



EUROINFRA INVERSIÓN, S.L.U. and Subsidiaries

Non-Financial Reporting Statement for
the year ended on
31 December 2021



[Paraph]



EUROINFRA INVERSIÓN, S.L.U. AND SUBSIDIARIES

2021 Non-Financial Reporting Statement

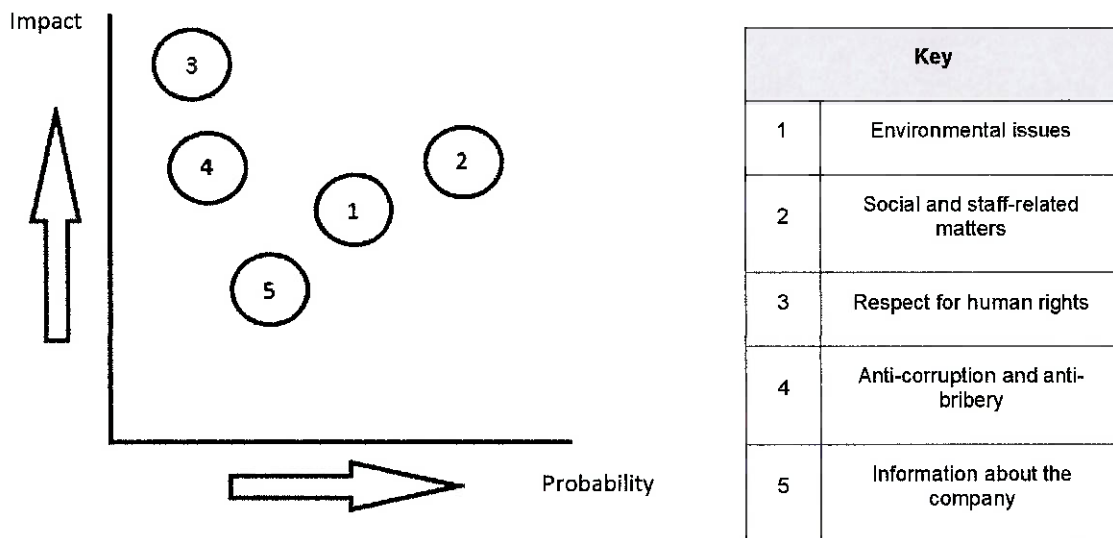
1. About this chapter

This non-financial reporting statement has been drawn up in accordance with the requirements established in the Non-Financial Reporting and Diversity Act 11/2018, of 28 December, approved on 13 December 2018 by the Congress of Deputies, and modifying the Code of Commerce, the recast text of the Capital Companies Act approved by Royal Legislative Decree 1/2010, of 2 July, and the Accounts Auditing Act 22/2015, of 20 July, with regard to non-financial reporting and diversity (derived from Royal Decree-Act 18/2017, on 24 November).

The preparation thereof likewise has taken into account the guidelines regarding the presentation of non-financial reports issued by the European Commission (2017/C 215/01), derived from Directive 2014/95/EU. Consideration has likewise been given to the terms established in the sustainability report guidelines issued by *Global Reporting Initiative* (GRI Standards).

Within this context, by means of the non-financial reporting statement, the parent company, Euroinfra Inversión, S.L.U., of Grupo Aldesa, S.A. together with its subsidiaries (hereinafter jointly referred to as "Grupo Aldesa") aim to provide information as to environmental, social and staff-related matters and in connection with significant human rights matters for the company in the performance of its inherent activities in the business of Grupo Aldesa.

The preparation of this report and the selection of the content has taken into account the results of the materiality analysis conducted in early 2021. This analysis comprised an evaluation of the relevance for Euroinfra Inversión, S.L.U. of the various aspects set out in Act 11/2018, with these aspects consequently being classified as follows:



This non-financial reporting statement was subjected to an independent external review process. The independent assurance report including the objectives and scope of the process, and the review procedures employed and their conclusions, is included at the end of this document.

2. Business model

Euroinfra Inversión, S.L.U., as Parent Company of Grupo Aldesa, is a limited liability company validly incorporated and extant under the laws of Spain, holding the majority of the shareholder stock, and hence the majority of the voting rights of the company Grupo Aldesa, S.A., which is a public limited liability company validly incorporated and extant under the laws of Spain, with over 50 years of experience in the construction

sector, dating back to 1969. Over the years, Grupo Aldesa has diversified its activities both through organic growth and through acquisitions, and from 2007 onwards has undertaken a thorough process of internationalisation, expanding to the Americas, Europe and other jurisdictions.

Grupo Aldesa is one of the largest consolidated construction groups in Spain and Mexico, dedicated to the development of civil engineering and buildings infrastructure, while furthermore operating in the industrial sector and undertaking investment activities, such as concessions, real estate and renewable energies.



- **Construction**

The construction division is alongside the industrial division Grupo Aldesa's main activity, acting above all as an EPC (engineering, procurement and construction) contractor, focusing on value-added activities and techniques such as design, engineering and management of the relationship with the end clients and suppliers of Grupo Aldesa, while subcontracting less complex aspects of the works.

The construction division covers all fields of specialist civil engineering, with more than 800 km of roadways and railways successfully completed to date:

- Conventional and high-speed railway infrastructure
- Highways and motorways
- Airports
- Harbours
- Urban development
- Underground works (tunnels, water pipelines, etc.)

The construction division also covers landmark buildings (retail centres, hospitals, educational institutions, corporate and institutional buildings, transport infrastructure, etc.), residential buildings and major refurbishment projects.

- **Industrial**

The industrial division includes the construction, maintenance and operation of energy projects (including energy, generation, transmission and distribution), technological solutions (traffic and lighting systems) and installation activities.

- Energy:
 - o Planning, construction, installation and maintenance of generating plants and electrical transmission projects.
 - o Gas pipeline construction.
- Technological solutions:
 - o Management and installation of urban traffic and long-range transit route systems.
 - o Installation, maintenance and energy optimisation of lighting systems.



- Control systems, installation and maintenance of equipment connected with information and communications technologies (such as electricity meters to communicate energy consumption data).

- Installations:

- Telecoms infrastructure projects (optical fibre, lines and transmission networks).
- Industrial installations (construction of manufacturing plants for the automotive sector).
- Installations at landmark buildings, offices, retail centres and hotels.

- Investment activities:

Grupo Aldesa undertakes other investment activities to generate business in addition to its construction and industrial divisions.

Participation is normally structured by means of Joint Ventures, where we ensure most of the construction rights and try to minimize CAPEX by including other partners and maximizing cash flows for the core.

- Renewable energies:

- Development, design and operation of renewable energy generation projects.

- Concessions:

- The group is involved in the public-private partnership sector through the operation and maintenance of transport infrastructure and public services (such as toll motorways and schools).

