.00	0.08	0.00

* Occupational illness rate = (number of occupational illnesses/hours worked) x 10⁶

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

Employee accident rate

Location	No. of recordable work-related injuries			No. of injuries due to work-related accidents with major consequences			Hours worked		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Spain	54	0	54	2	0	2	20,162,632	3,079,595	23,242,227
Europe	11	0	11	0	0	0	3,142,903	383,716	3,526,619
North America	0	0	0	0	0	0	1,561,753	126,274	1,688,027
Latin America	19	1	20	0	0	0	14,826,088	2,052,311	16,878,399
Africa	3	1	4	0	0	0	4,352,370	651,252	5,003,622
Asia	0	0	0	0	0	0	271,242	13,101	284,343
Oceania	0	0	0	0	0	0	518,027	222,012	740,039
Total international	33	2	35	0	0	0	24,672,383	3,448,666	28,121,049
Total	87	2	89	2	0	2	44,835,015	6,528,261	51,363,276

(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.
Only including accidents involving more than one day's leave, not counting those on way to or from work.

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 (on way to/from work or during work): risk of crashes, being run over, fire...

The main and most serious injuries resulting from the occupational hazards described above are: deaths, amputations, hemiplegia, paraplegia, severe fractures and burns, among others.

Appendix I of this report contains a detailed comparison of the accident rate of employees compared to the previous year.

Committed to prevention in subcontractors

The Elecnor Group extends its culture and commitment to the health and safety of subcontractors by monitoring accident rates. In particular, its frequency rate was 2.58 and its severity rate was 0.08.

Accident rates	2022	2023
Frequency rate	2.53	2.58
Severity rate	0.04	0.08

Frequency rate = (number of accidents involving more than one day's leave, not counting those on way to or from work/hours worked) x 10⁶

Severity rate = (number of days lost/hours worked) x 10³

Figures broken down by gender

	2022		2023	
	Male	Female	Male	Female
Frequency rate	2.53	0.00	2.58	0.00
Severity rate	0.04	0.00	0.08	0.00

Accident rate at subcontractors

Geographic area	No. of work-related injuries			Hours worked		
	Men	Women	Total	Men	Women	Total
Spain	38	0	38	10,759,546	0	10,759,546
Europe	4	0	4	821,915	0	821,915
North America	0	0	0	4,446	0	4,446
Latin America	9	0	9	5,112,837	0	5,112,837
Africa	1	0	1	2,338,001	0	2,338,001
Asia	0	0	0	435,004	0	435,004
Oceania	0	0	0	680,236	0	680,236
Total	14	0	14	9,392,439	0	9,392,439
Total	52	0	52	20,151,985	0	20,151,985

Of the total number of accidents, five were recorded as work-related accidents with major consequences. Only including accidents involving more than one day's leave, not counting those on way to or from work.

Elecnor deeply regrets to have to report that there was a fatal accident involving a subcontracted staff member in Spain and another in Latin America. This further reinforces the Group's strong commitment to continue working towards the goal of 0 accidents.

Appendix I of this report contains a detailed comparison of the accident rate of subcontractors compared to the previous year.

Occupational Health and Safety with customers and subcontractors GRI 403-7, GRI 403-8

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.

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.

Health surveillance 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 2023, that is there were no serious permanent or life-threatening injuries to employees.

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. Accordingly, all expatriate/posted workers are required to take a health course using the SOS International e-learning platform.

In 2023, awareness initiatives continued to focus 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

Employee occupational illnesses

Geographic area	No. of work-related illnesses and diseases			Hours worked		
	Men	Women	Total	Men	Women	Total
Spain	4	0	4	20,162,632	3,079,595	23,242,227
Europe	0	0	0	3,142,903	383,716	3,526,619
North America	0	0	0	1,561,753	126,274	1,688,027
Latin America	0	0	0	14,826,088	2,052,311	16,878,399
Africa	0	0	0	4,352,370	651,252	5,003,622
Asia	0	0	0	271,242	13,101	284,343
Oceania	0	0	0	518,027	222,012	740,039
Total international	0	0	0	24,672,383	3,448,666	28,121,049
Total	4	0	4	44,835,015	6,528,261	51,363,276

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 (residual risk, which has never materialised).
- Musculoskeletal diseases at construction sites.

In 2023, there were no cases of malaria or dengue fever resulting in occupational sick leave of staff in countries where this type of illness is recognised as a work-related disease.

Moreover, there were 4 cases of occupational illnesses in Spain, both in men and of musculoskeletal origin, although these figures are partial as there are countries where they are not registered as such due to their legislation. There were no deaths due to occupational diseases in 2023.

Cases among local staff in countries with endemic diseases are not considered to be occupational illnesses.

Depending on the type of activity and risk, the Elecnor Group takes the necessary measures to minimise the occurrence of occupational illnesses: application of procedures, training, control, etc. Likewise, through the agreement with SOS International, information and training activities are carried out.

Appendix I of this report contains a detailed comparison of employees' occupational illnesses compared to the previous year.

Safety Excellence Project (SEP)

During the year, the implementation of the SEP was completed in Mexico, and significant progress was made in Brazil, Italy, Portugal, the Dominican Republic and the United Kingdom. In other countries, progress continues to be made in implementing several lines of action in order to continue unifying the Group's actions.

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 2023, 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 356,741 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.
- 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 applicable legislation and their specific characteristics. This process will be completed in successive years throughout the international market.
- An artificial intelligence and big data application project has been launched that will improve the monitoring and use of several of the applications (SegurT, Notific@ and PRP), harnessing the potential of the huge amount of data they contain and detecting any possible misuse of the tools in order to correct it.
- The first module of the training project using virtual reality has been completed, a Transformer Station for SF6 cells in a precast concrete, which will improve the training of our employees in the local operation of medium- and low-voltage networks.

15.6 Operational excellence GRI 3-3 GRI 2-23 GRI 2-24

As mentioned in previous sections, the Elecnor Group has an Integrated Management System that includes the aspects of environment, quality, health and safety, energy management, R&D&I management, information security and risk management. All of them comprise the Group's Integrated Management Policy and encompass the organisation's common goal of ongoing improvement.

In 2023, the Board of Directors approved the update of the Integrated Management System Policy whereby the Elecnor Group consolidates its commitment to the principles that govern the operation of the entire organisation. In this way, they constitute the basis for defining and reviewing objectives that continuously improve the effectiveness of its management systems.

These principles, based on which specific commitments and lines of action are laid down for each area, are as follows:

- Strict compliance with applicable legislation and any other requirements binding upon Elecnor in all 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.
- Integration of risk management in the organisation's activities with a preventive approach that enables it to anticipate, manage and control the risks to which the Group is exposed.

In 2023, 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 Group's infrastructures area that contains all of the scopes of the various activities and all of the work centres. This year, the scope of this certification has been extended to the design and construction of renewable energy parks in the Engineering General Sub-Directorate. In the international sphere, Elecnor Peru was added to the multi-site certification.

This was the second year of implementation of the Corporate Social Responsibility Management System in Spain, Angola and Brazil according to the IQNet SR10:2015 standard. Worth highlighting are the advances and improvements incorporated, the main one being the launch of the Strategic Sustainability Plan 2023-2025, the basis of the CSR Management System.

This year, Elecnor Servicios y Proyectos, S.A.U. obtained the Risk Management System certification according to ISO 31000.

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 customer 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 all this process.

In 2023, various activities and initiatives were undertaken to strengthen both customer satisfaction management and the ongoing improvement process. The following can be highlighted:

- Deploying of the Management Systems:
 - Aligning the Management System at Elecnor Hawkeye and broadening the scope of the multi-site certificate to the Engineering General Sub-Directorate.
 - Obtaining new certifications:
 - Risk Management System Certification
 - Elecnor Peru Certification
- Optimising processes through the CORE tool, which encompasses the digitalisation of Integrated Management System processes. At present, the modules for audits, improvement management, objectives and targets, risks and action plans, and planner are available.
- Measures to expand the sample of customers in the satisfaction survey and to manage surveys with low ratings.

- Boosting the documentation of lessons learned and opportunities for improvement, identifying, documenting and providing 411 opportunities for improvement and 71 lessons learned.
- Inclusion of quality objectives in the Group's Strategic Plan related to customer satisfaction and non-quality costs.
- First international meeting of the Group's Quality and Environment managers, in which 12 countries took part and lines of work were established in accordance with the objectives of the Group's Strategic Plan.

63% of turnover is certified in accordance with international ISO 9001 standards.

Customers, at the heart of the business [GRI 2-25](#)

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

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

In 2023, 2,141 customer satisfaction surveys were sent, with a response rate of 70% (1,495 responses). The results show that Elecnor Group's average score among its customers has improved compared to 2022, rising from 8.62 to 8.71.

Satisfaction survey	2022	2023
Number of surveys	1,217	1,495
Average score	8.62	8.71

The most highly rated aspects in both 2022 and 2023 were compliance with safety requirements, training and technical capacity, and service 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 7.5 in order to find out the causes of this score and to analyse how to improve it. This is implemented by means of improvement Director's reports defining the necessary corrective actions to remedy the cause of the score obtained. Following the implementation of these actions, the customer survey is conducted again to assess the customer's compliance with the action plans.

As for customer claims or complaints, they are managed in accordance with the "Internal and External Communication" and "Improvement Management" procedures that outline the system to be applied for their management, analysis of causes and definition of efficient corrective actions.

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

- Designating persons responsible for assessing customer complaints and coordinating their resolution on the basis of improvement management reports.
- Annual recording, management 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 customer satisfaction once the improvement action has been implemented following the complaint.

In 2023, 408 customer complaints were filed, most of which were linked to technical management (39%), materials and equipment (25%) and workforce (15%). All complaints were answered within the defined period (maximum one week) and 54% of them closed with a satisfactory result.

In 2022, 194 customer complaints were filed, most of which were linked to technical management (60%), materials and equipment (18%) and workforce (15%). All complaints were fielded within a defined period and 66% of them are closed with a satisfactory result.

Supply Chain GRI 2-6

The Elecnor Group guarantees the most stringent levels of quality to its customers by fostering responsible management of the supply chain. This is the reason why 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.

The core risks affecting the supply chain are analysed from three distinct angles. Firstly, they are analysed at a high level by Management; secondly, the analysis is carried out at the operational level after identifying those responsible for the different processes; and finally, it is carried out at the project level by the project managers.

In this field, in 2023, 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 developed an action plan based on fostering digital transformation in the procurement process.

Therefore, this year, work began on implementing the Fullstep procurement platform nationally in the subsidiaries. This platform enables all parties involved in the procurement process to view the status of their processes in real time. Some relevant figures of 2023 are set out below:

- Upwards of 3,390 suppliers have registered with Fullstep, accepting both the General Terms and Conditions of Procurement, in which ethical, labour, social and environmental criteria, among others, are established, as well as the Code of Ethics and Conduct for Suppliers, Subcontractors and Collaborators, and the Information Security Policy. Therefore, by the end of 2023, a total of 19,310 registered suppliers had accepted these requirements.
- More than 3,500 internal procurement platform users.
- More than 13 training sessions have been given to more than 400 internal users.
- More than 350,000 procurement orders have been placed for approximately Euros 1,802 million.

Supply chain management is described in the Materials/Services Supplier Management procedure.

In 2023, both the general procurement conditions and the general terms and conditions of business and the model contracts to subcontractors have been updated to reflect the changes made in these processes.

Depending on the nature and relevance of its suppliers, the Elecnor Group requires compliance with the following requirements:

- To all suppliers: acceptance of the general procurement conditions or acceptance of the general terms and conditions of business.
- To major suppliers: approval process.
- To relevant suppliers: they are subject to the ESG audit process.

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 health and safety, compliance, R&D&I, information security and sustainability.

Currently, the Elecnor Group has a total of 7,069 approved suppliers: 5,781 in Spain and 1,288 internationally across 19 countries. In 2023, 1,489 new suppliers have been approved, of which 727 (49%) have been proven to be aligned with environmental requirements and 120 (8%) with the sustainability requirements required by the Group.

In 2022, the Elecnor Group had a total of 7,844 approved suppliers: 6,927 in Spain and 917 internationally across 16 countries. 2,287 suppliers were approved, of which 730 (32%) were proven to be aligned with environmental requirements and 114 (5%) with the sustainability requirements required by the Group.

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

The Elecnor Group has selected its relevant suppliers, which represent 58% of its purchasing volume, and audits them by applying environmental, social and governance criteria, since the aim is not only to detect possible risks, but also to develop the weakest areas of suppliers in order to align them with the Group's policies. In this way, relevant suppliers are audited every 3 years, thus keeping information on their performance up to date at all times.

During 2023, 7 audits were carried out on relevant suppliers (the same as in 2022), all of them with a favourable outcome, the result of which directly affects their approval as a major supplier. For this reason, the relationship with relevant suppliers is constant, requesting corrective action plans if deemed necessary. Therefore, the Elecnor Group is aware that insisting on the resolution of the non-conformities detected during the audit is the way forward to help its distributors improve as a business and mitigate the risks associated with the supply chain. Working with suppliers who comply with standards helps improve performance and generates shared value.

Such is the case that, in 2023, 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)
 - soporteproveedores@elecnor.es
 - Purchasing Process Manual and Supplier Quality Manual
- > E-coordina (platform for the coordination of business activities)
 - soporte@e-coordina.com
 - Library for suppliers
- > Whistleblowing channel
 - codigoetico@elecnor.com
 - PO box (apartado de correos) nº 77-48008

15.7 Committed to the environment

Climate action GRI 3-3

Climate change strategy

The Elecnor Group seeks to actively and decisively contribute to building a sustainable and low-carbon future. Climate change is a strategic priority and challenge that is embodied in both the [Strategic Sustainability Plan 2023-2025](#) and the [Climate Change Strategy 2020-2035](#), which establishes greenhouse gas emission reduction targets in line with the Science Based Targets (SBT) initiative, with the commitment to achieving Net Zero by 2050.

With a comprehensive approach, the organisation effectively analyses and manages both physical and transitional risks associated with climate change, while identifying and capitalising on emerging opportunities. With this approach and backed by a diversified business, the Elecnor Group is firmly positioned to reduce emissions, decarbonise its business model and strengthen its resilience to climate impacts.

The Climate Change Strategy acts as an integrative framework to steer all the Group's actions to reduce greenhouse gas emissions, adapt to climate change impacts and tap into the associated opportunities. Its purpose is to lay the foundations for a decarbonised, profitable and continuously growing business, thus consolidating the Elecnor Group as a leading company on the path to a more sustainable, low on carbon emissions future.



The Strategy, based on the structure of the Task Force on Climate-related Financial Disclosures (TCFD), is based on four overarching areas of action: Governance, Strategy, Risk Management, Metrics and Targets. These areas are intertwined with three cross-cutting lines: People, Assets and Knowledge, with the aim of aligning with best practice in disclosure.

The TCFD's initiative, by enhancing the quality of financial reporting on the potential impacts of climate change, seeks to improve the ability of investors to assess climate-related risks and opportunities.

In 2022, the SBT initiative validated the emissions reduction targets presented by the Elecnor Group in 2021, the year in which it joined this initiative led by CDP, the United Nations Global Compact, the World Resources Institute (WRI) and the World Wide Fund for Nature (WWF).

Establishing 2020 as a baseline year, the Elecnor Group's target for 2035 for absolute Scope 1 and 2 emissions is to cut them by 38%. This target is in line with the Paris Agreement to limit the increase in global temperature to below 2°C. In addition, over the same period and on the same time basis, it has committed to reduce its Scope 3 emissions from the purchase of goods and services, as well as from fuel and energy-related activities, by 18%. In this context, taking into account that the Elecnor Group has defined the base year (2023) in this financial year, during 2024 the emission reduction targets will be re-validated by the SBT initiative.

It should be pointed out that the Elecnor Group participates in the CDP (Carbon Disclosure Project), presenting its voluntary report on climate change, which strengthens its commitment to sustainability. In 2023, it upheld the score of A- achieved in the two preceding years, 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.

This endeavour means we are working along four lines of action:

- Fuels:
 - Renewing the fleet for more efficient and less carbon-intensive vehicles.
 - Developing country projects for the switch to more sustainable fuels.
 - Optimising waste collection routes to minimise journeys.
- Renewable energy:
 - Acquiring 100% of electricity from renewable energy by 2035 at Group level.
 - Fostering self-consumption in installations.
 - Use of construction machinery with integrated solar panels.
- Value chain:
 - Setting up a collaboration programme with the main suppliers as regards greenhouse gas emissions, 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.

Governance

The Elecnor Group's climate governance is a cross-cutting responsibility at all levels of the company. This implies that the commitment to address and manage climate change impacts is shared and integrated across all areas and functions of the organisation.

The Appointments, Remuneration and Sustainability Committee of the Group's Board of Directors, to which the Sustainability Committee reports, holds the ultimate responsibility for climate issues.

This Committee monitors the company's Strategic Sustainability Plan on a quarterly basis and submits its assessment to the Board of Directors. This Strategic Sustainability Plan addresses climate change issues through a number of strategic initiatives.



In February 2023, the Board of Directors approved a new Integrated Policy on Environmental Management, Quality, Health and Safety, Energy Management, R&D&I Management, Information Security and Risk Management.

The section "Progressing in our commitment to sustainability" of this report provides a more detailed description of how the Elecnor Group's sustainability governance is organised.

Management of climate risks and opportunities [GRI 201-2](#)

In 2023, the Elecnor Group carried out a review of its analysis of climate risks and opportunities following the recommendations of the TCFD.

This year it broadened and enhanced the analysis of risks and opportunities carried out in 2022, covering a wider range of activities, increasing the coverage of scenarios used and analysing a wider and more varied range of risks and opportunities.

This study considers, on the one hand, how climate change affects the Group's physical assets (Enerfin's renewable energy generation plants) and, on the other, how it affects the construction of infrastructures and transmission lines in Angola, Australia, Brazil, Cameroon, Chile, Colombia, Spain, Gambia, Guinea Bissau, Guinea Conakry, Ghana, Lithuania, Mexico, Mozambique, Panama and the Dominican Republic.

For the Elecnor Group, the analysis of climate risks and opportunities in construction projects is essential, as it allows for more accurate planning, strengthens resilience and favours the execution of more sustainable projects. This approach benefits both the Group and its customers by providing more robust solutions adapted to present and future climate challenges.

The analysis carried out is aligned with the criteria relating to the principle of not causing significant harm to climate change adaptation included in Appendix A of the Commission Delegated Regulation 2021/2139 on European Taxonomy.

In compliance with TCFD recommendations, and in order to be able to analyse a representative range of various future scenarios, the Elecnor Group worked in 2023 with three climate scenarios, analysed in each case for three time horizons: short (2021-2040), medium (2041-2060) and long term (2081-2100):

- a. SSP1-2.6: increase of about 1.5°C by mid-century and about 2.6°C by the end of the century.
- b. SSP2-4.5: increase of about 2.0°C by mid-century and about 4.5°C by the end of the century.
- c. SSP5-8.5: significantly higher increase, exceeding 3°C by mid-century and reaching 8.5°C or more by the end of the century.

The analysis is based on historical data from 1995 to 2014.

These scenarios provide a variety of contexts to assess risks and opportunities, thus establishing a robust basis for decision-making. SSP1 projects a sustainable and equitable future; SSP2 represents an interim trajectory based on historical patterns; and SSP5 illustrates rapid development driven by fossil fuels and technology.

The process of identifying, analysing and managing the risks associated with climate change is developed through a collaborative and cross-functional approach, with the close involvement of the different organisations as well as corporate departments.

The management of physical risks in facilities was focused at the local level, given the specific nature of these risks, which are directly linked to particular climatic, geographical and environmental conditions. On the other hand, transition risks were addressed at the national level, responding to the critical influence of governments and regulators in shaping markets and public sectors. This strategic choice is due to the need to comply with specific national regulatory frameworks and government policies in the countries where Elecnor Group operates.

- a. **Physical risks:** to identify these risks, a detailed analysis of the evolution of climatic variables at the Elecnor Group's operational locations (construction sites and fixed assets) was carried out. Using GIS software, we worked with specific GIS layers for each climate variable, scenario type and time horizon. The interpretation of the evolution of climatic variables in the different scenarios made it possible to determine the probability of occurrence of climatic events that could pose a risk to the organisation's activities. This analytical approach also includes consideration of all relevant physical hazards identified in Appendix A of the European Commission Delegated Regulation 2021/2139 on European Taxonomy.
- b. **Transitional risks and opportunities:** a comprehensive analysis of current and emerging climate regulation was carried out, assessing its potential impact on the Elecnor Group in the short, medium and long term. In addition, trends in sustainability and climate action globally and in the company's sector of operation were examined. This analysis encompasses technological and market aspects, considering potential changes in customer and end-consumer behaviour, as well as changes in material prices linked to climate action initiatives.

In this phase, 29 physical risks, 19 transitional risks and 21 opportunities with a certain probability of occurrence were identified.

Subsequently, a prioritisation process was carried out by means of an assessment carried out by the working group, considering the possible impacts that the risks and opportunities could have on the locations where the Elecnor Group operates or on the organisation as a whole. This process was conducted through questionnaires and interviews with the working group, who finally jointly assigned a severity level to the impacts of the risks and opportunities, following pre-established criteria.

For those risks and opportunities with a higher probability and significant severity, a more in-depth assessment of their impact on the Group from a financial perspective has been carried out.

The following tables show the most relevant risks and opportunities of the study:

High-severity risks

Transitional risks

Description	Potential impact, scope and risk management	Action Plan
<p>Increased stringency or obligations of environmental legislation and regulations</p>	<p>The increase in carbon pricing mechanisms in the various regions where Elecnor or Enerfín operates, as well as the increase in the prices of the current mechanisms, could have a significant impact on the Group's operating costs. This scenario could result in higher costs for the organisation, as it could face higher prices for supplies of materials needed for operations.</p> <p>This is the case in countries such as Mexico or Spain, where there is already a carbon regulatory market in place; Colombia, where the regulatory market is still under development; or Brazil, where its implementation is being considered.</p> <p>Horizon: short-term</p> <p>Affected activities: Elecnor – Projects in Spain, Mexico, Colombia and Brazil. Enerfín - Operations in Brazil and Spain.</p>	<p>To mitigate risk and reduce emissions, the Elecnor Group will focus on improving energy efficiency and promoting the adoption of clean technologies in its operations. Its SBT target is to reduce absolute Scope 1 and 2 GHG emissions by 38%. In addition, the organisation is committed to adopting sustainable practices to achieve the SBT target of reducing Scope 3 emissions by 18% by 2035, using 2020 as the base year.</p>
<p>Border adjustment mechanism</p>	<p>The EU's Carbon-Border Adjustment Mechanism (CBAM) is one of the key instruments of the European Green Pact. It aims to prevent emission reduction requirements on European industry from resulting in a flight of companies to source from jurisdictions with laxer climate legislation and to incentivise greater climate ambition at the global level.</p> <p>This could affect an increase in the organisation's operating costs by having to pay more for imports of materials related to iron, steel, cement, aluminium, fertilisers, electricity and hydrogen.</p> <p>Horizon: short-term.</p> <p>Affected activities: Purchases of the organisation from the European Union to external countries.</p>	<p>Faced with the risk posed by the European Union's CBAM, the Elecnor Group plans to implement a set of strategic measures between 2024 and 2035. These actions will include supplier diversification, process optimisation and close collaboration with strategic partners. The main objective will be to reduce reliance on materials subject to the 'green tariff', thus ensuring continuous adaptation to emerging climate regulations and improving operational efficiency.</p>

Physical risks

Description	Potential impact, scope and risk management	Action Plan
Heat wave	<p>According to scenarios SSP1-2.6, SSP2-4.5 and SSP5-8.5, a progressive increase in the number of days with temperatures above 35°C is observed. These temperature extremes can affect the quality of work, the well-being and safety of workers and the timing and completion of projects. In addition, there are countries, such as Spain, with sanctions for occupational hazards associated with extreme temperatures. In the specific case of Spain, for example, temperatures between 14° and 25° are recommended for light work and humidity between 45% and 60%, with sanctions for non-compliance.</p> <p>If risk mitigation measures are not taken, there is a risk of production stoppages due to occupational health and safety regulations or loss of employees due to sick leave because of working conditions.</p> <p>Horizon: short-term</p> <p>Affected activities: Elecnor - Some projects in Panama, Brazil, Mozambique, Norway, Australia, Dominican</p>	<p>To mitigate the risk of extreme temperatures at work, measures such as constant monitoring of working conditions and the adoption of safety protocols, including regular breaks and adequate provision of water and shade, are proposed. In addition, increased investment in infrastructure would be considered to ensure optimal working conditions (2024-2035).</p>
Storms and extreme events (including blizzards, dust and sandstorms)	<p>The occurrence of storms and extreme weather events presents a significant financial risk to Enerfín. This risk is broken down into several aspects:</p> <ol style="list-style-type: none"> Reduced energy production: during and after these events, the need to temporarily disable turbines to avoid damage results in a loss of direct income. Repair and maintenance costs: affected facilities will require additional repairs, resulting in additional maintenance costs. For example, the repair of broken wind turbine blades during a storm. Insurance and mitigation costs: increases in insurance costs are expected to cover potential damages, in addition to expenses related to the implementation of mitigation and resilience measures. <p>Horizon: short-term</p> <p>Affected activities: Enerfín - Some wind farms in Spain and Brazil.</p>	<p>To mitigate the risk of storms and extreme weather events, Enerfín will propose the implementation of measures such as improving infrastructure to withstand adverse climatic conditions, geographic diversification of projects and the review and updating of insurance policies to cover possible damages. In addition, the development of contingency plans and monitoring systems for a faster and more efficient response to adverse climate events will be considered (2024-2035).</p>

Description	Potential impact, scope and risk management	Action Plan
Storms and extreme events (including blizzards, dust and sandstorms)	<p>The occurrence of storms and extreme weather events poses a significant risk to the Elecnor Group's operations. The following describes how these events could impact financially:</p> <ul style="list-style-type: none"> a. Stoppage of works: storms and extreme events can force the temporary stoppage of work in progress, resulting in a decrease in productivity and an increase in construction time. This could affect the expected revenues and profitability of projects or the reputation of the company. b. Repair and replacement costs: infrastructure construction is exposed to damage from these adverse weather conditions, which would generate additional costs related to repairs and, in some cases, the need to replace affected structures. c. Insurance and mitigation costs: given the likelihood of damage caused by these weather conditions. Insurance costs are expected to rise to cover these risks. <p>Horizon: short-term</p> <p>Affected activities: Elecnor - various construction projects in Ghana, Brazil, Gambia, Guinea Bissau, Guinea Conarky, Mozambique, Colombia, Cameroon, Angola, Australia, Mexico and Spain.</p>	<p>To manage the risk of storms and extreme weather events, Elecnor will propose the implementation of measures aimed at strengthening the construction of infrastructures (2024-2028) and the review and updating of insurance policies to cover possible damages (2024-2025). Priority will also be given to establishing a methodology for monitoring climate variables (2024-2035) and early warning systems (2030-2035) to minimise impacts on operations.</p>

Description	Potential impact, scope and risk management	Action Plan
Forest fires	<p>The occurrence of forest fires poses a significant risk to the production and operation of Enerfin's wind farms. How these events could impact financially is detailed here:</p> <ul style="list-style-type: none"> a. Repair and maintenance costs: the need for additional repairs and maintenance would generate added costs, which could affect the company's profit margins and profitability. b. Loss of revenue due to unavailability: the temporary interruption of wind farm operations due to fires would result in a direct loss of revenue associated with power generation. This loss of revenue would affect Enerfin's ability to meet its financial and commercial targets. a. Insurance and mitigation costs: With the likelihood of damage caused by forest fires, insurance costs are expected to increase to cover these risks. <p>Horizon: Short-term</p> <p>Affected activities: Enerfin - Some wind farms in southern and eastern Spain</p>	<p>Enerfin proposes the implementation of constant monitoring of climate variables and the adoption of preventive measures, such as early detection systems and firebreak areas, to mitigate risks in wind farms (2024-2035).</p>

Climate opportunities

Description	Potential impact, scope and management of opportunities	Action Plan
Returns on investment in low-emission technology	<p>The Elecnor Group's adoption of sustainable practices and production of environmentally-friendly products not only has the potential to generate significant impact, but can also offer a number of tangible and strategic benefits. Some of these benefits include:</p> <ul style="list-style-type: none"> a. Improved brand perception: the commitment to sustainability and the production of eco-friendly products strengthens Elecnor's image as a responsible company committed to the environment. b. Opening up new opportunities in sustainable growth markets: Elecnor could take advantage of this trend to expand its presence in sustainable growth markets and diversify its product portfolio. c. Increased sales and expansion of market share: growing demand for eco-friendly products could boost the company's growth and strengthen its competitive position in the construction industry. <p>Horizon: long-term</p> <p>Affected activities: Elecnor - Projects carried out by the Elecnor Group in all locations.</p>	<p>Elecnor plans to implement sustainable practices and develop eco-friendly products to improve its brand perception, drive customer loyalty and capitalise on opportunities in growing sustainable markets, thereby strengthening its competitive position and increasing its share of the construction market.</p>

Description	Potential impact, scope and management of opportunities	Action Plan
Access to new markets, new locations and facilities	<p>The climate opportunity presents a favourable scenario for Enerfín, as more and more consumers are becoming more environmentally conscious and are looking for sustainable energy. This shift in consumer preferences, coupled with increased regulations and environmental requirements, expands Enerfín's market potential and opens up new business opportunities.</p> <p>By meeting this growing demand for sustainable energy, Enerfín has the capacity to increase its production and generate higher profits. Expanding into wider markets and positioning itself as a leading renewable energy provider strengthens the company's competitive position and its ability to fully capitalise on this opportunity.</p> <p>Horizon: medium-term</p> <p>Affected activities: Enerfín - All locations.</p>	Enerfín plans to boost technological innovation, expand its production, diversify its products and consolidate its brand image to capitalise on the growing demand for sustainable energy and strengthen its competitive position.

Metrics and targets

In this report, the Elecnor Group presents essential indicators that provide detailed information on climate and the strategy to combat climate change. These indicators are crucial for the ongoing monitoring of the Group's decarbonisation targets and the resilience of the strategy to the climate events analysed.

Below is a description of the key aspects, such as calculating the Elecnor Group's carbon footprint, the emissions avoided as a result of the renewable energy generation activity and the results of implementing the Climate Change Strategy.

These metrics are complemented by other climate-related aspects such as energy and water consumption and waste management. These indicators are described in the Environmental performance section of this Report.

Monitoring, evaluation and review of the climate change strategy for 2023

GRI 302-4, GRI 302-5

Below is a description of the main actions carried out in 2023 within the framework of the Elecnor Group's Climate Change Strategy.

Strategic line	Investment (€)	Shares	Emissions avoided tCO ₂ e
Fuel	5,153,193	<ul style="list-style-type: none"> • Conference calls encouraged to avoid journeys. • Acquisition of vehicles, machinery with lower fuel consumption. • Optimising municipal waste collection routes and other services. • Developing preventive maintenance of vehicles. 	796
Energy	482,753	<ul style="list-style-type: none"> • Renewable energy use. • Acquiring efficient IT tools (computers, tablets, etc.). • Installation of timers for electronic devices and automatic off switches. LED lighting to replace existing fixtures. • Improving the thermal insulation of buildings. 	1,962
Water	8,580	<ul style="list-style-type: none"> • Developing a plan to reduce water consumption and/or optimise its use. • Implementation of technology, practices or systems that reduce, optimise, recycle or reuse water. 	8
Other actions	33,096	<ul style="list-style-type: none"> • Developing a plan to cut down on the use of plastics. • Recovery of waste materials from the construction site for on-site projects. 	0.6
Total	5,677,622		2,767

Carbon footprint

One of the main objectives of the Elecnor Group's environmental management is aimed at reducing the carbon footprint generated as a result of the organisation's activity.

For the past 10 years, the Elecnor Group has been calculating its carbon footprint in accordance with internationally recognised standards and implementing actions to reduce GHG emissions within the scope of its activity. Each year, the Elecnor Group calculates its footprint using a tool that enables each organisation in the Company to report the consumption data associated with Scopes 1, 2 and 3.

The 2023 inventory has been verified by Aenor using the methodology established by the GHG Protocol and applying the principles established in the document "The Corporate Value Chain (Scope 3), Accounting and Reporting standard". This change in methodology with respect to previous years (until now, ISO 14064-1:2018 was used as the reference standard) responds to the Elecnor Group's adherence to the Science Based Target (SBT) initiative, which uses the GHG Protocol as a reference.

