

# Equality plan



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## 1. INTRODUCTION

Article 14 of the Spanish Constitution enshrines the right to equality and non-discrimination on the basis of gender, obliging public authorities to promote the conditions necessary for equality to be realised.

To ensure and perpetuate compliance with this universal legal principle, the Organic Law on the Effective Equality of Women and Men was passed on 22 March 2007. The law aims to: “give effect to the principle of equal treatment and opportunities between women and men, in particular by eliminating discrimination against women in all spheres of life, especially in the political, civil and labour spheres”.

Royal Decree-Law 6/2019 of 1 March, on urgent measures to guarantee equal treatment and opportunities between women and men in employment and occupation, subsequently complemented this regulation by establishing new legal requirements for companies in terms of equality.

Notably, companies with over 50 employees are now required to include measures in an Equality Plan to prevent discrimination between women and men in the workplace. Previously, this obligation only applied to companies with over 250 employees.

The Elecnor Group demonstrates its commitment to equality and non-discrimination through its specific Corporate Social Responsibility principles, recognising the development of labour relations based on equal opportunities, non-discrimination, and respect for diversity as a strategic objective.

## 2. ACTION AXES

In line with the results of the Diagnosis and the Remuneration Audit, 11 action axes are envisaged:

- Axis 1. Communication
- Axis 2. Selection and Recruitment
- Axis 3. Professional Classification
- Axis 4. Training
- Axis 5. Professional Promotion
- Axis 6. Working Conditions
- Axis 7. Work-Life Balance and Co-responsibility
- Axis 8. Under-representation
- Axis 9. Remuneration and Salary Audit
- Axis 10. Prevention and Action in the Case of Sexual and/or Gender-Based Harassment
- Axis 11. Occupational Health

For each action axis, the objectives to be achieved and the specific actions to achieve them are described.

### Axis 1. Communication

**Objective 1.1. Ensure that all company communications use non-sexist and inclusive language and images and eliminate unconscious gender bias.**

- Produce guidelines on non-sexist and inclusive language in collaboration with communications teams and departments responsible for corporate communications. These will include different options for reference, such as Ministry Guidelines and other guidelines.
- The Equality Committee will monitor communications to verify that they are being carried out in accordance with the guidelines. In the event of any non-compliance, a reminder will be sent with a proposal for improvement.
- Promote the use of non-sexist images in all communication spaces, including websites, documents and reports.
- Incorporate a gender perspective in Safety and Health (OSH) campaigns on safety and well-being.

**Objective 1.2. Use key dates to raise awareness about equal treatment and opportunities and to raise the profile of women.**

- Carry out campaigns and/or events related to equal opportunities between women and men on specific days (8 March, International Women's Day; 11 February, International Day of Women in Science; etc.) and raise the profile of women in the company on these days through communications and events.

**Objective 1.3. Disseminate the content of the Equality Plan.**

- Communicate the axes that make up the plan and its content by means of a short presentation (pills), using the specific means provided for this purpose.
- Include specific information on the Equality Plan and the protocol for the prevention of sexual and gender-based harassment when onboarding new hires.

**Objective 1.4. Create a space on the intranet (Good morning) for developing the Equality Plan.**

- Have a dedicated **intranet** space for the plan (Good morning) with the content of the plan and the Procedure for the Reporting, Investigation, and Assessment of Workplace Harassment and Violence

**Objective 1.5. Dissemination of best practices carried out by the company.**

- Draw up an annual report on the Equality Plan to be submitted to Management, including progress and commitments in this area.
- Study possible surveys on equality or include this type of survey in other work climate surveys.
- Creation of an email inbox, **igualdad@elecnor.com**, to be used as a communication channel for both the Equality Committee and staff for enquiries or issues.

## Axis 2. Selection and Recruitment

**Objective 2.1. Ensure that selection processes comply with the principle of equal treatment and opportunities, based on objective criteria and free from direct or indirect discrimination.**

- Job offers: review and gender analysis of language. Randomly analyse 20 job offers.
- Ensure that the skills and requirements requested in job advertisements are appropriate and do not require overqualifications. Ensure that the skills requested are not biased towards one sex or the other. Conduct a

random analysis of at least 10 active job advertisements at the time of review to access all the information on the advertisement and its specific requirements.

- Check that job advertisements published by the company specify both genders to ensure equality.
- Active search for profiles (men and women) in areas of the company's vacancies that are traditionally male or female.

#### **Objective 2.2. Make the company's commitment to equal opportunities in recruitment visible.**

- Inform employment agencies of the company's Recruitment Policy and request that they comply with it, following the principle of equal treatment and opportunities, as well as the company's commitment to the incorporation of women in male-dominated areas.