- Real estate:

- Investment in the real estate market, including residential and office buildings.

2.1. Markets in which it operates

Grupo Aldesa has extensive experience in the construction sector in Spain, and over the last 11 years it has begun to expand geographically. In addition to Spain, it currently has a significant presence in Mexico and Poland (including operations in Slovakia using the experience of our Polish teams), as well as operations in the South American Cone (Peru, Colombia, Chile and Uruguay) and new European markets (Denmark, Hungary and Norway).





2.2. Company objectives and strategies

In recent years, Grupo Aldesa, being aware of the cyclical nature of the industries in which it operates, has been able to anticipate changes in its traditional markets and consolidate new areas of business both geographically and by line of business.

In the short term, this strategy has served to offset the reduction of activity in the infrastructure market in Spain, but particularly to provide greater solidity to the Group's future as it is now based on more than one activity and a presence in several continents.

The internationalisation and diversification strategy were the result of a thorough analysis of the potential of each market, as well as its own strengths and the resources available. Each decision has always been mindful of conducting a meticulous analysis and management of the risks to avoid rash decisions that could jeopardise the viability of our business.

Thus, in recent years, Grupo Aldesa has succeeded in consolidating its positioning as a leading player in infrastructure in Mexico and the countries of the Southern Cone, with a portfolio of more than 400 million euros, and in Poland, with a portfolio of almost 500 million euros, distributed across the different business lines of Grupo Aldesa.

Its consolidation in markets with high investment potential has been accompanied by the development of activities in the area of Industry and Energy in these markets. These business lines form our core business along with transport infrastructure, and are destined to be the new drivers of growth in the countries in which we operate. Our proven experience in these markets gives us a significant competitive advantage.

The strategy for the coming years will focus on further consolidation in open markets, where our know-how acquired over the years will allow us to reduce the risks and increase our profitability and return on investment. At the same time, the strategy aimed at bolstering the Grupo Aldesa's liquidity through efficient cash management, asset turnover, and active management of corporate finance will also remain in place.

All of these strategic lines are in keeping with numerous commitments and values underpinned by a model based on sustainability and responsible business management at all levels: economic, social and environmental, thereby bolstering the continuous growth potential of Grupo Aldesa.

2.3. Impact of the Covid-19 in the Group

Since the World Health Organization declared the coronavirus (COVID-19) outbreak as an international pandemic in March 2020, the rapid evolution of events has led to an unprecedented health crisis, which has impacted the macroeconomic environment and business development.

The impact on Grupo Aldesa has had various levels of geographical and temporary impact, and has been mitigated as vaccination processes have progressed. However, in 2021 there have been some ups and downs depending on the various waves that have been suffered. In any event, a lower overall impact was seen in the second half of 2021 compared with the previous periods, to the extent that the existing restrictions had been lifted partially or completely.

With the highest levels of pandemic and associated restrictions, the impacts of the health crisis situation have been reflected in two areas:

- Production fell due to the discontinuation of ongoing projects and the failure to start recently awarded projects. Also, delays in supplies and increase in transport and raw materials prices.
- Decrease in contracts. Affecting both public and private works, above all in renewable energy projects where delays in public permits and financing have affected project signing.

With regard to the mitigating measures implemented, mention should be made of the following:

- The Group's cost structure, due to the type of activities it carries out, reveals that most of the Group's costs are variable costs, because of the subcontracting of the work. The suspension of variable costs is associated with the suspension of activity itself.
- With regard to fixed costs, the Group carries out the procedures in order to address the situation and minimise its impact, and employment-related actions have therefore been implemented in each country. In this regard, in 2020, in Spain, temporary workforce restructuring procedures were carried out in almost all Spanish companies forming part of the Group. In the other companies of



the Latin American Group, other temporary redundancy mechanisms were implemented. Likewise, in Spain in 2020 a process of substantial modification of working conditions was launched in the last quarter of the financial year, affecting both structural and project personnel, with the aim of adjusting the economic cost involved in maintaining the workforce to the current production situation. This effect was reflected in the 2021 financial year. In addition, during the 2021 financial year periodic monitoring was performed with regard to activity levels and the associated workforce, with the relevant measures being implemented specifically in countries such as Mexico, where there has been a substantial reduction in turnover compared to the previous financial year.

- Lastly, despite the current health crisis situation, the entry of CRCC into the shareholding of the Group and the capital increase carried out in 2020 has provided financial stability to the Group (the purpose of the capital increase allowed the execution of the amortisation of €250M of senior covered bonds maturing in 2021 of 7.25% issued by Aldesa Financial Services S.A. at par on 19 May 2020, issued by Aldesa Financial Services, S.A., and, by means of an intercompany financing agreement with CRCCII, the Group cancelled all outstanding debt with recourse from the group), thereby improving its profile of future debt maturities.
- In any case, the Group has the financial support received by CRCCII.

3. Management of non-financial aspects

3.1. *Governance and compliance*

3.1.1. Grupo Aldesa Governance Model

The corporate governance of Grupo Aldesa is responsible for activities in fulfilment of the applicable legislation, the articles of association in force and the principles and values set out in the various codes and internal policies, guaranteeing coordination, monitoring and organisational control for the achievement of corporate objectives, pursuing at all times the interest of all the companies that make up Grupo Aldesa.

Grupo Aldesa furthermore publicly declares its commitment to maintain business integrity in the performance of its operations by complying with the highest ethics and standards, with the publication on its websites of its code of ethics and anti-corruption policy, both documents being translated into Spanish, English and Polish.

It also has in place a Compliance Policy the main aim of which is to oversee compliance with Grupo Aldesa's ethical principles, good corporate governance and transparency, quality and excellence, customer focus and integrity in the services provided, while also generating a sound culture of ethical values and regulatory compliance.

3.1.2. Governing bodies: composition and responsibilities

Within the corporate structure of Grupo Aldesa, the shareholding structure of which is Euroinfra Inversión S.L.U. 75% and Holding de Inversiones Favifam, S.L. 25%, the highest governing body is the Governing Body, comprising eight directors (six from the parent company and two from the minority company), the duty of which is to establish the general guidelines for the management of Grupo Aldesa, S.A. Its obligations include addressing the following issues:

- Establish the strategic planning and policies of the Group.
- Generate the general management guidelines.
- Monitor the development and effective implementation of these guidelines.

In order to fulfil its responsibilities, Grupo Aldesa likewise enjoys support from various internal bodies, including in particular the Internal Audit Committee, the Compliance Committee, the Remuneration and Appointments Committee and the Health, Safety and Environment Committee, the functions delegated by the Board of Directors focusing on strengthening internal control over the organisation, serving to guarantee the objectivity and sustainability of its operations at the organisation. Each committee is made up of five members who meet on a quarterly basis on a regular basis to follow up on matters delegated to them.

