



INDEX

1.	INTRODUCTION	3
2.	ACTION AXES	3
	Axis 2. Selection and Recruitment	5
	Axis 3. Professional Classification	5
	Axis 4. Training	5
	Axis 5. Professional Promotion	6
	Axis 6. Working Conditions	7
	Axis 7. Work-Life Balance and Co-responsibility	8
	Axis 8. Under-representation	9
	Axis 9. Remuneration	10
	Axis 10. Prevention and Action in the Case of Sexual and/or Gender-Based Harassment	10
	Axis 11. Occupational Health	11
3.	DEFINITIONS OF THE TERMS INCLUDED IN THE EQUALITY LAW AND IN ROYAL DECREE-LAW 6/2019	11
4.	SIGNERS, SCOPE, AND EFFECT	12
5.	PROCEDURE FOR AMENDING THE EQUALITY PLAN AND THE INDEPENDENT DISPUTE RESOLUTION MECHANISM	13
6.	OPERATING RULES FOR THE EQUALITY, ASSESSMENT, MONITORING, AND REVIEW COMMITTEE	15
	6.1. Monitoring and assessment	15
	6.2. Joint Equality Plan Monitoring Committee	16
7.	SCHEDULE I. DIAGNOSTIC SUMMARY FOR GROUP COMPANIES	18
8.	SCHEDULE II. PAY AUDIT FINDINGS	22
	8.1. Job category and ratings	22
	8.2. Pay audit methodology	23
	8.3. Summary of the pay audit findings	26
9.	SCHEDULE III. ACTION PLAN	28
10.	SCHEDULE IV. SCHEDULE OF ACTION FOR IMPLEMENTING, MONITORING, AND ASSESSING MEASURES UNDER THE EQUALITY PLAN	31

## 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.

In drawing up this Equality Plan each of the companies involved has performed its own diagnostic assessment, and a summary of that assessment for the Group's companies is presented in Schedule I to this report.

## 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](mailto: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 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. SIGNERS, SCOPE, AND EFFECT

This Equality Plan has been issued in accordance with Spanish Royal Decree 901/2020 of 13 October 2020 setting out Implementing Regulations on the contents of equality plans, the negotiation of plans by companies and workplace representatives, and registration.

The members of the negotiating panel are listed below:

For the company:

- Eduardo Irigaray Murillo
- Javier Rodrigo Lafuente
- Javier Lecumberri Hormaechea
- Marta Segura Altayo
- Susana Mico García
- Cristina Marquina Testillano
- Nora Astigarraga López
- Miriam Pozanco Nieto
- Diana Molero Calvete
- Arantza Gamboa Pardo
- Verónica Carmona Arias
- Marta Rodríguez Robledo

Workplace representatives:

For Spain's Comisiones Obreras (CCOO) [*Workers Commissions*] trade union:

- Ana Isabel Bautista Martínez
- Paula Estrada Herrera
- Beatriz Rodríguez Palacios
- Micaela Gimeno Suarez
- Juan Gutiérrez Ordóñez
- Luis Manuel Rojas Rebaza
- Miguel Santamaria Campillo
- Ianire Tobalina Mulas
- Eva María Madrigal Henríquez
- Álvaro Garrido Romero (trade union adviser)

For Spain's Unión General de Trabajadores (UGT) [*General Union of Workers*] trade union:

- Ana María Domínguez González
- Alfredo Fernández Callejón
- Federico José Vidal Rocamora
- Marina Sebastián Azcona
- Antonio Carmona (trade union adviser)

This equality plan for the ELECENOR GROUP is valid for all the employees of the Group companies AUDECA, S.L., ELECENOR SEGURIDAD, S.L., ELECENOR, S.A., JOMAR SEGURIDAD, S.L.U., and ELECENOR SERVICIOS Y PROYECTOS, S.A.U. in the entire territory of Spain.

It was approved by the Board of Directors of Elecnor Holding at its meeting held on 11 December 2025 and was signed by the negotiating panel on 7 January 2026, the date on which it entered into force for two years until 31 December 2027.

## 5. PROCEDURE FOR AMENDING THE EQUALITY PLAN AND THE INDEPENDENT DISPUTE RESOLUTION MECHANISM

This procedure has been established to set up a framework for (i) amending the Equality Plan in whole or in part while it is in effect and (ii) handling, providing channels for, and independently resolving discrepancies, disputes, and disagreements that arise regarding interpretation, implementation, compliance, evaluation, or revision and assuring good-faith negotiations, documentary traceability for all actions taken, and approval of decisions by the requisite legal majorities. {Royal Decree 901/2020, sections 9(2), 9(3), 9(4), and 9(6); Royal Decree 901/2020, section 5(6)}

### 1. General principles for action (good faith, record-keeping, access to information, and confidentiality)

All actions taken under this procedure will be carried out (i) under the principle of good-faith negotiations aimed at reaching a consensus; (ii) keeping a record of the participants, stances, proposals, agreements or disagreements, and where appropriate position statements for every meeting, every session; and (iii) ensuring that the negotiating panel or monitoring committee can access the documents needed to assess the situation and provide support for proposals as required by law, and the company will be required to make those documents available when needed to prepare or update diagnostic assessments or to evaluate measures. At any rate, the participants will have the duty to keep all confidential information that has been expressly disclosed secret. No documents delivered may be used outside the strict domain of the Plan or for any purposes other than those for which they were originally disclosed. {Royal Decree 901/2020, section 5(6); Royal Decree 901/2020, section 5(5); Royal Decree 901/2020, section 5(7); Royal Decree 901/2020, section 5(8)}