#### **Objective 2.3. Information and monitoring of data, job offers, and selection and recruitment processes.**

- Monitoring of indicators and data adapted to the professional classification:
  - Number of hires disaggregated by sex.
  - Number of men and women recruited by hierarchical level and professional group.

### **Axis 3. Professional Classification**

#### **Objective 3.1. Ensure the principle of equal pay for work of equal value.**

- Obtain the criteria, factors, sub-factors and weightings of the Job Classification System and Job Evaluation.
- Produce a report with proposals for necessary adjustments.
- In cases where the Equality Committee receives complaints regarding professional classification at [igualdad@elecnor.com](mailto:igualdad@elecnor.com), the employee will be informed of the existing channels and procedures for dealing with the complaint.

### **Axis 4. Training**

#### **Objective 4.1. Establish a company culture based on equal treatment and equal opportunities through training and awareness-raising activities for all staff, especially those responsible for organising work.**

- Establish a training programme for the duration of the Equality Plan with the following characteristics:
  - Annual campaigns with different content for the entire workforce with cross-cutting 'training pills' that are valid for everyone in terms of content and short in duration.
  - Specific training in content and duration for key departments or positions in the organisation or in achieving Equality:
    - The Equality Committee itself
    - Human Resources
    - The Communication Area

- The company's planned face-to-face training should, wherever possible, take into account the schedules of staff with reduced or adapted working hours, without exceeding their contracted hours. Training should take place at the workplace wherever possible, to avoid travel and scheduling conflicts relating to family responsibilities.
- If an employee selected for a course is on maternity, paternity or breastfeeding leave, a place will be reserved for them on their return and they will be given priority to complete the training in accordance with their requested timetable.
- The company must ensure that access to training promotes the development of the necessary job-related skills.
- Train managers and middle management on equality issues. Address unconscious biases in decision-making and company rules to prevent sexual and workplace harassment.
- After long periods of absence due to temporary incapacity or leave of absence, during which changes to working methods have been implemented, employees returning to work will receive training to enable them to resume their normal duties.

#### **Objective 4.2. Obtaining general indicators for monitoring training plans.**

- Number of actions and hours: disaggregated by gender and broken down by techniques, skills and languages. The average number of hours received by men and women in each action.
- Guarantee women's access to training courses that could lead to promotions linked to positions of responsibility.
- Promote the participation of women in training courses related to traditionally male-dominated activities.

### **Axis 5. Professional Promotion**

#### **Objective 5.1. Facilitate women's access to positions of high responsibility: senior management positions, Management Committee and Boards of Directors, with the aim of achieving balanced representation of women and men in positions of responsibility within the company.**

- Identify and detect women within the organisation with potential access to Management Committees or positions of high responsibility.
- Facilitate participation in projects for the development of women in senior management, such as the *Promociona* Project or the Women's Institute's More Women/Better Companies Project.
- Raise awareness of those women who are promoted within the company.
- Make the presence and achievements of women within the company visible and communicate them externally.
- Prioritise the internal search for high-potential profiles, ensuring female talent has access to these vacancies for their professional development within the company.
- On an annual basis, the Equality Committee will be updated on the promotion processes and may request any additional information on these processes.

**Objective 5.2. Encourage the promotion of women and ensure equal promotion opportunities.**

- Women's empowerment actions.
- Specific mentoring and coaching actions.
- Participation in company projects that facilitate their promotion.
- Give visibility to the work and achievements of female colleagues in male-dominated departments.
- Ensure that internal vacancies are advertised to in-house staff, as opposed to external recruitment.

**Objective 5.3. Obtain monitoring indicators.**

- Information on staff data segregated by gender, unit, centre, hierarchical level and professional group, indicating the initial and final situation after promotions.
- Follow-up on development programmes launched in the company, disaggregated by gender.
- Information on applications for promotions disaggregated by gender, hierarchical level and professional group. Data on the proportion of these promotions that come from women who have participated in women's empowerment or development programmes (e.g. talent, *promociona*, management skills, etc.).
- Develop a traceability system for applications and promotions.

**Axis 6. Working Conditions****Objective 6.1. Ensure that recruitment and remuneration conditions meet the criteria of equal treatment and equal opportunities.**

- Randomly analyse the conditions per job, covering a sample of up to 10% per applicable collective agreement for new hires.
- Obtain data and information on payment allowances.
- Analyse the criteria for allocating each salary concept in the payroll for each applicable agreement from a gender perspective and identify the criteria and individuals receiving them.
- Study a performance appraisal system in order to obtain rating data for men and women.
- HR managers should consider the impact on working conditions for teams when an employee is on leave due to childbirth, adoption, breastfeeding or legal guardianship. Consider paying a job allowance for extraordinary workloads resulting from the absence of others in the area/department.
- Similarly, ensure that people who reduce their working hours by more than 15% per year or take leave of absence have their targets and financial compensation adapted to their actual working hours.