In addition, Grupo Aldesa has internal supervisory bodies which allow it to have a decentralised structure for the approval of its activities, which are:

- The Investment Committee which oversees those investment and divestment operations which must be scaled and approved by the Board of Directors, or which are subject to review by this committee, provided that they are not within the scope of those referred to in the above paragraph.
- The Procurement Committee, which oversees the presentation of company offers in its construction activities, managing and reviewing the possible risks detected in the analysis of opportunities identified by the company.

3.1.3. Corporate governance policies, regulations of the bodies

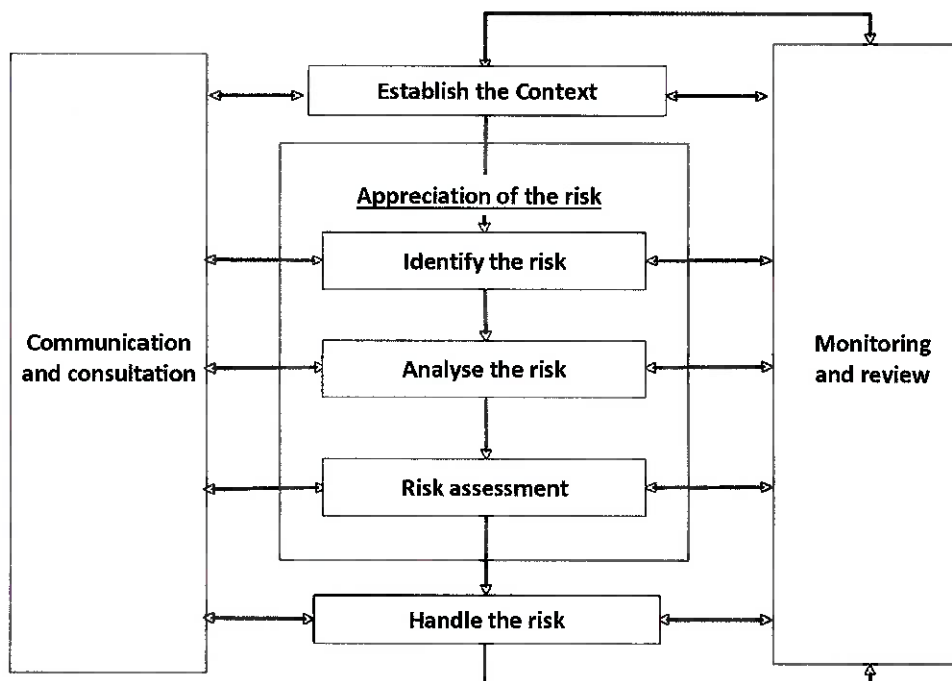
Grupo Aldesa has in place a Structural and Corporate Governance Policy which sets out: i) the main aspects and commitments of the company with regard to corporate governance any; ii) the general guidelines and instructions defining the corporate group structure (Grupo Aldesa); and iii) the configuration of its respective governing bodies.

It has likewise established a Regulation for the Grupo Aldesa Board of Directors, setting out the operational principles of the Board of Directors and the basic rules for its organisation, functioning, and standards of conduct for its members.

3.2. Management of non-financial risks

Organisations face internal and external influences and factors that lead to uncertainty as to whether and when they will achieve their objectives. The impact that this uncertainty has on the achievement of an organisation's objectives represents Risk.

In 2021 Grupo Aldesa applied standard ISO 31000 to risk management to embark on the process of equipping its areas of responsibility with the most effective possible management system. There are 7 steps or phases in the Risk Management Cycle, 5 of them following a clear order, while the other 2 appear throughout the entire cycle:



The aims of Grupo Aldesa at the close of the cycle are as follows:

1. Identify the risks connected with our area that could have a negative impact on the achievement of the organisation's objectives.
2. Estimate the likelihood that these risks will materialise.



3. Evaluate and classify the criticality of the operation that could be affected were the risks to materialise, and the recovery costs.
4. Identify what actions and/or corrective or preventive plans could be implemented by the structure to mitigate or reduce the risks without the costs exceeding the losses.
5. Develop a communication plan serving to establish effective consultations and communications with stakeholders.
6. Establishment of a system for periodic review and evaluation of the risks.

Grupo Aldesa views as significant those risks inherent in its business which could jeopardise the economic profitability of its operations, its financial solvency or the integrity of its employees. Our risk management operates at four levels, taking into account political and economic risks with regard to people and social aspects.





	Risks	Potential impact
Political	Increased competition in markets	Grupo Aldesa operates in highly competitive markets. If our competitors are in a better position to meet competitive challenges or to react to changes in factors affecting competition in our industry, we could suffer a loss of market share that could have a significant adverse effect on our business.
	Physical safety	Even if we adopt health and safety policies and procedures to minimise risks, we cannot guarantee that there will be no failure in said policies and procedures. Any safety failure could result in serious harm for the staff of the company, subcontractors, the public sector or the environment.
	Legislative change	In each of the jurisdictions where we operate, difficulties and uncertainties in the application of laws, regulations, terms and conditions could give rise to lawsuits, which could have an impact on our financial and operational planning with a potentially significant adverse effect on our business.
Economic	Suspension of works	A breach of certain contractual terms and conditions could expose us to contractual penalties, adjustments to the contract price and/or an obligation to refund part of the price paid under the contract. In the event of a serious breach, the consequence could be the suspension of the project and even the cancellation of the contract, and the establishment of due performance sureties and the associated performance guarantees.
Personnel	Loss of key personnel	If certain key members of our senior management or technical personnel were to terminate their relationship with us and we could not find an appropriate replacement in a timely manner, our business, financial position and operational results could be negatively affected.
	Lack of operational personnel	Our business could be compromised by a lack of a significant commitment of resources in terms of manpower, time management and operational resources, alongside inadequate staff recruitment.
	Consolidated activities undergoing changes	If we are unable to react to changes in the factors affecting competition in our industries, it is possible that we might not be competitive in tendering for projects, or could find ourselves forced to accept projects on less favourable financial terms.
Social	Loss of licence to operate	If the contractor does not comply with the requirements established in an agreement reached with a public authority, said contractor may ultimately be disqualified from participating in tenders for new public contracts in the future within a particular jurisdiction.
	Corruption / Credibility	We are exposed to the risk of breaches of anti-corruption laws, sanctions or other similar regulations applicable in the countries where we operate or intend to operate. In the event of any breach of anti-corruption, sanctions or similar regulations, this could have an adverse material and reputational impact.
	Operational continuity	The occurrence of a case of force majeure or some other unpredictable event affecting a project on which we are working could cause delays, suspensions and cancellations, or prevent us from completing said projects. We might not always be able to include force majeure terms in the contracts with our clients, or obtain cover for such events.