### 2. Oversight body: monitoring committee and its authority to propose amendments and resolve disputes

The Equality Plan's joint or parity oversight and monitoring committee (the "Monitoring Committee") is the regular body that has been established in line with the Plan, with the make-up and duties set forth in the Plan. It is tasked with: (i) taking note of and recording incidents, disputes, and proposals; (ii) holding interim and final assessments; (iii) putting forward reasoned proposals to amend or revise the Plan; and (iv) independently striving, as a priority, for solutions by consensus. {Royal Decree 901/2020, section 9(5); Royal Decree 901/2020, section 9(6); Royal Decree 901/2020, section 8(2)(j)}

### **3. Initiating proceedings: to address an incident, a discrepancy, or an amendment proposal**

Proceedings will be started by written request by either party (the company or the workers) to the Secretary of the Monitoring Committee or by decision of the Monitoring Committee itself, clearly stating: (i) the aspect of the Plan concerned (measure, purpose, indicator, timetable, resources, diagnostic assessment, or pay audit under the Plan); (ii) the facts or circumstances of the request; (iii) the specific proposal put forward (if any); (iv) urgency (if any); and (v) available supporting documents. On receipt of the request, the Secretary will acknowledge receipt and will start internal proceedings indicating the proceeding number, numbering system, and start date. {Royal Decree 901/2020, section 8(2)(k)}

### **4. Ordinary procedures: notice, meetings, records, and decisions**

On receipt of a request, the Secretary will, within the internal time period, e.g., 15 calendar days from receipt, call a meeting of the Monitoring Committee to consider it. The matter is to be placed on the order of business for the meeting, and the relevant documents are to be circulated sufficiently in advance. The meeting will discuss the facts, take note of the positions of the parties, and if appropriate agree on tasks and a plan of work, the people to be in charge, and the timetable for collecting data, making proposals, and evaluating impacts. Minutes will be drawn up for all meetings, approved, and signed and may contain statements by individuals. Decisions will be subject to approval by the company and by a majority of the worker representatives on the committee taking the decision in the terms for negotiations under the Plan. {Royal Decree 901/2020, section 5(5); Royal Decree 901/2020, section 5(6)}

### **5. Mandatory review of the Plan and impact on diagnostic assessments and measures**

Without prejudice to discretionary revisions, the Plan must be reviewed in all the circumstances envisaged by law: (i) subsequent to the outcome of monitoring and assessments; (ii) where there is a clear failure to meet legal or regulatory requirements or inadequacies have been disclosed by employment or Social Security inspectors; (iii) in cases of merger, take-over, sale, or re-registration of the company; (iv) in case of incidents that bring about substantial changes to the workforce, working methods, corporate structure, or remuneration schemes, including breaches of collective agreements and material changes to working conditions or the situations evaluated in the diagnostic assessment for the Plan; and (v) when a court has ruled that direct or indirect sex discrimination has occurred or the Plan is not in conformity with legal or regulatory requirements. Revisions must be properly reasoned and are to update the Plan's diagnostic assessment and, insofar as necessary, the measures contained in the Plan, as required. {Royal Decree 901/2020, section 9(2); Royal Decree 901/2020, section 9(3)}

### **6. Discretionary changes during monitoring: revising, redirecting, and replacing measures**

Measures may be revised at any time while the Plan is in effect in order to add, redirect, improve, correct, intensify, allay, or even stop enforcing measures based on the observed effects in relation to attainment of the objectives. These discretionary changes will be processed under the regular procedure set forth in the Plan. The supporting reasons must be recorded in the minutes and in a document specifying the changes. Insofar as they are affected, the objectives, indicators, timetable, people in charge, resources, and monitoring system will also need to be updated. {Royal Decree 901/2020, section 9(4); Royal Decree 901/2020, section 8(2)(f); Royal Decree 901/2020, section 8(2)(h); Royal Decree 901/2020, section 8(2)(i); }Royal Decree 901/2020, section 8(2)(k)}

### **7. Independent dispute resolution mechanism: internal phase (negotiations in the framework of the Monitoring Committee)**

Discrepancies regarding interpretation or implementation of the Plan and disputes concerning the degree of compliance, evidence, indicators, timetables, or resources will preferably undergo a preliminary internal negotiation phase held by the Monitoring Committee. This internal phase will consist of: (i) a written explanation of the dispute (purpose, scope, remedies sought); (ii) each party's proposed solution; (iii) exchange of the requisite background documents; (iv) one or more purposeful meetings until the end of the time period for the internal phase, e.g., 30

calendar days from the initial meeting; and (v) closing the proceedings by agreement (full or partial) or by a reasoned statement of disagreement. Negotiating in good faith and documenting every session will be mandatory. {Royal Decree 901/2020, section 5(6); Royal Decree 901/2020, section 5(5)}

### 8. Escalation of independent dispute resolution proceedings

If the internal phase fails to resolve the disagreement, the Monitoring Committee may take the decision to initiate proceedings with SIMA [*Cross-Industry Trade Union Mediation and Arbitration Service*] independent dispute resolution bodies in the terms provided by law, expressly setting down in the record: (i) the dispute's objective, (ii) the issues submitted to the proceedings, (iii) each party's position, (iv) the documents submitted, and (v) the representatives appointed. To do this, a decision to initiate these proceedings will be required, unless a rule or provision for doing so exists, in which case the terms envisaged there will apply. {Royal Decree 901/2020, section 5(6)}