Similarly, Elecnor obtained the “Calculo y Reduzco” seal granted by Spain’s Ministry for Ecological Transition’s Office for Climate Change (OECC) as part of the National Register for Carbon Footprint, Offsetting and Absorption of CO₂ and Demographic Challenge.

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

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

Scope	2022	2023	Changes (%)
Scope 1 Stationary and mobile combustion	76,084	82,322	8 %
Scope 2 Consumption of electricity	1,647	1,511	-8 %
Scope 1 & 2 totals	77,731	83,833	8 %
Scope 3 emissions	1,079,714	760,603	-30 %
Total	1,157,445	844,436	-27 %

*Fugitive emissions have been reported in Scope 1

In the calculation of the carbon footprint for this year, the Scope 1 and Scope 2 emission factors have been updated using sources from recognised entities such as DEFRA, International Energy Agency, MITECO, etc.

As a consequence of the change in the carbon footprint calculation methodology (especially Scope 3), the variation of the data for 2022 and 2023 are not comparable.

In line with the Group’s increased activity, in 2023 its carbon footprint was 83,833 tCO₂e for Scope 1 and Scope 2 (77,731 in 2022). Factoring in Scope 3 emissions (deriving from the value chain), the Group’s total emissions amounted to 844,436 tCO₂e (1,157,445 tCO₂e in 2022), considering the market-based⁶ method.

For the information of Elecnor Group stakeholders, GHG emissions have also been calculated using the location-based method⁷ totalling 846,176 tCO₂e.

For the calculation of the carbon footprint, an operational control approach has been chosen, although a shareholding approach has been used for the emissions included in the Scope 3 Investments category, given that they correspond to emissions from Celeo, a company in which the Elecnor Group has a stake.

The greenhouse gases (GHG) encompassed in the carbon footprint are those which, among those considered in the Kyoto Protocol, are generated by the organisation’s activity. These are: carbon dioxide (CO₂), methane (CH₄) and nitrous oxide (N₂O) and, additionally, hydrofluorocarbons (HFCs) associated with refrigerant gas leaks in climate control and refrigeration equipment.

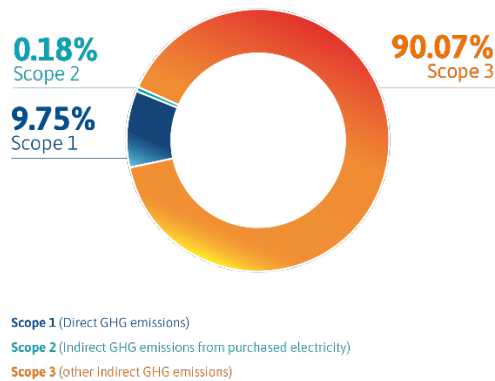
⁶ Market-based means that, in case of guarantees of origin, in those centres that have them, the emission factor is zero.

⁷ *Location-based*. This scenario does not take into account the guarantees of origin that each organisation may have taken out with its marketer. The emission factors used are those of each country’s electricity mix.

Initially, the Elecnor Group considered 2014 as the base year, which was later changed to 2020 as it was the first year in which the organisation calculated all its emissions in all relevant categories. Currently, it has been decided to select 2023 as the base year to align with the change in methodology and the Science Based Target (SBT) initiative.

The Elecnor Group's GHG emissions in 2023 were 844,436 tCO₂e. 90.07% of emissions come from Scope 3, 9.75% from Scope 1, and the remaining 0.18% from Scope 2 emissions.

Distribution of the Elecnor Group's GHG emissions 2023



Of the total Scope 1 and 2 emissions, 98% correspond to direct emissions (Scope 1) and the remaining 2% to indirect emissions from purchased electricity (Scope 2).

At 2023 year-end, for Scopes 1 and 2 the ratio of emissions generated per hour worked was 1.67 kgCO₂e/hour, the same as that in 2022. Nevertheless, taking 2014 and 2020 as the basis for comparison, the ratio has clearly improved, having fallen by 30% and 10% respectively (2.4 kgCO₂e/hour in 2014, 1.86 KgCO₂e/hour in 2020 and 1.67 kgCO₂e/hour in 2023). With regard to Scope 3, the ratio of emissions generated per hour worked was 15.60 kgCO₂e/hour, with the previous year being 23.19 kgCO₂e/hour. [GRI 305-4](#)

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 Corporate Value Chain (Scope 3) Accounting & Reporting 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.
- 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.
- End of life of products sold.
- Investments.

Scope 3 emissions by category are detailed below: [GRI 302-2](#)

Scope 3* emissions	2022	2023	Changes (%)
Purchase of goods and services	971,355	587,893	-39%
Capital goods		50,959	
Upstream fuel and energy activities	18,976	19,624	3%
Upstream transmission and distribution	25,732	9,208	-64%
Waste generation	942	3,328	253%
Corporate journeys	21,318	15,964	-25%
Commuting	23,243	39,114	68%
Upstream leased assets	5,563	9,135	64%
End of life of products sold	104	43	-58%
Investments**	12,481	25,334	103%
Total	1,067,233	760,603	-29%

*As a result of the change in the carbon footprint calculation methodology, the data for 2022 and 2023 are not comparable.

** The investments correspond to Celeo.

Emissions related to bioenergy consumption

In addition, 547 tCO₂ of biogenic emissions from biofuels consumed by the Elecnor Group (biodiesel and ethanol) are reported outside the scope of the carbon footprint calculation. Thus, direct GHG emissions (Scope 1), stationary combustion, from biodiesel consumption were 107 tCO₂e, and direct GHG emissions (Scope 1), mobile combustion, from ethanol consumption were 440 tCO₂e.

Mitigation through activities. Avoided emissions [GRI 302-5](#)

The Group's electricity 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.

As part of its commitment to diversification, the Group's renewable 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 particular, through its subsidiary Renovables del Cierzo, S.L., it 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 noting that Enerfin's renewable energy production amounted to 2,660,309 MWh in 2023 (2,875,260 Mwh in 2022), taking into consideration the projects operated in Spain, Brazil and Canada. Greenhouse gas emissions avoided through renewable energy production totalled 444,156 tCO₂e (429,620 tCO₂e in 2022).

By means of its concessions and projects business, the Group has holdings in 2,079 MW of renewable energy facilities in operation and under construction in Spain, Brazil, Canada and Colombia (1,897 MW in 2022), broken down as follows:

Renewable energy (MW)	2022	2023
Wind energy	1,355	1,538
Solar thermal energy	150	150
Solar PV energy	392	391
Total	1,897	2,079

Environmental performance GRI 3-3, GRI 2-23, GRI 2-24

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

In order to monitor the areas of Quality and Environmental Management, there is a team of 132 people distributed between the Quality and Environment area of the Corporate Services Department and the various organisations of the Group, both in Spain and internationally, in order to ensure compliance with the company's established Management Systems. During 2023, the first international meeting of the Elecnor Group's Quality and Environment Managers was held, in which 12 countries took part.

The principles of the Environmental Management of the Elecnor Group are set out in the Integrated Management System Policy, which was updated in 2023.

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 2023, multi-site 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 Group's infrastructures area that contains all of the scopes of the various activities and all of the work centres. This year, the scope of this certification has been extended to the design and construction activities of renewable energy parks in the Engineering General Sub-Directorate. In the international sphere, Elecnor Peru was added to the multi-site certificate.

63% of turnover is certified in accordance with international ISO 14001 standard.

Elecnor has renewed the Verified Aenor Environment CO₂ Certificate, with which the Group obtains an independent and rigorous endorsement of the quantification of its greenhouse gas emissions in its activities, which helps improve its environmental and energy management.

It also renewed the Energy Management System (GE-2013/0033) under the UNE-EN ISO 50001:2018 standard, thereby reinforcing the Group's commitment to sustainability.

In the Group's new Strategic Sustainability Plan 2023-2025, quality and environmental objectives related to customer satisfaction, non-quality costs and reduction of greenhouse gas emissions have been included.

In 2023, the Elecnor Group has allocated a total of Euros 11,400,000 to managing environmental impacts (Euros 11,254,000 in 2022), broken down as follows:

Activity (investment)	2022	2023
Actions to minimise environmental impacts (climate change strategy, waste management, others)	6,916,500	7,207,000
Environmental awareness-raising	12	9,000
People dedicated to environmental activity	4,200,000	3,960,000
Environmental certifications	20	25,000
Environmental consultancy and advice	105.5	199,000
Total	11,254,000	11,400,000

The Elecnor Group took out an environmental liability policy for 2023. This policy covers Elecnor S.A., Elecnor Servicios y Proyectos, Celeo and Enerfín, including all the countries where the Group operates, with a general limit of Euros 20 million.

Consumption management

Energy consumption [GRI 302-1](#), [GRI 302-3](#)

In 2023, energy consumption totals 1,196 TJ, 4% up on the previous year (1,146 TJ). Furthermore, the ratio of energy consumed by the organisation per hour worked was 2.5 J/hour, the same ratio as in 2022.

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

The various energy consumptions are presented below:

Energy consumption (TJ)

	2022	2023
Natural gas	0.21	0.57
Diesel	75	69
Petrol	90	72
Gas oil	906	978
Biodiesel	0.03	1.48
Electricity	71	66
Non-renewable source	30	24
100% Renewable source	41	42
Other fuels	3	8
Total	1,146	1,196

Note. All the electricity consumed by the Elecnor Group's facilities in Spain in 2023 comes from 100% renewable sources.

Energy efficiency initiatives [GRI 302-5](#)

Energy management is one of the Elecnor Group's areas of activity. It 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 293,411 street lights in 102 Spanish municipalities, representing an increase of 4% over the number of street lights managed compared to the previous year.

Meanwhile, internally, over the course of 2023, a number of energy-saving and energy efficiency actions were implemented, most notably:

- Procurement of electricity with renewable origin certificate and improvement of renewable energy self-consumption facilities.
- Acquiring efficient tools (computers, tablets, etc.)
- Fleet renewal, including new hybrid vehicles in the organisation.
- Conference calls encouraged to avoid journeys.
- 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.).
- Design of the Group's new headquarters according to sustainability, optimisation of consumption and reduction of waste generation criteria (e.g., individual light meters, LED screens and sensors for light regulation, blinds, micro-perforated roof and acoustic insulation screens, bicycle parking and electric vehicle charging points in the garage).
- Self-consumption of electricity through photovoltaic solar panels at Atersa.
- Addition of hybrid vehicles to Audeca's fleet.
- One-off modifications to the facilities at water treatment plants to reduce electricity consumption, installing more energy-efficient machines, planned and implemented under ISO 50001 certification.

Sustainable financing GRI 3-3

Elecnor registered in June 2023 a Multi-currency Promissory Note Programme on the Alternative Fixed Income Market, MARF, for up to Euros 400 million, the objective of which is to allow short and medium-term financing in advantageous conditions compared to alternative sources of financing.

This is the Elecnor Group's second Programme linked to sustainability that includes targets for reducing greenhouse gas emissions and accidents at work. If they are not met, they imply a commitment of contributions to sustainable projects.

The programme, which runs until June 2024, will allow financing in Euros and US Dollars, with maturities of up to 24 months, through the issuance of promissory notes with a nominal value of Euros 100,000 to institutional investors.

The programme is part of the strategy to diversify the sources of financing of working capital and to optimise its costs. In this context, the soundness of Elecnor's business model and reputation is well recognised in the MARF, which is allowing Elecnor to be one of the companies with the highest issued amount and lowest costs in the market. In the last twelve months, the company has made 70 issues, maintaining an average outstanding amount of Euros 226 million.

For this Promissory Note Programme, Elecnor will have Banca March, Banco de Sabadell, Renta 4 and Norbolsa as placement entities, assuming the functions of distributing the issues among qualified investors. Banca March is also the Registered Advisor and Paying Agent. Cuatrecasas has taken over the legal advice, and G-Advisory is the consultancy firm that will issue the sustainability reports.

This Promissory Note Programme accompanies other sustainable financing operations signed by the Elecnor Group in 2021:

- 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 company signed a novation of the Syndicated Financing Agreement which, being in compliance with the requirements of the Sustainability Linked Loan Principles, was rated as sustainable.

Consumption of renewable energy

The electricity consumed by the Elecnor Group's facilities in Spain in 2023 comes from 100% renewable sources.

Furthermore, the subsidiary Audeca has several solar energy generation facilities at road maintenance centres of the Ministry of Transport and Sustainable Mobility. Atersa's self-consumption thanks to the 100 kWp photovoltaic system installed on the roof.

Celeo in Brazil generates photovoltaic energy for its own consumption at its maintenance base in Uberlândia. Celeo in Chile also has photovoltaic panels at the Atacama maintenance base.

Water consumption GRI 303-1

The types of 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.

Although the activities conducted by Elecnor do not generate a major impact on the water resource and it regards the water footprint as a material topic of low criticality, the company is aware of the importance of this limited resource and that some of its activities are conducted in areas with a high risk of water stress, which is why 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, and good practices are introduced to foster the minimisation of water consumption.

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)

Elecnor has emergency plans and protocols in place, in addition to duly trained personnel, in order to ensure that in the event of a spill or dumping in a body of water, correct and rapid action is taken, minimising any adverse effect on the environment, indicating how to collaborate and the means of communication to be used with the stakeholders involved. At the same time, the minimum impact on water is guaranteed, ensuring strict compliance with legislation.

As stated above, Elecnor ensures compliance with legislation in all areas where it conducts its business, the aspect of water consumption is integrated into the organisation's management system, and it has the proper means and duly trained personnel in the event of an emergency that could affect a body of water. Elecnor avoids collecting water in areas of high water stress where it operates.

GRI 303-3, GRI 303-5	2022	2023
Mains water consumption (MI)	96	188
Water consumption in areas without water stress (MI)	28	121
Water consumption in areas of high water stress (MI)	68	67

Note. Water stressed areas have been identified on the basis of the "WRI Aqueduct 2023"

The increase in water consumption is mainly due to the inclusion of new countries and organisations (Australia, Dominican Republic and Cameroon) in the report, as well as the increase in the Group's activity.

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 considers the consumption of raw materials to be non-material due to the sector to which it belongs. The 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. For the future, work is underway to implement a methodology to consolidate and report this information.

Waste management [GRI 306-1](#), [GRI 306-2](#)

The Elecnor Group's Environmental Management System includes the protocol for managing waste generated by Elecnor's own activity 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 by authorised managers, seeking the best available techniques for recovery wherever possible and optimising the resources used at worksites and work centres. Moreover, in 2023 the company generated a total of 94,312,288 kilograms of waste (35,904,107 kilograms in 2022), 79% of which was recovered (re-use, recycling, soil treatment or other means), 3% less than the previous year.

Although there has been a slight decrease in waste recovery, it is worth noting that the Elecnor Group remains committed to continuous improvement in its waste management practices, as reflected in the recovery percentages in Spain (93%), Italy (100%) and Portugal (100%).

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

Below are details of the amounts of waste generated in its operations: [GRI 306-3](#)

Waste generation by type	2022	2023
Hazardous waste	338,667	1,065,370
Non-hazardous waste	35,565,440	93,246,918
Total	35,904,107	94,312,288

For waste generated in the European Union, waste is classified using the EWL Code (European Waste List), which is a system for classifying the different types of waste based on their origin and composition. It is established on the basis of a hierarchy of numerical categories, each of which corresponds to a specific type of waste and is associated with a precise description of its characteristics and composition.

GRI 306-4, GRI 306-5

2022 (kiloograms)	Hazardous waste	Non-hazardous waste
Waste not destined for disposal	181,369	29,352,884
Reuse/Preparation for reuse	54,006	11,855,993
Recycling	2,316	14,627,130
Other recovery operations	125,047	2,869,760
Waste destined for disposal	157,298	6,212,556
Incineration (with energy recovery)	8,415	11,761
Incineration (no energy recovery)	8,950	19,676
Transfer to landfill	71,188	5,897,587
Other elimination operations	68,745	183,532
% Destined for recovery	82%	
Total	35,904,107	

2023 (kilograms)	Hazardous waste	Non-hazardous waste
Waste not destined for disposal	260,712	74,268,584
Reuse / Preparation for reuse	29,596	37,592,255
Recycling	53,244	27,585,512
Other recovery operations	177,872	9,090,817
Waste destined for disposal	804,658	18,978,334
Incineration (with energy recovery)	26,868	1,198
Incineration (no energy recovery)	75,702	260,136
Transfer to landfill	608,677	18,173,751
Other elimination operations	93,411	543,249
% Destined for recovery	79%	
Total	94,312,288	

The increase in total waste generation compared to the previous year is mainly linked to the increase in the number of large projects in the Brazilian business. These projects are responsible for 48% of the total waste generated.

During 2023, projects carried out in Brazil included the construction of transmission lines in the states of Minas Gerais, Rio Grande do Norte, Pará and Amazonas; the construction of the Mutum, Terminal Rio and Boa Sorte substations; and the construction of solar PV farms, such as Boa Sorte, Sol do Piauí, Lar do Sol II and Arinos Sul.

The increase in waste generation is also due to the inclusion of Australia, the United Kingdom and Italy in the report.

Finally, the waste reporting methodology has been improved with the implementation of the digital platform for GRel waste management in Brazil, Uruguay, Chile and Argentina.

Other initiatives GRI 306-2

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

Enerfín participates as a partner alongside other developers and industrial companies in the Rencycle project to develop industrial and technological solutions that promote the circular economy in the renewable energy sector.

The subsidiary Atersa has improved the efficiency of photovoltaic panels marketed. 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. It also works with Ecolec, a non-profit organisation that fosters the proper management of electronic and electrical waste and care for the environment, to ensure the removal and recycling of solar panels at the end of their useful life.

Environmental awareness

The Elecnor Group involves its employees and all other stakeholders in environmental awareness programmes and campaigns. While some actions are undertaken at Group level others are implemented locally.

Some of the most notable initiatives include:

- Goodbye Plastic campaign. On the occasion of World Environment Day, the Goodbye Plastic campaign was launched to encourage commitment and responsibility in reducing plastic pollution.
- Make your footprint positive! ("¡Que tu huella sea positiva!") campaign with the aim of encouraging good environmental practices within project facilities through different activities.
- First Children's Drawing Competition The importance of water in my life ("La importancia del agua en mi vida") in Mexico. The aim of the campaign was to raise awareness among workers and their children about water care.
- Carrying out various awareness campaigns focused on optimising water use and reducing consumption, for example in the Dominican Republic, Montelecnor and Elecnor Angola.
- Audeca has carried out an internal awareness campaign to reduce the use of plastic by eliminating this type of water bottles and distributing glass bottles to workers.

Management of biodiversity and protection of the natural environment

GRI 2-25, GRI 3-3, GRI 304-1, GRI 304-2, GRI 304-3

The Elecnor Group's human-induced impact on biodiversity 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 2023 to minimise and limit the impact on biodiversity are described below:

Related to fauna conservation

- Nueva Alto Melipilla - Nueva Casablanca - La Pólvora - Agua Santa transmission line (Chile). Implementation of measures for the protection of birdlife, such as the installation of flight deterrents to increase the visibility of power lines and prevent birds from being electrocuted.

In addition, prior to carrying out works, a series of measures have been implemented such as scaring off low-mobility wildlife through controlled disturbance, manual and gradual removal of refuges, as well as rocks or vegetation. Removed rocks and vegetation have been used to build new burrows outside the site area.

- Portón del Sol solar PV farm (Colombia). Relocating all the fauna located in the project area through scaring, collection and relocation.
- Santos de la Piedra Wind Farm (Spain). The following actions have been carried out: recovery plan for the common crayfish and removal of animal carcasses.
- Ribera Navarra Wind Farm (Spain). Bird detection cameras have been installed for the automatic shutdown of wind turbines, in the event of detecting a dangerous situation for birds.
- PATE- LT230 kV Oriximiná-Juruti-Parintins e Subestações Associadas (Brazil). Some actions are carried out within the framework of the wildlife conservation programme:
 - Rescue and management of animals during removal of vegetation.
 - Raptor conservation programme.
 - Signalling and monitoring programme for birds susceptible to collision.
- Aerosur wind farm (Spain). Enerfín has set up conservation actions for the Egyptian vulture (*Neophron percnopterus*) and the Montagu's harrier (*Circus pygargus*). Monitoring is conducted for reproduction, marking specimens, supplementary feeding or the maintenance of unharvested cultivated plots to allow the species to nest. We have also carried out reintroduction and reinforcement sessions for endangered birds.
- Sigma solar PV plant. Arco 1-5 farms (Spain). Actions were undertaken to identify Montagu's harrier (*Circus pygargus*) nests in the Arco 4 and 5 projects, following the detection of their presence in the vicinity.
- Yaoundé Lake (Cameroon). Monthly monitoring of biodiversity by identifying native and invasive species of fauna and flora present in the project area.
- NYOM II (Cameroon). The following actions have been carried out:
 - Identification of invasive plant species in the project area.
 - Weeding and clearing of vegetation.
 - Awareness-raising sessions among employees to enable the team to be able to identify this type of species.
- 230 kV Sabanitas Substation - Panamá III Substation transmission line (Panama). Rescue of a three-toed sloth (*Bradypus variegatus*).
- 400 kV Segura - Centurión transmission line (Spain). Some actions have been taken to help reduce interaction with local wildlife:

- Purchase of multi-purpose nests to accommodate barn owls, kestrels or lesser kestrels.
- Installation of bird deterrents to increase the visibility of the power lines and prevent birds from being electrocuted.

Lastly, during the pre-operational (construction) phase of its projects, the renewable energy subsidiary Enerfín conducts exhaustive environmental impact studies 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 projects' viability.

Once the facility enters operation, Enerfín 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.

Related to flora conservation

The Elecnor Group and Enerfín undertake several actions for the protection of flora in the projects they carry out. The most significant ones for 2023 are outlined below:

- Portón del Sol solar PV farm (Colombia). Various measures have been taken, such as drying out the ponds, and rescuing and relocating species of flora in the national closed category (orchids, bromeliads, bryophytes and lichens).

We have also rescued individual saplings, treated them in a nursery until they can be transplanted, and rescued epiphytic plants. Additionally, the trees of the *Pseudomalmea boyacana* species have been spared until they flower so that they can disperse the seeds, as this is a species with a scarce presence in the area.

- Sigma solar PV plant. Arco 1-5 farms (Spain). Transplanting of palmetto (*Chamaerops humilis*) specimens located in the access works to the plants was carried out. In addition, trees and bushes located in the areas affected by the photovoltaic modules have been transplanted.
- New 2x220 Nueva Alto Melipilla - Nueva Casablanca - La Pólvora - Agua Santa (Chile) line. Geophyte specimens were identified for rescue and relocation.
- PATE - 230 kV Oriximiná-Juruti-Parintins e Subestações Associadas transmission line (Brazil). Flora rescue programme for the conservation of plant genetic resources, rescuing and saving germplasm and producing herbarium samples of forest species collected in the area affected by the project.
- Boa Sorte solar PV plant (Brazil). Plant germplasm has been rescued to mitigate and compensate for the negative environmental impacts caused by the removal of vegetation in the project area.
- New England Solar Farm (Australia). A Biodiversity Management Plan has been carried out during the implementation of the project. Some of the actions carried out have been the following:
 - Study of the existing flora in the project area.
 - Control and management of vegetation in the project area.
 - Control of vegetation growth on roadside verges.

Connected with restoration projects

The Elecnor Group carries out and implements actions to restore habitats in the areas of influence of the projects. The most important ones are described below:

- Portón del Sol solar PV farm (Colombia). The following restoration actions have been carried out: planting of 405 host trees in addition to those required by the Environmental Management Plan (EMP) to ensure greater survival of individuals in the ecological rehabilitation area for the growth of non-vascular epiphytes. Furthermore, additional maintenance has been contracted to that established in the EMP to ensure the survival of the planted trees.
- The subsidiary Audeca continues to carry out emergency works to mitigate the effects of the May 2023 fire in the Hurdes and Gata mountains in Extremadura. These actions consist of the extraction of the burnt wood and numerous works for the restoration of the ecosystem, in order to minimise the risks of ash and soil possibly being blown and swept over the population and the environment.
- The subsidiary Audeca has undertaken the restoration of the river Zapardiel in the province of Ávila up to the mouth of Tordesillas, in Valladolid. The project 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. This project began in 2018 and will run until 2027.

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.

European taxonomy of environmentally sustainable economic activities

The European taxonomy forms part of a series of actions that seek to redirect capital flows towards sustainable activities within the European Union's European Green Pact, which in turn identifies a set of policy initiatives geared towards compliance with the commitments made in the Paris Agreement and, more specifically, with the goals set out in the United Nations 2030 Agenda for Sustainable Development adopted in 2015.

Under the European Taxonomy Regulation (EU Regulation 2020/852) (hereafter, TR), the taxonomy is intended as a classification system for environmentally sustainable economic activities to assist in informing investors —under a single, official criterion— about which investments are sustainable, providing transparency and clarity in the market.

Pursuant to these regulations, the Elecnor Group discloses in this Non-Financial Information Statement (NFIS) 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. In particular, the Group publishes the proportion of its total turnover, CapEx and OpEx that is linked to environmentally sustainable economic activities. In addition, and for the first time this year, the Group has analysed the extent to which its activities can be considered eligible under these regulations in relation to the other environmental objectives, such as the sustainable use and protection of water and marine resources, the transition to a circular economy, the prevention and control of pollution and the protection and recovery of biodiversity and ecosystems.

In that regard, there are two levels of classification of economic activities in terms of their contribution to environmental objectives:

- On a first level, an economic activity will be regarded as an **eligible** economic activity pursuant to the taxonomy to the extent that it fits one of the descriptions of activities included in the delegated acts implementing this regulation¹ (1st Delegated Act, expanded by virtue of the 3rd Delegated Act and partially modified by the 4th Delegated Act, in relation to the goals of mitigation of and adaptation to climate change, and 5th Delegated Act in relation to the rest of the environmental goals), regardless of whether it meets any or all the technical selection criteria established so that it can also be considered environmentally sustainable. As a consequence, the fact that an economic activity is eligible under the taxonomy does not provide any indication of its actual environmental performance and sustainability.
- On a second level, an eligible economic activity will also be regarded as an **environmentally sustainable** activity when it meets the technical selection criteria identified for each activity in the appendices to the abovementioned delegated acts, i.e. when:
 - it contributes substantially to one or more of the environmental objectives laid down in Article 9 of the TR,
 - does not cause any material detriment to one or more of the environmental objectives laid down in Article 9 of the TR, and
 - it is conducted in conformity with minimum social safeguards that ensure that the activity is performed in compliance with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights laid down in the eight core conventions referred to in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

Note 1. Appendix I of this Report identifies in greater detail the main implementing legislation of the European Taxonomy Regulation.

Methodology for the identification of eligible activities

Categorisation of activities into eligible and non-eligible activities

The Elecnor Group has found that the activities it conducts may contribute primarily to mitigating the effects of climate change rather than contributing to adapting to it and its consequences, to the sustainable use and protection of water and marine resources, to a circular economy, to the prevention and control of pollution or to biodiversity (without prejudice to the positive effects that they may also generate in this field). In these circumstances, while the analysis of the eligibility of its activities under the taxonomy rules has taken into consideration all environmental objectives, the subsequent analysis of its environmental sustainability has focused on the assessment of its contribution to the goal of **mitigating climate change**.

The Elecnor Group classifies its activities and sub-activities using an internal coding system.

These activities and their corresponding sub-activities have been analysed using the classification of economic activities included in the delegated acts of the Regulation corresponding to the various environmental goals, and which are based on the NACE (Statistical Classification of Economic Activities in the European Community) classification.

Following the exercise conducted, it has been concluded that the following Elecnor Group activities and subactivities are deemed eligible according to the taxonomy:

- Electricity. Subactivities: distribution and transmission networks, substations, transformer stations and live working.
- Energy efficiency. Subactivity: street lighting.
- Power generation. Subactivities: wind farms, solar photovoltaic, power generation and self-consumption plants.
- Railways. Subactivities: catenary, traction substations, signalling and interlocking, and communications.
- Maintenance. Sub-activities: urban services.
- Facilities. Subactivities: electricity and instrumentation, air-conditioning, HVAC, PCI and plumbing and comprehensive installations.
- Construction. Subactivities: non-residential buildings.
- Environment and Water. Sub-activities: water works, distribution networks and water treatment plants and environmental works.

Appendix I of this Report contains an itemised list of the Elecnor Group's eligible and ineligible activities and sub-activities and their correspondence with the abovementioned NACE codes and environmentally sustainable activities according to the Taxonomy Regulation and implementing regulations.

Methodology for identifying environmentally sustainable activities: analysing compliance with technical selection criteria

With the aim of analysing which activities or projects comply with the technical selection criteria laid down in the taxonomy regulation that enable them to be classified as environmentally sustainable, the Elecnor Group first identifies and reviews all the projects under execution registered in its works system and determines the scope of this analysis. The analysis on the fulfilment of the selection criteria is conducted at project level when, given its nature (type of activity and requirements of the taxonomy, geographical location and deployment and execution of the applicable management and control procedures, primarily) and magnitude, it is deemed necessary to accredit this fulfilment on an individualised basis. Conversely, in cases where the nature of the projects included in a given activity is homogeneous, the management procedures set up are applied across the board and the individual volume of each project is not significant; the analysis is performed at the activity level.

The technical selection criteria applicable to each of the eligible activities pursuant to the taxonomy are substantially different and, accordingly, there is a substantial variation in the assessment of compliance with them from one activity to another. As can be seen below, a highly significant part of the Elecnor Group's activity is identified with the construction or rendering of services associated with the operation of electricity transmission or distribution systems and with the construction or operation (in the latter case, through the Enerfín Subgroup's activity) of electricity generation facilities based on wind energy or photovoltaic solar technology. The most notable aspects included in this analysis process in relation to these activities are described below.

[Substantial contribution to the goal of mitigating climate change](#)

Set out below are the main aspects of assessing whether projects for the **construction or rendering of services related to operating electricity transmission or distribution systems** substantially contribute to the goal of mitigating climate change:

- Identifying whether the transmission and distribution infrastructure or equipment subject to the project is located within the interconnected European system;
- Identifying, if not, whether the infrastructure in question is connected or intended to create a connection or extend an existing connection to an energy production facility with a level of greenhouse gas emissions below the thresholds laid down in the taxonomy regulation (low-carbon generation) or whether the primary goal of the infrastructure is to increase the generation or use of renewable electricity generation; and
- As a last resort, where neither of the above two circumstances can be proven, analysing the characteristics of the electricity system in which the infrastructure is located and, specifically, whether the average emissions factor of the system network or whether more than 67% of the newly activated capacity in the system falls below certain emissions thresholds, in both cases considering a successive period of five years.

Generally speaking, and according to the "Renewable Energy Statistics 2023" report from the International Renewable Energy Agency (IRENA), the participation of renewable energy in the production and installed capacity of electricity generation in the main countries in which the Elecnor Group is present executing transmission and distribution system construction projects is very high. In all cases, major efforts have been made in recent years to increase the percentage of renewable energy in their installed generation capacity.

With regard to projects related to the **construction or operation of electricity generation facilities using renewable energy sources (wind and solar)**, their very nature proves their substantial contribution to this goal of mitigation.

With regard to the **construction and maintenance of rail transport infrastructure**, this activity refers to actions on electrified infrastructure and associated subsystems, which also proves its substantial contribution to this mitigation goal.

Finally, for **building renovation and related activities**, the substantial contribution is shown through the assessment of the energy performance of the buildings or facilities subject to the corresponding actions.

No significant harm to other environmental goals

In line with the nature of the Elecnor Group's principal eligible activities, our analysis of compliance with these selection criteria has been particularly focused on the goals of adaptation to climate change, transition to a circular economy and protection and recovery of biodiversity and ecosystems. Although the requirements laid down in the taxonomy regulations to demonstrate that economic activities do not cause significant harm to any of the identified environmental goals also differ between the different eligible activities, the aforementioned activities of electricity transmission and distribution and the construction and operation of renewable generation facilities based on renewable sources, construction and maintenance of infrastructure for railway transport and renovation of buildings and related activities, generally have important elements in common in terms of demonstrating compliance with these requirements.

The nature of the core activities conducted by the Elecnor Group sometimes limits its ability to significantly influence some of these environmental goals. This is especially true with respect to the goals of adapting to climate change and the transition to a circular economy, given that the Group—with the exception of the energy generation facilities, mainly wind power, which it operates through the Enerfín Subgroup— does not own or operate the infrastructures it builds throughout their entire lifecycle. As a rule, the design and technical specifications of the projects are determined by the customer and the Group has no ability to manage these assets after the completion of their construction and delivery.