As for financial risks, Euroinfra Inversión, S.L.U. has in place internal supervision procedures and control mechanisms for each of the financial risks described, with the Annual Accounts being audited by PricewaterhouseCoopers Auditores, S.L.



3.3. *Anti-corruption and anti-bribery*

3.3.1. *Policies and procedures for combating corruption, bribery and prevent money laundering*

The Compliance and Criminal Risk Prevention Model of Grupo Aldesa (hereinafter, the Compliance Model) is intended to mitigate any risk to which the corporate group might be exposed in performing its activities.

This Model includes an Anti-Corruption System based on the highest international regulations and standards, such as the US Foreign Corrupt Practices Act, the UK Bribery Act, the OECD Anti-Bribery Convention, the Australian 3806-2006 Anti-Corruption Standards, the UN Convention Against Corruption, the Spanish Penal Code, standards ISO 19600 and UNE 19601, and any other regulations that would apply in this sphere (hereinafter, "Anti-corruption Regulations"), to prevent and mitigate any risk of public or private corruption to which the corporate group might be exposed.

The main constituent elements of this system are:

- Anti-Corruption Policy: the Anti-Corruption Policy reveals the specific commitment of Grupo Aldesa to combat corruption through the firm condemnation of any conduct that could be liable to be considered an act of corruption or bribery, in both the public and private spheres.

Compliance with this Policy is mandatory for all Directors, Officers and employees of Grupo Aldesa, and it is published on the website in Spanish and in English.

- Conflict of Interest Management Policy: this policy sets out the general principles of integrity, honesty and trust in the policies of Grupo Aldesa, and is the guarantee of transparency in the professional relationships of all members of Grupo Aldesa.

- Third-Party Anti-Corruption Due Diligence Procedure: the procedure to be followed prior to the formalisation of agreements with Third Parties, irrespective of their structure, composition and geographical location.

- Anti-Corruption Due Diligence Procedure in M&A Operations: the procedure to be followed prior to the execution of structural modifications as a consequence of merger and acquisition processes involving new organisations.

- Resource Assignment Procedure: the standard in force has been updated, establishing guidelines for the assignment of resources, tools and/or ancillary elements in the workplace.

- Anti-Corruption Clauses: various formats for anti-corruption clauses to be included in standard Grupo Aldesa contracts have been devised.

However, these are not the only policies and procedures, and furthermore this system is an additional complement to other controls included in the Compliance Model, such as: approval procedures performed by the different Delegated Committees of the Board of Directors, approval and review procedures of the Investments Committee, approval, control and monitoring of budgetary items, Human Resources Policy, **Personnel Administration procedure in the work flow of Grupo Aldesa companies**, procurement procedures, the approval of powers of attorney and, as the basis for all the above, the Code of Ethics of Grupo Aldesa, setting out the principles and values of Grupo Aldesa, as developed in the Employee Conduct Policy.

The Group also has in place a Policy for Donations, Sponsorship, Collaboration and Patronage Agreements, indicating the resolute commitment of Grupo Aldesa to comply with the law and to avoid any suggestion of impropriety, by establishing standards, principles and criteria to be followed when engaging in such operations.

The Compliance Model likewise has in place specific controls for the prevention of Money Laundering, most notably the Internal Control body, Prevention of Money Laundering Manual and the annual external audits that are conducted.

Lastly, the Grupo Aldesa's Compliance Model is certified under standard UNE 19601 on Criminal Compliance Management Systems, which is also accredited by ENAC (the National Accreditation Body).



3.3.2. Responsibilities for implementation

The Policies and Procedures of Grupo Aldesa apply to all personnel of Grupo Aldesa, and also to stakeholders to the extent they have a relationship with Grupo Aldesa. It likewise establishes a Conduct Policy for employees and a Conduct Policy for Business Partners, in which it expresses the ethical expectations of the organisation with its stakeholders.

For the control, supervision and monitoring of these safeguards, Grupo Aldesa has in place a Compliance Committee, operating as an autonomous and independent body with sufficient powers to fulfil the obligations entrusted by the Board Directors of Grupo Aldesa, S.A., and to maintain the control, supervision and efficacy of the Compliance Model of Grupo Aldesa. It is made up of five members and draws on the collaboration of a Support Unit and external consultancy, in addition to the support of other compliance bodies at international level.

This body is responsible for fulfilment of the policies and procedures of Grupo Aldesa and the evaluation of any criminal risks to which Grupo Aldesa might be exposed. It performs both preventive and supervisory and monitoring tasks, performing an internal audit of both the system and the Compliance Model controls and self-assessments by those responsible for them, with sufficient resources to perform their responsibilities.

As a tool to detect any breaches, an ethics channel, etica@aldesa.es, has been set up, posted on the website and available to all employees, allowing them to report any conduct in breach of Grupo Aldesa's policies, and to raise any questions and suggestions, with the possibility of anonymous communication. During this financial year the ethics channel received thirty-four notifications, nine of which corresponded to reports, and six of which let to the instigation of internal investigatory proceedings, none of them connected with cases of corruption or money laundering.

Meanwhile, each officer is responsible for fulfilment of the Policies and Procedures of Grupo Aldesa's companies in accordance with the corresponding areas.

Likewise, in order to prevent money laundering a representative before the SEPBLAC service (the Spanish Executive Service of the Commission for the Prevention of Money Laundering and Monetary Offences) has been appointed, together with an internal control body which supervises, blocks or authorises any operation at the real estate department that could be considered suspicious within Grupo Aldesa's internal procedures. It also has a specific communications channel, pblanqueo.capitales@aldesa.es, which can be used to report any conduct that could constitute a breach of the principles and procedures of the Money Laundering Manual.

In addition, internal and external audits were performed in which no impact was detected in the organisation's control processes.

3.3.3. Awareness of governing bodies, officers and employees

At Grupo Aldesa, all members of the governing bodies, its officers and employees receive regular awareness actions in the Code of Ethics, the Compliance Model, and the whistleblowing channel.

Therefore, new recruits must accept the company's Code of Ethics and Policies, and are given this awareness at the start of their recruitment.

In addition, specific periodic training has been conducted during this period in accordance with specific risks to the different departments affected in the field of Compliance, Environment, Health and Safety, in accordance with an annual training plan that is updated periodically.

3.3.4. Contributions to foundations and non-profit entities

In the case of donations, sponsorship, patronage, etc., prior approval is required from the Corporate Affairs Department.

During this financial year Grupo Aldesa in Poland actively collaborated (€1,305 contribution) with the Siepomaga foundation, dedicated to social causes of various profiles (helping the sick, protecting children, promoting inclusion, etc.) and with Nowa Akropolis Cultural Society (€870 contribution), focused on the promotion of cultural activities. In addition, the Group has donated €268 worth of supplies to the Medical University of Warsaw and the orphanage in Płońsk, worth €2,175, as part of its community activities linked to the S7 project.