### 9. Substantiating decisions regarding amendments or dispute settlement

Decisions that entail amending the Plan or full or partial settlement of a dispute will be documented in writing and will include: (i) the identifying details of the proceedings and the decision, (ii) the background and reasoned grounds, (iii) the consolidated text of the amendments or commitments approved, (iv) the timetable for implementation, (v) the indicators and follow-up assessments, and (vi) the persons in charge and the resources allocated. Decisions will be signed by the parties with authority to do so and must show that the required majorities have been met. They must be added to the Plan as a schedule or a consolidated version, as the case may be. {Royal Decree 901/2020, section 5(6); Royal Decree 901/2020, section 8(2)(k)}

### 10. Registration of the Plan and any amendments to it

Registration of the Equality Plan is mandatory, irrespective of source or type and whether or not it has been approved by consensus. Amendments to the registered contents of the Plan must also be registered insofar as appropriate. {Royal Decree 901/2020, section 11(1); Royal Decree 901/2020, section 11(3)}

## 6. OPERATING RULES FOR THE EQUALITY, ASSESSMENT, MONITORING, AND REVIEW COMMITTEE

### 6.1. Monitoring and assessment

Section 46 Spanish Organic Effective Equality between Women and Men Act [*Ley Orgánica para la Igualdad efectiva entre mujeres y hombres*] provides that Equality Plans are to set specific equality objectives to be attained along with the strategies and practices to be implemented to do so and are to implement effective systems for monitoring and assessing the objectives that have been set.

Accordingly, a periodic assessment of the indicators for each measure will be carried out yearly as a means of evaluating the impact of each one.

A report with the findings of each review will be prepared by the equality officer for submission to the Equality Committee for consideration.

After completion of the different measures, a report setting out general conclusions containing an assessment of the efficacy of the measures and their impact on the company will be drawn up at the end of the term of this Plan. The follow-up and assessment phase of the Equality Plan is aimed at ascertaining progress made under the Plan and the results obtained in the various areas addressed during and after implementation.

The follow-up phase will proceed on a regularly scheduled basis to provide information on possible needs and/or difficulties encountered during implementation. This knowledge will be used to adjust the Plan and its coverage to give it the necessary flexibility for it to be successful.

## 6.2. Joint Equality Plan Monitoring Committee

Following approval of the Equality Plan, a Joint Equality Plan Monitoring Committee will be set up. It will be referred to as the Monitoring Committee and will be tasked with oversight to ensure attainment of the Plan's objectives according to the timetable, with the requisite resources, the persons in charge, and assessment indicators and timeline.

The Monitoring Committee will be tasked with tracking, evaluating, and monitoring implementation of the measures set forth in this Plan.

### Composition of the Monitoring Committee

The Joint Equality Plan Monitoring Committee will have 6 members from among the worker representatives who signed the Equality Plan and 2 members appointed by the company.

#### FOR ELEC NOR

- Eduardo Irigaray
- Javier Rodrigo
- Miguel Muñoz
- Marta Segura
- Jorge Alcibar
- Cristina Marquina

#### FOR THE COMISIONES OBRERAS TRADE UNION

- Ana Isabel Bautista
- Beatriz Rodríguez
- Ianire Tobalina

#### FOR THE UGT TRADE UNION

- Ana María Domínguez
- Sara Palomar
- Alfredo Fernández

Committee meetings may also be advised by persons from outside the company who have special qualifications in the subject areas dealt with in this section.

### Substitutes:

Monitoring Committee members may be replaced by others in the following cases:

- After the end of the period set for implementing the Equality Plan.
- If a member wishes to resign from the Committee or if decided internally for organisational reasons.
- If any member leaves the company for any reason.
- If any member takes protracted sick leave, an extended leave of absence, or any other form of planned leave lasting longer than one year that would prevent normal operation of the Committee.

The Committee is to be informed of this as the persons responsible for replacing the member in question, whether a company representative or a worker representative. Both parties are authorised to add the member they consider most suitable.

#### **Duties of the Monitoring Committee:**

The Monitoring Committee's duties will include:

- Promoting the principles of equality and non-discrimination.
- Drawing up timetables setting the time periods for implementing the positive actions and measures to be taken and establishing the indicators for evaluating the effectiveness of those measures.
- Receiving quarterly reports on the job offers effected by the company and on the recruitment processes.
- Monitoring both implementation of the equality promotion measures and compliance and progress of the Equality Plan.
- Identifying areas for priority action.

#### **Operation of the Monitoring Committee:**

After the Equality Plan has been drawn up, the Monitoring Committee will ordinarily meet twice a year, half yearly. Meetings will be called by the equality plan implementation officer, who will be responsible for drawing up the order of business for meetings and for drawing up the minutes recording comments made by any party and any decisions taken. Notices of ordinary meetings will be sent by email at least 7 days in advance.

Ordinary meetings will be held by video conference.

Special meetings may also be called at the request of one of the parties by the same procedure and with the same advance notice set out above.

#### **Minutes:**

Minutes of each meeting summarising the topics discussed, decisions taken, and disagreements will be kept and are to be signed by all the Committee members.

#### **Confidentiality:**

All Committee members are bound to keep all the information, data, documents, and/or any other details used in Committee or delivered to the members but not referred to in the minutes confidential.

**Resources:**

The company commits to providing the necessary resources to enable the Monitoring Committee to fulfil its duties. These include, in particular:

A place to hold meetings.

The material needed for meetings.