In any case, and as regards the goal of **adapting to climate change**, the abovementioned technical specifications generally address the most adverse climatic conditions and set out the appropriate adaptation solutions. These are usually related to implementing the best technology in the installations and using highly durable materials that can withstand the most extreme conditions and, above all, to the location of the various supports of the transmission and distribution lines and of the photovoltaic and wind complexes themselves and of the foundations and towers of the wind turbine generators.

Furthermore, and as explained in the Climate Action section of this Report, the Elecnor Group has a Climate Change Strategy that lays down the goals in this area for the 2020-2035 period. This strategy constitutes the framework within which all of its initiatives to reduce greenhouse gas emissions, adapt to the impacts of climate change and take advantage of the associated opportunities are included. As a core part of the design and implementation of this strategy, the Group has identified the risks and opportunities related to climate change in its activities, following the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) and in accordance with the criteria set out in Appendix A ("*Criteria relating to the principle of no significant adverse effect on climate change adaptation*") of Appendix I relating to the goal of mitigating climate change of the 1st Delegated Act. Specifically, the impact of climate change has been assessed both on the Elecnor Group's physical assets and on the infrastructure construction activity in the countries in which it currently has a greater presence or significant medium- and long-term business opportunities. The findings of this analysis form the basis for the identification and implementation of adaptation solutions to reduce the impact of the most significant physical climate risks to the Group's activities, taking into account their context and their position in the supply chain.

The Elecnor Group, as also outlined in the Environmental Performance section, conducts its operations pursuant to the procedures established in its Environmental Management System certified under ISO 14001:2015. In particular, as regards the goal of **transitioning towards a circular economy**, and as outlined in the "*Waste management*" section of the abovementioned Environmental Performance section, the Elecnor Group fosters the circular economy by reducing and recovering the waste generated whenever possible and optimising the resources used at all worksites and work centres. In that regard, it has specific Waste Management procedures in place to ensure both adequate protection of human health and the environment and fulfilment of the applicable legislation, seeking the best available techniques for recycling. Similarly, the key characteristics of its operations and activities that may have a material impact on the environment are regularly monitored and measured through the Environmental Action Control Plans, and compliance with legal requirements is verified.

Furthermore, and as also outlined in detail in the abovementioned section of this Report on Waste Management, the Group is fully committed to and working intensively on a number of initiatives geared towards preventing the generation of waste and enhancing the circular economy, especially with respect to wind power generation facilities.

Lastly, as regards the goal of **protecting and recovering biodiversity and ecosystems**, and as detailed in the Biodiversity management and protection of the natural environment section of the abovementioned Environmental Performance section, the Elecnor Group identifies and assesses in all its operations the impact they may have on fauna and flora, taking the appropriate measures to reduce this impact or even to generate a positive impact on the environment. Most of the projects implemented by the Group have the mandatory Environmental Impact Assessment reports and the corresponding environmental impact statements, based on which environmental monitoring plans are prepared to ensure the application of the appropriate mitigation and compensation actions.

As a result of the assessment conducted regarding these selection criteria, the Group has concluded that, overall, its eligible activities do not cause material detriment to any of the environmental goals set out in the taxonomy regulations.

With regard to the analysis of no significant adverse effect on the objectives of sustainable use and protection of water and marine resources and pollution prevention and control, the exposure of the Group's main activities is low. In any case, the Group implements appropriate working procedures to mitigate any negative impact that may occur.

Minimum social safeguards

To assess whether the operations conducted by the Elecnor Group are performed pursuant to minimum social safeguards, the outcome of the Final Report on Minimum Safeguards issued by the European Sustainable Finance Platform in October 2022 has been considered primarily. Based on this report, the analysis has been conducted with respect to the Group's management and performance in the following four areas:

- a. Combating bribery and corruption.
- b. Human rights.
- c. Taxation.
- d. Free competition.

To prevent and adequately manage the risks linked to these four areas and to ensure adequate performance in full compliance with the law and its principles and values, the Elecnor Group has a fully operational Compliance System that is structured and operates according to the best national and international practices. The Elecnor Group's Compliance System is certified according to the UNE-ISO 37001 anti-bribery management system standard and the UNE 19601 criminal compliance management system standard. The Ethical management and regulatory compliance section of this report outlines the key components of this system and the manner in which the Group conducts its operations in these areas of management.

The Human Rights section of the Responsible Management chapter of this report makes explicit in particular the Elecnor Group's commitment to support, uphold and protect human rights to the fullest extent and the mechanisms it has in place to ensure that all of its operations are conducted pursuant to these principles.

Lastly, the Tax Transparency section included in the abovementioned chapter on responsible management covers the key areas and elements of governance in tax matters that ensure compliance with legislation in this field.

Neither Elecnor, S.A. nor any of its subsidiaries have been convicted in a final judgment in 2023 for any offence relating to tax evasion or human rights. Similarly, neither Elecnor, S.A. nor any of its subsidiaries or its management team have been convicted by a final judgment in matters of corruption, bribery or infringement of laws related to free competition. [GRI 2-27](#)

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

Having catalogued the Elecnor Group's activities as eligible and ineligible and assessed compliance with the technical selection criteria for the projects and activities identified as eligible, the indicators (KPIs) required by the abovementioned regulations have been calculated using the following methodology.

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 subgroup 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, are considered eligible and potentially sustainable activities.

Also, as a result of the search for an investor to acquire a controlling stake in the Enerfín Subgroup during the current year, which culminated in the signing in November of an agreement for the sale and purchase of all the shares of this subgroup to the Norwegian company Statkraft European Wind and Solar Holding AS, all the income and expenses for 2023 relating to the Enerfín Subgroup were recognised under "Discontinued operations" in the Elecnor Group's consolidated income statement. Furthermore, from the date on which it was considered that the conditions for transferring the net assets of this subgroup to "Non-current assets held for sale" were met (31 August 2023), all of its assets and liabilities were recognised under this heading in the consolidated statement of financial position.

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

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). The sales (production) recorded in these systems (using the percentage of completion or degree of progress method, as stipulated in the applicable accounting regulations) and which are included in the Group's accounting systems represent practically all of the organisation's turnover.

Each of the works registered in the system is associated with an activity code, which helps in the process of identifying and aggregating the production associated with environmentally sustainable activities.

Taking this into account, the Elecnor Group has calculated the turnover indicator for 2023 that derives from eligible and environmentally sustainable activities by dividing the aggregate turnover of the activities and projects deemed to meet the criteria for eligibility and alignment with environmental objectives (technical selection criteria), respectively, by the Elecnor Group's "Net turnover" figure shown in the Consolidated Annual Accounts for 2023 prepared by the Board of Directors on 28 February 2024 – Euros 3,792,906 thousand. From this calculation, the following results have been obtained:

- a. Proportion of turnover corresponding to eligible activities: 67.76%.
- b. Proportion of turnover corresponding to environmentally sustainable activities or projects (based on total consolidated turnover): 54.57%.

As mentioned above, the calculation of these percentages does not take into account the turnover for 2023 corresponding to the Enerfín Subgroup, which amounted to Euros 193,814 thousand and is entirely associated with economic activities that are considered environmentally sustainable, specifically the operation of electricity generation facilities using renewable energy sources, mainly wind power.

Appendix I of this Report contains in-depth information on the Elecnor Group's turnover related to environmentally sustainable activities.

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:

- a. Wind power generation facilities and rights of use over associated assets.
- b. Machinery, hand and machine tools, 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*).
- c. Other supporting property, plant and equipment not directly related to business activities, such as computer systems or furniture and fixtures.

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 and environmentally sustainable 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 indicator for capital expenditure (CapEx) for 2023 associated with eligible and environmentally sustainable activities. To do so, it takes the amount corresponding to the capital expenditure made in 2023 by the Enerfín Subgroup (investments in electricity generating facilities from renewable energy sources (wind and solar) and associated use rights) until the date on which, as mentioned above, all of its assets and liabilities have been transferred to the "Non-current assets held for sale" heading of the consolidated statement of financial position, —calculated as the sum of the consolidated "Additions" for the year under "Intangible Assets – Other Intangible Assets", "Right-of-use assets" and "Property, Plant and Equipment" of the Enerfín Subgroup that form part of the consolidated Elecnor Group, which amounted to Euros 155,639 thousand— and divides it by the 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 2023 prepared by the Board of Directors on 28 February 2024 – Euros 251,510 thousand. From this calculation, the following results have been obtained:

- a. Proportion of capital expenditure (CapEx) corresponding to eligible activities: 61.88%.

- b. Proportion of capital expenditure (CapEx) corresponding to environmentally sustainable activities or projects (based on the amount of total consolidated CapEx): 61.88%.

Appendix I of this Report contains in-depth information on the Elecnor Group's capital expenditure (CapEx) related to assets or processes associated with environmentally sustainable activities.

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

The regulations on taxonomy 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. However, as mentioned above, all the income and expenses for 2023 relating to the Enerfín Subgroup were recognised under "Discontinued operations" in the Elecnor Group's consolidated income statement and, therefore, "R&D&I expenses", "Leases" and "Repair and maintenance" in the consolidated income statement do not include any amount in relation to the expenses incurred by the Enerfín Subgroup in this connection.

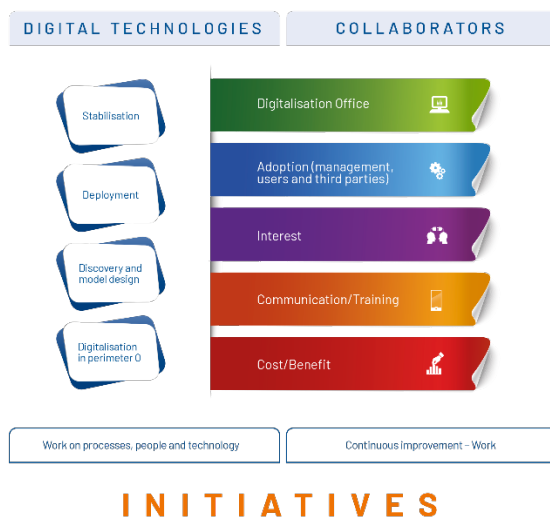
Appendix I of this Report contains in-depth information on the Elecnor Group's operating expenses (OpEx) related to assets or processes associated with environmentally sustainable activities.

15.8 Technology and innovation

The digital transformation in the Elecnor Group: processes, technology and people GRI 3-3

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 the Digital Transformation index, achieving 97.1% in 2023.

This new index unifies the previous Digital Development and Implementation indices.

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.

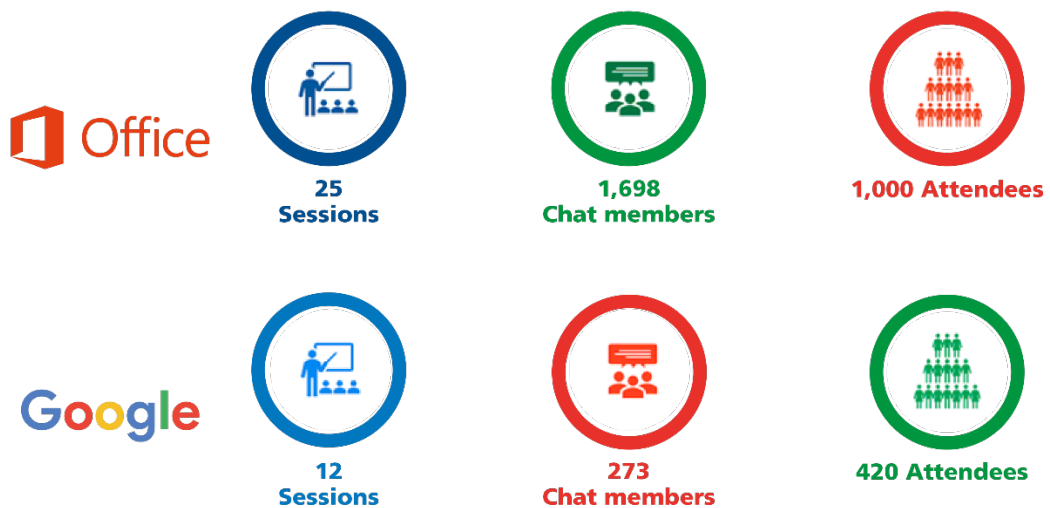
The decisions adopted are assessed by the Digital Transformation Committee, which includes representation from all areas of the company and contributes a transversal business approach. During 2023, the Committee met 11 times, during which the most relevant developments and issues of the year were analysed and highlighted.

Achievements 2023

During 2023, progress was made along two main lines: the Transformation Plan, with 25 initiatives, and cultural change through the promotion of digital skills. The main milestones are set out below:

- Improving operational efficiency, reducing costs and increasing revenues through process automation and the implementation of digital tools that increase efficiency in various areas, reducing production times, optimising the supply chain by simplifying administrative processes, among others.
- Improving the customer experience by facilitating interaction with customers through online platforms, mobile applications and more efficient customer service systems, providing a more satisfying and personalised experience.
- Data-driven decision-making by providing access to large volumes of data. The ability to collect, analyse and act on this data has significantly improved strategic and operational decision-making.
- Greater flexibility and agility to adapt to market changes and customer demands. The implementation of technologies allows for greater flexibility in the way tasks are performed responding to changing needs.
- Cultural change and internal training, fostering collaboration, innovation and continuous training of staff to adapt to new technologies and ways of working.
- Improved safety. With the adoption of appropriate digital solutions, the security of systems and data has been strengthened, with increased protection against cyber threats and associated risks.

Office and Google sessions



Highlights of Digital Transformation training



**Training of
16 applications for
implementation**



**48 demos and
trainings**



**+3,000 trained
employees**

Information security GRI 3-3

The Elecnor Group includes the information security aspect in its Integrated Management System, as well as in the Integrated Policy. Furthermore, in 2023, the Information Security Management System certification was renewed 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.

Of note in this context is the business continuity plan, which lays down the action guidelines to guarantee the continuity of all Elecnor's systems, processes and services developed at all its sites. To this end, a series of action plans are drawn up to resolve contingencies that may affect the availability of the business.

Cybersecurity in the Elecnor Group is based on a zero trust policy. It is a relevant area for the company due to, 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.

In 2023, the Elecnor Group has undertaken the following projects:

- Implementation of the International Cybersecurity Plan.
- Awareness and training to the workforce, crucial to maintain a high degree of protection against external threats. Both workforce awareness campaigns and specialised training for specific users requiring more in-depth knowledge are conducted, such as:
 - Gamification campaign on the Digflix platform, in which 1,530 employees participated.
 - Cyber awareness campaign to the Brazil office, with a participation rate of 76%.
 - Specific GDPR awareness campaign for Human Resources staff.
 - Security pills via email to all employees of the organisation (+23,000 employees)
- Phishing simulation. A phishing campaign was carried out by sending it to 20,476 users.
- Projects designed to guarantee security in facilities and plants.

- Conducting internal and external audits, obtaining ISO/IEC 27001:2013 certification.
- Active workstation protection with the deployment of a new RBS solution.

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.

Innovation is a part of the Group's Integrated Management System. Elecnor, S.A. and its subsidiary Audeca are currently certified in accordance with UNE 166002 standard.

In 2023, the total investment figure for 2022 for all the Group's R&D&I projects is included, and amounted to Euros 23.3 million. In addition, a total of 4.5 million in allowances, grants and deductions were received.

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

Infrastructure
<ul style="list-style-type: none"> • Railway • Electricity transmission/distribution • Gas transmission/distribution • Roads • Construction and building solutions

Energy
<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

Facilities
<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
<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

Water
<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

Singular projects
<p>Development of projects in which innovation provides a significant qualitative leap.</p>

The Elecnor Group works to encourage the necessary climate in which innovative ideas are generated by creating committees of experts by activity, holding creativity workshops or specific monographs. Some of the year's achievements are set out below:

Achievements 2023

- Maintenance of UNE 166002 certification for RDI Management Systems of Elecnor and Audeca.
- Launch of INNOVA 2023 call for proposals for R&D&I projects funding.
- Standardisation of KPIs in R&D&I for the Group and its organisations.
- Obtaining tax deductions for R&D&I.
- Internationalisation of R&D&I taxable profit in foreign subsidiaries.
- Conducting workshops on collaborative/open innovation in conjunction with Tecnalia, Spain's largest centre for applied research and technological development.
- Grant from the Provincial Council of Vizcaya for the monographic workshop on collaborative innovation with start-ups.
- Approval by the Provincial Council of Vizcaya of two innovative projects within the framework of the Hazitek call for proposals: Aria de Ferrocarriles (initiated in 2023) and Popin de Sistemas projects.
- Presentation of new proposals from Elecnor Deimos, the Group's technology subsidiary, within the framework of national and European programmes.
- Market presence of green hydrogen production facilities.
- Development of wind, photovoltaic and storage hybridisation projects.
- Implementation of a freecooling system in FTTH rooms at 150 sites in the northern half of Spain, using network analysers to measure energy savings, with remote connection to control and visualise the rooms.
- Completion of the development of the Sigidel 4.0 Control system, a system based on the historic Sigidel system but at the forefront of technological innovations and complying with cybersecurity standards.
- Completion of the autonomous vehicle feasibility project subsidised by the Catalan Public Agency for Business Competitiveness (Acció), in collaboration with the UPC and the company Sorigué.
- Advances of a project that consist of a platform for the optimisation of sports infrastructure processes by means of predictive models and energy recovery solutions together with Tecnalia, Tecman, Sedical and Laenk, and subsidised by Hazitek.

Innovation projects

During the year, the Elecnor Group was involved in numerous innovation projects which, on several occasions, it performs in collaboration with various universities and technological centres and institutes, such as Railway Innovation Hub, Carlos III University, Madrid's Polytechnic University, University of Leon, CENES in France, UKSA in the United Kingdom, POLSA in Poland, CENER (National Renewable Energy Centre); the company Tekniker or aerospace agencies such as Spain's Institute of Aerospace Technology (INTA) and Tecnalia, among others.

Highlighted projects

Development of energy efficiency projects in technical rooms and data centres

The enthalpy or direct freecooling system consists of the cooling of technical rooms by supplying cold air from the outside to the inside of the room, through forced ventilation, using sensors, ducts and regulators, to achieve the appropriate volume intake of outside air to meet the cooling requirements of the technical room.

The aim is to save electricity consumption through proper control of the air-conditioning system, reducing the operating hours of the machines and thus extending their service life.

Integration of circular economy criteria

The goal of Enerfin, the Group's renewable subsidiary, is to develop and work on these strategies applicable to wind blades, considering aspects such as the composition of the materials, applicable legislation, the principal technologies and applications for the reuse and recycling in the wind farms that the company plans to repower in the short term. Work has been conducted along the following lines:

- Support and participation in advanced circular economy strategies linked to the destination of uninstalled wind turbines.
- Participation in the Ain Circular Platform project driven by the Industrial Association of Navarre, the aim of which is to identify opportunities for transformation within the framework of the circular economy, analysing options for new approaches and developments within value chains.
- Participation in the launch of the Renercycle business project, which will work on three possible lines of business linked to the circular economy in wind farms: dismantling and industrial reconditioning of the primary components of wind turbines, recovery of certain raw materials and recycling of materials composed of glass fibres and non-reusable resins.

Digital transformation of the remote site business

The main objective of the project is to focus on the management and optimisation of operator routes. To achieve this, a centralised remote management platform using advanced geolocation and data analysis technologies will be implemented.

This platform will enable efficient route allocation for operators, improving logistics and reducing travel times. In addition, artificial intelligence tools will be integrated to anticipate and address potential obstacles on routes, thereby improving operational efficiency and optimising resources.

Expected benefits include improved efficiency of operations at remote sites, reduced operational costs associated with journeys, and increased satisfaction of both operators and end-users by ensuring more efficient and timely service delivery.

Design and development of a monitoring and control system for electric vehicle charging stations

The Elecnor Group has developed a SCADA system for charging electric vehicles, facilitating the deployment of the infrastructure needed to monitor charging, detect faults and control the power supply in these charging systems. In general terms, the project includes the following actions:

- Collection of information from the facilities where the system is to be developed.
- Requirements engineering for design and implementation.
- Design and development of the electric charging monitoring and control system.

Thus, the aim of the project is to develop a system that integrates the information of the different elements that make up the electric vehicle charging subsystem for public transport, promoting the use of less polluting vehicle fleets, reducing dependence on fossil fuels and the emission of greenhouse gases.

New catenary and electrification system for the railway sector in the Baltic countries (Elecatenar)

This project is part of the railway sector, a booming industry in terms of innovative development and, more specifically, in the field of energy supply for railway lines, which require increasingly sophisticated infrastructures and power systems capable of meeting the energy demand for a continuous service.

The main objective of the project is the electrification of a 350 km long line (160 km/h) by means of static converters (SFC) for the operation of parallel and synchronised substations, i.e., not including neutral zones.

This need is mainly located in a specific technological context, which corresponds to the scarce development of this type of systems in the Baltic countries, as well as the existing limitations of the geographical area itself, which require a high degree of specification at infrastructure level, due to the particular climatology with characteristics of cold, ice and wind that pose a major engineering challenge.

The proposed solution constitutes a unique solution that combines a new concept of electrification by means of static converters for the operation of parallel and synchronised substations, the specific infrastructure designs necessary to meet both the climatological and orographic requirements of the area and the requirements associated with the set of converters, and the definition of a specific power subsystem for SFC that allows power supply from the electricity grid.

Design and development of a new hardware for the installation of power lines using drones

The project aims to improve and optimise the power line construction process in order to ensure a more efficient, safe and sustainable infrastructure. Currently, the construction of power lines is a complex and costly process, with risks associated with worker safety and possible interruptions to the power supply.

The main focus of the project is to use innovative technologies and advanced construction methods to speed up the power line installation process. Solutions such as the use of drones for inspection and mapping of installation areas, the implementation of prefabricated construction techniques to reduce assembly times and the use of more efficient and resistant materials are being explored.

In addition, the aim is to integrate monitoring and control systems into the power lines, enabling more efficient management of the grid and early detection of possible faults or breakdowns. This helps to minimise incident response times and improve the quality of the electricity service.

i-Signal

Audeca, the Group's subsidiary specialising in the comprehensive maintenance of road infrastructures and environmental conservation, has developed an innovative prototype of mobile signage, with which it has automated the tasks of marking and signposting road works. This signage work was carried out by operators who had to park their vans and walk along the hard shoulder, with the risk to their personal safety and to road safety.

The new autonomous mobile sign will travel in the maintenance van. Its operation has been based on commands launched from the user interface in the hands of the operator. The sensors installed and the communication systems designed and implemented in the sign also allow the operator to be kept informed in real time of the situation, both of the sign itself and of its surroundings.

Alhambra

Deimos has developed Alhambra, a traveller services software platform designed to meet the demand for up-to-date information required by today's permanently connected society, boosting the use of public transport by rail and improving the traveller's perception of the quality offered, image and credibility.

In 2023, a new product was added to the Alhambra platform: Alhambra DS, a digital signage system that consists of content library management, template management, scheduling and campaign management, panel management, alarm management, etc.

In addition, new functionalities have been added to Alhambra ISS-PIS, such as management of the catalogue of messages for public address systems and monitors with the possibility of classification with labels, improved announcement modes (incident and emergency), TAP mode, among others.

Maritime Surveillance and Control System (MSCS)

Maritime control and surveillance system. It is a SW C2 Command and Control Platform developed entirely at Deimos Space which forms the core of the maritime solutions.

The MSCS tool has a flexible design based on open, modular and scalable architecture (OSA), and makes extensive use of COTS elements.

Furthermore, this control system is applicable to both civilian and military operations.

GISAL

SmartCity platform that allows the monitoring and control of the public lighting infrastructure, detecting possible deviations in consumption or breakdowns at an operational level and allowing the preparation of consumption and savings reports.

GISAL makes it easier for public lighting managers to create geo-referenced inventories and carry out preventive and corrective maintenance of public lighting infrastructure.

The solution is offered in two modalities: remote management at the head of the electric panel (control panel) and point-to-point remote management, with the capacity to integrate with commercial platforms such as Citytouch, Cimelux, Arelsa, etc.

In 2023, major upgrades were made to the system, focusing on the front-end, and significant improvements to the application were implemented, such as the introduction of new APIs. In the mobile application, improvements were made to the user experience.

All these initiatives have contributed to strengthening the continuity and competitiveness of the system, being a reference in public lighting maintenance systems.

Innova 2023 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 and subsidiaries can apply for funding for their R&D&I projects.

Main indicators:

- Number of proposals submitted: 3
- Number of projects approved: 1 and 1 in request for additional information by the R&D&I committee to the persons responsible for the proposal.

Innova 2023 featured projects

Data collection system for a platform to optimise infrastructure processes through predictive modelling and energy recovery solutions (POPIN)

The POPIN project proposes working towards the recovery of residual energy in sports centres, for which a robust, modular, compact and configurable substation for heat recovery will be developed for different types of sports centres. The substation will integrate all available low-thermal waste energy streams (swimming pool water renewal, grey water, condensing energy from chillers, etc.) to be used as energy source for the heat pumps in charge of thermal production.

Compared to existing ad hoc solutions, the substation will be an industrialised and easily integrated solution with optimised control that will simultaneously meet the requirements of energy efficiency and process optimisation in sports centres.

In addition, as an extension of the substation, a heat pump solution will be developed, adapted to the use of light bulbs at temperatures above the current limits (20°C) as a source of energy, in order to increase their performance.

POPIN solutions will contribute to the reduction of external energy dependence and the decarbonisation of the building stock. They will also help achieve the targets for reducing energy consumption in buildings, in line with the European directive.

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.

Elecnor has collaborated with Multiverse Computing as part of the public-private initiative BIND 4.0, which promotes open innovation to foster interaction between disruptive startups and companies.

The startup provided a quantum random password generator that can be accessed through a real-time, on-demand API. The use of quantum technologies for the generation of random passwords brings an improvement in cyber security through the use of quantum mechanical properties.

In addition, we have participated in the following projects with startups:

- Development of R&D&I tests in road maintenance in the Community of Madrid, together with the company Asimob Artificial Intelligence and IoT for monitoring roads, signposting/marketing and potholes. The software allows vertical signs, automatic inventory updating through image recognition, verification of the correct visibility of each and every sign, automatic detection through sensors and geolocation, among others.

During 2023, the project has continued to progress until the module for monitoring road markings and safety barriers has been fully developed. The results of the collaboration agreement were presented at the 32nd Madrid Road Week, organised by the Spanish Road Association (AEC) and promoted by the Community of Madrid.

- Presentys. Using VR (virtual reality) technology for the acquisition of a standard transformer station simulator.

- Datatons. The goal is to apply an advanced data analytics and artificial intelligence tool for graphic evidence to the Elecnor Group's three health and safety tools: PRP, SegurT and Notific@.

Membership of RDI associations and platforms GRI 2-28

- 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.
- Member of the UNE-CTN140/SC7 subcommittee whose main objective is the adaptation of Eurocode EC-07 at national level.
- Member of the CTN133/SC1 - Infrastructures committee as a stakeholder for the preparation of the specification of GRP fibreglass reinforced polyester poles for telecommunications lines.
- Member of Asociación Nacional de Derivados del Cemento Andece.
- Member of Asociación Española de Fabricantes de Bienes de Equipo Eléctrico de Alta y Media Tensión (Afbel), and member of the board of directors and chairman of the new technologies committee.
- Members of the R&D committees of Spain's Association of Technological Aeronautics, Space and Defence Companies (Teda), the European Association of Remote Sensing Companies, the European Association of Space Companies Eurospace and the Open Geospatial Consortium. Elecnor Deimos chairs the R&D committee of the space sector.
- 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 and actively participates in various working groups in Aepibal, Batteries, Cells and Energy Storage Business Association; AIN, Navarre Industry Association; AEE, Spanish Wind Energy Association and REOLTEC, Innovation Platform within the Spanish Wind Energy Association.

In the Galician Hydrogen Association (AgH2), established this year for the development and promotion of hydrogen projects, Enerfín is one of the original members of the association and is involved in the technology and market task forces and in the preparation of the draft of the action measures of the hydrogen industry sectorial agenda.

- Galician Wind Energy Association (EGA).
- Association of Wind Energy Developers of Castilla y León (Apecyl).
- Enercluster (Wind Cluster of Navarre)
- Enerfic.Platmform

Participation in forums and congresses

- Attendance at the Open Innovation Conference at IESE, a meeting between experts and leaders in innovation.
- Rail Live Congress, an event that brings together all those involved in the railway value chain.
- South Summit Brazil and Madrid, a collaborative space for key players in driving business progress and growth.
- Participation at the seventh edition of the BIND 4.0 programme.
- Participation at the International Euro-Latin American and Caribbean Congress, whose main objective is to investigate and analyse the synergies between Latin America and the Caribbean and the European Union for the creation of a Euro-Latin American cultural space.
- Attendance at DCD Connect Madrid, one of the main forums for the main players in the world of data centres.
- First action of the Public Innovation Procurement Programme of the General Directorate of Roads, the Preliminary Market Consultation, providing innovative solutions to several challenges proposed by MITMA, such as Technologies and Artificial Intelligence for the inspection of road assets, advanced management of Road Safety or the proposal of protection measures for vulnerable users.
- Audeca participated in the 32nd Madrid Road Week, organised by the Spanish Road Association (AEC) and promoted by the Community of Madrid, as sponsors, where the results of the collaboration with Asimob for the automation of road inspections with artificial vision were presented.
- Technical seminar on "Installation and removal of construction site signage", where the Elecnor Group's experience in special cases such as autonomous luminous signage, a new form of traffic management that is safer for workers, was conveyed.

15.9 Responsible management

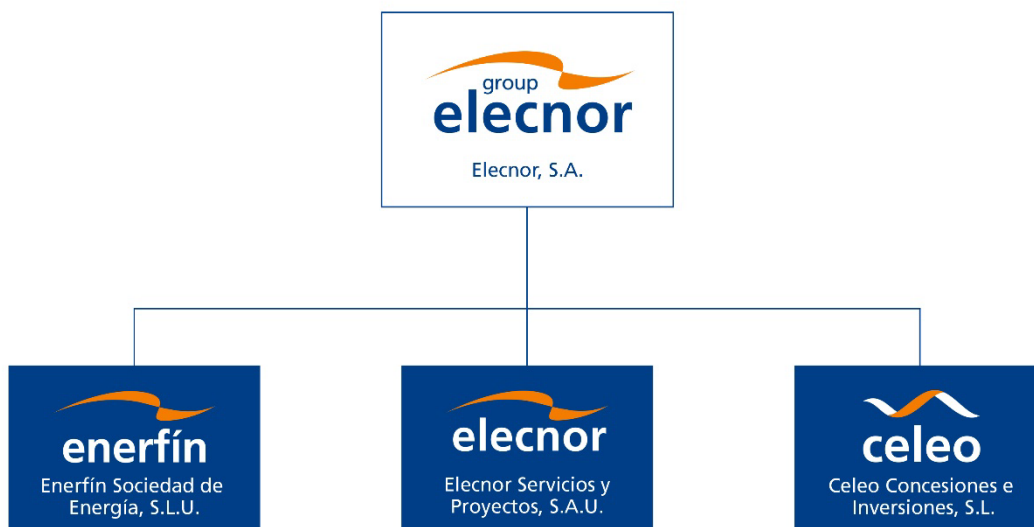
Corporate governance GRI 3-3

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 Commission ("Code of Good Governance")⁸.

Corporate structure

Elecnor, S.A. is the Group's head listed company and the main business 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.

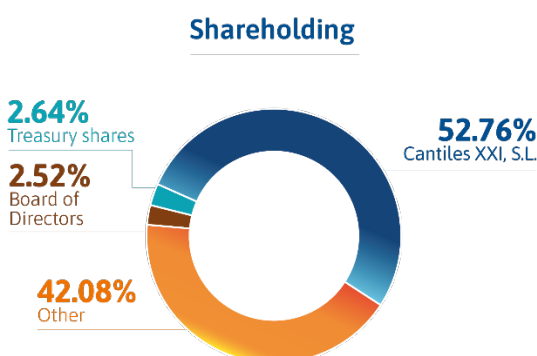
⁸ This information is available under the Corporate Governance section and in the Annual Corporate Governance Report (ACGR) of the Shareholders and Investors section of the Elecnor Group corporate website.