3.4. Respect for human rights

In the field of Human Rights, Grupo Aldesa has in place the following tools:

1. Signature of the United Nations Global Compact. We have since September 2015 been an active member of the Global Compact (evidence attached - consult if required).
2. Our Code of Ethics to guarantee Human Rights.

The Grupo Aldesa Code of Ethics sets out the values, standards and principles reflected in our corporate culture, explicitly including respect for Human Rights as one of the fundamental behavioural principles. It specifically indicates that all actions of Grupo Aldesa and of its constituent individuals must scrupulously respect the Human Rights and Public Freedoms included in the Universal Declaration of Human Rights. This Code is developed by the Employee Conduct Policy and the Business Partner Conduct Policy, which reinforces and strengthens the ethical business culture.

Grupo Aldesa embraces and supports the fulfilment of Human Rights, and avoids working with any organisations guilty of rights abuses. It has therefore given a commitment to respect all provisions issued in this regard by the International Labour Organization (ILO) and the Global Compact.

The Code of Ethics furthermore requires that all members of Grupo Aldesa likewise ensure compliance with these provisions, placing a particular emphasis on those connected with child and forced labour. Our corporate culture in the sphere of Human Rights extends to our value chain, since our Code of Ethics is signed by partners and suppliers.

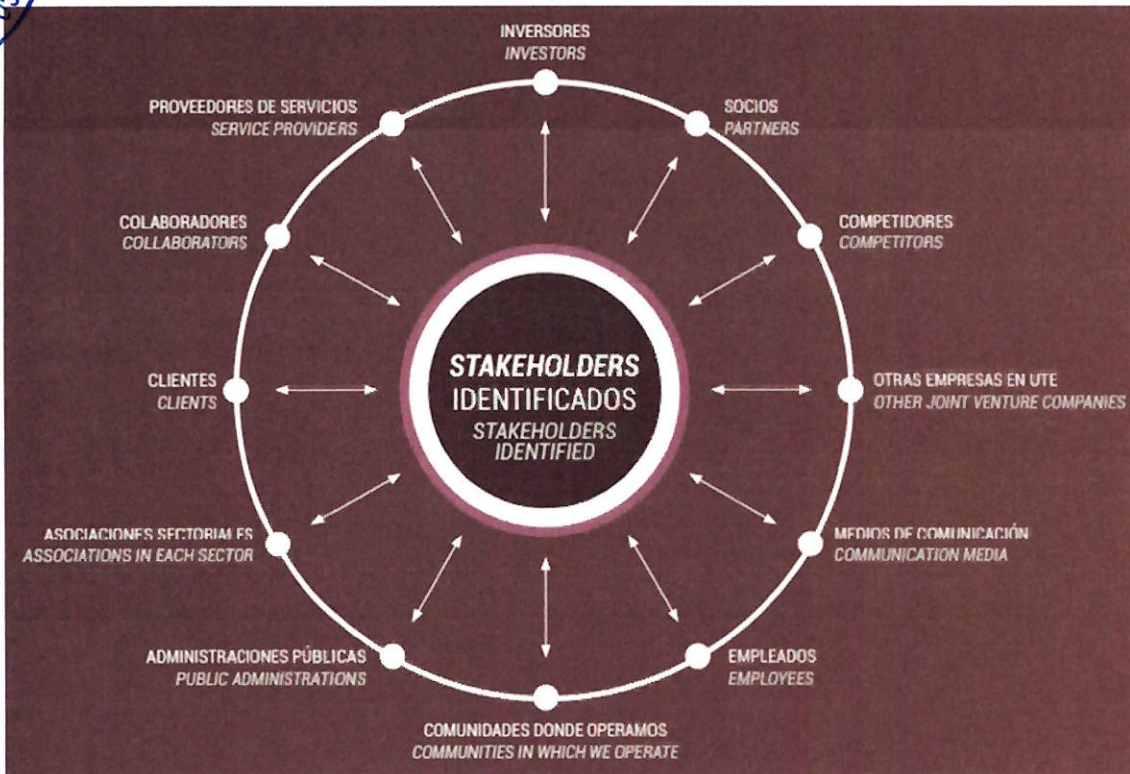
Grupo Aldesa in the sphere of Human Rights has in place specific compliance policies and control procedures in the event of any possible cases of infringement, which could lead to the imposition of penalties, which must be known to all employees and executives of the company. Grupo Aldesa has to date received no complaints of cases of human rights breaches.

3.5. Relationship with stakeholders

Grupo Aldesa, being familiar with the business in which it operates, and convinced that it is necessary to maintain a sustainable business model, is capable of identifying the members of its stakeholders.

Grupo Aldesa is aware that the pursuit of its activities and the decisions that it takes have direct or indirect impacts on a group of individuals, entities or organisations, which make up its stakeholders. This circumstance vests in them a series of attributes, such as legitimacy to demand certain behaviours of Grupo Aldesa, a power to be understood as the capacity to generate an effect on it, and diligence, in the sense that their demands require immediate attention.





The dialogue between Grupo Aldesa and its stakeholders comprises an integral element of its Social Responsibility strategy and its Communication plan, in promoting the establishment of relationships of trust. This commitment takes the form of a mechanism for dialogue and mutual understanding, allowing all stakeholders to be taken into account in daily operations, and ensuring that their respective expectations can be ascertained. In specific cases of construction works or projects close to populated areas, direct communication platforms have been established, to ensure that communication is reciprocal and all those concerned feel they are involved in local development.

The Group's Corporate Responsibility strategy, summarised in the slogan "We Build Trust" ("Construimos confianza"), is based on a series of corporate values which extend to every level of the organisation and aim to be not simply a hallmark, but a genuine commitment to all stakeholders:

3.6. Social and staff-related matters

3.6.1. Employment

Grupo Aldesa has in place a Corporate Human Resources Policy which establishes the strategic basis that must serve as the guide for all initiatives connected with Grupo Aldesa personnel, the reference points being the Grupo Aldesa Mission and Values, intended not only for personnel at the Human Resources area, but for all those supervisors responsible for managing people in their daily operations.

Taking this into account, the objective of this Policy is to define, design and disseminate a Group human resources management model capable of attracting, promoting and retaining talent and fostering the personal and professional growth of all individuals who belong to Grupo Aldesa's team, involving them in the project of corporate success and providing them with a decent and secure job.