The statistical data set forth in the follow-up criteria established for each measure, broken down by sex, provided with the corresponding frequency.

## 7. SCHEDULE I. DIAGNOSTIC SUMMARY FOR GROUP COMPANIES

### Diagnostic Assessment Report: Elecnor S.A.

Main conclusions of this assessment for **Elecnor S.A.**

#### Main Conclusions

- **Sex distribution:** The workforce consists of **52 women (54%)** and **44 men (46%)**, for a total of 96 employees.
- **Job stability:** Women have the larger share of permanent employment contracts, indicative of solid job stability for that group within the company.
- **Age distribution:** The age bracket with the most employees is **46 years of age and up** for both sexes. It is to be noted that women make up **64.29%** of the total in the youngest age bracket (20-29).
- **Recent hires:** In 2025 **4 women and 2 men** (66.67% women) joined the workforce, a significant change from 2022 and 2023, when there were no women hires.
- **Technical backgrounds:** Half of the new engineer/university graduate hires were women, a significant advance in the participation of women in technical and managerial roles.
- **Principle of equality:** The assessment concluded that the salary policy was equitable and that job categories grouped together positions of equal rank with no direct or indirect discrimination.
- **Salary differences:** Differences of over 25% were observed for certain salary items (base salary and supplemental pay items), but the company has shown this to be due to the **activities carried out, job duties and responsibilities, and days worked** during the year, not to gender bias.
- **Use of measures:** There continues to be an imbalance in the use of the work-life balance entitlements. Responsible for care-giving still falls chiefly on women.
- **Leave and reduced hours:** In 2025 **6 women** requested reductions to their working hours for child care compared to **just 1 man**. In addition, temporary sick leave was appreciably higher for women (10) than for men (4).
- **Training:** There is a centralised procedure for detecting training needs and career paths in place.
- **Pay gap:** The pay audit performed concluded that the differences in pay greater than 25% observed for base

salaries, for supplemental pay, and for "non-salary remuneration" and hence for total pay were chiefly attributable to the activities performed by the employees in their different job positions (duties, responsibilities, etc.) and that there was no gender bias of any kind in the pay received, with all amounts and reasons for payment being set forth in and regulated by the collective agreement and **Elecnor S.A.**'s salary policy.

- **Protocols:** The company has active protocols against sexual harassment in place, coordinated by HR and Compliance.

### Diagnostic Assessment Report: Elecnor Seguridad

Main conclusions of this assessment for **Elecnor Seguridad**

#### Main Conclusions

- **Sex distribution:** The workforce consists chiefly of men, 117 men (93.6%) and just 8 women (6.4%) out of a total of 125 employees.
- **Job stability:** 96.8% of the men and 87.5% of the women (7 out of 8) have permanent employment contracts.
- **Age distribution:** The workforce is tending towards older (104 employees over 30). On the other hand, women are more prevalent in the younger age group, 20-29 years of age, and account for 15% of that group.
- **Recent hires:** There were 22 hires in the last year considered, all men.
- **Length of service:** Women fall mainly into the 1 to 5-year bracket, and no women have been with the company for more than 6 years.
- **Working hours:** Nearly the entire workforce (122 out of 125 employees) works full time for 40 hours a week.
- **Horizontal segregation:** Women are grouped entirely in technical and supporting roles such as office assistants, technical specialists, and operations analysts.
- **Vertical segregation:** There are no women in operational categories (master and journeyman skilled workers or team leaders) or in line managerial roles like foreman or site manager.
- **Principle of equality:** The assessment concluded that the salary policy was equitable and that job categories grouped together positions of equal rank with no direct or indirect discrimination.
- **Use of measures:** Two men took paternity leave and **no women took maternity leave** during the period considered.
- **Leaves of absence:** A single employee, a woman, took **parental child care leave**.
- **Family dependants:** Most employees that have declared children list them as over 15.
- **Age distribution:** The workforce is tending towards older, with most employees being over 30 (104 people). There tend to be proportionately more women in the younger age group (20-29 years of age), and women make up 15% of that age group.
- **Working hours:** Nearly the entire workforce (122 out of 125 employees) works a 40-hour work week.
- **Departures and turnover:** During the past year there were 22 departures from the workforce. The only parental

leave of absence for child care was taken by a woman.

- **Temporary leave:** Temporary leave was taken by 29 employees, mostly sick leave. In terms of work-life balance, two men took paternity leave and no woman took maternity leave during the period considered.
- **Training:** There is a centralised procedure for detecting training needs and career paths in place.
- **Pay gap:** A 17% pay gap was disclosed. That percentage was less than the 25% that requires proving that the gap is not sex based under Spanish Royal Decree 902/2020 on Equal Pay for Women and Men. It was basically caused by differences in the job positions held by the two groups.
- **Protocols:** The company has active protocols against sexual harassment in place, coordinated by HR and Compliance.

### Diagnostic Assessment Report: Jomar Seguridad

Assessment of the situation at **Jomar Seguridad**.