The Board of Directors of the Company informed the Market, by means of an Inside Information communication dated 17 November 2023, of the signing of the agreement for the sale of 100% of the share capital of Enerfín Sociedad de Energía, S.L.U. ("Enerfín"), with Statkraft European Wind and Solar Holding AS (a company belonging to the Statkraft Group), for the acquisition of the entire shareholding of Enerfín which, upon completion of the sale and purchase, will enable it to acquire the status of sole shareholder of Enerfín.

For these purposes, as Enerfín is an essential asset for the purposes of article 160.f of the Revised Text of the Spanish Companies Act, on 24 January 2024 the Extraordinary General Shareholders' Meeting approved the aforementioned transaction, with 99.9997% of the share capital present and represented at the Meeting voting in favour.

Ownership structure



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.

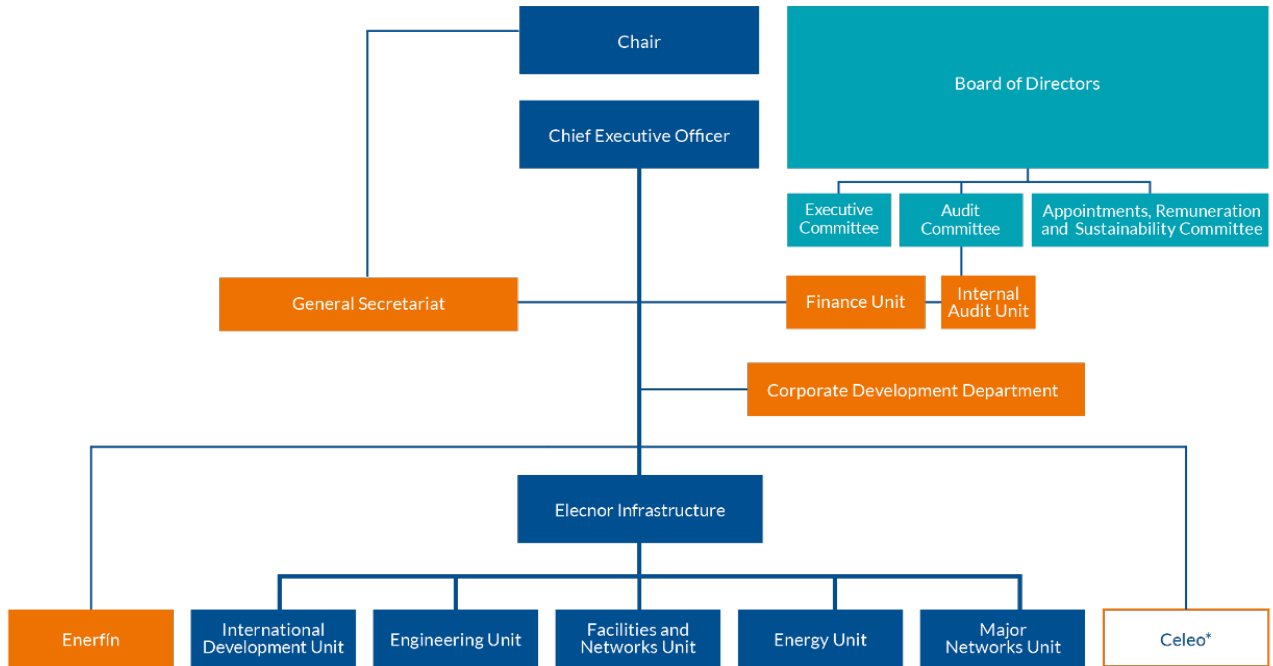
The heading "Other" in the chart includes shareholders with a non-material shareholding (less than 3%).

Governance structure

The governing bodies of the Parent (Elecnor, S.A.) are its General Shareholders' Meeting and the Board of Directors. The Board of Directors has established within its structure the Executive Committee, Audit Committee and Appointments, Remuneration and Sustainability Committee.

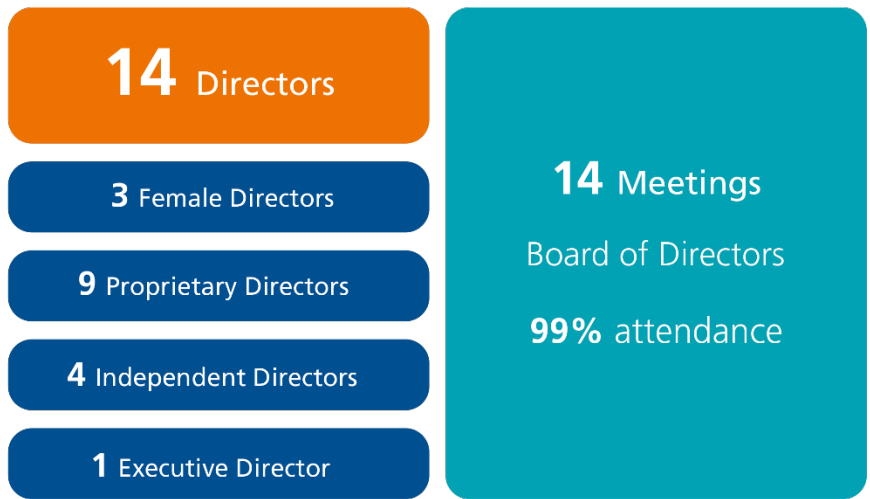
For the second consecutive year, the Ordinary annual General Shareholders' Meeting for 2023 was held, on second call, in "hybrid" format, i.e., with both physical and online attendance of shareholders and their proxies, with 82.53% attendance of the share capital.

Organisational structure at 31 December 2023



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

Board of Directors GRI 2-9, GRI 2-10, GRI 2-11



Director name	Position on the Board	Category	Date last appointed
Jaime Real de Asúa Arteche	President (non-executive)	Proprietary	18/05/2022
Ignacio Prado Rey-Baltar	Vice-Chair	Proprietary	18/05/2022
Rafael Martín de Bustamante Vega	Director and Chief Executive Officer	Executive	23/06/2021
Cristóbal González de Aguilar Alonso-Urquijo*	Deputy- Secretary	Proprietary	17/05/2023
Miguel Cervera Earle	Member	Proprietary	18/05/2022
Isabel Dutilh Carvajal*	Member	Independent	17/05/2023
Joaquín Gómez de Olea y Mendaro	Member	Proprietary	20/05/2020
Irene Hernández Álvarez	Member	Independent	18/05/2022
Juan Landecho Sarabia	Member	Proprietary	18/05/2022
Santiago León Domecq	Member	Proprietary	23/06/2021
Miguel Morenés Giles	Member	Proprietary	18/05/2022
Francisca Ortega Hernández- Agero	Member	Independent	18/05/2022
Rafael Prado Aranguren	Member	Proprietary	18/05/2022
Emilio Ybarra Aznar*	Member	Independent	17/05/2023
Pedro Enrile Mora-Figueroa	Secretary non-director		24/06/2020

* Reappointed for a further four years by resolution of the Ordinary General Shareholders' Meeting of 17 May 2023.

Board of Directors' Committees [GRI 2-9](#), [GRI 2-12](#)

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 same.

During 2023, the Executive Committee maintained its composition since the Board of Directors of the Company, at its meeting held after the Ordinary Annual General Shareholders' Meeting of 17 May 2023, agreed to re-appoint Cristóbal González de Aguilar Alonso-Urquijo as member of the Executive Committee for a period of four years.

Name	Position	Category
Jaime Real de Asúa Arteché	President	Proprietary
Joaquín Gómez de Olea Mendaro	Member	Proprietary
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
Pedro Enrile Mora-Figueroa	Non-Director Secretary	

*Re-appoint on 17/05/2023

Executive Committee	Number	% of total
Executive directors	1	16.7%
Proprietary directors	5	83.3%
Committee meetings	20	

The Executive Committee met 20 times in 2023, with all members attending all meetings.

Key Group matters were discussed at these meetings, such as the principal investment and divestment operations, the progress of the subsidiaries' businesses, the 2023-2025 Strategic Plan and actions regarding sustainability and climate change, among others.

Comprehensive information on the composition and actions of the Executive Committee in 2023 can be found in both the Executive Committee's Annual Report and the Annual Corporate Governance Report. Both documents are available in the "Shareholders and Investors" section of the Group's corporate website.

Audit Committee [GRI 2-16](#), [GRI 2-27](#)

The Audit Committee provides support to the Board in the supervision of financial and non-financial reporting, in 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.

During 2023, the composition of the Audit Committee did not change in terms of members, but has changed in terms of positions. In this regard, the Board of Directors of the Company, at its meeting held after the Ordinary Annual General Shareholders' Meeting of 17 May 2023, agreed, on the one hand, to re-appoint Isabel Dutilh Carvajal as a member of said Committee for a period of four years, and, on the other hand, to appoint Francisca Ortega Hernández-Agero as Chair of the Committee for a period of four years.

In accordance with the above, as of 17 May 2023, the composition of the Audit Committee is as follows:

Name	Position	Category
Francisca Ortega Hernández-Agero**	President	Independent
Miguel Morenés Giles	Secretary	Proprietary
Isabel Dutilh Carvajal*	Member	Independent
Ignacio Prado Rey-Baltar	Member	Proprietary
Irene Hernández Álvarez	Member	Independent

*Re-appointed on 17/05/2023

**Appointed on 17/05/2023 as Chair to replace Irene Hernández Álvarez, as the maximum term of four years legally and statutorily established for performing the duties of Chair has expired, who now holds the position of Member.

Audit Committee	Number	% of total
Independent directors	3	60%
Proprietary directors	2	40%
Female directors	3	60%
Committee meetings	12	

The Committee met 12 times in 2023, with an attendance rate of 100%. Additionally, when deemed appropriate, the Committee has requested that various persons from the company or its Group or external professionals attend meetings, depending on the matters to be discussed, in all cases at the invitation of the Chair of the Committee and to only address those items on the agenda in relation to which they have been summoned.

The Audit Committee has put into practice each of the functions attributed to it by article 5 of its Regulations in 2023, by means of the following main actions:

- Supervision and evaluation of the process of drafting and preparation of financial and non-financial information and of the main risks that may affect the completeness and accuracy of this information and review of the information to be published in the markets.
- Supervision of internal audit and internal control.
- Supervision and evaluation of the risk management system, both financial and non-financial.
- Supervision and evaluation of the external auditor's performance and independence, and submission to the Board of its fee proposal.
- Supervision of the Compliance System and the activities of the Compliance Committee.
- Supervision of compliance with the company's corporate governance rules and internal codes of conduct.
- Supervision of the actions carried out in application of the internal procedure on related-party transactions.
- Review of the main economic conditions and accounting impacts of the sale of the Enerfín group.
- Information to the General Shareholders' Meeting on matters within its competence.

Comprehensive information on the composition and actions of the Audit Committee in 2023 can be found in both the Audit Committee's Annual Report and the Annual Corporate Governance Report. Both documents are available in the "Shareholders and Investors" section of the Group's corporate website.

Appointments, Remuneration and Sustainability Committee

This Committee is in charge, among other functions, of assessing the competencies, know-how and experience necessary in the Board. Additionally, it proposes and reviews the Remuneration Policy for Directors and Management, and reviews the corporate governance system and sustainability of the Company.

The Appointments, Remuneration and Sustainability Committee agreed in 2023 to re-appoint two of its members, Isabel Dutilh Carvajal and Emilio Ybarra Aznar, (the latter being its Chair), thus its composition has not changed during the year, and remains as follows:

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

*Re-appointed on 17/05/2023

Appointments, Remuneration and Sustainability Committee	Number	% of total
Proprietary directors	2	50%
Independent directors	2	50%
Female directors	1	25%
Committee meetings	11	

The Committee met 11 times in 2023, with all members attending all meetings, and with one of the meetings having been held by circular resolution and without meeting. Additionally, when deemed appropriate, the Committee has requested the presence of the Chief Executive Officer and other members of the management team, in all cases at the invitation of the Chair of the Committee and to only address those items on the agenda in relation to which they have been summoned. In particular, the Director of Corporate Development, the Director of Human Resources, the Coordinator of the Sustainability Committee, and the Secretary General and Secretary of the Board have participated in some of the Committee's meetings. Similarly, when deemed appropriate, external advisors or suppliers have participated in connection with certain particularly complex matters within the remit of the Appointments, Remuneration and Sustainability Committee.

The Appointments, Remuneration and Sustainability Committee has implemented each of the duties assigned to it in 2023, inter alia:

- The composition of the Board of Directors and its Committees, having reviewed the category of each of the Directors, concluding that the current categories remain fully in line with their circumstances.
- The selection of Directors and members of the management team, by carrying out a prior analysis of needs of the Board of Directors including competencies, know-how and experience required, all of which was taken into account when compiling proposals and reports submitted to the Board concerning the re-appointment of Directors. Furthermore, in relation to the members of the management team, the Committee has approved a proposal for the appointment of the new Deputy Director of Finance and Internal Audit of the Elecnor Group; and has issued a favourable report on the proposal for the appointment of a Director representing the Company on the Board of Directors of Celeo Concesiones e Inversiones, S.L.

- The positions on the Board and the Committee, having approved the re-appointment of Emilio Ybarra Aznar as Chair of the Committee. Likewise, the Succession Plan for the Chairman of the Board of Directors and the Chief Executive Officer has been updated, and the Succession Plan for the management team has also been reviewed.
- Remuneration of Directors and members of the management team, proposing fixed and variable annual remuneration for the Executive Director and the long-term incentive system associated with the 2023-2025 Strategic Plan. It also prepared the Annual Report on Directors' Remuneration for 2022, which the Board of Directors submitted to the Ordinary Annual General Shareholders' Meeting for a consultative vote and which was approved by a large majority at the meeting held on 17 May 2023, analysed the degree of compliance with the 2020-2022 Strategic Plan for the purpose of calculating the incentive derived therefrom and its distribution by groups of participants as well as the corresponding individual allocation, and analysed various aspects related to the remuneration of employees and members of the management team.
- The review of corporate governance and sustainability; accordingly, it has overseen the actions of the Sustainability Committee analysing the degree of compliance with the Strategic Sustainability Plan 2020-2022 and has favourably reported to the Board of Directors on the new Strategic Sustainability Plan 2023-2025, and has issued a report in connection with the functions of supervising compliance with the Corporate Policies within its remit and reviewing the Corporate Governance system.

Comprehensive information on the composition and actions of the Appointments, Remuneration and Sustainability Committee in 2023 can be found in both the Committee's Annual Report and the Annual Corporate Governance Report. Both documents are available in the "Shareholders and Investors" section of the Group's corporate website.

Diversity of the Board of Directors and Director selection

The Elecnor Group's "Policy for the Selection of Directors and for Board Diversity" accessible on the Group's website, outlining 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, know-how, competencies and gender and so as to ensure that, in general, they do not entail implicit biases that might imply any kind of discrimination.

This Policy was amended in December 2020 in order to adapt it to the reform of the Code of Good Governance approved in June 2020 by the CNMV, and is regularly reviewed by the Appointments, Remuneration and Sustainability Committee in order to make progress in improving this aspect.

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.

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.

Similarly, the Company has had since February 2018 an Equality Plan, which was updated in January 2022, applicable not only to the Board of Directors but also to the management team and all Group staff, which lays down specific actions to be performed 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 15 recommendation of the Code of Good Governance of ensuring that the number of female directors represents at least 40% of members of the Board of Directors, the company intends to continue fostering an increased presence of female directors on the Board so as to fulfil the said Recommendation without affecting the normal functioning of the Board and the suitability of its members as a whole to discharge their duties.

Remuneration policy GRI 2-19, GRI 2-20

On 18 May 2022, Elecnor's General Shareholders' Meeting, at the proposal of the Board of Directors and the company's Appointments, Remuneration and Sustainability Committee, approved the new Directors' Remuneration Policy for the remainder of 2022 after its approval and for 2023, 2024 and 2025, with 96.79% of the share capital present and represented voting in favour.

The current Policy, which continues the previous Remuneration Policy, seeks to ensure that the remuneration system for all Directors —for the performance of both non-executive and executive duties— falls within the framework of the new statutory remuneration system (article 12 of the Bylaws) also approved by the General Shareholders' Meeting held on 18 May 2022, and encourages the attraction, retention and development of the best talent, contributing to the business strategy and to the long-term interests and sustainability of the company.

In that regard, the Policy is governed by the following guiding principles:

- Moderation:** remuneration should be reasonable, in keeping with trends and benchmarks in similar companies, and in reasonable proportion to the company's situation and the economic situation at any given time, taking into consideration, in the case of remuneration linked to the company's earnings, any qualifications that may be included in the external auditor's report and reduce those earnings.
- Proportionality:** Directors' remuneration will be reasonably proportionate to the size of the company, its financial position at any given time and the performance of consolidated profits, as well as to market standards of comparable companies.
- Suitability:** Directors' remuneration will be sufficient to attract and retain Directors with the desired profile and to reward the dedication, qualifications and responsibility demanded by the position, but not so high as to compromise the independence of judgement of non-executive Directors.
- Profitability and sustainability:** the remuneration of the Chief Executive Officer will incentivise performance and professional performance and reward long-term value creation, ensuring alignment with the interests of the company and its shareholders.

- e. **Transparency:** the Policy will be designed, approved and implemented in a manner that ensures adequate transparency. Specifically, the company will make available to shareholders when the General Meeting is called, the reasoned proposal regarding this Policy and the specific Report of the Appointments, Remuneration and Sustainability Committee. Comprehensive information on the preparation, approval or, where applicable, amendment and implementation of the Policy will be included both in the notes to its Annual Accounts and in the company's Annual Report on Directors' Remuneration.
- f. **Protection of shareholders' interests:** the current Policy seeks to set up a system of Directors' remuneration that protects shareholders' interests in the short, medium and long term.

Total remuneration accrued both in the company and in Group companies, by the Board of Directors in 2023 amounted to Euros 5,404.6 thousand (Euros 4,809.8 thousand in 2022), including remuneration deriving from their executive functions (Chief Executive Officer) 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 for 2023, published by the CNMV and on the Group's corporate website.

Remuneration accrued within the Company

Remuneration accrued within Group companies

Director name	Total cash remuneration	Gross profit on vested shares or financial instruments	Remuneration from savings schemes	Other items of remuneration	Total in 2023	Total cash remuneration	Gross profit on vested shares or financial instruments	Remuneration from savings schemes	Other items of remuneration	Group total in 2023	Company + Group total in 2023
Jaime Real de Asúa Arteche PROPRIETARY	494.5				494.5	20.0				20.0	514.5
Ignacio Prado Rey-Balta PROPRIETARY	227.0				227.0	20.0				20.0	247.0
Rafael Martín de Bustamante Vega EXECUTIVE	2,362.5			6.7	2,369.2	20.0				20.0	2,389.2
Joaquín Gómez de Olea y Mendaro PROPRIETARY	207.0				207.0	20.0				20.0	227.0
Cristóbal González de Aguilar Alonso-Urquijo PROPRIETARY	207.0				207.0	20.0				20.0	227.0
Miguel Cervera Earle PROPRIETARY	194.5				194.5	20.0				20.0	214.5
Isabel Dutilh Carvajal INDEPENDENT	202.0				202.0						202.0
Irene Hernández Álvarez INDEPENDENT	186.5				186.5						186.5
Juan Landecho Sarabia PROPRIETARY	164.5				164.5	20.0				20.0	184.5
Santiago León Domecq PROPRIETARY	174.0				174.0	20.0				20.0	194.0
Miguel Morenés Giles PROPRIETARY	227.0				227.0	20.0				20.0	247.0
Francisca Ortega Hernández-Agero INDEPENDENT	187.4				187.4						187.4
Rafael Prado Aranguren PROPRIETARY	164.5				164.5	20.0				20.0	184.5
Emilio Ybarra Aznar INDEPENDENT	199.5				199.5						199.5
Total	5,197.9			6.7	5,204.6	200.0				200.0	5,404.6

Figures in thousands of Euros

Board of Directors' Evaluation GRI 2-18

The company's Board of Directors evaluates annually, 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 corrective measures. The results of these evaluations are reviewed by the Board and the Committees (each with their own results) and, additionally, the Appointments, Remuneration and Sustainability Committee reviews the results of the evaluation of the Board, the Chair, the Chief Executive Officer and the Secretary.

The abovementioned questionnaires include the assessment of areas such as preparation, dynamics and culture of the meetings, monitoring of the matters discussed (among others, strategic issues, ESG, etc.), composition of the Board and its Committees, training of its members, communication between governing bodies, the performance of the duties of the Chair, Secretary and Chief Executive Officer, etc.

Pursuant to recommendation 36 of the Code of Good Governance, it is worth noting that for the 2021 assessment conducted in 2022, the external consultant Russell Reynolds was hired to review and update the assessment system.

The annual assessment for 2022, carried out by the members of the Board of Directors during 2023, has been conducted internally, without the assistance of an external consultant, but using the questionnaires reviewed and used by Russell Reynolds during the previous financial year, and has resulted in the development of a proposed Action Plan for 2023, highlighting the following aspects:

- Regular market and competitor information analysis.
- Make progress with the Board's capability matrix and awareness of the risk map, improving the monitoring of key risks (KPIs).
- Further debate on the Group's medium and long-term strategy.
- Assessment of the adequacy of the composition of the Board and its Committees, taking into account the recommendations of the Code of Good Governance and future regulations on parity.
- Continuous improvement in the provision of information to be discussed at meetings of the Board and its Committees.

The Company is also strengthening the necessary coordination between the different Board Committees.

Progress on the principles of good governance

The endeavour and constant will of the Elecnor Group is to advance and improve in compliance with the recommendations of the Good Governance Code. Thus, it is reported that the degree of compliance at 31 December 2023 with the recommendations of the aforementioned Code was 95%, maintaining the level of 2022.

Since 2021, the Elecnor Group has had an Equity Story as a tool for transparency and market positioning, which provides a summary of its value project and future investment proposal. This document is periodically updated and is published both at the CNMV and on the corporate website.

In December 2023, the Board of Directors of the Company approved the amendment of the Policy on communication of information, contacts and engagement with shareholders, institutional investors, asset managers, proxy advisers and other stakeholders, in order to adapt it to the new Code of Good Practices for institutional investors, asset managers and proxy advisers in relation to their duties in respect of vested assets or services provided, approved in February 2023 by the CNMV.

Risk management GRI 205-1, GRI 2-13

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.

Ultimate responsibility for identifying the key risks and for implementing and monitoring the internal control and information systems lies with the Group's Board of Directors, which is assisted by the Audit Committee in this function of supervising and assessing the risk management and internal control systems.

Notwithstanding the foregoing, the day-to-day management and effective direction of the Elecnor Group's businesses and activities is undertaken by the Chief Executive Officer and the management team who, in the ordinary course of these responsibilities, and through the various business units and organisational structures, identify, assess, appraise and manage the various risks affecting the performance of the Group's activities.

The Elecnor Group's Risk Management System is therefore designed as an integrated, structured and dynamic system, the core elements of which are as follows:

- Identifying risks on an ongoing basis, and assessing and prioritising them in terms of impact and likelihood of occurrence.
- Assessing and implementing the most appropriate strategies for managing the major risks identified on the basis of their risk tolerance levels.
- Identifying and implementing the management and control mechanisms and tools of the main risks and conducting ongoing assessment on 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.

To ensure that risks are properly identified and their management is integrated and coordinated at all levels and in all areas of the organisation, the Elecnor Group has a Corporate Risk Map, which is a structured list of risks in which each one is assessed according to its potential impact (measured by turnover, profitability and efficiency, reputation and sustainability) and its likelihood of occurrence, which determines the inherent risk associated with each event and the effectiveness of the control measures in place, resulting in a residual risk assessment. The result of this assessment exercise, which is reviewed annually, makes it possible to prioritise these risks accordingly and to focus the organisation's resources on supervising and improving the management of the most significant risks.

To ensure better identification and management of the risks identified, the Risk Map is structured into five broad categories:

- **Governance risks.** They primarily relate to risks associated with 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 and reputation).

- **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 notably include risks related to management and attention to changing customer needs and satisfaction, strategy and management related to business partners, changes in the market, industry and competition, laws and regulations, the political or social (geopolitical) situation, changes in exchange rates and interest rates, and climate change.
- **Operating risks.** This chapter covers risks related to the way in which the organisation conducts its activity and administers its resources in accordance with the established processes and procedures. These include, inter alia, 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.
- **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 Director's reports or mandatory reports (Annual Accounts, reports and tax filings, etc.). The risks included in this chapter notably include those related to the process of preparing the financial and non-financial information to be disclosed to the markets.
- **Compliance risks.** These risks are 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. The key risks managed within the framework of the Compliance System include those relating to corruption, money laundering and the financing of terrorism, competition law, taxation, the environment and human, social and labour rights.

Within the framework of the ongoing review process of the risks to which the Group is exposed, this year the Group stepped up its assessment in terms of impact and probability of certain risks, such as those related to sustainability, physical climate risks, geopolitics, instability and legal insecurity and human resources management, among others.

Using the Corporate Risk Map as a basis and integrated as part of the Risk Management System, the Elecnor Group has designed and implemented various management and control systems that provide a more precise identification of the risks associated with certain specific areas of management and an appropriate deployment, monitoring and improvement of the measures established to adequately prevent, detect and mitigate them. Among these systems, during the year the Group continued to make progress in systematising and improving the management of the risks associated with the process of preparing non-financial information.

Similarly, and as part of its Integrated Management System, the Elecnor Group has devised a system, fully aligned with the methodology described for the development, updating and management of the Risk Map, which makes it possible to identify and manage the main risks related to certain processes by means of a periodic review and the establishment and monitoring of action plans. This system complements the initiatives and actions carried out based on the abovementioned corporate Risk Map.

The key areas of management that are covered by these specific management and control systems include project management, compliance, taxation, environmental and health and safety management, preparation of financial and non-financial information and information systems.

The management and control mechanisms and tools identified and implemented for appropriate risk management 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, and share a series of characteristics that define the way in which the Elecnor Group manages, operates and controls its activities:

- Continuous monitoring of risks and operations by the governing body and senior management.
- Organisational structure and allocation of roles and responsibilities in a clear and precise manner and disseminated throughout the organisation.
- Segregation of duties.
- Well-defined power structure in line with the functions assigned to the different organisational levels.
- Development and dissemination of policies and procedures.
- Continuous monitoring and control of operations by the departments comprising the internal audit and control function.

The Elecnor Group's Board of Directors, as part of its general supervisory function, reviews at its monthly meetings the evolution of the Group's main economic figures, the general market situation, and the Group's business position and strategy in order to identify risks in the economic and business environment and adjust its strategic orientation in each case.

Ethical management and regulatory compliance GRI 3-3, GRI 2-23, GRI 2-

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 well-being by deploying infrastructure, energy and services to territories all over the world in order to develop their potential.

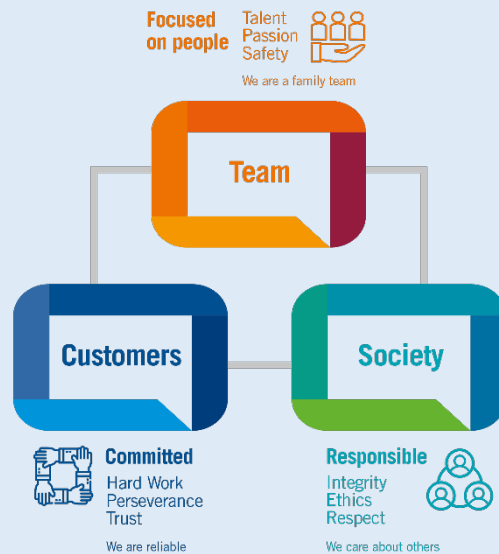
We place engineering and technology at the service of people.

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 its beginnings more than 65 years ago, 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 is based. This has earned it a national and international prestige that allows it to develop projects around the world for public and private customers of the highest level.

This success would not be possible without an absolute commitment at all levels to the highest ethical and compliance standards and best practices in corporate governance, which is a strategic priority and for which the Group makes every effort and dedicates all available resources. The international environment in which it operates, the standards demanded by its related parties and its obligations as a listed entity require it to renew this commitment on an ongoing basis.

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 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. The Elecnor Group takes a zero tolerance approach to malpractice in connection with ethics and integrity.

Compliance System GRI 2-16, GRI 205-1, GRI 205-3, GRI 407-1, 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 and is applicable to all the Group's subsidiaries and employees. The company also trusts that all its business partners will act to uphold its principles and values, which are mainly set out in the Code of Ethics and Conduct and in the Group's Compliance Policy, both of which can be found on the organisation's different websites, as well as on the corporate intranet "Buenos Días".

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



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

To identify these risks, the Group first analyses situations in which legal entities may be criminally liable for certain offences committed by their employees or by certain related parties, pursuant to the provisions of the Spanish Criminal Code in force and equivalent local regulations.

Similarly, for each of these situations, 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, 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, whether these processes are undertaken exclusively by the Group's own employees or with the support of third parties.

With regard to human rights, the Group places special emphasis on working conditions, both for Group employees and subcontracted workers who carry out work on the various projects under way. And with regard to competition law enforcement, efforts are concentrated on monitoring and supervising public tender processes, relations and agreements with competitors and participation in business associations.

The following table includes the main risks associated with these offences potentially imputable to legal persons and that could potentially affect the Group:

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.
Moral integrity and sexual harassment	Inflicting degrading treatment or repeatedly engaging in hostile or humiliating acts amounting to gross harassment and soliciting favours of a sexual nature by bringing about an objectively and seriously intimidating, hostile or humiliating situation.
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 disclosure 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

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 Elecnor 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; establishing procedures for procurement and compliance risk management in the supply chain, payment management, comprehensive management of major projects, setting up temporary business associations/consortia/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; structured and standardised recruitment and selection process; 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.

With regard to employees, the main due diligence measures planned 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, business development and for subcontractors. In any case, all third parties that interact with the Elecnor Group must expressly confirm in writing their knowledge of the content of the Elecnor Group's Code of Ethics and Conduct for Suppliers, Subcontractors and Collaborators and their commitment to complying with it. This Code of Ethics and Conduct for Suppliers therefore constitutes an essential Elecnor Group tool to encourage its suppliers, subcontractors and collaborators to conduct their professional pursuits in accordance with only the best business practices and the highest ethical standards.

As regards the first two groups mentioned in the above paragraph, 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: making a centralised request for contracting or agreement through the legal counsel; obtaining compliance reports on the third party through specialised external databases; collection and analysis of specific compliance questionnaires; obtaining express statements from the third party with regard to its adherence to the Elecnor Group's Code of Ethics and Conduct for Suppliers and to the highest ethical standards; having models of contracts and agreements with specific clauses on integrity and regulatory compliance; gaining approval for the contract or agreement at the highest level following a report prepared by legal counsel; and 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: centralised request for the preparation of contracts through the respective management areas of the various business units; models of contracts and agreements with specific clauses on integrity and regulatory compliance; restrictive powers of attorney for signing the corresponding contracts; and 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 and the General Terms and Conditions of Business, which must be signed by all suppliers, include a specific clause on integrity and compliance, which is frequently reviewed and updated.

Similarly, and whenever circumstances may determine the existence of a higher than normal risk in relation to the supply chain, Elecnor assesses on a case-by-case basis the advisability of bolstering these procedures for suppliers and subcontractors. It does so by requesting, in these cases, that they fill in specific questionnaires on compliance, and analysing, through specialised platforms or other public sources, their profile in matters related to integrity and regulatory compliance.

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 indicators (KPIs) to conduct better monitoring on the correct operation and performance of its Compliance System. The key indicators are concentrated on aspects such as training or awareness-raising, the scope of the review of procedures and controls, the activity of the Ethics Channel and the management of compliance risk associated with third parties. The Group also uses certain indicators with respect to the main compliance risks identified.

The Compliance Committee, which functionally reports to the Audit Committee, is entrusted with the duties of continuously improve and ensuring the correct operation of the Compliance Management System, through its appropriate supervision, monitoring and control. The Committee is headed by the Elecnor Group's Chief Compliance Officer and currently comprises him and nine other members representing the fields of general services, human resources and the Group's various business divisions, primarily through the corresponding legal counsel areas. In 2023, the Compliance Committee held 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 ethics 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 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.

GRI 2-26 The Elecnor Group believes that, in order for a solid corporate culture of integrity and compliance to exist and be present in the daily decision-making process, it is essential to create an environment and conditions in which all people feel motivated and confident to share their opinions, doubts or concerns regarding any situation they may encounter or witness in the context of their relationship with the Elecnor Group.

In order to facilitate this consultation and communication process, the Elecnor Group has set up an integrity and regulatory compliance Internal Reporting System (as part of the Group's Compliance System), which is designed and operates in accordance with the principles of action and commitments assumed by the Elecnor Group, set out in the Policy of the Elecnor Group's *Integrity and Regulatory Compliance Internal Reporting System*.