3.6.1.1. Workforce

Distribution of personnel segmented by gender, professional category and age at the close of 2020 and 2021:



	Men		Women		Total	
	2020	2021	2020	2021	2020	2021
Spain	646	700	144	138	790	838
Mexico	907	569	219	141	1,126	710
Poland	152	135	122	107	274	242
Other¹	71	163	19	38	90	201
Total	1776	1567	504	424	2280	1991

	Management ²		Technical Personnel		Rest ³		Total	
	2020	2021	2020	2021	2020	2021	2020	2021
Spain	68	74	383	387	339	377	790	838
Mexico	48	26	515	282	563	402	1,126	710
Poland	20	30	189	158	65	54	274	242
Other¹	8	16	69	119	13	66	90	201
Total	144	146	1156	946	980	899	2280	1991

	18-35		36-55		>55		Total	
	2020	2021	2020	2021	2020	2021	2020	2021
Spain	129	144	463	475	198	219	790	838
Mexico	683	416	363	253	80	41	1,126	710
Poland	155	116	106	113	13	13	274	242
Other¹	34	73	45	103	11	25	90	201
Total	1001	749	977	944	302	298	2280	1991

Grupo Aldesa has optimised its reporting system for data of "personnel at closing" in 2021 distributed by age range, up to 100% of the workforce being reported.

3.6.1.2. Type of contract

Grupo Aldesa has in place a complex staff recruitment system at the international level involving numerous concepts, collective agreements and specific regulations in the countries where it operates. In the interests

¹ Portugal, Peru, Colombia, Chile and Uruguay

² Senior management, workers holding executive and managerial positions at Grupo Aldesa are included

³ Skilled tradesmen and operatives are included



of transparency and improvement, Grupo Aldesa has standardised its reporting systems for data referring to "type of contract" up to 100% of the workforce.

The following table breaks down data on type of contract at the close of 2021:

	Permanent			Temporary		
	2020	2021		2020	2021	
		Full-time	Part-time		Full-time	Part-time
Spain	599	637	5	191	184	12
Mexico	352	276		774	434	
Poland	107	124		167	118	
Other¹	22	129		68	72	

Part-time contracts are used only in Spain, with a minimal impact on 1% of the total workforce at closure.

Average distribution with data on 100% of the workforce according to "type of contract" (permanent, temporary and part-time) segmented by gender, professional category and age range in 2021:

	Average type contract - Gender					
	2020			2021		
	Men	Women	Total	Men	Women	Total
Full-time permanent	874	317	1191	863	267	1130
Part-time permanent	3	4	7	1	4	5
Full-time temporary	932	196	1128	661	159	820
Part-time temporary	15	4	19	12	3	15



¹ Portugal, Peru, Colombia, Chile and Uruguay



	Average type of contract – Professional category							
	2020				2021			
	Management ²	Technical Personnel	Rest ³	Total	Management ²	Technical Personnel	Rest ³	Total
Full-time permanent	139	586	466	1191	133	568	429	1130
Part-time permanent	-	6	1	7	-	4	1	5
Full-time temporary	18	638	472	1128	15	397	408	820
Part-time temporary	-	5	14	19	-	4	11	15

	Average type contract - Age							
	2020				2021			
	18-35	36-55	+55	Total	18-35	36-55	+55	Total
Full-time permanent	351	622	218	1191	318	602	210	1130
Part-time permanent	1	4	2	7	-	3	2	5
Full-time temporary	613	412	103	1128	418	320	82	820
Part-time temporary	5	6	8	19	3	4	8	15

Part-time contracts are used only in Spain, with a minimal impact on 1% of the average total workforce.

3.6.1.3. Data corresponding to average remuneration and salary gap

Information reported regarding remuneration and salary gaps includes fixed and variable remuneration. Calculation of the average remuneration takes into account proper imputation in accordance with the type of working hours corresponding to each employee.



² Senior management, workers holding executive and managerial positions at the Grupo Aldesa are included

³ Skilled tradesmen and operatives are included



	Average remuneration - Professional category			
	Spain		Total ⁴	
	2020	2021	2020	2021
Management²	90,927	91,991	77,945	77,308
Technical Personnel	36,193	37,503	23,827	26,654
Rest³	21,090	21,787	11,535	12,924
Total	34,217	35,241	21,088	23,576

	Average remuneration - Age			
	Spain		Total ⁴	
	2020	2021	2020	2021
18-35	25,183	26,779	12,404	13,545
36-55	35,977	36,733	27,312	28,768
+55	35,977	37,556	30,244	32,809
Total	34,217	35,241	21,088	23,576

Grupo Aldesa promotes equality, the employees are treated solely on the basis of their worth and commitment, disregarding their gender. In order to improve the standardisation of data, the salary gap calculation does not include expatriate personnel because of the specific nature of their conditions.

	Average Pay - Gender			
	Spain		Total ⁴	
	2020	2021	2020	2021
Men	34,071	35,129	21,548	24,256
Women	34,874	35,811	19,499	21,121
Total	34,217	35,241	21,088	23,576
	-2.3%	-1.9%	9.5%	12.9%

With regard to the Board of Directors of Grupo Aldesa, the average remuneration (salaries, allowances and remuneration of any kind accruing over the course of the financial year) of the directors, eight people at the close of the financial year, amounts in 2021 to 84 thousand euros (99 thousand euros in 2020).

Average remuneration (salaries, allowances and remuneration of any kind accruing over the course of the financial year) on the part of the ten members of the Executive Committee of Grupo Aldesa at the close of financial year 2021 amounted to 210 thousand euros (265 thousand euros in 2020). The aforementioned accrued remuneration includes remuneration corresponding to two Directors who also performed Senior

⁴ Portugal is not included in the "Total" average remuneration as the data is not material.

² Senior management, workers holding executive and managerial positions at the Grupo Aldesa are included

³ Skilled tradesmen and operatives are included

Management functions. Said amounts are likewise included in the information associated with the members of the Board of Directors.

3.6.1.4. Number of dismissals

The number of dismissals for the 2021 financial year refers to 100% of Grupo Aldesa's workforce.

Number of dismissals															
Gender				Age						Professional category					
Men		Women		18-35		36-55		55		Management ²		Technical Personnel		Rest ³	
2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021
401	125	105	32	178	59	268	68	60	30	21	18	319	79	166	60

The types of dismissal included are those categorised as unfair and objective, without including departures as a result of the end of project-specific contracts.

3.6.1.5. Employees with disability

Employees with disability belonging to Grupo Aldesa are located in Spain and Poland. In this regard, the scope of the information reported with regard to previous years has considerably increased in the 2021 financial year.

	Number of men with disability						Number of women with disability					
	Address ²		Technical Personnel		Rest ³		Address ²		Technical Personnel		Rest ³	
	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021
Spain	0	0	5	4	0	3	0	0	2	2	1	0
Poland	0	1	0	0	0	0	0	0	1	1	0	1

Grupo Aldesa not only includes employees with disability in those jobs that can be adapted in order to allow such individuals to perform the functions inherent in the job, but also collaborates with special employment centres, from which it purchases goods and services produced by people with some type of disability, so as to contribute to their integration within the world of work.