**Objective 6.2. OHS and equality.**

- The company must expedite changes or adaptations to jobs for pregnant or breastfeeding women if they make a justified request.
- Work clothes and PPE (Personal Protective Equipment) must be gender-sensitive so that employees can use them properly.

- Identify and evaluate tasks and positions that may pose a risk to reproduction, pregnant or breastfeeding women. Automatic response mechanisms must be put in place in cases of risk.
- Ensure that women's changing facilities are available in the workplaces where needed.
- Review PPE and work clothes from a gender perspective.

## Axis 7. Work-Life Balance and Co-responsibility

### **Objective 7.1. Ensure that work-life balance rights are accessible to the entire workforce and raise awareness of co-responsibility.**

- Data on requests for working time adjustments is provided to check whether they are granted and, if not, the reason for refusal.
- Develop actions to encourage men to make use of work-life balance rights to care for dependants.
- Facilitate measures to adapt the working day and create a pool of hours for people with shared custody.
- Extend the right to request the adaptation of the working day in Article 34.8 of the WS (Workers Statute) to include workers with children by a further two years up to the age of 14. During these two extra years, exclude the possibility of requesting remote working, unless it is already in place within the company.
- Likewise, in accordance with the aforementioned Article 34.8 of the WS (Workers Statute), those persons with care responsibilities for children over the age of 12, their spouse or partner, and relatives up to the second degree of consanguinity, as well as other dependants living with them and unable to care for themselves due to age, accident or illness, shall have this right and must justify their request.
- Those persons in charge of a child or dependent with a serious illness (Annex I, Royal Decree 1148/2011) may request leave to accompany them to medical consultations or hospital admissions. This leave will not be limited by the number of times it has been requested, provided the consultations are linked to the serious illness and the reasons are justified.
- Raise awareness of the right to take birth leave on a full-time or part-time basis after the first six weeks.
- Grant paid leave to perform inexcusable public and personal duties that cannot be performed outside working hours.
- Information will be provided on the special measures to meet the needs of single-parent families in Article 48 of the WS (Workers Statute), particularly the additional weeks of leave for childbirth and childcare.
- The use of these work-life balance measures will not affect future career promotions or salary increases.
- Ensure that bonuses and allowances generated in accordance with the applicable agreement and for work-related reasons are not affected by these work-life balance measures.

### **Objective 7.2. Improve work-life balance rights in cases of pregnancy and breastfeeding.**

- Raise awareness of the right to suspend the work contract due to the birth of a child on a full-time or part-time basis after the first six weeks following the birth, at the worker's discretion.

- To avoid the need for travel, remote working should be made available from the 32nd week of pregnancy, if possible, from a technical, organisational and productive standpoint, and from the first weeks in the case of high-risk pregnancies.
- Facilitate the possibility of applying for breastfeeding leave on a cumulative basis.

**Objective 7.3. Monitoring of work-life balance and co-responsibility measures.**

- Collect statistical data disaggregated by gender, professional category and type of contract, on the different types of unpaid leave, contract suspensions, reductions in working hours and leave of absence related to work-life balance.
- Information on requests for reductions and adaptations of working hours requested, accepted and rejected, and the alternative measures proposed.
- Provide data on requests for adjustments to working hours to verify that they have been granted and provide the reason for refusal where applicable.
- Ensure that the use of work-life balance measures (leave of absence and reduced working hours) does not affect future promotions, salary allowances or bonuses.
- Inform the Equality Committee of requests for breastfeeding.

**Axis 8. Under-representation****Objective 8.1. Promote balanced representation of women and men in the company's various professional groups and categories and the commitment to increasing the average number of women in the workforce during the plan's implementation period.**

- Review all departments and list them in order of priority, starting with the most male-dominated, with the aim of increasing the presence of women in the company.
- Conduct a more detailed study of areas/units and/or geographical zones where women are underrepresented.

**Objective 8.2. Encourage the recruitment of women into male-dominated areas or departments.**

- Integrate specific questions into exit interviews to address the lack of training or advancement in male-dominated departments.
- Analyse and review the company's job vacancy publication portals from a gender perspective.