Without prejudice to other mechanisms and communication channels that may be used by interested parties for the same purpose, since 2011 the Elecnor Group's Ethics Channel has been the main confidential communication channel through which its professionals and/or third parties with a legitimate interest may, in good faith, communicate and report any irregular behaviour or conduct contrary to applicable legislation or to the provisions established in its Code of Conduct and Ethics, the regulations on which it is based and the policies and procedures that implement it, as well as express any doubts in this regard or propose improvements to the existing internal control systems. 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. Access to this channel can be obtained through the following email address codigoetico@elecnor.com or from apartado de correos (P.O. Box) no. 77-48008 (Bilbao, Vizcaya - Spain) (FAO: "Ethics Channel").

In 2023, no complaints were received through the Ethics Channel or other available channels in terms of human rights violations, in particular, violations of freedom of association and the right to collective bargaining, forced or compulsory labour, child labour, discrimination or violation of indigenous rights. Likewise, neither have been any complaints received through the Ethics Channel in connection with corruption, bribery or money laundering.

The six complaints received in the year through the Ethics Channel refer mainly to labour-related issues, and were handled by the relevant persons belonging to the Compliance Committee. At the time of completing this Report, there were no complaints pending resolution.

Actions in 2023

- Renewal for a further 3 years (new effective date until April 2026) of the certificates issued by AENOR attesting compliance of the Elecnor Group's Compliance System with the requirements of the UNE-ISO 37001 "Anti-bribery management systems" and UNE 19601 "Criminal compliance management systems" standards.
- Continuing the process of rolling out improvements in compliance risk management and due diligence procedures in relation to third parties (mainly business partners, suppliers and subcontractors), notably including:
 - Launch and deployment of the digital platform for the application and authorisation of Temporary Business Associations, Consortia and Joint Ventures (eUTES), which has made it possible to integrate the tools and procedures established for the analysis of business partners from a regulatory compliance and integrity perspective as an essential part of the process.
 - Incorporation of a new business information solution for companies that improves the analysis capabilities of third parties and, in particular, of related persons (group of companies, shareholders, directors, key staff, etc.).

- Progressive consolidation and enhancement of capabilities for proper analysis of third-party compliance risk (extension of the use of the specialised third-party compliance risk profile reporting solution and improvement of the analysis and reporting structure).
 - Requesting and obtaining (since January 2022) from suppliers and subcontractors registered on the Group's procurement platform their express acceptance of and compliance with the Elecnor Group's Code of Ethics and Conduct for Suppliers, Subcontractors and Collaborators. By year-end 2023, more than 19,300 suppliers had expressed their acceptance and adherence to it.
- Adaptation of the Elecnor Group's Integrity and Regulatory Compliance Internal Reporting System ("*Ethics Channel*") to the requirements of Law 2/2023 on Whistleblower Protection (transposition of the EU "*Whistleblowing Directive*"), and in particular:
 - Review of the principles of action and commitments that govern and inspire the operation of the system and development, approval and dissemination of the Policy of the Elecnor Group's *Integrity and Regulatory Compliance Internal Reporting System*.
 - Review of the system for managing communications received through the Elecnor Group's Ethics Channel and development, approval and dissemination of the *Procedure for managing communications received through the Elecnor Group's Ethics Channel*.
 - Appointment by the governing body of the person responsible for the Elecnor Group's Integrity and Regulatory Compliance Internal Reporting System.
 - Redesign of the corporate website to improve visibility and facilitate access to the Ethics Channel.
 - Compliance Training: [GRI 205-2](#)

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 were part of the Group's workforce and who have received this kind of training in the last 3 years (since the end of 2020), broken down by professional category and geographical area:

2023

Geographic area	Management			Executive			Technician		
	No. employees	%	Hours	No. employees	%	Hours	No. employees	%	Hours
Spain	4	1	8	60	0.94	120	334	0.89	668
Europe	0	0	0	1	0.01	2	9	0.03	18
America	0	0	0	3	0.05	6	16	0.04	32
Africa	0	0	0	0	0	0	16	0.04	32
Asia	0	0	0	0	0	0	0	0	0
Oceania	0	0	0	0	0	0	1	0	2
Total (*) (**)	4	1	8	64	1	128	376	1	752

2022

Geographic area	Management			Executive			Technician		
	No. employees	%	Hours	No. employees	%	Hours	No. employees	%	Hours
Spain	7	0.87	11	201	0.97	260	299	0.96	574
Europe	0	0	0	2	0.01	3	2	0.01	4
America	1	0.13	1	2	0.01	3	2	0.01	4
Africa	0	0	0	2	0.01	3	7	0.02	14
Asia	0	0	0	1	0	1	0	0	0
Oceania	0	0	0	0	0	0	0	0	0
Total (*) (**)	8	1	12	208	1	270	310	1	596

2021

Geographic area	Management			Executive			Technician		
	No. employees	%	Hours	No. employees	%	Hours	No. employees	%	Hours
Spain	126	96%	158	108	89%	154	224	93%	446
Europe	2	2%	3	3	2%	5	5	2%	10
America	1	1%	1	6	5%	8	2	1%	4
Africa	1	1%	1	1	1%	1	8	3%	16
Asia	0	0%	0	2	2%	3	0	0%	0
Oceania	0	0%	0	1	1%	1	2	1%	4
Total (*) (**)	130	100%	163	121	100%	173	241	100%	480

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

(**) Includes a total of 385 employees in 2023 (287 in 2022 and 264 in 2021), mainly included in geographical area "Spain" and professional category "Technician") who have joined the Elecnor Group in each one of these years and who have received specific training on compliance as part of the on boarding phase training.

During 2023, in addition to other initiatives developed by the Group's various organisations and subsidiaries, the following training activities were carried out:

- i. A total of 59 Elecnor Group professionals (mainly legal counsel, administration, purchasing and people involved in the application and authorisation process for Temporary Business Associations, Consortia and Joint Ventures) have received specific training on the analysis and management of third-party compliance risks.
- ii. Furthermore, a total of 385 new employees have completed during the "onboarding phase" specific training in compliance through the corresponding digital platform, training which is compulsory for Structure staff joining any of the organisations domiciled in Spain. This training develops the main concepts of compliance, the risks in this area to which the organisation may be exposed, including risks such as corruption, competition and human rights, among others, and the main elements that make up the Elecnor Group's Compliance System.

Additionally, during 2021 and 2022, around 465 professionals, working both in Spain and in foreign organisations, received specific training in antitrust matters. For the preparation and delivery of these training sessions, the company partnered with a specialised firm (Deloitte).

Likewise, with regard to on-boarding training, in 2021-2022, a total of around 550 new employees in the organisations domiciled in Spain completed the compliance training module specifically designed for this phase of the integration process in the Elecnor Group.

The members of the Board of Directors receive regular training in various areas of their responsibility. With regard to compliance, and without prejudice to any specific training sessions that may be held, in 2023 "compliance pills" were shared at 4 of its meetings on various compliance issues (corruption, politically exposed persons (PEPs), etc.). [GRI 2-17](#)

- Launching and completion of the initial phase of the campaign to confirm commitment/adherence to the Group's principles and values (Code of Ethics and Conduct and related policies) by Structure staff both national and international. In January 2023, the Group's Chief Executive Officer launched the corresponding communication to the target group of this campaign and almost 3,600 members of the organisation formally renewed during the year their commitment to carry out their responsibilities in accordance with the highest ethical and compliance standards. The Group plans campaigns of this nature in a multi-annual frequency with the scope it deems appropriate at any given time to enhance the commitment of its employees to ethics, integrity and compliance.
- Designing, developing and publishing both on the Group's website and corporate intranet ("*Buenos Días*") interactive infographics that summarises the core areas of the Elecnor Group's Compliance System ("*Compliance at a glance*") to help and support the Group's dissemination and promotion of its principles and values and the main elements of the abovementioned system to both its staff and third parties.
- Launch of the project for the design of a long-term compliance training plan and for the development of dynamic and interactive training materials to facilitate the process of understanding and assimilation of the main risks and behavioural guidelines to be considered in this area.
- In line with its commitment to continuous improvement and alignment with best practices in compliance and risk prevention in the field of competition law, an assessment was carried out, with the assistance of a specialised firm (Deloitte), of the design, deployment and implementation of the different processes, procedures and specific controls for the prevention and detection of competition risks currently in operation, identifying new opportunities for improvement that are being implemented. Deloitte's expertise has also been used to improve and update knowledge of the latest trends, standards and requirements for competition compliance systems.
- Reviewing and strengthening the procedure for participation in associations.
- Diagnosis, with the support of a specialised firm, regarding the Elecnor Group's degree of exposure to risks related to the field of international sanctions and export controls and improvement of existing procedures for their proper identification and management.
- Continuous improvement of 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.

- Executing the *IE-Elecnor* work plan Observatory on Sustainable Compliance Cultures, by the Elecnor Foundation, notably featuring:
 - Publication and presentation of the study on "*Compliance and sustainability practice and policies in Latin America - case studies from Brazil, Chile and Mexico*".
 - Recording and broadcasting of new videopodcasts ("*Compliance Matters: We care about sustainable future*") 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. Three videopodcasts have been released throughout 2023.
 - Continuous improvement of the content of the Observatory's website (articles written by compliance experts, compliance pills...)

Goals in 2024

In 2024, the work of the Elecnor Group will be continued in relation to the following goals in terms of compliance, among others:

- > Finalising the roll-out process in different organisations of the enhancements developed and implemented in 2022 and 2023 in relation to compliance risk analysis and third-party due diligence procedures.
- > Development and deployment of the long-term compliance training plan and design, development and implementation of the training initiatives planned for 2024 (development of new training materials and implementation of at least one training campaign).
- > Review and update of the compliance training module in the "on-boarding" phase and of the systematic monitoring of its effective operation.
- > Improving the systematic approach to the design, development and implementation of awareness-raising initiatives in the field of compliance.
- > Development, implementation and deployment of the improvement opportunities identified in 2023 in relation to the processes, procedures and controls in place for risk management in the area of competition law and international sanctions and export controls.
- > Analysis and adaptation of the antitrust compliance system to the requirements of the UNE 19603 *Compliance management systems in free-competition matters* published at the end of 2023.
- > Improving the system for managing risks related to the defence and protection of human rights.
- > Continuation of the consolidation and improvement of the Group's Compliance System at the various subsidiaries in accordance with the "Compliance System Rollout Plan".
- > Development and implementation of the scheduled activities of the *IE-Elecnor Observatory on Sustainable Compliance Cultures*.

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 2022 and 2023, the Group tightened its controls in relation to its participation in industry associations with a view to preventing and reducing related risks in the field of competition law, such as mainly accepting or implementing recommendations or collective decisions that could limit competition or exchanging commercially sensitive information. [GRI 2-28](#)

Committed to fighting corruption, bribery and money laundering [GRI 205-1](#)

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 Elecnor Group in law or in fact, enabling them, within the scope of their respective functions and responsibilities, to detect and prevent practices that might constitute acts of corruption or bribery.

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.

The Elecnor Group, as established in its *Anti-Corruption Policy*, adopts a position of strict political neutrality and does not make donations to any political parties, political candidates, federations, coalitions, voter groups or foundations that serve as a vehicle for political contributions. [GRI 415-1](#)

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 guiding principles by its employees and partners, 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 the 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 since the end of 2018, according to a pre-established schedule.

With regard to money laundering, the corresponding associated risks are identified among those monitored by the Elecnor Group's Compliance System, as stated above. 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 suppliers 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 these risks, which are subject to ongoing review and improvement to ensure that they operate correctly. As part of these procedures, the Group identifies those situations and transactions from which a higher exposure to corruption risks may arise and applies enhanced due diligence measures in such cases.

No incidents of corruption or money laundering have been identified in 2023. In any case, and following its due diligence procedures with respect to third parties, the Group assesses — should potential indications of malpractice by third parties be identified— whether or not it is appropriate to start or continue the corresponding business relationship, taking the appropriate measures.

Committed to upholding competition law [GRI 415-1](#), [GRI 206-1](#)

The Elecnor Group seeks to compete effectively in all the countries in which it operates, within the legal framework and without the risk of violating competition law.

Under no circumstances shall the Elecnor Group and/or its employees undertake any isolated or concerted initiative that violates antitrust law, a principle that is also applicable to any natural or legal person with whom the Group establishes a business relationship. In particular, and as established in its Antitrust Policy, the Elecnor Group strictly prohibits:

- Entering into agreements or engaging in concerted or consciously parallel practices between competitors which, by their object or effect, may restrict competition between economic operators (e.g., fixing prices or other trading conditions, sharing markets or customers, limiting or controlling production, etc.).
- Anti-competitive public or private bid rigging, whether through unjustified joint ventures or subcontracting, making offers of cover, accompaniment, courtesy, etc., or any other means.
- Accepting or implementing collective recommendations or decisions issued or adopted by associations that could restrict competition between economic operators.
- Exchanging commercially sensitive information with competitors or third parties, including individual and disaggregated data on strategic variables such as current or future prices, discounts, quantities or present and future sales volumes.
- Carrying out actions that could constitute abuse of a dominant position by means, among others, of setting unfair or discriminatory prices or commercial conditions, or unwarranted refusal or restriction of supply.
- Engaging in acts of unfair competition which, due to affecting the public interest, could potentially affect the general interest (for example, acts of fraud and deliberate misleading, aggressive practices, selling at a loss, breach of secrecy, unlawful advertising, etc.).

In order to promote respect for these principles of action by its employees and business partners, the Elecnor Group is firmly committed to disseminating its commitments and requirements in this area, to training and to establishing appropriate communication channels with its employees and other interested third parties.

Likewise, and particularly with regard to this area, the Elecnor Group is committed to ensuring the utmost diligence in the context of public procurement, avoiding any type of irregularity that could be interpreted by the competent authorities as a manipulation of the procedure and to collaborating with official bodies, such as the Spanish National Commission on Markets and Competition (CNMC) and other competition authorities.

In order to prevent, detect and adequately manage any risk relating to competition to which the organisation might be exposed, the Elecnor Group has set up an antitrust compliance system (integrated in the Group's overall Compliance System), fully effective and subject to a continuous review and improvement process to ensure its proper operability and its alignment with the best practices in the matter.

Human Rights GRI 3-3, GRI 407-1, GRI 408-1, GRI 409-1, GRI 411-1

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 Sustainability Policy and its Code of Ethics and Conduct, 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.

In the context of its ongoing management of the risks to which it is exposed, the Elecnor Group identifies the main fields in which human rights risks may materialise with a view to establishing the appropriate measures to prevent possible human rights violations and to mitigate any impact that may arise in this regard. As a result of this analysis, the Group attaches particular attention and focuses its efforts on fostering and defending non-discrimination and equal opportunities regardless of people's characteristics, the abolition of forced labour and child labour, health and safety, respect for the rights of local communities, with special care for the most vulnerable groups, such as ethnic minorities and indigenous populations, and the recognition and defence of the freedom of assembly and association of its workers.

In particular, and as regards the above-mentioned local communities, the Group has a *Local Community Relations Policy* that outlines its commitment to fostering a culture of respect, generating relationships of trust and furthering the generation of value by promoting specific initiatives and establishing an ongoing dialogue with these communities in the countries and environments in which it conducts its business. In that regard, a special effort is made to identify the communities impacted by the projects; to assess the environmental, social and economic factors that may result from their activity and have an effect on these communities; to engage in dialogue, inform and encourage the participation of the communities in the various stages of the projects through different consultation processes; to respect the values, traditions and cultures of the local communities; and to responsibly manage the positive and negative impacts that may materialise.

The Group manages the abovementioned human rights risks through various initiatives and procedures integrated into its operations and activities. These mechanisms notably include its labour procedures, the primary goals of which are to ensure a fluid and honest dialogue with its employees, to guarantee fair working conditions in line with applicable legislation, and to ensure non-discrimination and equal opportunities; the procedures and controls in place in the field of health and safety based on the principle of zero accidents; the identification and registration of its workers and of the people who work on its projects through the corresponding subcontractors, as well as their ongoing and appropriate training; and dialogue with local communities, the implementation of initiatives to protect them from the effects that may arise from the projects and to improve their situation.

Furthermore, as regards third parties that collaborate with the organisation in carrying out its activities, the Elecnor Group sets up various due diligence measures, already mentioned above, the primary goals of which include acquiring adequate knowledge of the performance of its business partners in terms of human rights and fostering respect for them throughout the entire supply chain.

In particular, the Code of Ethics for Suppliers, Subcontractors and Collaborators states, among other matters, that the Group's business partners must maintain working practices and conditions with their employees that are respectful of the relevant national and international regulations and acknowledge their workers' freedom of assembly and association and right to collective bargaining, as well as reject forced labour in all its forms, any manifestation of abuse of authority and the use of child labour.

No situations have been identified in 2023 in which these rights have been deemed to have been violated or compromised.

Although, as mentioned throughout this section, the Elecnor Group adequately manages risks related to human rights, during 2024, as part of the continuous improvement of its processes and procedures, it plans to carry out a more systematic analysis of these in order to identify potential improvements to these procedures in accordance with best practices in this area.



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-corruption 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 has 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, which is available on the Group's corporate website. 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 governing 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.

GRI 207-4 In 2023, the Elecnor Group has submitted the 2022 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	2022	2023		Total
		Continuing operations	Discontinued operations	
Abu Dhabi		351		351
Germany	-26	178		178
Angola	10,701	6,158		6,158
Algeria	-75	-133		-133
Argentina	1,629	1,659		1,659
Australia	-7,119	-66,719	-2,830	-69,549
Belgium	-3,655	-28		-28
Bolivia	147	501		501
Brazil	75,280	22,606	35,429	58,035
Cameroon	-5,623	-2,822		-2,822
Canada	6,229		10,253	10,253
Chile	14,023	11,881	-1,070	10,811
Colombia	-21	-1,733	-807	-2,540
Ivory Coast	2,630	773		773
Denmark		556		556
Ecuador	-2,072	583		583
El Salvador	165	-100		-100

Spain	7,659	73,290	31,306	104,596
United States	11,996	21,845	-2,351	19,494
Philippines	-31	-275		-275
Finland	1,011	588		588
Ghana	-2,006	1,693		1,693
Guinea	-124	-301		-301
Honduras	1,763	7,693		7,693
Italy	2,263	10,218	-1	10,217
Jordan	-691	102		102
Kuwait	-25	-12		-12
Lithuania	7,211	12,036		12,036
Morocco	-1,616	15,148		15,148
Mauritania	-600	98		98
Mexico	9,860	-32,090	-550	-32,640
Mozambique	-1,345	-673		-673
Norway	4,800	3,589		3,589
New Zealand		103		103
Oman	2,743	753		753
Panama	5,102	5,721		5,721
Peru	16,164	213		213
Portugal	683	3,346		3,346
United Kingdom	5,871	5,035		5,035
Dominican Republic	3,952	-5,069		-5,069
Romania	79	90		90
Senegal	-1,496	-408		-408
South Africa	60			
Uruguay	536	2,761		2,761
Venezuela	-40	-129		-129
Zambia	-79	-1,315		-1,315
Total	165,913	97,761	69,379	167,140

For figures for 2023, see Note 7 of the Notes to the Consolidated Annual Accounts attached to this Directors' Report.

Payment of income tax

Figures in thousands of Euros

Country	2022		2023	
		Continuing operations	Discontinued operations	Total
Angola	4,257	1,197		1,197
Argentina	113	25		25
Australia	4,685	2,359		2,359
Belgium	29			
Bolivia		24		24
Brazil	16,408	5,741	9,941	15,682
Cameroon	200	1,153		1,153
Canada	92		138	138
Chile	-696	2,088		2,088
Colombia	515	755		755
Ecuador	397	654		654
El Salvador	29			
Spain	8,378	16,034	3,538	19,572
United States	1,564	7,607		7,607
Finland	51	44		44
Ghana	1	30		30
Guinea	5	95		95
Honduras	38	88		88
Italy	322	1,401		1,401
Jordan	5			
Kuwait	46	16		16
Lithuania	127	374		374
Mauritania	315	23		23
Mexico	3	8,410		8,410
Mozambique	5	25		25
Norway	-1,053	2,403		2,403
Panama		30		30
Peru		-233		-233
Portugal	662	683		683
United Kingdom	687	917		917
Dominican Republic	18	793		793
Romania	10	10		10
Senegal		2		2
Uruguay	107	499		499
Venezuela		1		1
Total	37,320	53,280	13,617	66,897

For figures for 2023, see Note 7 of the Notes to the Consolidated Annual Accounts attached to this Directors' Report.

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 2022, and to payments on account of taxes accrued in 2023 which will be settled in 2024.

Public grants received GRI 201-4

In 2023, the Elecnor Group received public grants amounting to Euros 4,117 thousand, compared with Euros 3,613 thousand in the previous year, as detailed below.

Figures in thousands of Euros

Country	2022	2023
Spain	2,531	2,878
Canada	130	-
Italy	99	60
United Kingdom	99	245
Portugal	744	924
Romania	10	10
Total	3,613	4,117

15.10 Social impact GRI 3-3

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 in the various countries in which they operate.

Value generation

Direct financial value generated and distributed GRI 2-28, GRI 201-1

The information 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	2022	2023
Direct economic value generated	3,714,068	4,168,359
Revenue ¹	3,714,068	4,168,359
Distributed financial value	3,573,529	4,032,505
Operating costs ²	2,454,755	2,802,106
Personnel expenses ³	984,095	1,059,903
Payments to capital suppliers ⁴	96,580	103,048
Tax contribution ⁵	37,320	66,897
Investment in the community ⁶	779	551
Retained financial value	140,539	135,854

Source. Figures from the income statement in the Consolidated Annual Accounts for 2023, except for dividend payments and income tax payments shown in the statement of cash flows included in the Consolidated Annual Accounts.

For 2023 data, see Note 7 of the Notes to 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 22,000 people in over 40 countries, people are the main asset for the Elecnor Group, being crucial to the optimum execution of its activities.

At the end of 2023, the Group's workforce had increased by 215 people (up 1% on the previous year).

Workforce	2022	2023	Changes
Domestic	11,210	11,746	5%
International	11,138	10,817	-3%
Total	22,348	22,563	1%

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

Local employment

Location	2022		2023	
	Employees	Local	Employees	% local
Spain	10,425	93 %	10,914	93 %
Europe	1,140	78 %	1,340	77 %
America	6,694	98 %	5,988	91 %
Africa	2,259	94 %	1,572	92 %
Asia	93	45 %	12	36 %
Oceania	203	86 %	715	96 %
Total	20,814	93 %	20,541	91 %

Procurements from local suppliers GRI 204-1

As described in the chapter on Operational Excellence of this NFIS, the Elecnor Group is focused on the ongoing optimisation of the supply chain. In this sense, and whenever possible, priority is given to contracting local suppliers from the countries where the projects are carried out in order to promote the economy of these countries.

Below is the percentage of the volume of purchases made from local suppliers:

	2022	2023
Spain	92%	86 %
Brazil	100%	100 %
Chile	74%	75 %
United States	100%	100 %
Mexico	83%	100 %
United Kingdom	79%	85 %
Other	77%	80 %
Total	89%	86 %

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 2023, the dividend yield has been increased compared to the previous year. The dividend yield is calculated on the closing share price of the previous year.

Stock market indicators	2022	2023
Closing share price (€)	€10.60	€19.55
Dividend yield	3.50 %	4.10 %

In 2023, two dividends were paid to shareholders: a supplementary dividend against 2022 profit in a gross amount of Euros 0.36053065 per share (Euros 0.37040598 including the pro-rata distribution of treasury shares); and an interim dividend against 2023 profit in a gross amount of Euros 0.06572862 per share (Euros 0.06751654 including the pro-rata distribution of treasury shares).

Elecnor Group social action GRI 203-1, GRI 203-2, GRI 413-1

The Elecnor Foundation is the main vehicle through which the Group carries out its social action.

In 2023, the Elecnor Group donated a total of Euros 534,089 to various associations, foundations and non-profit entities to support a range of social causes (Euros 779,126 in 2022). Of that amount, the Elecnor Group contributed Euros 400,000 to Elecnor Foundation.

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's mission has been to contribute to the progress of society through the implementation of projects that help improve people's living conditions and the conservation of the environment with strong values for all its actions, focused on:

- The design and construction of water and energy infrastructures in those communities that need them most, always respecting the environment and focusing on innovation and sustainability.
- Supporting training and research to nurture the professional projection of young people, stimulating relations between business, public institutions and the educational sector.

It is worth highlighting that, since its creation, the Elecnor Foundation has signed numerous collaboration agreements with NGOs, universities and training centres, private companies and public bodies, with a view to combining efforts, know-how and experience to achieve the best results and to progress in meeting the SDGs.

As such, the Foundation has been present in Spain, Honduras, the Dominican Republic, Chile, Uruguay, Peru, Nicaragua, Mexico, Brazil, Cameroon, Ghana, Angola, Senegal and the Democratic Republic of Congo.

Since it was first set up, the Elecnor Group has donated funds amounting to Euros 8.3 million. Moreover, the Foundation has obtained other funds totalling Euros 5.9 million. Accordingly, the Elecnor Foundation has led projects worth a total of Euros 14.2 million.

In 2023, the Foundation invested Euros 1.4 million in the various projects (622,195 in 2022).

Social infrastructure projects

In 2023, the Elecnor Foundation has focused on the following projects:

- > *Health Energy, Senegal*

The Elecnor Foundation, in conjunction with the NGO Manos Unidas, has implemented this project at the Saint Jean de Dieu Hospital, located in Thiès (Senegal), with the aim of introducing a more efficient energy consumption system that allows for cost savings and, in turn, makes it possible to acquire new machinery for the detection and treatment of diseases.

This hospital is recognised for its universality, caring for all patients free of charge and without discrimination, fostering respect and equality. Nevertheless, the obsolescence of its electrical installations entails a high risk of power supply disruption, which hampers the work of the doctors and nurses and puts the lives of their patients at risk, while at the same time generating high maintenance costs.

This project, launched in January 2023, consisted of a 250 kilowatt PV solar installation that will reduce the hospital's monthly electricity bill with panels fixed to the hospital's roof that provide between 40% and 50% of the hospital's monthly electricity consumption. Equipped with a remote management system that allows the level of electricity consumption and the quota of each service to be displayed in real time, it will enable savings to be made that will then be redirected to other investments.

During construction, the hospital's maintenance team has been trained to be able to maintain and operate the PV system in the best possible conditions and to obtain the highest possible yield from the panels.

- > *H₂OMe, Brazil. Water, electricity, health and education for the Quilombola community*

The Quilombola community is made up of 290 people who live in the municipality of Óbidos, in the Brazilian state of Pará. Its public school, which caters for 95 children, has to collect water by hand from an Amazon tributary and has serious power supply problems.

H₂OMe Muratubinha, launched in June 2023, is an innovative project that provides a change in the quality of life of families in the Muratubinha community. Its main objectives are to provide access to renewable energy, to drinking water, to offer a medical post to families, as well as to build a social space for the development of various educational and audiovisual activities.

- > *Sunpower health, Mozambique. Access to photovoltaic energy at El Carmelo hospital*

The Elecnor Foundation, together with the Daughters of Charity of San Vicente de Paul, is going to develop this project, co-financed with the NGO Manos Unidas, whose objective is to improve health care in the provinces of Gaza and Inhambane, as well as to guarantee the economic sustainability of the Carmel Hospital in Chokwe by installing photovoltaic energy.

The Carmel Hospital was established as a tuberculosis treatment centre and is now a centre of reference for the whole country. Malnutrition, malaria, AIDS and tuberculosis, along with chronic diseases such as diabetes, are the daily struggles faced by the centre's doctors. Today they treat 8,900 people with various diseases, another 3,000 people with chronic diseases and 1,700 people with tuberculosis.

The expected results of the photovoltaic installation on the hospital and laboratory roofs are a reduction in energy consumption, which will reduce dependence on the unstable electricity grid, savings in costs associated with grid consumption (estimated savings of 68%), improved energy efficiency and a reduction in carbon emissions.

Training and research projects

In the field of training and research, the Elecnor Foundation has developed the following initiatives

- > 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. Its aim is to foster the culture of compliance and sustainability with a special focus on small and medium-sized enterprises.

This year, the following actions were performed:

- Continuation of "Compliance Matters", a video podcast channel to deliver a 360-degree view of the world of compliance, featuring leading professionals. This channel is available on digital audio platforms.
 - Publishing articles and compliance information shorts on the Observatory's website.
 - Publication and presentation of the "Compliance and Sustainability in Latin America" report, which highlights the high level of compliance with compliance and sustainability regulations in leading companies in Brazil, Chile and Mexico.
 - Organisation of the event "AI in business: opportunities and ethical challenges".
- > Corporate Leadership in Entrepreneurship and Innovation, Deusto Business School Spain

The Elecnor Foundation has a collaboration agreement with Deusto Business School and Icade Business School to develop this programme, which includes the most innovative entrepreneurial initiatives of major corporations explained by the executives who have led them.

This year, the graduation of the 2022/2023 graduating classes of the Executive Education Programme took place, including two people from Elecnor, and was sponsored by the CEO of the Elecnor Group.

- > Improving in Emotional Prevention

This educational project on emotional risk prevention is undertaken through the digital environment and classroom activities. Growing in Emotional Prevention is intended for 3rd, 4th and 5th year Primary School pupils and their teachers.

By December 2023, some 40,100 children in the Community of Madrid, Castile-La Mancha, Extremadura and the Autonomous Community of Navarre will have benefited from this educational project.

- 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 the life, 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.
 - > Specialist course in medium- and low-voltage electrical installations. Vocational training at Colegio Salesianos Deusto.

The eleventh edition of this course has been organised this year, lasting 131 hours.

It is worth noting that the facilities where are trained are also used for the training and recycling of Elecnor workers.

- > Ingenia store - Polytechnic University of Madrid. Spain

Collaboration between the Elecnor Foundation and the Foundation for the Promotion of Industrial Innovation to support research into electrical systems based on "ingenia-store" renewable energies.

Within the collaboration between the Elecnor Foundation and the Electrical Engineering Area of the ETSII-UPM in relation to the subject "Engineering an electrical system", it was agreed to carry out a three-year project that aims to incorporate the study of storage systems with lithium batteries linked to the production of electrical energy with renewable sources into the development of this subject.

- > Advanced qualification in renewable energies. Dual vocational training.

This initiative is intended to train students as professionals specialised in Elecnor's own activities, so that they can become site managers in the future. The aim of this vocational training is to provide students with knowledge through apprenticeships both at school and in companies.

In 2023, three students completed their studies and internships at the Astexol solar thermal power plant and various substations. Two of them have been hired at Elecnor's Southern Branch.

- > 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 three scholarships, acknowledging the talent of students who have developed their work in various areas of knowledge linked to the Elecnor Group's activities.

- > Agrovoltaic Chair ETSIAMN, Polytechnic University of Valencia

The Agricultural Engineering and Natural Environment Faculty (ETSIAMN) of Valencia's Polytechnic University together with the Department of Agriculture, Rural Development, Climate Emergency and Ecological Transition are the two institutions that have promoted the creation of an Agrovoltaic Chair.

The main objective of the Chair is to promote research, development and implementation of agrovoltaic systems. These systems combine PV solar energy production with agricultural activity, allowing dual use of the land and maximising its productivity.

Some of the specific objectives of the Chair are:

- Research and develop technologies and methodologies for the implementation of efficient and sustainable agrovoltaic systems.
- Promote the education and training of professionals in agrovoltaics.
- Promote the transfer of knowledge and technology between academia, the business sector and farmers.
- Conduct economic, social and environmental feasibility studies and analyses of agrovoltaic systems.
- Collaborate with other national and international institutions and organisations on agrovoltaic related projects.

The Elecnor Foundation participates together with Emin Energy, engineering and consultancy firm; Vaos Sistemas, company specialising in the automation of irrigation systems; Comunidad de Regantes de Liria; Gestión y Administración Técnica Agraria S.L., an agricultural consultancy; and GSFI Energía, a solar panel installer.

- > Collaboration agreement between the Elecnor Foundation and the Integra Foundation

The Elecnor Foundation signed a framework collaboration agreement with the Integra Foundation to improve the conditions and means used in its new classrooms to optimise and strengthen the training they provide to vulnerable groups.