Grupo Aldesa's main domestic companies hold an exemption certificate issued by the Directorate-General for the State Public Employment Service within the context of Royal Decree 364/2005, 8 April 2005, governing alternative compliance on an exceptional basis with the quota set aside for workers with disability.

Grupo Aldesa is committed, taking into account needs, to accessibility measures and job adaptation systems for employees with disability, promoting their full integration. During 2021, Grupo Aldesa has not undertaken any necessary measures with regard to those already in existence.

3.6.2. Working structure

Office workers at Grupo Aldesa have working hours in connection with the number of working hours established under the collective agreement, and in accordance with the country where they live. In the case

² Senior management, workers holding executive and managerial positions at the Grupo Aldesa are included

³ Skilled tradesmen and operatives are included



of site personnel, they work at all times in accordance with the hours established by law and the required rest periods.

With regard to the organisation of working time and implementation of job disconnection policies, Grupo Aldesa, through a new proposal/project, is working to adapt its systems and procedures, moving towards an operational model at the company offering greater work-life balance. To this end, the principles governing the policies of Grupo Aldesa include in particular the principle of personal, family and working life balance, to ensure that all employees of the companies that belong to Grupo Aldesa are able fully to enjoy their personal and family life, within a flexible working environment that facilitates this balance.

The reconciliation of personal, family and working life at Grupo Aldesa is a strategy that it pursues, facilitating the achievement of effective equality between men and women, allowing each individual employed at Grupo Aldesa to achieve compatibility with the different facets of their life: work, family, leisure and personal time.

These measures applied by Grupo Aldesa for all employees of its companies include the implementation of flexible workplace arrival and departure times, shorter working hours during the summer months, support for maternal and paternal leave, and the preparation of a draft/proposal for a corporate procedure for the Reconciliation of Personal, Family and Working Life.

This draft/proposal takes into account not only the basic standards that all companies must fulfil, essentially with regard to paid and unpaid leave as established in the legislation in force (maternity, paternity, breastfeeding time allowance, leave of absence, reduced working hours, etc.), but also the ambition to extend this with work disconnection, flexible working hours and flexible remuneration policies. The aim is to implement actions serving to enable and improve the reconciliation of working, personal and family life at Grupo Aldesa by means of a Corporate Reconciliation of Family, Working and Personal Life Plan.

At Grupo Aldesa level and in accordance with the business days in 2021, the total number of hours of absence were:

	Hours of absence		Absence index	
	2020	2021	2020	2021
Total	62,626	103,073	2%	3%

3.6.3. Health and Safety

The commitments and guidelines of Grupo Aldesa with regard to Occupational Risk Prevention are set out in the Health and Safety Policy, involving the whole organisation of Grupo Aldesa in risk prevention management. The integration of Occupational Risk Prevention is for Grupo Aldesa an essential element of its corporate culture. This is a commitment at every level of the organisation, in order to put in place, the best possible working conditions in terms of safety, and high levels of protection for employees.

In accordance with the legal requirements governing the field of Occupational Risk Prevention, risk prevention operations at the Grupo Aldesa are structured by means of the In-house Risk Prevention Service, working jointly with the support of the other areas and departments of the organisation.

Grupo Aldesa companies subject their Occupational Risk Prevention management to legal and compliance audits in accordance with standard ISO 45001 (Occupational Health and Safety Assessment Series). This system not only satisfies the legal requirements, but also establishes the requirements to be fulfilled by organisations wishing to optimise the performance of their Occupational Health and Safety Management System. From the perspective of employees, the risks associated with the activity undertaken by the companies of Grupo Aldesa are minimised, thereby achieving the continuous enhancement of working conditions, moving closer both to the goal of eliminating risks and hazards and the achievement of "Zero Accidents".

At the same time, efforts have been made to promote the Policy and the management system among our subcontractors and partners, requiring that they comply in order to obtain the same level as that aspired to by Grupo Aldesa in partnership arrangements at our workplaces. One of the measures is to include our Health and Safety Policy within the Health and Safety Plans at each works site, as a mandatory requirement for each subcontractor to fulfil.



Information is set out below for the 2021 financial year with reference to the number of accidents and the accident rate indices for internal personnel at Grupo Aldesa in those countries (Spain and Mexico) that account the total of the reported accidents:

Number of accidents					
Total		Women		Men	
2020	2021	2020	2021	2020	2021
74	44	17	5	57	39

No professional illness has been identified at Grupo Aldesa during 2020 and 2021.

Accident Frequency Index ⁵				Accident severity index ⁶			
Women		Men		Women		Men	
2020	2021	2020	2021	2020	2021	2020	2021
19.78	4.34	18.60	7.71	0.23	0.03	0.56	0.16

The working days lost through working accidents amounted to 836 throughout Grupo Aldesa.

Days or working days lost through working accidents	
2020	2021
1933	836

3.6.4. Social relationships

As a guiding principle, Grupo Aldesa delegates regulation, modulation and management of industrial relations to HR and, in particular, to the Labour Relations area of each country. This area is responsible for maintaining the relationship with workers at the appropriate level.

In order to guarantee the long-term success of the company, Grupo Aldesa favours communication with all its employees both individually and collectively, irrespective of whether they are regularly represented by a committee, and also encourages negotiation as a vehicle for individual employment agreements.

In Spain, 100% of employees of Grupo Aldesa are covered by collective employment regulations. Collective agreements and/or collective conditions are signed for all works sites and projects. In other countries where we are present, such collective regulations do not exist, since it is not standard practice and is not required by law. In such cases mechanisms have been established to monitor the agreed conditions, at both Grupo Aldesa itself and its suppliers.

During the meetings held this year, particular attention was paid to guaranteeing the occupational health and safety of employees in the event of a public health emergency caused by the international coronavirus pandemic (COVID-19). Grupo Aldesa has the legally established workers' representatives in place in Spain, although nonetheless health and safety issues are discussed at the overall Grupo Aldesa level, separately from this sphere. In accordance with the Occupational Risk Prevention Act, all Grupo Aldesa Companies covered by its scope comply with the requirements to include health and safety matters in collective agreements.

3.6.4.1. Negotiation with trade unions and works councils

Grupo Aldesa has developed a "policy for negotiation with trade unions and works councils". This standard establishes the Grupo Aldesa guidelines for policies for collective bargaining and the relationship with trade

⁵ Frequency: (number of accidents with hours lost/hours worked) x 1,000,000
⁶ Severity: (number of hours lost through working accidents/hours worked) x 1,000



Unions, as a procedure for the creation of rules and adoption of decisions characterised by direct, joint and exclusive involvement by the workers' representatives (either individually or as a trade union) and the business owners and/or their representatives, intended to sign an agreement (typically a collective agreement or company-level agreement).