#### Main Conclusions

- **Sex distribution:** The workforce consists of 35 men (71.43%) and 14 women (28.57%).
- **Job stability:** All employees have permanent full-time employment contracts.
- **Age distribution:** For men, the most numerous age bracket is 46 and up (57.14%). In contrast, all the women fall in the lower age brackets (50% in the 20-29 bracket and 50% in the 30-45 bracket).
- **Recent hires:** The only two recent additions were women, one in the technical specialist category and the other in the university graduate category, considered positive with a view to gender equality.
- **Technical backgrounds:** There are no women in job categories 04, 05, or 06. All line managerial and technical positions like foreman, shop manager, organisation manager, and organisation technician are held exclusively by men. Women mainly hold positions in categories like university graduate (4 women to 3 men), office assistant, and intern.
- **Principle of equality:** The assessment concluded that the salary policy was equitable and that job categories grouped together positions of equal rank with no direct or indirect discrimination.
- **Salary differences:** Pay differences greater than 25% in certain pay categories are ascribable to the job performed and the duties and responsibilities of each position, not to direct gender bias in pay policy.
- **Use of measures:** Most male employees with children (80.49%) have children older than 15, while the children of most of the female employees fall more in the 3 to 14 year age brackets.
- **Leave and reduced hours:** In the past year two men took paternity leave and one woman transferred her maternity leave.
- **Training:** There is a centralised procedure for detecting training needs and career paths in place.
- **Pay gap:** The pay gap is **13%**, mainly due to differences in roles and responsibilities between job positions.
- **Protocols:** The company has active protocols against sexual harassment in place, coordinated by HR and Compliance.

### Diagnostic Assessment Report: Elecnor Servicios y Proyectos (SyP)

This assessment is for the largest company in the group, **Elecnor SyP**, with over 11,000 employees.

#### Main Conclusions

- **Sex distribution:** 11,266 employees, 9,886 men (87.75%) and 1,380 women (12.25%).
- **Job stability:** More women have permanent employment contracts, at 89%, than men, at 84%.
- **Age distribution:** Most female employees are in the 20-29 and 30-45 age groups. This is viewed as being a positive indicator of a growing trend towards hiring women in a traditionally male field.
- **Recent hires:** In the past year, only **11%** of new hires were women. Nevertheless, this is considered positive in the metalworking sector, where according to Spain's National Statistical Office [INE] the share of women tends to be only 20%.
- **Technical backgrounds:** The construction project category is nearly entirely men (27,333 male trainees compared to 161 women). Women are mainly concentrated in the core services category.
- **Principle of equality:** The assessment concluded that the salary policy was equitable and that job categories grouped together positions of equal rank with no direct or indirect discrimination.
- **Salary differences:** Pay differences greater than 25% for certain supplemental pay items are ascribable to duties performed and responsibilities or to days worked, not to direct gender bias in pay policy.
- **Use of measures:** Parental leave for child care was requested only by women (3 employees).
- **Leave and reduced hours:** There is an appreciable gap in taking reduced hours for child care, a benefit made use of by 147 women compared with just 7 men.
- **Training:** There is a centralised procedure for detecting training needs and career paths in place.
- **Pay gap:** The overall pay gap is **9%**, rising to **13%** for the base salary.
- **Protocols:** The company has active protocols against sexual harassment in place, coordinated by HR and Compliance.

### Diagnostic Assessment Report: Audeca S.L.

Assessment of the situation at **Audeca S.L.** The company's employees are mainly men, something that is common in the technical and infrastructure sectors.

#### Main Conclusions

- **Sex distribution:** Out of 517 employees in total, 86.46% are men (447) and just 13.54% are women (70).
- **Job stability:** The workforce is highly stable. 58% of employees have been working for the company for more than 10 years.

- **Age distribution:** 58.7% of employees are aged **46 or over**. This is the age bracket with the largest gender gap (270 men vs 33 women).
- **Recent hires:** In the past year women made up 18.37% of new hires (18 of 98), a positive step up towards balancing the current workforce (13.5%).
- **Technical backgrounds:** Senior skilled workers (128 men vs 2 women) and unskilled labourer (75 men vs 8 women), assistant gardeners (16 women out of 65 workers in all).
- **Principle of equality:** The assessment concluded that the salary policy was equitable and that job categories grouped together positions of equal rank with no direct or indirect discrimination.
- **Salary differences:** Differences of more than 25% for certain supplemental pay items and non-salary remuneration are attributable to job position (duties and responsibilities) and to the number of days worked. There is no evidence of direct gender bias.
- **Use of measures:** The age of the children of most employees with children is over 15 years old (157 cases). Only 19 employees have children under 3.
- **Leave and reduced hours:** 15 employees took maternity leave, 3 paternity leave, and two women requested parental child-care leave.
- **Training:** There is a centralised procedure for detecting training needs and career paths in place.
- **Pay gap:** The pay gap is very low at **4%**.
- **Protocols:** The company has active protocols against sexual harassment in place coordinated by HR and Compliance.

## 8. SCHEDULE II. PAY AUDIT FINDINGS

### 8.1. Job category and ratings

The Elecnor Group has its own system for rating job positions under the collective agreement in effect. The job classification system applies for the Group as a whole. It is job definition-based (for the personnel considered) or based on positions covering the basic duties to be performed by the employees in those jobs.

The classification system is based on an appraisal of the basic duties of the work or job and is step based. There are also different levels of recognition and remuneration for multi-function positions or jobs that come with ancillary duties. In accordance with section 22 Spanish Labour Code [Estatuto de los Trabajadores], the job classification for Elecnor Group employees is based on professional categories according to the qualifications required, professional skills, and the duties to be performed.

Two specific systems are used for rating job positions, both based on objective, measurable criteria used to assess a series of factors associated with that specific position. Each criterion is scored and the scores are used to assign each job position to a level. Employees, conduct, attitudes, etc. are not rated.