Corporate volunteering projects

In 2023, it was approved that employees in the country where social infrastructure projects are carried out will be the protagonists of Elecnor's corporate volunteering projects. This new approach is therefore underway in Brazil with the H₂OMe project, so that volunteers in Brazil can directly contribute to the success and sustainability of the project and to the well-being of the local communities.

Volunteers will support the following initiatives:

- Twinning with the Quilombola community with the aim of promoting cooperation.
- Technical supervision with H₂OMe operators for preventive maintenance.
- Providing children with school materials.
- Sponsoring children's school education and, where appropriate, higher education.
- Help with equipment to improve the functioning of the health post.
- Hold face-to-face training for children once a year.

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.

Below are some of the initiatives launched by Elecnor and the companies Enerfin and Celeo.

Angola

Elecnor has carried out many actions in the country, some of which are mentioned below:

- Donation of various goods to the community of Bandeira and Sociedade (Zavula)-Ndalatando

During the works carried out on the Zavula transmission line, the precariousness of some members of the Sociedade and Bandeira communities was noticed, so a campaign was conducted to collect various perishable and non-perishable goods to help some of these families, focusing especially on the elderly and children.

In addition to the donations collected, some PPE was also donated, in total 64 pairs of safety boots and 27 rain boots were donated.

- Donation of computers and monitors to IMNE-Marista

The equipment is available to students throughout their academic career in the school library, providing them with the necessary support for their education.

- Delivery of medical equipment donated by Elecnor to improve the health services of the Namibe Ngola Kimbanda Provincial Hospital

Donation of useful materials to improve the hospital's healthcare services, creating a very positive impact on the community that the hospital serves.

Brazil

Elecnor do Brasil has initiated a series of projects aimed at improving the quality of life of the inhabitants in the areas where it operates, highlighting its commitment in this area.

- Oficina dos Sonhos - Edição 3

The "Workshop of Dreams" ("Taller de los Sueños") project aims to promote ideal, innovative and creative conditions for visual arts and design for young people over 18 from low-income families in new Brazilian cities.

- Computing for seniors

Collaborate with the enhancement and strengthening of links with the elderly in vulnerable situations, through specific workshops such as basic introduction to computers in the city of Pirapora MG.

The aim of this project is work with social media or social networks through basic computing providing general learning and the use of smartphones and other technological devices.

- Garboggini Action

Action to collect food for the local community in need where our projects are located and for the Yanomami indigenous people.

- Warm clothing campaign

Aimed at the arrival of winter in Brazil, the campaign is based on the collection of warm clothing donated by employees, and for every 10 items of warm clothing collected, Elecnor do Brasil buys a blanket.

- Delivery of wheelchairs and bath chairs to the Arinos Rotary Club

Delivery of a total of 10 wheelchairs and 10 shower chairs to the Rotary Club of the municipality of Arinos. The main objective of the Arinos Rotary Club is to benefit the local population, both urban and rural, by providing this equipment through loan agreements.

The Group's renewable power subsidiary, Enerfín, approved by the Brazilian government and in compliance with tax incentive legislation, contributes to social development, culture and sport.

Through its subsidiary Ventos do Sul, it has approved several social projects in 2023 related to the promotion of sports, culture, prevention and health protection for children and the elderly.

Celeo has continued to develop various initiatives in order to contribute to the quality of life and the development of local human capital through a range of social projects, including the following:

- Project Quipá - cultivating knowledge. This is a youth education project aimed at young quilombolas in São João de Piauí.
- Green Ecoe Project ("Ecoe verde"). Project whose objective is to ensure the organisation and participation of the Esmeralda Community Space by the residents of the neighbourhood, guaranteeing the maintenance of the garden and the cultural activities carried out on the CANTE grounds, promoting environmental education and sustainable habits that preserve the environment.
- Restore Caatinga ("Restaura Catinga") Project (2022-2024). Developed together with the Caatinga Association, Vbio, Universidade Federal do Rio Grande do Norte, FIEC, Prefeitura de Carteus and PPPN Neném Barrios. The project promotes the restoration of 20 hectares of forest in a semi-arid region, as well as the dissemination of sustainable technologies adapted to the biome, research incentives, community development through the training of self-employed rural workers, such as the 40 rural communities living around the region, among other benefits.
- Green Initiative Project. It aims to protect the remnants of indigenous vegetation and improve the quality and quantity of surface and groundwater in the Itirapina region.

Canada

Enerfín has collaborated financially with different social, sporting and cultural initiatives in the municipalities included in its areas of action.

Chile

Celeo's social projects are mainly geared towards environmental education. As part of the School Networks Programme ("Programa de Redes Escolares"), initiatives with environmental content are developed in rural schools. Each school has a programme adapted to its reality and needs.

In addition, Celeo Chile has developed various social investment actions in Rincón de Pataguas and in the municipality of Colbún, such as the donation of a generator set that provides back-up power for the permanent provision of rural drinking water, the delivery of equipment to the Colbún firefighters under a permanent partnership with the institution, the equipment of the headquarters of the Senior Adult Club to improve its facilities and a welding course.

Colombia

As part of the social management plan of the Portón del Sol project, Elecnor has donated usable wood material such as pallets and boards to the Santa Helena community to improve their rural areas and residences.

Enerfín has carried out different activities:

- Donations of material to equip the educational centres of the communities, improving the conditions and facilities of the Purnio educational centre, which is attended by more than 100 students.
- Donation of material to equip the Purnio social centre, which has 200 members.
- Training for the communities of Purnio and Santa Helena for small entrepreneurs, co-financed by SENA - Servicio Nacional de Aprendizaje, in which 30 people participated.
- Conducting training in recruitment management for a total of 33 municipal officials in La Dorada.
- Donation for the celebration of the children's festival, where a total of 250 children participated, and co-financed by the National Infrastructure Agency (ANI).

Spain

Elecnor's different organisations have participated in many social actions in collaboration with different local associations, such as food, clothing and toy collection campaigns, among others.

Celeo España has collaborated financially with the ECODES foundation in the "Not a home without power" project which aims to help vulnerable families in the field of energy poverty. Also, with the Padre Piquer Foundation in the financing of school and meal grants for the most disadvantaged pupils at its headquarters in Madrid.

Dialogue with local communities GRI 2-25 GRI 3-3, GRI 203-2, GRI 413-2

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.

Brazil

In Brazil, citizen participation is a cornerstone of the environmental licensing process, through which project-affected parties have the chance to be heard, either in public hearings or in technical briefings. 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.

Canada

Within the framework of the Citadelle wind project, which Enerfín is developing in the province of Quebec, a preliminary agreement has been reached with the local communities for them to have a significant shareholding. This agreement also includes a minority holding of the Aboriginal community present in the region.

In addition, open house sessions have been held in the main affected municipalities and a website has been set up so that citizens can keep up to date with the progress of the project and raise their concerns or send their comments. A communication plan, approved by local bodies, has also been drawn up to ensure public information and participation as the project progresses.

In 2023, Enerfín has also completed the environmental impact assessment of two solar generation projects in Alberta, starting the public consultation process.

Chile

Within the framework of the Los Lagos del Sur project, Enerfín has initiated the Permanent Community Engagement Plan with local communities and indigenous populations. During this process, all 20 local communities and indigenous peoples' groups within the project's area of influence have been contacted.

In addition, meetings were held with two of the three municipalities where the Project is being developed, addressing the progress and schedule of the processing for obtaining the environmental permit and the presentation, analysis and agreement of the voluntary environmental commitments, as well as the compensation measures included in the environmental impact study.

In order to strengthen communication, a new information bulletin has been sent to all the communities on the progress of the project and the compensation measures and voluntary environmental commitments acquired.

Also noteworthy are the donations for the carrying out of local activities and traditional festivals to communities in the areas of influence.

In Chile, Celeo has a Community Engagement Strategy, which shows how to approach communities, carry out diagnoses and needs assessments, and manage social actions. In 2023, such a relations strategy has been implemented in the CASTE and MATE projects.

Thus, Celeo has held a number of meetings with the authorities of the municipality of Cauquenes on MATE. And in CASTE it has developed a community engagement plan, activating permanent communication channels, as well as meetings where projects are explained and doubts are resolved in the community. In addition, the first working group was set up with the residents of Lomas de Manso (SE Nueva Melipilla).

Colombia

The recently initiated Portón del Sol Solar Park Project has an employment committee made up of the neighbourhood councils of the project's area of influence and the municipality of La Dorada (Caldas). To date, 1,200 jobs have been created, 75% of which are for people in the communities of Purnio and Santa Helena, in the project's area of influence, and in the municipality of La Dorada.

Likewise, open and permanent communication is maintained with the community and the different actors through a point of attention and a system of attention and response to pleas, complaints, claims and requests.

Meetings have also been held with the communities in the areas of influence of the El Espino, El Roble and La Cayena projects.

United States

As part of the development of the Mantle Rock Solar project (Kentucky), two meetings were held with the local population to inform them about the project and its potential benefits for the community.

Respect for indigenous communities GRI 2-25

The Elecnor Group occasionally 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.

Canada

In 2023, Enerfín carried out several actions with indigenous communities. On the one hand, for the Citadelle project, an agreement has been reached with the aboriginal nation present in the study area, which includes carrying out a specific study of ancestral uses of the territory and possible impacts of the project on them, with the aim of implementing the necessary measures to avoid or minimise them at an early stage of development.

On the other hand, as part of the Winnifred project, the Pikánii Nation has conducted a field investigation of the route of the wind farm's interconnection line. Enerfín accompanied the nation's representatives during the visit.

Chile

The environmental impact study of the Los Lagos del Sur wind farm, submitted to the Environmental Assessment Service by Enerfín, includes anthropological studies which confirm the detection of indigenous communities and human groups of interest in the project's area of influence and the degree of impact of the project on them. Additionally, the impact study includes a series of mitigation measures for communities that have a declared material impact and voluntary environmental and social commitments for those with non-material impacts.

In early 2023, the Indigenous Consultation Process was initiated for three potentially affected communities during the construction and operation phase of the Los Lagos project. As part of this process, led by the Environmental Assessment Service, the proposed compensatory measures have been explained, modified and adapted in consensus with these communities.

In parallel to the Indigenous Consultation process and within the framework of the relationship with the indigenous communities, meetings have been held to explain the progress of the project.

Colombia

The Enerfín's projects located in Colombia are developed under a policy of dialogue and respect for the customs and traditions of the neighbouring indigenous communities. Thus, in 2023, more than 20 prior consultation meetings were held for the El Espino and El Roble projects, as well as several participation and agreement meetings for the environmental licensing of the Trupillo project with the 14 indigenous communities that live in its area of influence. At the same time, permanent communication channels have been maintained with the communities in the area of influence of the Brisas wind farm.

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).

Throughout the year, Celeo Brazil monitored the studies and plans awaiting assessment and approval by the relevant bodies (PBAI CAIUA, BQEP IMTE, BIEP JTE JAURÚ, ICS and ENTE).

In 2023, several initiatives were carried out with indigenous communities, most notably a Cultural Strengthening Support Programme within the framework of the PBAI CAIUÁ. It consists of the preparation of 17 architectural projects for the construction of Multipurpose Spaces, distributed in the indigenous territories. The building materials for the prayer houses are being donated to the indigenous lands, as agreed at the meeting to present the work plan. In addition, within the framework of ENTE, a community kitchen was built in the indigenous territory, strengthening the relationship with the community and facilitating line maintenance activities in the stretch of territory occupied by them.

Mexico

Enerfín holds regular meetings with the indigenous consultation agreement follow-up committees in the communities located within the area of influence of the Panabá-Sucilá Wind Power Complex project in the state of Yucatán. Several meetings have been held throughout the year, reporting on the progress of the project and responding to questions raised by the committees.

Enerfín has continued to finance workshops in the indigenous communities located within the area of influence of the Panabá-Sucilá Wind Power Complex project in the state of Yucatán, with the aim of developing skills to generate alternative income and diversify their livelihoods. Throughout the year, hammock weaving and textile painting workshops were given to 40 and 25 women, respectively.

Elecnor, committed to the SDGs

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</p> <p>Celeo Social projects</p> <p>Elecnor Foundation Social infrastructure projects</p>
	<p>Celeo Social projects</p>
	<p>Elecnor Group Safety Excellence project ISO 45001 certification Awareness campaigns Health and safety training plan</p> <p>Elecnor Foundation Social infrastructure projects</p>
	<p>Elecnor Group Collaboration with universities and vocational training centres</p> <p>Enerfín Training programmes in various projects</p> <p>Celeo Social initiatives</p> <p>Elecnor Foundation Education projects</p>
	<p>Elecnor Group Equality plan CEO Diversity Initiative</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

Enerfín

Wind farms

Celeo

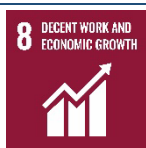
Energy transportation projects

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

Enerfín

Social projects

Celeo

Energy transportation projects

Social projects

Elecnor Foundation

Social infrastructure projects

**Elecnor Group**

Energy efficiency projects

Smart Cities Projects

Managing street lighting

Audeca

**Elecnor Group**

Energy efficiency projects

Smart Cities Projects

Managing street lighting

Audeca

Urban waste collection projects

Enerfín

Wind farms

Celeo

Energy transportation projects

Solar PV farms

**Elecnor Group**

Renewable energy projects: wind, solar PV, solar thermal hydroelectric and biomass

Climate change strategy

Analysis of climate change risks and opportunities

Calculation and verification of the carbon footprint

Emission reduction plan

**Audeca**

Water and waste water treatment projects

Projects to preserve natural spaces

Hidroambiente

Water treatment solutions

**Elecnor Group**

Initiatives to foster biodiversity

Audeca

Projects to preserve natural spaces

Enerfín

Plan to monitor bird life in wind projects

Celeo

Environmental initiatives

**Elecnor Group**

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

Certification to UNE 19601 criminal compliance management system standard

Compliance Training

Elecnor Foundation

The IE-Elecnor Observatory on Sustainable Compliance

Cultures

**Elecnor Group**Partnerships and collaborations with entities and associations
- Participation in forums**Elecnor Foundation**

Partnerships and collaborations with entities and associations

Other channels for engagement with society

Participation in associations GRI 2-28

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

AAEF, Asociación Andaluza de Empresas Forestales
 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
 AESPLA, Asociación Española de Servicios de Prevención Laboral
 AEPIBAL, Asociación Empresarial de Pilas, Baterías y Almacenamiento Energético
 AIN, Asociación de Industria de Navarra
 AgH, Asociación Gallega del Hidrógeno
 ANCI, Asociación Nacional de Constructores Independientes
 ANESE, Asociación Nacional de Empresas de Servicios Energéticos
 APECYL, Asociación de Promotores de Energía Eólica de Castilla y León
 APIEM, Asociación Profesional de Instaladores Eléctricos y de Telecomunicaciones de Madrid
 APPA Renovables - Asociación de Empresas de Energías Renovables
 ARPHO Asociación de Reparación, refuerzo y Protección del Hormigón
 ASAGUA, Asociación Española de Empresas de Tecnologías del Agua
 ASEJA Asociación de Empresas de Gestión de Infraestructura Verde
 ASERPUMA, Asociación de Empresas Restauradoras del Paisaje y Medio Ambiente
 Asociación de Acción Ferroviaria
 ATC, Asociación Técnica de Carreteras
 CEOE, Confederación Española de Organizaciones Empresariales
 CONFEMETAL, Confederación Española de Organizaciones Empresariales del Metal
 Enercluster, Cluster Eólico de Navarra
 EGA, Asociación Eólica de Galicia
 FEMEVAL, Federación Metalúrgica Valenciana
 PROTERMOSOLAR
 Sedigás, Asociación Técnica Española de la Industria del Gas
 SEPREM, Spanish Association of Dams and Reservoirs
 UNEF, Unión Española Fotovoltaica

Brazil

ABEEOLICA, Associação Brasileira de Energia Eólica
 ABRACEEL, Associação Brasileira de Comercializadores de Energia
 ABRATE, Associação Brasileira das Empresas de Transmissão de Energia Elétrica
 ABSOLAR, Associação Brasileira de Energia Solar Fotovoltaica
 ABRAMAN, Associação de Manutenção e Gestão de Ativos
 Associação Comercial de Osório
 AUI Cultural Produção Cultural e Artes Cênicas EIRELI
 Spanish Chamber of Commerce in Brazil
 CIGRE, Comité Nacional Brasileiro de Produção e Transmissão de Energia Elétrica
 ICRIO - Instituto Compliance Rio
 IDEC, Instituto Para o Desenvolvimento do Esporte e da Cultura
 CERNE, Centro de Estratégias em Recursos Naturais e Energia
 FIERGS, Federação das Indústrias do Estado do Rio Grande do Sul

Canada

CCIBF Chamber of Commerce and Industry of the Bois-Francs Region
AQPER, Quebec Association for the Production of Renewable Energy
CANREA, Canadian Renewable Energy Association
Spain-Canada Chamber of Commerce

Chile

Asociación Gremial de Transmisoras de Chile
Asociación Chilena de Energías
CIGRE, Consejo Internacional de Grandes Sistemas Eléctricos
Asociación Avanza de Inclusión Socio - Laboral

Colombia

ACOLGEN, Asociación Colombiana de Generadores de Energía Eléctrica
Asociación de Hidrógeno
Spanish Chamber of Commerce in Colombia. Comité de Infraestructura y Energías Renovables de la

United States

ACP, American Clean Power
WRISE, Women of Renewable Industries and Sustainable Energy
NAEMA, North American Energy Markets Association

Mexico

Cámara Nacional de Manufacturas Eléctricas
Spanish Chamber of Commerce
AMDEE, Asociación Mexicana de Energía Eólica
APER, Agrupación Peninsular de Energías Renovables

Portugal

AECOPS, Associação Emp. Construção Obras Publicas e Serviços
APIEE, Associação Portuguesa Ind. Eng. Energética

Participation in forums

Throughout 2023, 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:

- 1st Self-consumption Forum ("Foro de Autoconsumo") held by the newspaper El Economista, where the Elecnor Group analysed the keys to the launch and the trajectory of this renewable energy model in the company.
- Building The Future Together business meeting, in Angola. The Chairman of the Elecnor Group, Jaime Real de Asúa, accompanied the King and Queen of Spain on their state trip to the African country and took part in several business meetings on behalf of the Group as one of the main organisations in the region.
- Co-responsible Conference. Leadership and innovation, keys to ESG and responsible communication. Over 45,000 online viewers attended the Co-responsible Conference to present the 2023 Yearbook.

- Sustainable Encounters Forum (“Foro Encuentros Sostenibles”), organised by Twenergy, in Madrid. The aim was to discuss and share experiences and know-how among the different foundations currently active in the field of sustainability and environment. Among them was the Elecnor Foundation.
- 2nd Edition of the Canal CEO Dux Awards. Rafael Martín de Bustamante, CEO of the Elecnor Group, participated in these awards, which seek to give visibility to those people and initiatives that promote the creation of more humane and sustainable companies
- "Energy efficiency and investment in housing" (“Eficiencia energética e inversión en vivienda ”), organised by Cinco Días and BBVA. Elecnor spoke about the keys to saving and increasing the energy value of homes.
- Spain-Denmark Business Summit. The meeting was held in Copenhagen, where Jaime Real de Asúa, Chairman of the Elecnor Group, accompanied the Spanish Royal Family on their state trip to Denmark to strengthen business relations between the two countries. Elecnor is building the underwater tunnel that will link Denmark with Germany, one of the largest projects in Europe.
- A round table discussion on Energy Renovation, organised by the newspaper La Razón, with six experts in different fields related to the sector, including Elecnor.
- MedCap Forum. This forum, organised by the BME Group, gave the Group the opportunity to share the company’s strategy and future with investors and analysts.

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:

Africa

Enerfín was present at the regular meetings organised by the African Task Force of GWEC, as well as at the 2nd Annual Electricity Wheeling Conference, Cape Town.

Brazil

Enerfín participated in the following events:

- Congress on "Hidrogênio Verde - um novo caminho para o Rio Grande do Sul" promoted by the Government of the State of Rio Grande do Sul, with Enerfín participating as a speaker.
- ESG Business Meeting, promoted by ABEEOLICA
- Brazil Wind Power - Wind power generation business congress promoted by ABEEOLICA.
- ENASE - National Meeting of the Electricity Sector.
- INTERSOLAR - Solar power generation trade fair promoted by ABSOLAR.
- Annual conference of the strategic plan of the Associação Brasileira dos Comercializadores de Energia - Abraceel.

Canada

Enerfín participated in the Electricity Transformation Canada congress held in Calgary.

Colombia

Enerfín stood out with its participation at:

- 6th Latam Renewables Meeting and Trade Fair (“Encuentro y Feria Renovables Latam”) organised by Ser Colombia, Barranquilla.
- 15th Annual Energy Congress (“Congreso Anual de Energía”) organised by Acolgen, Bogotá.
- Latam Future Energy, Bogotá.
- H2 Tour Colombia, Barranquilla.

- 28th MEM Energy Congress ("Congreso de Energía MEM"), Barranquilla.
- Colombia Investment Summit 2023, Bogotá.
- Working group with Ser Colombia (Asociación Energías Renovables) and companies affiliated to the association, to propose improvements in grid connection processes.
- Working group of the energy sector with the National Environmental Licensing Authority on climate change, to learn about the sector's obligations and experiences in climate change mitigation and adaptation.
- Capacity-building workshop on the preparation of environmental studies in the energy sector, organised by the National Environmental Licensing Authority in conjunction with the Mining and Energy Planning Unit.
- Participation in the Wholesale Energy Market Congress ("Congreso de Mercado de Energía Mayorista"), Barranquilla.

Spain

In Spain, it is worth highlighting Enerfín's participation in the following events:

- Spanish Wind Energy Congress ("Congreso Eólico Español") 2023 of the AEE, Spanish Wind Energy Association.
- III International Congress of the Industry for Energy Transition in Navarre, CITE23.
- GE Vernova wind industry meeting.
- Vestas Wind Forum Spain.

The subsidiary Audeca took part in the following initiatives:

- Tecma 2023 and Trafic 2023 environmental conferences.
- 32nd Madrid Road Week ("Semana de la Carretera de Madrid"), organised by the Spanish Road Association (AEC) and promoted by the Autonomous Community of Madrid.
- IX Encuentros da Enxeñería de Camiños, Canais e Portos de Galicia.

Finally, Atersa was present at the Gebera 2023 trade fair in Madrid and at the European PV SEC trade fair in Munich.

United States

Enerfín was present at:

- Infocast Finance and Investment Conference.
- ACP Siting and Environmental Conference.
- CleanPower 2023.
- Texas Clean Energy Conference.
- RE+ 2023.
- REM 2023.

Mexico

Enerfín participated in the WindPower Mexico 2023 Event.

Recognition

- Aster Prize, awarded by ESIC Business&Marketing School.
- Planning Leader Award for the Vilnius Klaipeda project in Lithuania, a key project for the development of the railway sector in this country as it is one of the main passenger and freight transport routes in the Baltic countries.
- Prevention and Health Recognition from Orange Salud Laboral.
- DUX Canal Ceo Awards.
- Anese (Asociación Nacional de Empresas de Servicios Energéticos) award to Elecnor in recognition of its loyalty and in gratitude for its support to the institution.
- Financial Times recognises Elecnor as one of the Climate Leaders of the year.

- The work of Renecycle (a company in which Enerfín participates) in circular economy has been awarded by the Periódico de la Energía as the Best Net Zero Initiative at national level. Enerfín participates in Renecycle as a partner with other developers and industrial companies to develop industrial and technological solutions to boost the circular economy in the renewable energy sector.
- Celeo Chile and Celeo Brazil are ranked first in the GRESB ranking of power transmission companies in the Americas.

Appendix I

Supplementary information

Our people, our best asset GRI 2-1, GRI 2-7

Workforce data (year-end)

Countries in which the Elecnor Group operates

Geographical area and country	2022	2023	Changes
Spain	11,210	11,746	5%
Europe	1,461	1,743	19%
Germany	1	5	400%
Finland	2	2	0%
The Netherlands	1	2	100%
Italy	805	901	12%
Lithuania	82	215	162%
Norway	25	10	-60%
Portugal	280	331	18%
United Kingdom	243	253	4%
Romania	22	24	9%
North America	805	870	8%
Canada	7	9	29%
United States	798	861	8%
Latin America	6,026	5,711	-5%
Argentina	114	124	9%
Brazil	4,766	3,368	-29%
Chile	453	804	77%
Colombia	31	46	48%
Ecuador	3	2	-33%
El Salvador	1	1	0%
Honduras	51	101	98%
Mexico	97	294	203%
Panama	62	344	455%
Paraguay	1	0	-100%
Peru	49	47	-4%
Dominican Republic	162	379	134%
Uruguay	220	190	-14%
Venezuela	16	11	-31%
Africa	2,403	1,717	-29%
Angola	1,335	871	-35%
Algeria	1	1	0%
Cameroon	610	510	-16%
Ivory Coast	30	31	3%
Ghana	177	40	-77%
Guinea Conakry	0	1	
Mauritania	4	4	0%
Mozambique	225	229	2%
Senegal	13	20	54%
Zambia	8	10	25%
Asia	207	33	-84%

Geographical area and country	2022	2023	Changes
Philippines	0	1	
India	1	1	0%
Jordan	3	3	0%
Oman	203	28	-86%
Oceania	236	743	215%
Australia	236	743	215%
Total	22,348	22,563	1%

Professional category	2022			2023		
	Male	Female	Total	Men	Women	Total
Structure	4,547	2,025	6,572	4,751	2,193	6,944
Management	143	18	161	141	19	160
Executive	1,184	225	1,409	1,270	261	1,531
Technician	3,220	1,782	5,002	3,340	1,913	5,253
Works	14,900	876	15,776	14,828	791	15,619
Basic	14,900	876	15,776	14,828	791	15,619
Total	19,447	2,901	22,348	19,579	2,984	22,563

The professional category of Management includes the Chief Executive Officer.
 The Basic professional category comprises mainly men because it corresponds to Works staff.

By age

Structure	2022			2023		
	Male	Female	Total	Male	Female	Total
>50	696	181	877	812	226	1,038
From 30 to 50	2,868	1,269	4,137	2,922	1,366	4,288
<30	983	575	1,558	1,017	601	1,618
Total	4,547	2,025	6,572	4,751	2,193	6,944

Works	2022			2023		
	Male	Female	Total	Male	Female	Total
>50	2,951	85	3,036	3,213	95	3,308
From 30 to 50	9,138	515	9,653	9,049	451	9,500
<30	2,811	276	3,087	2,566	245	2,811
Total	14,900	876	15,776	14,828	791	15,619

Breakdown of information by contract type

By age	2022	2023	Changes
Open-ended	17,447	17,821	2%
>50	3,287	3,597	9%
From 30 to 50	10,704	10,745	0%
<30	3,456	3,479	1%
Temporary	4,901	4,742	-3%
>50	626	749	20%
From 30 to 50	3,086	3,043	-1%
<30	1,189	950	-20%
Total	22,348	22,563	1%

Average by age	2022	2023	Changes
Open-ended	16,708	17,953	7%
>50	3,264	3,653	12%
From 30 to 50	10,346	10,918	6%
<30	3,098	3,382	9%
Temporary	6,252	5,025	-20%
>50	786	742	-6%
From 30 to 50	3,984	3,236	-19%
<30	1,482	1,047	-29%
Total	22,960	22,978	0%

By geographical area	2022	2023	Changes
Open-ended	17,447	17,821	2 %
Spain	9,642	10,745	11 %
Europe	1,022	1,267	24 %
North America	307	196	-36 %
Latin America	5,791	5,060	-13 %
Africa	555	371	-33 %
Asia	6	5	-17 %
Oceania	124	177	43 %
Temporary	4,901	4,742	-3 %
Spain	1,568	1,001	-36 %
Europe	439	476	8 %
North America	498	674	35 %
Latin America	235	651	177 %
Africa	1,848	1,346	-27 %
Asia	201	28	-86 %
Oceania	112	566	405 %
Total	22,348	22,563	1 %

By professional category	2022	2023	Changes
Open-ended	17,447	17,821	2%
Management	161	160	-1%
Executive	1,222	1,353	11%
Technician	4,213	4,450	6%
Basic	11,851	11,858	0%
Temporary	4,901	4,742	-3%
Management	0	0	
Executive	187	178	-5%
Technician	789	803	2%
Basic	3,925	3,761	-4%
Total	22,348	22,563	1%

Average by professional category	2022	2023	
Open-ended	16,708	17,953	7%
Management	161	161	0%
Executive	1,210	1,332	10%
Technician	3,724	4,383	18%
Basic	11,613	12,077	4%
Temporary	6,252	5,025	-20%
Management	0	0	
Executive	186	181	-3%
Technician	1,137	803	-29%
Basic	4,929	4,041	-18%
Total	22,960	22,978	0%

By gender

Structure staff	2022	2023	Changes
Open-ended	5,596	5,963	7%
Male	3,830	4,036	5%
Female	1,766	1,927	9%
Temporary	976	981	1%
Male	717	715	0%
Female	259	266	3%
Total	6,572	6,944	6%

Works staff	2022	2023	Changes
Open-ended	11,851	11,858	0%
Male	11,213	11,261	0%
Female	638	597	-6%
Temporary	3,925	3,761	-4%
Male	3,687	3,567	-3%
Female	238	194	-18%
Total	15,776	15,619	-1%

Average by gender

Structure staff	2022	2023	Changes
Open-ended	5,095	5,876	15%
Men	3,484	3,978	14%
Women	1,611	1,898	18%
Temporary	1,323	984	-26%
Men	975	726	-26%
Women	348	258	-26%
Total	6,418	6,860	7%

Works staff	2022	2023	Changes
Open-ended	11,613	12,077	4%
Men	11,075	11,464	4%
Women	538	613	14%
Temporary	4,929	4,041	-18%
Men	4,664	3,832	-18%
Women	265	209	-21%
Total	16,542	16,118	-3%

*In Spain, the category of permanent seasonal employment contracts is included in the category of open-ended contracts.