**Axis 9. Remuneration****Objective 9.1. Ensure that the principle of equal pay applies to work not only equal but of equal value.**

- Review remuneration concepts, as well as salary and non-salary supplements, ensuring they are based on clear, objective and neutral criteria.
- Review remuneration records to produce reports on any existing discrepancies, establishing one or more specific working groups to prioritise the data from highest to lowest (amount or percentage), according to each applicable agreement.

- Systematise gender-sensitive job analysis and appraisal tools.
- Annual monitoring and analysis of the data in the annual remuneration records.

#### Axis 10. Prevention and Action in the Case of Sexual and/or Gender-Based Harassment

**Objective 10.1. Make sure that all staff know how to proceed in case of sexual harassment and/or harassment based on gender and sexual orientation. Ensure the protocol is communicated and accessible to everyone in the company.**

- Publication of the Protocol on the intranet (Good morning). It must be easily accessible for consultation and reporting purposes.
- Inclusion of the protocol in the Onboarding process for new hires. The person responsible for this will deliver and explain the procedure and collect the signature upon delivery of the document.
- In cases of sexual and gender-based harassment, as well as harassment in the workplace, the investigating committee shall include a member of the workers' legal representatives unless the complainant objects.

**Objective 10.2. Prevent any cases of sexual and/or gender-based harassment.**

- Provide specialised training on sexual and/or gender-based harassment for individuals assigned specific tasks and responsibilities within the prevention protocol, as well as for members of the Equality Committee.
- Facilitate flexible working arrangements or a change of workplace if necessary to protect the worker.
- Assess the possibility of offering psychological support or legal advice through company resources or agreements.
- Ensure job retention in the event of prolonged absences due to workplace or sexual harassment.
- In cases where a complaint has been filed under Elecnor's workplace or sexual harassment protocol, facilitate job flexibility or a change of workplace if necessary to protect the worker. Depending on the circumstances, consider organisational measures, a change of workplace or measures under Article 34.8 of the WS (Workers Statute), while the workplace or sexual harassment situation is being resolved, regardless of the actions taken at the end of the process.
- Distribution of the Procedure for the Reporting, Investigation, and Assessment of Workplace Harassment and Violence to the different WLR (Workers' Legal Representation).

**Objective 10.3. Data tracking.**

Monitoring of case indicators: number and type of complaints and case resolutions.

#### Axis 11. Occupational Health

The Committee will be informed of the results of the various surveys.

### 3. DEFINITIONS OF THE TERMS INCLUDED IN THE EQUALITY LAW AND IN ROYAL DECREE-LAW 6/2019

#### **Principle of equal treatment between women and men**

This means the absence of any direct or indirect discrimination on the grounds of gender, particularly with regard to maternity, family responsibilities and marital status.

#### **Equality Plan**

This is an organised set of measures adopted following an analysis of the situation. The aim is to achieve equal treatment and opportunities for women and men within the company, and to eliminate gender-based discrimination.

#### **Direct and indirect discrimination**

Direct gender-based discrimination shall mean the situation in which a person is, has been or could be treated less favourably than another person in a comparable situation on the basis of their gender.

Indirect gender-based discrimination shall mean the situation in which an apparently neutral provision, criterion or practice puts people of one gender at a particular disadvantage compared to people of another gender, except where there are exceptions provided for by law.

In any case, any order to discriminate, directly or indirectly, on the grounds of gender is considered discriminatory.

#### **Sexual harassment and gender-based harassment**

Sexual harassment is any verbal or physical conduct of a sexual nature that violates a person's dignity, particularly when it creates an intimidating, degrading or offensive environment.

Gender-based harassment is any conduct carried out on the basis of gender with the purpose or effect of violating the dignity of a person and of creating an intimidating, degrading or offensive environment.

Sexual harassment and gender-based harassment shall in any case be deemed to be discriminatory.

#### **Indemnity against retaliation**

Discrimination on gender-based grounds shall be deemed to be any adverse treatment or adverse effect which occurs to a person as a result of them submitting a complaint, claim, denunciation, demand or appeal of any kind aimed at preventing discrimination and demanding effective compliance with the principle of equal treatment between women and men.

#### **Work of equal value**

Jobs are deemed to be of equal value when the following criteria are equivalent: the nature of the functions or tasks entrusted; the educational, professional and training conditions required for their performance; and the factors strictly related to their performance and the working conditions under which such activities are carried out.

#### 4. ENTRY INTO FORCE

In accordance with Royal Decree 901/2020, of 13 October, which sets out the content, negotiation process and registration of equality plans, the company and the workers' legal representatives have agreed to this Equality Plan.

It was also approved by the Board of Directors of Elecnor Holding at its meeting on 11 December 2024, coming into force on 1 January 2026 for a two-year term ending on 31 December 2027.