The following factors bearing on employee job classification are used to assign each one to a given job category based on criteria prescribed in section 22 Labour Code (EDL 2015/182832):

- A. Knowledge: this factor is scored taking into account the basic training needed to be able to properly perform the duties of the job plus the level of knowledge and experience acquired and the level of difficulty involved in gaining that knowledge and experience.
- B. Initiative: this factor is scored taking into account the degree of subordination to guidelines or rules in performing those duties.
- C. Independence: this factor is scored taking into account the degree of hierarchical subordination in the performance of job duties.
- D. Responsibility: this factor is scored taking into account the job holder's margin for independent action, the degree of influence on outcomes, and the level of impact of job performance.
- E. Line management: this factor takes into account all planning, organisational, and supervisory tasks and managerial authority over the activities of other employees requiring the necessary knowledge to understand, motivate, and promote career development of subordinates having in mind the nature of the group and the number of persons under the manager's authority.
- F. Complexity: this factor is scored based on the number and degree of integration of the rest of the factors in the task or job assignment.

## 8.2. Pay audit methodology

The purpose of the pay audit is to gather the information needed to ascertain whether the Elecnor Group's remuneration system is compliant with effective attainment of the principle of equal pay for women and men as prescribed by Royal Decree 902/2020 of 13 October 2020 on Equal Pay between Women and Men.

It is also intended to specify measures aimed at avoiding, correcting, and preventing any difficulties and impediments that may exist or could arise in order to assure pay equality, transparency, and monitoring of the remuneration system.

### 8.2.1. Basic premises

The Elecnor Group's remuneration record sheet has been drawn up from an analysis of the personnel database containing mean and median base salary, supplemental pay item, and non-salary remuneration values for all employees within the organisation.

The analysis considered the annual remuneration compared to the mean and median values disaggregated by sex and distributed on the basis of positions of equal rank under the company's salary policy and the valuation method employed.

The pay audit has used the following approach:

- Remuneration in the Elecnor Group was analysed using the following structure:
  - Base salary:
    - Base salary
    - Statutory extra payments

- Supplemental pay items:
  - Length of service
  - Job-related extras and overtime
  - Variable / Bonus
- Non-salary remuneration:
  - Sick leave
  - Travel allowances
  - Foreign posting allowance
  - Severance payment
  - Company car
  - Non-cash remuneration
- The mean and median remuneration was calculated based on the annual remuneration actually paid to each employee, broken down by base salary, supplemental pay items, non-salary remuneration, and total remuneration. Mean and median remuneration:
  - Mean remuneration is the average (arithmetic mean) of all the remuneration actually paid to the organisation's employees annually.
  - Median remuneration is the midpoint value of all the remuneration actually paid to the organisation's employees annually.
- The percentage difference was calculated using the Gender Pay Gap Self-diagnosis Tool designed by the Spanish Ministry of Equality, namely:

$$\frac{(\text{pay for men} - \text{pay for women})}{\text{Pay for men}}$$

**8.2.2.1. Job Categories – the Method of Assessing the Elecnor Group's Pay Audit Valuation was performed taking job categories into account in accordance with the company's salary policy and the valuation approach employed.**

Accordingly, all jobs that have a similar valuation are grouped together in the same job categories, which are listed below:

Job Category
Category 00 – CEO
Category 01 – Executives
Category 02 – Management
Category 03 – Production/Technical Centre Directors / Level I Supervisors / Level I Technical Personnel
Category 04 – Level I Site/Project Managers / Level II Supervisors / Level II Technical Personnel
Category 05 – Level II Site/Project Managers / Level III Supervisors
Category 06 – Level III Site/Project Managers / Level IV Supervisors
Category 07 – Level IV Site/Project Managers / Level III Technical Personnel
Category 08 – Level IV Technical Personnel
Category 09 – Level V Technical Personnel
Category 10 – Project Supervisory Personnel
Category 11 – Project Technical Personnel
Category 12 – Project Support Staff

**8.2.2.2. Salary Items** The various salary items making up the salary structure in the Elecnor Group are set out and discussed below:

Salary items making up the salary structure of **Elecnor Group**:

**Base salary**

- **Job category salary:** As set forth in the corresponding collective agreement.

**Supplemental pay items:**

- **Length of service:** Supplemental pay for length of service in the form of periodic raises based on years of service, consisting of an additional amount paid for each five-year period in the amount stipulated in the applicable collective agreement.
- **Job-related extra pay:** A salary extra based on the specific features of the job position (risks, working with electrical installations, etc.).
- **Variable / Bonus Pay:** Variable pay is based on a coefficient calculated using a performance rating procedure. The evaluation is based on the results achieved by the organisation, progress made by the employee in his or her job, and the employee's work attitude. This item does not become part of the permanent compensation.

**Non-salary remuneration:**

- **Travel allowances:** Employees who have to stay overnight or take a meal in towns other than where the company or work centre is located while on company business are paid a travel allowance in the amount specified in the collective agreement.
- **Foreign posting allowance:** An allowance for secondment abroad.
- **Severance payment:** Compensation paid to employees on termination of their employment contract.

- **Company car:** Employees who are allocated a company car.
- **Non-cash remuneration:** Benefit received by employees who are allocated a company car in consideration of proportional use of the car for private purposes.

### 8.3. Summary of the pay audit findings

The results of the pay audit for each of the 5 companies in the Elecnor Group are set out below.

#### **Elecnor S.A.**

The overall mean and median remuneration do not exhibit any difference greater than 25% that has to be accounted for under section 28(3) Labour Code and section 6(b) Royal Decree 902/2020 of 13 October 2020 on equal pay for women and men. Mean salary gap 18%, median 19%.