Breakdown of information by employment type

By age	2022	2023	Changes
Full-time	22,163	22,302	1 %
>50	3,802	4,209	11 %
From 30 to 50	13,744	13,713	0 %
<30	4,617	4,380	-5 %
Part-time	185	261	41 %
>50	111	137	23 %
From 30 to 50	46	75	63 %
<30	28	49	75 %
Total	22,348	22,563	1 %

Average by age	2022	2023	Changes
Full-time	22,759	22,765	0 %
>50	3,926	4,275	9 %
From 30 to 50	14,282	14,097	-1 %
<30	4,551	4,393	-3 %
Part-time	201	213	6 %
>50	124	120	-3 %
From 30 to 50	48	57	19 %
<30	29	36	24 %
Total	22,960	22,978	0 %

By geographical area	2022	2023	Changes
Full-time	22,163	22,302	1 %
Spain	11,058	11,576	5 %
Europe	1,441	1,714	19 %
North America	799	832	4 %
Latin America	6,023	5,695	-5 %
Africa	2,403	1,717	-29 %
Asia	207	33	-84 %
Oceania	232	735	217 %
Part-time	185	261	41 %
Spain	152	170	12 %
Europe	20	29	45 %
North America	6	38	533 %
Latin America	3	16	433 %
Oceania	4	8	100 %
Total	22,348	22,563	1 %

By professional category	2022	2023	Changes
Full-time	22,163	22,302	1%
Management	161	159	-1%
Executive	1,397	1,502	8%
Technician	4,923	5,156	5%
Basic	15,682	15,485	-1%
Part-time	185	261	41%
Management	0	1	
Executive	12	29	142%
Technician	79	97	23%
Basic	94	134	43%
Total	22,348	22,563	1%

Average by professional category	2022	2023	Changes
Full-time	22,759	22,765	0%
Management	160	160	0%
Executive	1,381	1,496	8%
Technician	4,779	5,104	7%
Basic	16,439	16,005	-3%
Part-time	201	213	6%
Management	0	1	
Executive	15	17	13%
Technician	82	82	0%
Basic	104	113	9%
Total	22,960	22,978	0%

By gender

Structure staff	2022	2023	Changes
Full-time	6,481	6,817	5%
Male	4,494	4,673	4%
Female	1,987	2,144	8%
Part-time	91	127	40%
Male	53	78	47%
Female	38	49	29%
Total	6,572	6,944	6%

Works staff	2022	2023	Changes
Full-time	15,682	15,485	-1%
Male	14,818	14,710	-1%
Female	864	775	-10%
Part-time	94	134	43%
Male	82	118	44%
Female	12	16	33%
Total	15,776	15,619	-1%

Average by gender

Structure staff	2022	2023	Changes
Full-time	6,321	6,760	7%
Men	4,404	4,645	5%
Women	1,917	2,115	10%
Part-time	97	100	3%
Men	55	59	7%
Women	42	41	-2%
Total	6,418	6,860	7%

Works staff	2022	2023	Changes
Full-time	16,438	16,005	-3%
Men	15,646	15,197	-3%
Women	792	808	2%
Part-time	104	113	9%
Men	93	99	6%
Women	11	14	27%
Total	16,542	16,118	-3%

Workforce turnover ⁹ GRI 401-1

By age range, gender and geographical area

Location	Departures	Average employment	% Turnover	% Turnover	Change in Turnover
					2023 vs. 2022
Spain	1,978	11,528	17 %	21 %	-4%
Male	1,780	10,019	18 %	22 %	-4%
More than 50 years	406	2,705	15 %	18 %	-3%
30 to 50	1,017	6,139	17 %	21 %	-4%
Under 30	357	1,175	30 %	37 %	-7%
Female	198	1,509	13 %	17 %	-4%
More than 50 years	19	206	9 %	14 %	-5%
30 to 50	124	993	12 %	14 %	-2%
Under 30	55	310	18 %	30 %	-12%
Europe	453	1,651	27 %	35 %	-8%
Male	410	1,454	28 %	36 %	-8%
More than 50 years	74	333	22 %	33 %	-11%
30 to 50	220	779	28 %	35 %	-7%
Under 30	116	342	34 %	41 %	-7%
Female	43	197	22 %	26 %	-4 %
More than 50 years	1	16	6 %	13 %	-7 %
30 to 50	23	103	22 %	30 %	-8 %
Under 30	19	78	24 %	25 %	-1 %
North America	334	830	40 %	38 %	2 %
Male	318	766	42 %	38 %	4 %
More than 50 years	51	185	28 %	34 %	-6 %
30 to 50	175	442	40 %	37 %	3 %
Under 30	92	139	66 %	49 %	17 %
Female	16	64	25 %	36 %	-11 %
More than 50 years	0	12	0 %	60 %	-60 %
30 to 50	10	39	26 %	24 %	2 %
Under 30	6	13	46 %	50 %	-4 %
Latin America	7,152	6,279	114 %	105 %	9 %
Male	6,439	5,488	117 %	111 %	6 %
More than 50 years	590	645	91 %	90 %	1 %
30 to 50	3,725	3,365	111 %	106 %	5 %
Under 30	2,124	1,478	144 %	128 %	16 %
Female	713	791	90 %	59 %	31 %
More than 50 years	31	48	65 %	32 %	33 %
30 to 50	393	439	90 %	63 %	27 %
Under 30	289	304	95 %	56 %	39 %
Asia	186	96	194 %	31 %	163 %
Male	181	90	201 %	31 %	170 %
More than 50 years	24	9	267 %	32 %	235%

⁹ 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	% Turnover	Change in Turnover 2023 vs. 2022
30 to 50	116	60	193 %	30 %	163%
Under 30	41	21	195 %	33 %	162%
Female	5	6	83 %	22 %	61%
More than 50 years	0	0	0 %	0 %	0%
30 to 50	3	5	60 %	17 %	43%
Under 30	2	1	200 %	33 %	167%
Africa	1,439	2,124	68 %	42 %	26%
Male	1,277	1,809	71 %	44 %	27%
More than 50 years	53	92	58 %	28 %	30%
30 to 50	811	1,310	62 %	41 %	21%
Under 30	413	407	101 %	54 %	47%
Female	162	315	51 %	28 %	23%
More than 50 years	6	12	50 %	0 %	50%
30 to 50	81	219	37 %	24 %	13%
Under 30	75	84	89 %	41 %	48%
Oceania	186	470	40 %	42 %	-2%
Male	151	372	41 %	39 %	2%
More than 50 years	60	112	54 %	38 %	16%
30 to 50	73	204	36 %	43 %	-7%
Under 30	18	56	32 %	33 %	-1%
Female	35	98	36 %	49 %	-13%
More than 50 years	6	21	29 %	88 %	-59%
30 to 50	25	56	45 %	20 %	25%
Under 30	4	21	19 %	111 %	-92%
Total	11,728	22,978	51 %	50 %	1%

By geographical area, gender and type of employee

2022

Structure		Location	Works	
Men	Women		Men	Women
15%	17%	Spain	24%	22%
26%	25%	Europe	40%	34%
23%	28%	North America	45%	67%
43%	50%	Latin America	122%	70%
31%	28%	Africa	46%	28%
22%	22%	Asia	37%	0%
36%	40%	Oceania	54%	150%
23%	26%	Total	61%	43%

2023

Structure			Works	
Men	Women	Location	Men	Women
13%	12%	Spain	20%	22%
23%	21%	Europe	30%	24%
15%	26%	North America	55%	21%
41%	48%	Latin America	132%	144%
41%	29%	Africa	75%	64%
107%	83%	Asia	260%	— %
33%	29%	Oceania	52%	133%
22%	22%	Total	62%	85%

New hirings [GRI 401-1](#)

By gender and geographical area

Structure staff

Location	2022	2023	Changes
Spain	704	735	4%
Male	482	497	3%
Female	222	238	7%
Europe	177	156	-12%
Male	117	106	-9%
Female	60	50	-17%
North America	78	64	-18%
Male	61	52	-15%
Female	17	12	-29%
Latin America	695	473	-32%
Male	444	308	-31%
Female	251	165	-34%
Africa	101	87	-14%
Male	68	65	-4%
Female	33	22	-33%
Asia	42	1	-98%
Male	38	1	-97%
Female	4	0	-100%
Oceania	133	297	123%
Male	106	197	86%
Female	27	100	270%
Total	1,930	1,813	-6%

Works staff

Location	2022	2023	Changes
Spain	1,673	1,581	-5%
Male	1,632	1,536	-6%
Female	41	45	10%
Europe	541	632	17%
Male	505	593	17%
Female	36	39	8%
North America	310	394	27%
Male	300	391	30%
Female	10	3	-70%
Latin America	6,969	6,494	-7%
Male	6,543	6,014	-8%
Female	426	480	13%
Africa	891	699	-22%
Male	795	655	-18%
Female	96	44	-54%
Asia	43	21	-51%
Male	43	21	-51%
Female	0	0	0%
Oceania	55	367	567%
Male	47	355	655%
Female	8	12	50%
Total	10,482	10,188	-3 %

Location	2022	2023	Average employment 2023	New hiring rate 2023
Spain	2,377	2,316	11,528	20 %
Male	2,114	2,033	10,019	20 %
Female	263	283	1,509	19 %
Europe	718	788	1,651	48 %
Male	622	699	1,454	48 %
Female	96	89	197	45 %
North America	388	458	830	55 %
Male	361	443	766	58 %
Female	27	15	64	23 %
Latin America	7,664	6,967	6,279	111 %
Male	6,987	6,322	5,488	115 %
Female	677	645	791	82 %
Africa	992	786	2,124	37 %
Male	863	720	1,809	40 %
Female	129	66	315	21 %
Asia	85	22	96	23 %
Male	81	22	90	24 %
Female	4	0	6	0 %
Oceania	188	664	470	141 %
Male	153	552	372	148 %
Female	35	112	98	114 %
Total	12,412	12,001	22,978	52 %

By gender and age range

Structure staff

Age	2022	2023	Changes
>50	142	174	23%
Male	128	141	10%
Female	14	33	136%
From 30 to 50	1,029	949	-8%
Male	717	639	-11%
Female	312	310	-1%
<30	759	690	-9%
Male	471	446	-5%
Female	288	244	-15%
Total	1,930	1,813	-6%

Works staff

Age	2022	2023	Changes
>50	975	1,081	11 %
Male	935	1,040	11 %
Female	40	41	3 %
From 30 to 50	5,827	5,759	-1 %
Male	5,519	5,451	-1 %
Female	308	308	0 %
<30	3,680	3,348	-9 %
Male	3,411	3,074	-10 %
Female	269	274	2 %
Total	10,482	10,188	-3 %

Age	2022	2023	Average employment 2023	New hiring rate 2023
>50	1,117	1,255	4,396	29 %
Male	1,063	1,181	4,081	29 %
Female	54	74	315	23 %
From 30 to 50	6,856	6,708	14,153	47 %
Male	6,236	6,090	12,299	50 %
Female	620	618	1,854	33 %
<30	4,439	4,038	4,429	91 %
Male	3,882	3,520	3,618	97 %
Female	557	518	811	64 %
Total	12,412	12,001	22,978	52 %

Dismissals

This term refers 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 figures below include information from Spain, Angola, Argentine, Brazil, Cameroon, Chile, Ivory Coast, Ghana, Italy, Mexico, Mozambique, Panama, Peru and Uruguay.

By gender and professional category

Category	2022			2023			Changes
	Male	Female	Total	Male	Female	Total	
Structure	62	31	93	116	62	178	91 %
Management	0	1	1	0	0	0	-100 %
Executive	7	3	10	17	1	18	80 %
Technician	55	27	82	99	61	160	95 %
Works	986	44	1,030	1,257	77	1,334	30 %
Basic	986	44	1,030	1,257	77	1,334	30 %
Total	1,048	75	1,123	1,373	139	1,512	35 %

By gender and age

Structure staff

Age	2022			2023			Changes
	Male	Female	Total	Male	Female	Total	
>50	8	2	10	14	6	20	100%
From 30 to 50	40	16	56	71	38	109	95%
<30	14	13	27	31	18	49	81%
Total	62	31	93	116	62	178	91 %

Works staff

Age	2022			2023			Changes
	Male	Female	Total	Male	Female	Total	
>50	105	5	110	158	4	162	47 %
From 30 to 50	591	26	617	743	41	784	27 %
<30	290	13	303	356	32	388	28 %
Total	986	44	1,030	1,257	77	1,334	30 %

Remunerations Policy

As mentioned in the Chapter on Our people, our best asset, the Elecnor Group's Remuneration Policy respects the criteria of objectivity, fairness and non-discrimination, rewarding and recognising merit.

The theoretical fixed average remuneration by gender, age and professional category is detailed below:

2022

Age	Structure						Works	
	Management		Executive		Technician		Basic	
	Male	Female	Male	Female	Male	Female	Male	Female
Spain								
>50	138,963	116,834	56,950	57,408	33,724	30,547	24,342	24,309
From 30 to 50	101,773	98,391	49,849	49,758	33,626	29,203	22,718	22,740
<30			40,233	44,219	29,605	28,572	20,584	21,336
Europe (Italy, Norway, Portugal, United Kingdom and Romania)								
>50			88,764		45,236	32,787	25,636	19,618
From 30 to 50			44,136	41,153	36,926	31,750	26,564	26,122
<30			24,352	22,925	27,703	24,618	22,533	19,618
North America (United States and Canada)								
>50	208,696		133,694	89,694	129,734	60,793	100,610	73,491
From 30 to 50	199,225	*	125,200	88,631	73,182	57,504	98,737	71,264
<30			87,061	67,995	63,839	51,182	81,644	49,849
Latin America (Argentina, Bolivia, Brazil, Chile, Colombia, Ecuador, Honduras, Mexico, Panama, Peru, Dominican Republic and Uruguay)								
>50			63,844	34,577	31,599	22,888	10,817	10,588
From 30 to 50			47,088	44,468	20,940	14,982	8,647	5,656
<30				*	9,743	8,283	5,569	4,935
Africa (Angola, Algeria, Cameroon, Ghana, Mauritania and Senegal)								
>50			48,798		31,476	16,824	7,765	2,833
From 30 to 50			40,051	28,574	17,130	10,166	5,865	2,491
<30			13,028		4,843	5,450	2,637	2,120
Asia (Jordan and Oman)								
>50					48,833		35,869	
From 30 to 50			64,888	*	32,940	23,602	18,240	14,634
<30					21,121	14,449	15,434	
Oceania (Australia)								
>50			204,697		105,801	70,767	99,966	
From 30 to 50			105,883		89,972	58,169	79,606	79,618
<30					61,348	46,406	67,978	

2023

	Structure						Works	
	Management		Executive		Technician		Basic	
	Male	Female	Male	Female	Male	Female	Male	Female
Spain								
>50	138,652	130,953	59,483	57,258	35,729	31,705	25,514	25,994
From 30 to 50	114,447	102,996	52,242	52,005	35,439	30,439	23,912	23,276
<30			37,794	39,333	31,429	30,543	21,708	21,132
Europe (Germany, Finland, The Netherlands, Italy, Lithuania, Norway, Portugal, United Kingdom and Romania)								
>50			106,092		45,618	29,047	27,175	*
From 30 to 50			56,811	50,868	41,651	32,493	27,748	26,044
<30					33,027	29,496	24,739	22,894
North America (United States and Canada)								
>50	205,261	*	129,886	91,795	126,688	57,730	100,435	77,723
From 30 to 50	200,030		126,127	89,222	110,581	57,770	98,691	84,288
<30			76,135	81,233	66,142	63,803	86,832	74,096
Latin America (Argentina, Brazil, Chile, Colombia, Ecuador, El Salvador, Honduras, Mexico, Panama, Paraguay, Peru, Dominican Republic and Uruguay)								
>50			69,839	48,597	37,777	21,039	13,107	10,201
From 30 to 50			50,491	45,598	26,049	17,292	11,073	6,917
<30				*	13,107	10,555	7,799	6,310
Africa (Angola, Algeria, Cameroon, Ivory Coast, Ghana, Mauritania, Mozambique, Senegal and Zambia)								
>50			40,596		38,295	10,521	6,720	2,356
From 30 to 50			36,663	35,879	18,483	6,697	5,991	3,081
<30			*		4,233	7,444	3,174	2,239
Asia (Jordan and Oman)								
>50							13,850	
From 30 to 50			94,068		37,935	33,247	21,013	
<30					18,434	*	11,039	
Oceania (Australia)								
>50			146,398	*	101,366	62,716	59,338	58,483
From 30 to 50			130,334	115,922	85,603	63,786	55,221	55,418
<30					61,633	56,370	50,293	55,386

* 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

2022

	Structure		Works	
	Male	Female	Male	Female
Spain	42,034	33,092	23,001	22,932
Europe (Italy, Norway, Portugal, United Kingdom and Romania)	35,923	28,893	25,465	22,870
North America (United States and Canada)	125,918	73,073	94,736	64,621
Latin America (Argentina, Bolivia, Brazil, Chile, Colombia, Ecuador, Honduras, Mexico, Panama, Peru, Dominican Republic and Uruguay)	23,599	13,900	7,917	5,701
Africa (Angola, Algeria, Cameroon, Ghana, Mauritania and Senegal)	17,637	9,458	5,088	2,383
Asia (Jordan and Oman)	35,479	20,170	19,737	
Oceania (Australia)	92,021	58,315	82,069	79,618

* 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.

2023

	Structure		Works	
	Male	Female	Male	Female
Spain	44,105	34,754	24,174	23,561
Europe (Germany, Finland, The Netherlands, Italy, Lithuania, Norway, Portugal, United Kingdom and Romania)	42,470	31,790	26,890	24,142
North America (United States and Canada)	124,243	75,354	96,377	79,718
Latin America (Argentina, Brazil, Chile, Colombia, Ecuador, El Salvador, Honduras, Mexico, Panama, Paraguay, Peru, Dominican Republic and Uruguay)	28,975	16,955	10,383	6,961
Africa (Angola, Algeria, Cameroon, Ivory Coast, Ghana, Mauritania, Mozambique, Senegal and Zambia)	17,788	9,234	5,420	2,875
Asia (Jordan and Oman)	45,261	29,213	17,852	
Oceania (Australia)	91,053	64,079	55,679	56,434

Ratio of total annual compensation [GRI 2-21](#)

The annual remuneration ratio of the organisation's highest paid person to the median annual remuneration of all employees (excluding the highest paid person) is 26.4 (27.8 in 2022). Only the fixed remuneration of the Chief Executive Officer for his executive duties has been taken into account in this ratio. The Elecnor Group is working on its reporting systems in order to be able to report the total compensation ratio with all variable items in 2025.

We look after our people

Employee accident rate

2023

Location	No. of recordable work-related injuries			No. of injuries due to work-related accidents with major consequences			Hours worked		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Spain	54	0	54	2	0	2	20,162,632	3,079,595	23,242,227
Europe	11	0	11	0	0	0	3,142,903	383,716	3,526,619
North America	0	0	0	0	0	0	1,561,753	126,274	1,688,027
Latin America	19	1	20	0	0	0	14,826,088	2,052,311	16,878,399
Africa	3	1	4	0	0	0	4,352,370	651,252	5,003,622
Asia	0	0	0	0	0	0	271,242	13,101	284,343
Oceania	0	0	0	0	0	0	518,027	222,012	740,039
Total international	33	2	35	0	0	0	24,672,383	3,448,666	28,121,049
Total	87	2	89	2	0	2	44,835,015	6,528,261	51,363,276

(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.

Only including accidents involving more than one day's leave, not counting those on way to or from work.

2022

Geographic area	No. of work-related injuries			No. of workplace accidents with serious consequences			Hours worked		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Spain	58	0	58	1	0	1	19,200,469	2,894,432	22,094,901
Europe	8	0	8	0	0	0	2,335,312	472,874	2,808,186
North America	2	0	2	0	0	0	1,520,278	136,515	1,656,793
Latin America	14	0	14	2	0	2	16,988,232	1,697,463	18,685,695
Africa	8	0	8	0	0	0	4,940,318	730,714	5,671,032
Asia	0	0	0	0	0	0	682,933	19,390	702,323
Oceania	0	0	0	0	0	0	453,644	69,580	523,224
Total international	32	0	32	2	0	2	26,920,717	3,126,536	30,047,253
Total	90	0	90	3	0	3	46,121,186	6,020,968	52,142,154

(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.

Only including accidents involving more than one day's leave, not counting those on way to or from work.

Accident rate at subcontractors

2023

Geographic area	No. of work-related injuries			Hours worked		
	Men	Women	Total	Men	Women	Total
Spain	38	0	38	10,759,546	0	10,759,546
Europe	4	0	4	821,915	0	821,915
North America	0	0	0	4,446	0	4,446
Latin America	9	0	9	5,112,837	0	5,112,837
Africa	1	0	1	2,338,001	0	2,338,001
Asia	0	0	0	435,004	0	435,004
Oceania	0	0	0	680,236	0	680,236
Total	14	0	14	9,392,439	0	9,392,439
Total	52	0	52	20,151,985	0	20,151,985

Of the total number of accidents, five were recorded as work-related accidents with major consequences. Only including accidents involving more than one day's leave, not counting those on way to or from work.

2022

Geographic area	No. of injuries due to workplace accidents			Hours worked		
	Male	Female	Total	Male	Female	Total
Spain	50	0	50	12,223,641	0	12,223,641
Europe	1	0	1	125,385	0	125,385
North America	0	0	0	4,205	0	4,205
Latin America	2	0	2	5,327,394	0	5,327,394
Africa	7	0	7	3,587,178	0	3,587,178
Asia	0	0	0	1,435,823	0	1,435,823
Oceania	0	0	0	1,012,755	0	1,012,755
Total	10	0	10	11,492,740	0	11,492,740
Total	60	0	60	23,716,381	0	23,716,381

Employee occupational illnesses

2023

Geographic area	No. of work-related illnesses and diseases			Hours worked		
	Men	Women	Total	Men	Women	Total
Spain	4	0	4	20,162,632	3,079,595	23,242,227
Europe	0	0	0	3,142,903	383,716	3,526,619
North America	0	0	0	1,561,753	126,274	1,688,027
Latin America	0	0	0	14,826,088	2,052,311	16,878,399
Africa	0	0	0	4,352,370	651,252	5,003,622
Asia	0	0	0	271,242	13,101	284,343
Oceania	0	0	0	518,027	222,012	740,039
Total international	0	0	0	24,672,383	3,448,666	28,121,049
Total	4	0	4	44,835,015	6,528,261	51,363,276

2022

Geographic area	No. of occupational medical conditions			Hours worked		
	Men	Women	Total	Men	Women	Total
Spain	2	0	2	19,200,469	2,894,432	22,094,901
Europe	0	0	0	2,335,312	472,874	2,808,186
North America	0	0	0	1,520,278	136,515	1,656,793
Latin America	0	0	0	16,988,232	1,697,463	18,685,695
Africa	0	0	0	4,940,318	730,714	5,671,032
Asia	0	0	0	682,933	19,390	702,323
Oceania	0	0	0	453,644	69,580	523,224
Total international	0	0	0	26,920,717	3,126,536	30,047,253
Total	2	0	2	46,121,186	6,020,968	52,142,154

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 (within the area, adjacent to the area or with plots in the protected area)	Area/Length affected
Australia	New England Solar Farm	PCT 510 - Blakely's Red Gum - Yellow Box grassy woodland	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	Boa Sorte solar PV plant	Permanent Preservation Area (APP), Legal Reserve area and São Marcos river basin	Inside	900 ha
Colombia	Portón del Sol	Regional Integrated Management	Inside	200 ha
Spain	Ribera de Navarra Wind Farm	Habitats of Community interest Aicaena (Areas of Interest for the conservation of steppe birds in Navarre)	Adjacent	N/A
Spain	Aerosur wind farm	"La Janda" lagoon, African-European migratory flyway (Strait of Gibraltar)/ Important Bird and Biodiversity Area (IBA).	Adjacent	N/A

		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 (within the area, adjacent to the area or with plots in the protected area)	Area/Length affected
Spain	SIGMA solar PV plant. ARCO 1-5 FARMS	The nearest protected natural areas are the ZEC Río Guadalete, the Medina Sidonia IBA and the La Sauna periurban park.	Adjacent	N/A
Spain	400 kV Segura - Centurión transmission line	ZEC Río Ardila Alto	Part-time	5 km
Spain (Audeca)	Forestry work in the region of Padoluengo	ZEC ES4120092 Sierra de la Demanda; ZEPA ES4120012 Sierra de la Demanda; ZEC ES4120075 Banks of the Río Tirón	Inside	326 ha
Spain (Audeca)	Forestry work in the region of Sierra de Ávila	LIC & REN, Sierra Paramera and Serrota (ES4110034) (Sotalbo Monte 47)	Inside	27.2 ha
Spain (Audeca)	Forestry work in Las Hurdes	ES4320011 ZEC Las Hurdes; ES0000355 ZEPA Hurdes; ES4320047 ZEC Sierras de Risco Viein	Inside	81 ha
Spain (Audeca)	Emergency in Las Hurdes and Gata after the forest fire	ES0000370 ZEPA Sierra de Gata and Valle de las Pilas; ES4320037 ZEP Sierra de Gata	Inside	953 ha

Projects including monitoring of species appearing on the International Union for Conservation of Nature (IUCN) Red List [GRI 304-4](#)

Country	Project	Classification according to IUCN					
		CR*	EN*	VU*	NT*	LC*	Oth
Australia	New England Solar Farm			1		6	
Brazil	Boa Sorte solar PV plant			1	2	1	1
Brazil	PATE- LT230 kV Oriximiná-Juruti-Parintins e Subestações Associadas		1	12	3	2	
Cameroon	Yaoundé Lake					3	
Chile	New 2x220 Nueva Alto Melipilla - Nueva Casablanca - La Pólvora - Agua Santa line	1	4	5	1	2	
Colombia	Portón del Sol					74	
Spain	Santos de la Piedra Wind Farm		1			4	
Spain	Aerosur wind farm		1	1		1	
Spain	SIGMA solar PV plant. ARCO 1-5 FARMS					2	
Spain	400 kV Segura - Centurión transmission line					1	
Spain	Emergency in Las Hurdes and Gata after the forest fire				1		
Panama	230 kV Sabanitas Substation - Panamá III Substation transmission line					1	
Total		1	7	20	7	97	1

*CR: Critically endangered

*EN: Endangered

*VU: Vulnerable

*NT: Near threatened

*LC: Least concern

European taxonomy of environmentally sustainable economic activities

In 2020, the European Parliament and the Council of the European Union adopted 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) (hereinafter referred to as the *Taxonomy Regulation (TR)*).

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, five 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 (referred to as the *1st Delegated Act*).
- 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 (referred to as the *2nd Delegated Act*).
- Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022 amending Delegated Regulation (EU) 2021/2139 as regards economic activities in certain energy sectors and Delegated Regulation (EU) 2021/2178 as regards public disclosure of specific information on these economic activities. Specifically, this Delegated Regulation includes technical selection criteria that enable some activities in the fossil gas and nuclear energy sectors to be deemed environmentally sustainable activities (the *3rd Delegated Act*).

- Commission Delegated Regulation (EU) 2023/2485 of 27 June 2023 amending Regulation (EU) 2021/2139 by establishing the additional 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 (referred to as the *4th Delegated Act*).
- Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023, supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining conditions under which an economic activity qualifies as contributing substantially to the sustainable use and protection of water and marine resources, to the transition to a circular economy, to the prevention and control of pollution, or to the protection and recovery of biodiversity and ecosystems, and to determine whether such economic activity does not cause significant harm to any of the other environmental objectives, and amending Commission Delegated Regulation (EU) 2021/2178 as regards disclosure of specific public information on these economic activities (*5th Delegated Act*).

In this way, the European Taxonomy is set up as a classification system for environmentally sustainable economic activities to assist in informing investors —under a single, official criterion— about which investments are sustainable.

Eligible and ineligible activities

The following tables contain a list of the activities and sub-activities that the Elecnor Group has deemed eligible and ineligible pursuant to the regulations:

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)

ACTIVITY	SUB-ACTIVITIES	NACE Code	Taxonomy		
			Taxonomy Activity	Activity Description	Activity Goal and Type
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)
Power generation	Wind farms, solar photovoltaic, power generation and self-consumption plants	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 4.3. Electricity generation from wind energy 4.5. Electricity generation from hydropower 4.8. Electricity generation from bio-energy 4.10. Electricity storage 7.6. Installation, maintenance and repair of renewable energy technologies	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	4.1, 4.3 and 7.6 Mitigation (direct contribution activity) 4.5, 4.8 and 4.10 Mitigation (enabling activity)
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 product	Mitigation (enabling activity)

			Taxonomy		
ACTIVITY	SUB-ACTIVITIES	NACE Code	Taxonomy Activity	Activity Description	Activity Goal and Type
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)
Facilities	Electricity and instrumentation, air-conditioning, HVAC, PCI and plumbing and comprehensive installations	4120: Construction of buildings 4321: Electrical installations 4322: Plumbing, heating and air-conditioning systems installations 4531: Electrical installations	7.1. Construction of new buildings 7.2. Renovation of existing buildings	Construction of complete residential or non-residential buildings Construction and civil engineering works or preparation of such works	7.1. Mitigation (direct contribution activity) 7.2. Mitigation (transition activity)
Construction	Non-residential buildings	4120: Construction of buildings	7.1. Construction of new buildings 7.2. Renovation of existing buildings	Construction of complete residential or non-residential buildings Construction and civil engineering works or preparation of such works	7.1. Mitigation (direct contribution activity) 7.2. Mitigation (transition activity)
Environment and Water	Waterworks, distribution networks and water treatment plants and environmental works	4291: Water works 4299: Construction of other civil engineering projects n.e.c.	5.1. Construction, expansion and operation of water catchment, purification and distribution 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)

Furthermore, the following activities of the Elecnor Group are not described in the delegated acts implementing the TR and have therefore been catalogued as ineligible activities:

ACTIVITY	SUB-ACTIVITIES	NACE Code
Power generation	Combined cycle thermal power plants and on-line sales of PV solar equipment	3516: Production of conventional thermal electricity 2711: Manufacture of electric motors, generators and transformers
Oil & Gas	Distribution and transmission, infrastructure operations (domestic grid), domestic services and miscellaneous facilities of gas 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 and development, smart cities (systems)	2630: Telecommunications equipment manufacturing 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
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	Posts and pre-fabricated in glass reinforced polyester	4211: Construction of roads and motorways 4213: Construction of bridges and tunnels 4299: Construction of other civil engineering projects n.e.c. 2361: Manufacture of concrete elements for construction purposes
Environment and 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

Proportion of turnover from products or services related to environmentally sustainable economic activities (in thousands of Euros)

Financial year 2023	Year			Substantial contribution criteria						Do No Significant Harm (DNSH) criteria						Proportion of taxonomy-aligned turnover (A.1.) or taxonomy-eligible turnover (A.2.) 2023	Category of enabling activity	Category of transition activity
	Codes	Turnover (€ thousands)	Proportion of turnover, 2023	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity			
A. TAXONOMY-ELIGIBLE ACTIVITIES																		
A.1. Environmentally sustainable activities (taxonomy-aligned)																		
Generation of electricity using solar photovoltaic technology	CCM 4.1	378.191	9,97%	S	N/EL	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	13,64%	
Electricity generation from wind energy	CCM 4.3	275.532	7,26%	S	N/EL	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	10,46%	
Transmission and distribution of electricity	CCM 4.9	1.113.571	29,36%	S	N/EL	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	26,30%	F
Electricity storage	CCM 4.10	23.352	0,62%	S	N/EL	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	0,00%	F
Collection and transport of non-hazardous waste in source-segregated fractions	CCM 5.5	3.230	0,09%	S	N/EL	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	0,08%	
Rail transport infrastructure	CCM 6.14	218.068	5,75%	S	N/EL	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	2,56%	F
Construction of new buildings	CCM 7.1	1.307	0,03%	S	N/EL	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	0,06%	
Renovation of existing buildings	CCM 7.2	48.863	1,29%	S	N/EL	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	0,36%	T
Installation, maintenance and repair of energy-efficient equipment	CCM 7.3	2.014	0,05%	S	N/EL	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	1,81%	F
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	5.520	0,15%	S	N/EL	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	0,07%	F
Turnover from environmentally sustainable activities (taxonomy-aligned) (A.1)		2.069.648	54,57%	54,57%	0%	0%	0%	0%	0%	S	S	S	S	S	S	S	55,34%	
Of which: facilitators		1.362.525	35,92%	35,92%	0%	0%	0%	0%	0%	S	S	S	S	S	S	S	30,74%	F
Of which: transitional		48.863	1,29%	1,29%						S	S	S	S	S	S	S	0,36%	T
A.2. A.2 Taxonomy-eligible but not environmentally sustainable activities (taxonomy non-aligned activities)																		
Generation of electricity using solar photovoltaic technology	CCM 4.1	7.927	0,21%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0,76%	
Electricity generation from wind energy	CCM 4.3	8.103	0,21%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0,05%	
Electricity generation from hydropower	CCM 4.5	26.932	0,71%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0,75%	
Electricity generation from bio-energy	CCM 4.8	0	0,00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0,35%	
Transmission and distribution of electricity	CCM 4.9	417.847	11,02%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								9,29%	
Construction, expansion and operation of water catchment, purification and distribution systems	CCM 5.1	12.692	0,33%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0,93%	
Rail transport infrastructure	CCM 6.14	7.235	0,19%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0,09%	
Construction of new buildings	CCM 7.1	10.353	0,27%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0,37%	
Renovation of existing buildings	CCM 7.2	9.338	0,25%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								1,78%	
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	0	0,00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0,00%	
Turnover from taxonomy-eligible but not environmentally sustainable activities (taxonomy non-aligned activities) (A.2)		500.427	13,19%	13,19%	0%	0%	0%	0%	0%								14,37%	
A. Turnover from taxonomy-eligible activities (A.1+A.2)		2.570.075	67,76%	67,76%	0%	0%	0%	0%	0%								69,71%	
B. TAXONOMY NON-ELIGIBLE ACTIVITIES																		
Turnover from taxonomy non-eligible activities (B)		1.222.831	32,24%														30,29%	
TOTAL		3.792.906	100%														100,00%	

	Proportion of turnover/total turnover	
	that are taxonomy-aligned by objective	that are taxonomy-eligible by objective
CCM	54,57%	67,76%
CCA	0,00%	0,00%
WTR	0,00%	0,00%
CE	0,00%	0,00%
PPC	0,00%	0,00%
BIO	0,00%	0,00%

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

Financial year 2023	Year		Substantial contribution criteria							Do No Significant Harm (DNSH) criteria							Minimum guarantees	Proportion of taxonomy-aligned CapEx (A.1) or taxonomy-eligible according CapEx (A.2), 2023	Proportion of taxonomy-aligned CapEx (A.1) or taxonomy-eligible according CapEx (A.2), 2023	Category of enabling activity	Category of transition activity
	Codes	CapEx (€ thousands)	Proportion of CapEx, 2023	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity						
A. TAXONOMY-ELIGIBLE ACTIVITIES																					
A.1. Environmentally sustainable activities (taxonomy-aligned)																					
Electricity generation from wind energy	CCM 4.3	80.094	31,85%	S	N/EL	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	S	42,77%			
Generation of electricity using solar photovoltaic technology	CCM 4.1	75.545	30,04%	S	N/EL	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	S	0,00%			
CapEx from environmentally sustainable activities (taxonomy-aligned) (A.1)		155.639	61,88%	61,88%	0,00%	0,00%	0,00%	0,00%	0,00%	S	S	S	S	S	S	S	S	42,77%			
Of which: facilitators		0	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	S	S	S	S	S	S	S	S	0,00%	F		
Of which: transitional		0	0,00%	0,00%						S	S	S	S	S	S	S	S	0,00%	T		
A.2. A.2 Taxonomy-eligible but not environmentally sustainable activities (taxonomy non-aligned activities)																					
CapEx from taxonomy-eligible but not environmentally sustainable activities (taxonomy non-aligned activities) (A.2)		0	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%									0,00%			
A. CapEx from taxonomy-eligible activities (A.1+A.2)		155.639	61,88%	61,88%	0,00%	0,00%	0,00%	0,00%	0,00%									42,77%			
B. TAXONOMY NON-ELIGIBLE ACTIVITIES																					
CapEx from taxonomy non-eligible activities (B)		95.871	38,12%															57,23%			
TOTAL		251.510	100,00%															100,00%			

	Proportion of CapEx/Total CapEx	
	that are taxonomy-aligned by objective	that are taxonomy-eligible by objective
CCM	61,88%	61,88%
CCA	0,00%	0,00%
WTR	0,00%	0,00%
CE	0,00%	0,00%
PPC	0,00%	0,00%
BIO	0,00%	0,00%

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

Financial year 2023	Year		Substantial contribution criteria							Do No Significant Harm (DNSH) criteria							Proportion of taxonomy-aligned OpEx (A.1) or taxonomy-eligible OpEx (A.2), 2023	Category of enabling activity	Category of Transition activity
	Codes	OpEx (€ thousand)	Proportion of OpEx, 2023	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum guarantees			
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (taxonomy-aligned)																			
Electricity generation from wind energy	CCM 4.3	0	0,00%	S	N/EL	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	4,02%		
OpEx from environmentally sustainable activities (taxonomy-aligned) (A.1)				%	%	%	%	%	%	S	S	S	S	S	S	S	104,02%		
Of which: facilitators		0	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	S	S	S	S	S	S	S	0,00%		
Of which: transitional		0	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	S	S	S	S	S	S	S	0,00%		
A.2. A.2 Taxonomy-eligible but not environmentally sustainable activities (taxonomy non-aligned activities)																			
OpEx from taxonomy-eligible but not environmentally sustainable activities		0	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%								0,00%		
A. OpEx from taxonomy-eligible activities (A.1+A.2)		0	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%								104,02%		
B. TAXONOMY NON-ELIGIBLE ACTIVITIES																			
OpEx from taxonomy non-eligible activities (B)		194.105	100,00%														95,98%		
TOTAL		194.105	100,00%																

	Proportion of OpEx/Total OpEx	
	that are taxonomy-aligned by objective	that are taxonomy-eligible by objective
CCM	0,00%	0,00%
CCA	0,00%	0,00%
WTR	0,00%	0,00%
CE	0,00%	0,00%
PPC	0,00%	0,00%
BIO	0,00%	0,00%

Nuclear and fossil energy-related activities

Nuclear energy related activities	
The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
Fossil gas related activities	
The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
The undertaking carries out, funds or has exposures to construction, refurbishment and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

Fiscal transparency

Country by Country Report 2023 GRI 207-4

Tax jurisdiction	Number of employees	Income from sales to third parties	Income from intra-group transactions with other tax jurisdictions	Profit or loss before taxes*	Tangible assets other than cash and cash equivalents	Income tax paid	Income tax accrued**	Difference between accrued tax and that resulting from applying the tax rate to the accounting profit/loss
GERMANY	0,50	-	-	479.247,08	-	-	-	4
ANGOLA	1.335,00	65.361.061,04	6.940.714,21	2.510.360,27	9.533.651,13	4.256.915,65	109.547,82	8, 11
ALGERIA	2,00	10.554.883,22	-	3.486.301,79	-	23.098,52	1.178.026,29	8, 11
ARGENTINA	114,00	9.433.775,19	-	1.628.371,61	824.722,51	113.345,20	35.644,86	5, 6, 8
AUSTRALIA	229,00	342.777.059,69	699.983,93	7.603.076,66	10.053.157,92	4.685.486,33	2.049.831,02	6, 11
BELGIUM	6,67	6.099.593,51	-	179.643,23	533,59	28.592,30	32.828,87	12
BOLIVIA	-	5.813,43	-	384.151,89	6.486,36	-	-	4, 9
BRAZIL	4.765,00	472.668.108,41	144.678.013,95	87.737.406,28	380.137.066,76	16.407.894,39	16.545.311,73	10, 11
CAMEROON	603,00	23.155.361,25	62.821,88	4.733.299,17	3.253.393,72	199.963,37	6.624.305,51	6
CANADA	6,00	34.826.098,58	7.189.785,55	10.812.794,43	138.842.823,86	91.980,89	1.402.488,10	5, 6, 11
CHILE	453,00	39.643.782,50	56.215.683,47	9.635.397,12	4.610.187,09	695.930,62	1.600.609,27	5, 11
COLOMBIA	31,00	19.936.859,73	2.197,30	606.020,34	9.406.115,22	514.899,28	-	4, 5, 6, 7, 11
IVORY COAST	31,66	4.774.567,83	-	1.855.717,18	-	-	-	4
DOMINICAN REPUBLIC	170,50	22.642.079,24	1.072.297,60	4.401.560,84	2.905.716,12	26.579,05	722.379,28	1, 5, 6, 11, 12
ECUADOR	3,00	26.005.625,48	2.430.344,91	4.242.090,50	84.518.761,75	397.276,53	1.051.419,18	5, 11
USA	796,00	322.490.262,92	398.419,29	20.230.180,59	17.576.730,56	1.563.799,08	3.213.652,72	11, 12
EL SALVADOR	15,92	681.479,25	818.956,79	452.430,32	4.495,10	11.060,90	6.163,75	12
UNITED ARAB EMIRATES	-	-	-	-	1.223,06	-	-	N/A
SPAIN	11.197,00	1.769.024.465,94	185.859.928,08	381.165.273,56	287.643.597,29	8.378.249,94	32.344.670,94	5, 6, 7, 11
PHILIPPINES	-	-	-	31.056,41	-	-	-	4
FINLAND	15,00	5.772.027,23	1.024.306,94	288.340,82	0,02	50.879,33	77.895,74	4, 6
GAMBIA	1,00	217.190,00	-	120.920,00	-	-	-	3
GHANA	177,00	4.058.067,06	2.568.524,61	357.054,09	979.639,50	1.124,97	29.658,45	4, 6
GUINEA	4,00	6.339.521,81	1.375.910,00	638.080,24	367.897,51	5.432,95	5.432,95	1, 3, 11
GUINEA-BISSAU	1,00	508.960,00	-	37.860,00	-	-	-	3
HAITI	3,00	222.114,29	-	3.449.049,35	21.275,30	107.134,05	-	4, 9
HONDURAS	51,00	6.647.076,74	1.929.983,50	477.021,20	360.629,30	37.661,00	187.199,57	3, 6
ENGLAND	243,00	27.519.729,83	9.574.617,04	5.887.048,67	500.200,06	687.226,06	1.141.796,71	5, 6, 7, 11
ITALY	785,00	67.359.607,65	36.394.391,96	3.746.581,29	17.151.833,35	322.163,00	356.760,99	1, 5, 6, 7, 11
JORDAN	3,00	476.058,84	-	1.151.673,27	-	5.164,47	5.164,47	4, 5, 6, 11, 13
KUWAIT	-	499.539,97	-	5.895,09	-	45.741,15	41.714,76	4, 5, 11
LIBERIA	-	4.237,00	-	457.396,50	-	-	-	3
LITHUANIA	82,00	2.176,13	57.178.912,80	2.206.000,85	22.550.218,19	126.899,17	326.416,53	6, 12
MOROCCO	-	6.349,30	-	300.065,17	-	-	181.257,22	1, 4, 12
MAURITANIA	4,00	835.370,22	244.000,00	870.476,05	674.423,50	314.708,45	326.961,50	1, 4
MEXICO	68,00	12.954.626,37	1.114.750,95	5.405.986,96	775.874,60	2.862,37	1.541.951,44	4, 11
MOZAMBIQUE	226,00	14.485.986,51	36.354,01	3.697.562,38	3.163.464,72	5.221,67	16.143,79	1, 4, 6
NORWAY	73,50	21.932.095,24	12.758.430,55	1.619.066,22	217.469,05	1.053.075,84	184.234,93	6, 12
OMAN	202,00	74.640.582,47	21.334.300,79	865.070,81	26.164.092,52	96.795,00	125.343,00	4, 7, 11
PANAMA	79,00	26.055.169,18	9.176.424,49	5.413.352,43	2.029.154,00	-	38.088,48	1, 4, 11
PARAGUAY	1,00	-	-	109.480,98	-	-	-	4
PERU	49,00	3.942.877,50	-	14.242.426,23	305.996,62	-	53,31	7, 11
PORTUGAL	277,00	34.525.090,49	2.081.614,95	589.019,03	1.250.158,37	661.630,63	375.086,46	4, 6, 7, 11, 12
ROMANIA	-	640.826,40	741.310,65	79.757,54	6.418,55	10.088,79	11.474,11	5, 6
SENEGAL	13,00	1.542.711,91	300.291,65	1.495.942,68	73.502,44	-	-	12
SOUTH AFRICA	-	-	-	-	-	-	-	4
URUGUAY	220,00	16.689.515,24	-	535.550,38	912.971,16	107.160,86	19.177,65	1, 8
VENEZUELA	16,00	17.755,07	-	84.121,06	293.369,30	-	-	4, 11
ZAMBIA	8,00	2.668.848,70	-	21.083,96	870.284,74	-	-	4
Overall total	22.360,75	3.499.684.396,65	564.203.271,86	523.653.619,85	1.027.987.534,84	37.538.028,89	62.361.596,56	

Points I and II: The full list of ELECNOR companies and their main activities is published annually in Appendices I of the Consolidated Annual Accounts.

- Application of minimum tax
- Special scheme that defers the tax payment
- Projects that are exempt from the income tax
- A country that did not have any activity, or losses were generated, and therefore no tax payable was generated
- Negative tax adjustment (non-taxable income)
- Positive tax adjustment (non-deductible expenses) and inflationary adjustment
- Application of tax credits
- Application of deferred taxes
- Tax year different from the calendar year
- Presumed profit
- The group of companies of the same fiscal jurisdiction with before-tax losses reduces the estimate of accrued corporations tax
- Adjustments due to accounting integration
- Prior years' tax from inspection

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	43-44	GRI 2-6
Markets where it operates	Material	3, 45	GRI 2-1 GRI 2-6
The organisation's goals and strategies	Material	43-44	GRI 2-6
The main factors and trends potentially affecting future performance	Material	24, 35-37	GRI 3-3
Reporting framework used	Material	30	GRI 1
Principle of Materiality	Material	35-40	GRI 3-1
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	77-101	GRI 3-3
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	91-92	GRI 3-3
Procedures for environmental assessment or certification	Material	91	GRI 3-3
Resources allocated to preventing environmental risks	Material	91	GRI 3-3
Application of the precautionary principle	Material	72-73, 92	GRI 3-3
Amount of provisions and guarantees for environmental risks	Material	92	GRI 3-3
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	
Circular economy and waste prevention and management			
Prevention, recycling, re-use, other methods of waste recovery and elimination	Material	96-98	GRI 306-1 (2020) GRI 306-2 (2020) GRI 306-3 (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	95-96	GRI 303-5 (2018)
Consumption of raw materials and measures implemented to boost efficiency in their usage	Material	96	GRI 3-3
Direct and indirect energy consumption	Material	92-93	GRI 302-1
Measures taken to boost energy efficiency	Material	93	GRI 3-3
Renewable energy use	Material	94	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	88-90	GRI 305-1 GRI 305-2 GRI 305-3 GRI 305-4
Measures implemented to adapt to the consequences of climate change	Material	77-87	GRI 3-3 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	77-87	GRI 305-5
Safeguarding biodiversity			
Measures implemented to preserve or restore biodiversity	Material	98-101	GRI 304-3
Impacts of the activities or operations on protected areas	Material	98-101	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	44-62 62-72 179-199	GRI 3-3
Employment			
Total number of employees and breakdown by country, gender, age and professional category	Material	44-47,179-180	GRI 2-7
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	181-185	GRI 2-7
Number of layoffs by gender, age and professional category	Material	47, 192	GRI 3-3 GRI 401-1
Average remuneration and evolution thereof by gender, age and professional category or equal value	Material	54-55-193-194	GRI 3-3 GRI 405-2
Wage gap, remuneration of equal jobs or company average	Material	55	GRI 3-3 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	54-55, 130-132	GRI 2-19 GRI 3-3 GRI 405-2
Policies to facilitate disconnection from work	Material	56-57	GRI 3-3
Number of disabled employees	Material	59-60	GRI 3-3
Organisation of work			
Organisation of work time	Material	56	GRI 3-3

Number of hours of absenteeism	Material	47	GRI 3-3
Measures aimed at facilitating work-life balance and fostering a mutually responsible approach thereto by both parents	Material	56-57	GRI 3-3
Health and Safety			
Occupational Health and Safety conditions	Material	62-72	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	67-71	GRI 403-9 (2018) GRI 403-10 (2018)
Social relations			
Organisation of social dialogue, including procedures to inform and consult employees and to negotiate with them	Material	61-62	GRI 3-3
Percentage of employees covered by collective bargaining agreements by country	Material	61	GRI 2-30
Balance of collective bargaining agreements, especially in connection with occupational health and safety	Material	65	GRI 403-4 (2018)
Mechanisms and procedures that the company has in place to encourage workers' involvement in the management of the company, in terms of information, consultation and participation	Material	62	GRI 3-3
Training			
Training policies implemented	Material	49-41	GRI 3-3
Total number of training hours by professional category	Material	51-54	GRI 404-1
Universal access			
Universal access for disabled people	Material	60	GRI 3-3
Equality			
Measures implemented to promote equal treatment and equal opportunities for women and men	Material	57-58	GRI 3-3
Equality plans, measures adopted to promote employment, protocols against sexual harassment and gender-based harassment	Material	57	GRI 3-3
Policy against any kind of discrimination and, in the event, for managing diversity	Material	57	GRI 3-3
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	151-152	GRI 3-3

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	151-152	GRI 2-23 GRI 2-26
Complaints regarding human rights breaches	Material	57, 143	GRI 3-3
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	151-152	GRI 3-3
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	138-143, 148-150	GRI 3-3
Measures implemented to prevent bribery and corruption	Material	138-143, 148-150	GRI 3-3 GRI 2-23 GRI 205-3
Anti-money laundering measures	Material	138-143, 148-150	GRI 3-3 GRI 2-23 GRI 205-3
Contributions to foundations and non-profit organisations	Material	148, 160	GRI 2-28 GRI 201-1
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	157-178	GRI 3-3
The company's commitment to sustainable development			
Impact of the business on society, with regard to jobs and local development	Material	158-170	GRI 3-3 GRI 203-2 GRI 204
The impact of the business on local communities and territory	Material	35-37, 158-170	GRI 2-29 GRI 203-2
Relations with the stakeholders in local communities and modalities of dialogue with them	Material	35-37, 41-43, 169-170	GRI 2-29
Association or sponsorship actions	Material	101-102, 124, 133, 146-147	GRI 2-28 GRI 3-3 GRI 201-1
Subcontracting and suppliers			

Inclusion in procurements policy of social issues, equality and environmental considerations	Material	75-76	GRI 3-3
Consideration, in relations with suppliers and subcontractors, of their social and environmental responsibility	Material	75-76	GRI 2-6 GRI 308-1
Supervisory system and audits, and findings thereof	Material	75-76	GRI 2-6
Consumers			
Measures to ensure consumer health and safety	Material	72-74	GRI 3-3
Complaints systems, complaints received and resolution thereof	Material	74	GRI 3-3
Tax information			
Profits obtained by country	Material	154-155	GRI 207-1 (2019) GRI 207-2 (2019) GRI 207-3 (2019)
Income tax paid	Material	156	GRI 207-1 (2019) GRI 207-2 (2019) GRI 207-3 (2019)
Public grants received	Material	157	GRI 201-4
EU Regulation (202/852) - Taxonomy			
Regulation requirement	Material	101-110, 203-210	Elecnor Group's own methodology prepared based on article 8 of the European Taxonomy

Appendix III

Index of GRI indicators

Statement of use	Elecnor has prepared the report pursuant to GRI Standards for the period from 1 January to 31 December 2023.
GRI 1 Used	GRI 1: 2021 background
Applicable GRI Sector Standards	Not applicable

GRI standard	Training	Page of the report featuring response	Omissions
GRI 1: 2021 background			
GRI 2: General disclosures 2021			
2-1	Organisational details	30, 179-180 Arturo Soria, 343 28033 Madrid - Spain Spain	
2-2	Entities included in the sustainability reporting	30 Appendix I to the Annual Accounts of Elecnor, S.A. and Subsidiaries Year 2023	
2-3	Reporting period, frequency and contact point	Annual submission Contact address elecnor@elecnor.com	
2-4	Update of information	There have not been any significant changes.	
2-5	External assurance	225-227 ACGR C.1.30	
2-6	Activities, value chain and other business relationships	43-44, 75-76	
2-7	Employees	45-47, 179-180 Elecnor has no employees for non-guaranteed hours Workforce data reported Head Count criteria	
2-8	Workers who are not employees	47	Information on Workers who are not employees controlled by the Elecnor Group is not available in the company's systems with the required breakdown. The Elecnor Group is working towards improving its systems to report this information in 2023
2-9	Governance structure and composition	124-125 ACGR C.1.3.	

2-10	Nomination and selection of the highest governance body	124 ACGR C.1.16.	
2-11	Chair of the highest governance body	124-125	
2-12	Role of the highest governance body in overseeing the management of impacts	125-129 ACGR C.2.1	
2-13	Delegation of responsibility for managing impacts	31, 134 ACGR C1.3, C.2.1	
2-14	Role of the highest governance body in sustainability reporting	31-32	
2-15	Conflicts of interest	ACGR D6	
2-16	Communication of critical concerns	31-32, 126-127,138-143	
2-17	Collective knowledge of the highest governance body	146 ACGR C1.3	
2-18	Evaluation of the performance of the highest governance body	133 ACGR C.1.17	
2-19	Remuneration policies	54-55, 130-132 Remuneration Policy 2022-2025	
2-20	Process to determine remuneration	130-131 Remuneration Policy 2022-2025 Remuneration consultants are not involved in the process of determining remuneration	
2-21	Ratio of total annual compensation	196	The information in section b has not been reported. Section a. Only fixed remuneration has been taken into account in this ratio, with the Chief Executive Officer's compensation corresponding to the fixed remuneration for his executive duties. The Elecnor Group is working on its reporting systems in order to be able to report the total compensation ratio with all variable items in 2025.
2-22	Sustainable Development Strategy Statement	The declaration of the most senior decision-maker will be included in the Integrated Report 2023.	
2-23	Policies and commitments	30, 72-73, 91-92, 136-143	
2-24	Embedding policies and commitments	30, 72-73, 91-92, 136-143	

2-25	Processes to remediate negative impacts	41-43, 57, 73-74, 98-101, 167-169	
2-26	Mechanisms for seeking advice and raising concerns	142-143	
2-27	Compliance with laws and regulations	107, 126-128	
2-28	Membership of associations	121, 148, 158, 174-175	
2-29	Approach to stakeholder engagement	35-37, 41-43	
2-30	Collective bargaining agreements	61-62	
GRI 3: General disclosures 2021			
3-1	Process to determine material topics	35-37	
3-2	List of material topics	35-37	

Thematic content

GRI standard	Training	Page of the report featuring response	Direct Response/Omissions
Management of skilled people			
3-3 Material topics			
3-3	Management of material topics	47-54	
GRI 401: Employment 2016			
401-1	Hiring of new employees and staff turnover	47, 186-192	
401-3	Parent leave	57-58	
GRI 404: Training and education 2016			
404-1	Average hours of training per year per employee	53	
404-2	Programs for upgrading employee skills and transition assistance programs	49-51	Note. At present, the Elecnor Group does not have any transition assistance programmes in place to facilitate employability
404-3	Percentage of employees receiving regular performance and career development reviews	54	
Occupational health and safety			
3-3 Material topics			
3-3	Management of material topics	38, 63-72	
GRI 403: Occupational Health and Safety 2018			
403-1	Occupational health and safety management system	62-63	
403-2	Hazard identification, risk assessment and incident investigation	63-64	
403-3	Occupational health services	63-64, 66-67	

403-4	Worker participation, consultation and communication on occupational health and safety	65	
403-5	Worker training on occupational health and safety	65-66	
403-6	Promotion of worker health	66-67	
403-7	Prevention and mitigation of occupational health and safety impacts directly linked to business relationships	63-64, 69-70	
403-8	Workers covered by an occupational health and safety management system	63-64, 65, 69-70	
403-9	Work-related injuries	67-70	
403-10	Work-related ill health	67-72	
Ethics and Compliance			
3-3 Material topics			
3-3	Management of material topics	38.136-151, 153-157	
GRI 201: Economic performance 2016			
201-4	Financial assistance received from government	157	
GRI 205: Anti-Corruption 2016			
205-1	Operations assessed for risks related to corruption	134-136, 138-143, 148-150	
205-2	Communication and training about anti-corruption policies and procedures	144-146	
205-3	Confirmed incidents of corruption and actions taken	138-143	
GRI 206: Unfair competition			
206-1	Legal actions related to unfair competition and monopolistic and anti-competitive behaviour	150-151 Note 18 Annual Accounts of Elecnor, S.A. and Subsidiaries	
GRI 207: 2019 taxation			
207-1	Explanation of the material topic and its boundary	153-157	
207-2	The management approach and its components	153-157	
207-3	Evaluation of the management approach	153-157	
207-4	Country-by-country reporting	154-155 211	
GRI 415: Public policy 2016			
415-1	Contributions to political parties and/or representatives	148, 150-151	
Resource efficiency			
3-3 Material topics			
3-3	Management of material topics	38, 91-98	
GRI 302: Energy 2016			
302-1	Energy consumption within the organisation	92-93	
302-2	Energy consumption outside the organisation	90	
302-3	Energy intensity	92	
302-4	Reduction of energy consumption	86-87	
302-5	Reduction of energy requirements of products and services	90-91, 93	
GRI 303: Water 2018			

303-1	Interactions with water as a shared resource	95	
303-3	Water withdrawal	95	
303-5	Water consumption	95	
GRI 306: 2020 waste			
306-1	Waste generation and material waste-related impacts	96	
306-2	Management of material waste-related impacts	96, 98	
306-3	Waste generated	96	
306-4	Waste not destined for disposal	97	
306-5	Waste destined for disposal	97	
Biodiversity			
3-3 Material topics			
3-3	Management of material topics	38, 98-101	
GRI 304: Biodiversity 2016			
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside	98-101 200-201	
304-2	Significant impacts of activities, products, and services on biodiversity	98-101	
304-3	Habitats protected or restored	98-101	
304-4	Species on the IUCN Red List and on national conservation lists whose habitats are found in areas affected by the operations	202	
Climate change			
3-3 Material topics			
3-3	Management of material topics	38, 77-91	
GRI 201: Economic performance 2016			
201-2	Financial implications and other risks and opportunities due to climate change	79-86	The financial implications of the risk or opportunity will be calculated in 2024, as well as the costs associated with the measures to be taken.
GRI 305: Emissions 2016			
305-1	Direct (Scope 1) GHG emissions	88-90	
305-2	Energy indirect (Scope 2) GHG emissions	88-89	
305-3	Other indirect (Scope 3) GHG emissions	88-90	
305-4	GHG emissions intensity	89	
305-5	Reduction of GHG emissions	86-87	
Dialogue with communities			
3-3 Material topics			
3-3	Management of material topics	38, 167-170	
GRI 203: Indirect economic impacts 2016			

203-2	Significant indirect economic impacts	160-162, 167-169	
GRI 413: Local communities 2016			
413-2	Operations with significant actual and potential negative impacts on local communities	167-169	
Local development			
3-3 Material topics			
3-3	Management of material topics	38, 157-167	
GRI 201: Economic performance 2016			
201-1	Direct economic value generated and distributed	158-160	
GRI 203: Indirect economic impacts 2016			
203-1	Infrastructure investments and services supported	160-164	
GRI 204: Procurement practices 2016			
204-1	Proportion of spending on local suppliers	159	
GRI 413: Local communities 2016			
413-1	Operations with local community engagement, impact assessments, and development programs	160-167	
Human rights			
3-3 Material topics			
3-3	Management of material topics	38, 138-143, 151-152	
GRI 406: Non-Discrimination 2016			
406-1	Incidents of discrimination and corrective actions taken	57	
GRI 407: Freedom of association and collective bargaining 2016			
407-1	Operations and suppliers whose right to freedom of association and collective bargaining may be at risk	138-143 151-152	
GRI 408: 2016 child labour			
408-1	Operations and suppliers with a material risk of cases of child labour	138-143 151-152	
GRI 409: Forced or compulsory labour 2016			
409-1	Operations and suppliers with a material risk of cases of forced or compulsory labour	138-143 151-152	
GRI 411: Rights of indigenous people			
411-1	Cases of violations of indigenous peoples' rights	151-152	
Service quality and customer focus			
3-3 Material topics			
3-3	Management of material topics	38, 72-74	
Digital transformation			
3-3 Material topics			
3-3	Management of material topics	38, 111-113	
Data protection and cybersecurity			
3-3 Material topics			
3-3	Management of material topics	113-114	

Sustainable finance			
3-3 Material topics			
3-3	Management of material topics	94	
Corporate Governance			
3-3 Material topics			
3-3	Management of material topics	122-133	

Appendix IV

Table of contents according to the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD)

The contents of this report are in line with the recommendations of the TCFD. The location of the contents suggested by the initiative can be viewed in this table of contents:

Areas	Training	Pages
Governance	Describe the board's oversight of climate-related risks and opportunities	78-19
	Describe management's role in assessing and managing climate-related risks and opportunities	78-19
Strategy	Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term	77-86
	Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning	77-86
	Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario	77-86
Risks	Describe the organisation's processes for identifying and assessing climate-related risks	79-80, 134-136
	Describe the organisation's processes for managing climate-related risks	79-80, 134-136
	Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organisation's overall risk management	79-80, 134-136

Metrics	Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process	86-87
	Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks	88-90
	Describe the targets used by the organisation to manage climate-related risks and opportunities and performance of these targets	77



Elecnor, S.A.

Informe de verificación independiente
Estado de Información No Financiera Consolidado
31 de diciembre de 2023



Informe de verificación independiente

A los accionistas de Elecnor, S.A.:

De acuerdo al artículo 49 del Código de Comercio hemos realizado la verificación, con el alcance de seguridad limitada, del Estado de Información No Financiera Consolidado (en adelante EINF) correspondiente al ejercicio finalizado el 31 de diciembre de 2023, de Elecnor, S.A. (Sociedad dominante) y sociedades dependientes (en adelante Elecnor o el Grupo) que forma parte del informe de gestión consolidado adjunto de Elecnor.

El contenido del informe de gestión consolidado incluye información adicional a la requerida 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 de la Sociedad dominante

La formulación del EINF incluido en el informe de gestión consolidado de Elecnor, así como el contenido del mismo, es responsabilidad de los administradores de Elecnor, S.A. El EINF se ha preparado de acuerdo con los contenidos recogidos en la normativa mercantil vigente y conforme a los criterios de los *Sustainability Reporting Standards* de *Global Reporting Initiative* (estándares GRI) de acuerdo a 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 informe de gestión consolidado.

Esta responsabilidad incluye 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 Elecnor, S.A. 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 gestión de la calidad

Hemos cumplido con los requerimientos de independencia y demás requerimientos de ética del Código Internacional de Ética para Profesionales de la Contabilidad (incluidas las normas internacionales de independencia) del Consejo de Normas Internacionales de Ética para Profesionales de la Contabilidad (Código de ética del IESBA por sus siglas en inglés) que está basado en los principios fundamentales de integridad, objetividad, competencia y diligencia profesionales, confidencialidad y comportamiento profesional.

Nuestra firma aplica la Norma Internacional de Gestión de la Calidad (NIGC) 1, que requiere que la firma diseñe, implemente y opere un sistema de gestión de la calidad que incluya políticas o procedimientos relativos al cumplimiento de los requerimientos de ética, normas profesionales y requerimientos legales y reglamentarios aplicables.

PricewaterhouseCoopers Auditores, S.L., Torre PwC, Pº de la Castellana 259 B, 28046 Madrid, España
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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 acuerdo con los requisitos establecidos en la Norma Internacional de Encargos de Aseguramiento 3000 Revisada en vigor, "Encargos de Aseguramiento distintos de la Auditoría o de la Revisión de Información Financiera Histórica" (NIEA 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 seguridad limitada los procedimientos llevados a cabo varían en naturaleza y momento de realización, y tienen una menor extensión, que los realizados en un trabajo de seguridad razonable y, por lo tanto, la seguridad proporcionada es también menor.

Nuestro trabajo ha consistido en la formulación de preguntas a la dirección, así como a las diversas unidades de Elecnor 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 de Elecnor, S.A. 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 del ejercicio 2023 en función del análisis de materialidad realizado por Elecnor y descrito en el apartado "Temas materiales del Grupo Elecnor", 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 2023.
- Revisión de la información relativa a los riesgos, las políticas y los enfoques de gestión aplicados en relación a los aspectos materiales presentados en el EINF del ejercicio 2023.
- Comprobación, mediante pruebas, en base a la selección de una muestra, de la información relativa a los contenidos incluidos en el EINF del ejercicio 2023 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 de la Sociedad dominante.

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 2023 no ha sido preparado, en todos sus aspectos significativos, de acuerdo con los contenidos recogidos en la normativa mercantil vigente y conforme a los criterios de los estándares GRI de acuerdo a 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 informe de gestión consolidado.

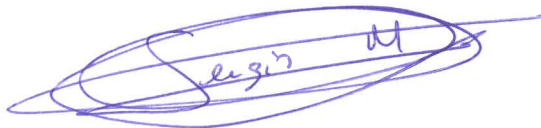
Párrafo de énfasis

En base al 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, así como en base a los Actos Delegados promulgados de conformidad con lo establecido en dicho Reglamento, se establece la obligación de divulgar información sobre la manera y la medida en que las actividades de la empresa se asocian a actividades económicas elegibles en relación con los objetivos medioambientales de uso sostenible y protección de los recursos hídricos y marinos, transición a una economía circular, prevención y control de la contaminación y protección y restauración de la biodiversidad y ecosistemas (el resto de objetivos medioambientales), y respecto de determinadas nuevas actividades incluidas en los objetivos de mitigación y adaptación al cambio climático, por primera vez para el ejercicio 2023, adicional a la información referida a actividades elegibles y alineadas ya exigida en el ejercicio 2022 en relación con los objetivos de mitigación del cambio climático y de adaptación al cambio climático. En consecuencia, en el EINF adjunto no se ha incluido información comparativa sobre elegibilidad en relación con el resto de los objetivos medioambientales anteriormente indicados ni con las nuevas actividades incluidas en los objetivos de mitigación del cambio climático y de adaptación al cambio climático. Por otra parte, en la medida en la que la información relativa al ejercicio 2022 no se requería con el mismo nivel de detalle que en el ejercicio 2023, en el EINF adjunto la información desglosada tampoco es estrictamente comparable. Adicionalmente, cabe señalar que los administradores de Elecnor, S.A. han incorporado información sobre los criterios que, en su opinión, permiten dar mejor cumplimiento a las citadas obligaciones y que están definidos en los apartados "Taxonomía europea de actividades económicas medioambientalmente sostenibles" del EINF 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.

PricewaterhouseCoopers Auditores, S.L.



Sergio Mateos Orcajo

28 de febrero de 2024

INSTITUTO DE CENSORES
JURADOS DE CUENTAS
DE ESPAÑA

PRICEWATERHOUSECOOPERS
AUDITORES, S.L.

2024 Núm. 01/24/00185

SELLO CORPORATIVO: 30,00 EUR

Sello distintivo de otras actuaciones