The largest differences are discussed below:

- Category 01: Executives, the mean and median remuneration actually paid to men is respectively 30% and 26% higher than the remuneration paid to women in that same job category. In terms of pay actually received, one-third of the women in Category 01 have not been paid 100% of their annual base salary because of maternity and reduced working hours. By contrast, all the men in this category have worked and have been paid 100% of their base salary. This difference in days worked during the year and the percentage of the working day worked by employees means that the mean and median values for men in this job category are higher than for women.
- Category 04: Level II Technical Personnel. In this salary category the mean and median remuneration actually paid to women is respectively 49% and 39% higher than the amount paid to men. This difference in this supplemental pay item is partly due to the fact that the employees who are paid the highest supplemental length of service pay are women.

#### **Elecnor Servicios y Proyectos, S.A.U.**

The overall mean and median remuneration do not exhibit any difference greater than 25% that has to be accounted for under section 28(3) Labour Code and section 6(b) Royal Decree 902/2020 of 13 October 2020 on equal pay for women and men. Mean salary gap 9%, median 13%.

The 3 relevant situations are discussed below:

- The base salary makes up 90% of the total remuneration paid to women and 73% of that paid to men. Accordingly, when assessing overall remuneration, the base salary will be the most important factor.
- Pay differences for **supplemental pay items** are higher than 25% in job categories 9, 11, and 12 and benefit men. This difference is due to the fact that the vast majority of construction site jobs give rise to supplemental pay stemming from the nature of the work performed.
- There are also differences in remuneration greater than 25% in job categories 3, 4, and 7 benefiting women. The differences are chiefly ascribable to amounts higher than the median resulting from the “Variable/Bonus” pay item.

### **Elecnor Seguridad**

The overall mean and median remuneration do not exhibit any difference greater than 25% that has to be accounted for under section 28(3) Labour Code and section 6(b) Royal Decree 902/2020 of 13 October 2020 on equal pay for women and men. Mean salary gap 17%, median 24%.

Relevant details in Category 01 are that both the mean remuneration and the median remuneration paid to men are higher than the remuneration paid to women, the former 34% higher, the latter 50% higher. In Category 06 the mean remuneration actually paid to women is 26% higher than that paid to men. These differences are due to the number of days worked by the various male and female employees during the year considered as a result of the various leaves taken.

### **Audeca**

The overall mean and median remuneration do not exhibit any difference greater than 25% that has to be accounted for under section 28(3) Labour Code and section 6(b) Royal Decree 902/2020 of 13 October 2020 on equal pay for women and men. Mean salary gap 4%, median 2%.

In Audeca the base salary makes up 82% of the total remuneration paid to women and 76% of that paid to men. Even so, there are differences greater than 25% in the mean and median remuneration paid to women and to men in Category 3 Core Business Activities. The mean and median remuneration actually paid to men is respectively 28% and 40% higher than that paid to women.

The differences in the mean and median base salary remuneration paid to women and men are due to the number of days worked and/or the tasks performed, hence they are circumstantial differences that do not involve any gender bias, inasmuch as that pay item is set and specified in the collective agreement.

### **Jomar Seguridad**

The overall mean and median remuneration do not exhibit any difference greater than 25% that has to be accounted for under section 28(3) Labour Code and section 6(b) Royal Decree 902/2020 of 13 October 2020 on equal pay for women and men. Mean salary gap -13%, median 10%.

When the Job Categories in the salary policy for Jomar employees are considered, it turns out that there are no women in Categories 04, 05, and 06. There are both female and male employees in all the other Job Categories. The pay audit performed concluded that the differences in pay greater than 25% observed for base salaries, for supplemental pay, and for "non-salary remuneration" and hence for total pay were chiefly attributable to the activities performed by the employees in their different job positions (duties, responsibilities, etc.) and that there was no gender bias of any kind in the pay received for any pay item category, with all amounts and basis for payment being set forth in and regulated by the collective agreements and Jomar's salary policy.

## 9. SCHEDULE III. ACTION PLAN

Area of action	Specific measures	Indicators	Time frame	People in charge	Resources	Objective
<b>Communication</b>	<ul style="list-style-type: none"> <li>Draw up guidelines for inclusive, gender neutral language.</li> <li>Promote gender neutral images on the website and in documents.</li> <li>Campaigns to promote key dates and heighten the visibility of women.</li> <li>Set up a help channel and a web page for the Plan.</li> </ul>	<ul style="list-style-type: none"> <li>Language guidelines published (Yes/No).</li> <li>No. of campaigns carried out during the year.</li> <li>No. of enquiries made using the help channel.</li> </ul>	April 2026	Communications teams, HR, and Equality Committee	Human	Drawing up guidelines and 3 campaigns
<b>Recruitment and Hiring</b>	<ul style="list-style-type: none"> <li>Review job offers through a gender lens (random sample of 20 job offers).</li> <li>Actively search for candidates for areas that are preponderantly male or female.</li> <li>Require external recruitment firms to comply with the equality policy.</li> </ul>	<ul style="list-style-type: none"> <li>No. of offers reviewed yearly.</li> <li>No. of hires broken down by sex and rank.</li> </ul>	Permanent	HR and cooperating recruitment firms	Human and Financial	20 job offers and disaggregated data
<b>Job Category</b>	<ul style="list-style-type: none"> <li>Define the criteria and weights for the job assessment system.</li> <li>Prepare reports with proposed changes.</li> </ul>	<ul style="list-style-type: none"> <li>Report on changes made (Yes/No).</li> <li>No. of complaints about the classification dealt with.</li> </ul>	April 2026	Equality Committee and HR	Human	100% of claims dealt with
<b>Training</b>	<ul style="list-style-type: none"> <li>Awareness raising programmes for the entire workforce and middle management.</li> <li>Specific training for key departments (HR, Communication, Committee).</li> <li>Priority for training by employees after maternity/paternity leave.</li> </ul>	<ul style="list-style-type: none"> <li>No. of hours of equality training by sex.</li> <li>% middle managers undergoing unconscious bias training.</li> </ul>	September 2026	HR and Equality Committee	Human	Training completed

Area of action	Specific measures	Indicators	Time frame	People in charge	Resources	Objective
<b>Promotion</b>	<ul style="list-style-type: none"> <li>Identify women who are potential candidates for senior management positions.</li> <li>Participate in external projects (Promotion, More Women)</li> <li>Prioritise internal searches for vacancies.</li> </ul>	<ul style="list-style-type: none"> <li>% women promoted by rank.</li> <li>No. of women in empowerment/mentoring programmes.</li> </ul>	September 2026	Upper Management, HR, and Equality Committee	Human and Financial	Identification complete
<b>Working conditions</b>	<ul style="list-style-type: none"> <li>Randomly assess 10% of new hires to ensure equal pay.</li> <li>Make adjustments to job positions for pregnancy/nursing and review PPEs by gender.</li> <li>Ensure women's changing rooms where needed.</li> </ul>	<ul style="list-style-type: none"> <li>% contracts reviewed yearly.</li> <li>No. of positions adapted to pregnancy/nursing.</li> </ul>	September 2026	HR and OHS Department	Human and Material	Evaluation and adaptations requested and effected
<b>Work-life balance and Co-responsibility</b>	<ul style="list-style-type: none"> <li>Expand the entitlement to changes to work schedules for children up to 14 {section 34(8) Labour Code}.</li> <li>Promote the use of work-life balance benefits by men.</li> <li>Remote working option after the 32nd week of pregnancy.</li> </ul>	<ul style="list-style-type: none"> <li>No. of requested changes to work schedules accepted/denied by sex.</li> <li>Reason for denying requests for changes to work schedules</li> </ul>	Permanent	HR and Equality Committee	Human	Implementation of the entitlement
<b>Under-representation</b>	<ul style="list-style-type: none"> <li>Draw up a list of priority departments with male over-representation.</li> <li>Integrate a gender lens into exit surveys.</li> </ul>	<ul style="list-style-type: none"> <li>Trend in the % of women in areas with male over-representation.</li> <li>Report on exit surveys performed.</li> </ul>	March 2027	HR and Upper Management	Human	Obtain the exit survey report
<b>Remuneration</b>	<ul style="list-style-type: none"> <li>Yearly review of remuneration records and salary items.</li> <li>Create working groups to assess pay disparities.</li> </ul>	<ul style="list-style-type: none"> <li>Gender pay gap (amount/percentage) under the collective agreement, salary setting authority, and record of annual pay.</li> <li>Assessment of job positions using a gender lens completed.</li> </ul>	March 2027	HR and special working groups External advisers pay records	Human and Financial	Annual pay audit completed

Area of action	Specific measures	Indicators	Time frame	People in charge	Resources	Objective
<b>Harassment Prevention</b>	<ul style="list-style-type: none"> <li>• Publication and signed acknowledgement of receipt of the protocol during onboarding.</li> <li>• Specialised training for the Equality Committee and people in charge of the protocol.</li> <li>• Protective measures (flexibility/transfer) for victims.</li> </ul>	<ul style="list-style-type: none"> <li>• No. and types of complaints received/settled.</li> <li>• % new hires that have signed in acknowledgement of receipt of the protocol.</li> </ul>	June 2027	Equality Committee, HR, Worker Representatives	Human and Material	Publication of the protocol
<b>Workplace Health &amp; Safety</b>	<ul style="list-style-type: none"> <li>• Report on the results of the climate and equality surveys to the Committee.</li> </ul>	<ul style="list-style-type: none"> <li>• Survey report submitted to the Committee (Yes/No).</li> </ul>	July 2027	OHS Department and Equality Committee.	Human	Report completed

## 10. SCHEDULE IV

Schedule of action for implementing, monitoring, and assessing measures under the equality plan

Área de Intervención	Measures	1st Qtr	2nd Qtr	3rd Qtr	4th Qtr
<b>Harassment Prevention</b>	Draw up and circulate the sexual and sex-based harassment prevention protocol	X			
<b>Communication</b>	Review inclusive, gender neutral language in internal/external communications	X	X		
<b>Recruitment and Hiring</b>	Implement neutral selection with blind CV screening		X	X	
<b>Training</b>	Give courses on equality and unconscious bias to the entire workforce		X	X	
<b>Work-life Balance</b>	Awareness-raising campaign about co-responsibility and using work-life balance measures			X	
<b>Job Classification</b>	Use a gender lens when reviewing the job assessment system			X	X
<b>Career Advancement</b>	Set objective, transparent criteria for internal promotions			X	X
<b>Remuneration</b>	Conduct a pay audit and monitor the pay gap				X
<b>Workplace Health &amp; Safety</b>	Integrate a gender perspective into the assessment of workplace health & safety risks				X
<b>Harassment Prevention</b>	Draw up and circulate the sexual and sex-based harassment prevention protocol	X	X	X	X