Collective bargaining is based on the independence of the parties, and typically takes place in accordance with certain (minimum) legal rules, and the guidelines for criteria drawn up or accepted by the negotiators.

The regulatory status of collective agreements, which is the ultimate culmination of negotiation, explains why they must comply with the legally established terms, since it is the law which acknowledges their legislative validity.

Unlike national regulations, collective bargaining is characterised by its disperse nature, being undertaken in different spheres or business units defined by their functional criteria (professions, business sectors, etc.) and on a regional basis (state, autonomous regions, areas, districts, provinces and municipalities), serving to fulfil specific needs that cannot easily be governed by diverse mandatory provisions of public authorities. The dispersal (and on occasion "fragmentation") of collective bargaining gives rise to substantial structural problems as a consequence of the plethora of collective agreements and conventions intended to govern the working conditions of employees in the various spheres and at different regional and functional levels.

The overriding aim of collective bargaining is to establish rules serving to govern working conditions, understood in the broad sense, although the process can and typically is used for many other purposes, such as the creation of channels of communication and participation between companies and their workers, or between the representatives of each side, along with the potential to facilitate the management of collective conflicts and assist the company in its functions.

The scope of application of this policy will in general cover all employees and companies of Grupo Aldesa, although the distinctive features in each country will be recorded in the specific national standards in this regard, where applicable.

3.6.5. Training

Training is a fundamental strategy at Grupo Aldesa to maintain the intellectual capital of Grupo Aldesa, to underpin competitiveness and allow employees to develop their comprehensive professional profile, ensuring that they have the skills required to take on new challenges at Grupo Aldesa.

The nature of our business demands that we have certified professionals in place in specific areas to perform operations, along with a high level of technical and management specialisation in order effectively to perform each job. Hence the fact that Grupo Aldesa in Spain and Mexico has a Training Department dedicated to administration of the Annual Training Plan, and began in 2018 to employ blended programmes to provide distance training for professionals in other countries where the Group has operations.

Training is furthermore incorporated within our global HR and people management policy, and we therefore focus our efforts on guaranteeing universal access to training, the diversity of the training offering and comprehensive management of the system.

This administrative process is guided by such key values as:

- Focus on the business: developing plans and strategies that focus on improving the business.
- Attention to the individual needs of employees: training is planned in accordance with the employee's profile and on the basis of their needs both at the technical level and in other profile areas.
- Quality and efficacy: develop effective actions and a high-quality training offering.
- Flexible and proactive approach: efforts are made to remain one step ahead of business requirements, with an agile, flexible system in addressing changes and new needs.
- Equality and fairness: the training system strives to offer relevant training schemes for all Grupo Aldesa employees and to include the greatest possible number of employees within training activities.

The following policies have been implemented in order to structure this model:



1. Grupo Aldesa Training Policy: this describes the general operational approaches of the Group within the training sub-System.
2. Long-Term Training Programme Funding Policy: this is a specific policy guaranteeing full or partial bursaries for training on specialist courses or master's programmes for Grupo Aldesa professionals.
3. Policy for Individual Long-Term Training Management: this describes the regulations for the selection of employees in the distribution of budgetary resources made available for this type of scheme.

In addition to the aforementioned policies, Grupo Aldesa has in place a set of procedures allowing for transparent administration of the system, namely:

1. Needs Detection Procedure: describing the steps and tools used to identify the training needs of the business and of each employee.
2. Training Procedure: covering the phases of the training process at Grupo Aldesa, the associated documentation and the forms of activation, administration and closure.
3. Unplanned Training Request Procedure: this sets out the procedure to deal with urgent needs not foreseen or identified in the annual plan.
4. Long-Term Training Funding Request Procedure: setting out the steps in order to access the funding programme.

3.6.5.1. Programmes to improve skills:

Grupo Aldesa has in place a raft of programmes intended to improve professional transition or otherwise to increase the skill levels of its employees. This training has different levels of implementation in accordance with the operational needs detected during the year, or otherwise the design and implementation requirements in each country. A brief description of each programme is given below:

Programme	Intended for	Objective	Implemented
Works Supervisor Training	All professionals holding this position or expected to do so in the near future	Train works overseers in all project phases and areas requiring administration in their position, so as to guarantee uniform actions	Spain
Language Training	All employees	Annual training cycles are conducted in different languages (English, Chinese, Norwegian, Portuguese, Spanish...)	Entire Organization
Qualified Operator Courses for the Installation and/or Maintenance of Fire Protection Systems in accordance with Royal Decree 513/2017 of 22 May	Skilled staff	The entry into force of the Regulations on fire protection installations (RIPC) in accordance with Royal Decree 513/2017 requires specific training for operators wishing to obtain the certificate allowing them to perform work for the Installation and/or Maintenance of Fire Protection Systems.	Spain
Infrastructure Machinery Operator (OMI)	Skilled staff	Necessary and compulsory traffic safety clearance for track work	Spain
Mentoring Programme	Executives	Equip professionals with the tools and skills to act effectively as mentors	Spain

The number of hours in financial year 2021 refers to all countries where training has been provided:





	Hours of training delivered	
	2020	2021
Spain	15,685	24,323
Mexico	3,367	1,075
Peru	330	35
Poland	45	0
Total	19,427	25,433

The breakdown of hours of training by type is shown below:

	Number of hours by type of training									
	Mandatory		Skills		Tools		Languages		Technical	
	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021
Spain	2,484	5,038	1,346	874	815	1,566	4,475	6,331	6,565	10,514
Mexico	0	0	100	880	675	60	182	10	2,410	125
Peru	0	0	0	0	0	0	0	0	330	35
Poland	0	0	0	0	0	0	0	0	45	0
Total	2,484	5,038	1,446	1,754	1,490	1,626	4,657	6,341	9,350	10,674

This summary of hours does not include those completed under special programmes for Engineers in Training and the Tradesmen School.

Grupo Aldesa, being aware that this is the parameter set out in Non-Financial Reporting and Diversity Act 11/2018, has taken a quality leap in its registration systems to report the number of hours of training by professional category in the 2021 financial year:

	Number of hours per professional category					
	Management ²		Technical Personnel		Rest ³	
	2020	2021	2020	2021	2020	2021
Spain	2,112	4,000	12,207	16,921	1,366	3,402
Mexico	82	0	3,113	920	172	155
Peru	0	0	330	35	0	0
Poland	45	0	0	0	0	0
Total	2,239	4,000	15,650	17,876	1,538	3,557

In the 2021 financial year we can see a significant increase in training hours, this growth is due to the partial recovery from the public health emergency caused by the international coronavirus pandemic (COVID-19) and its direct impact on the business.

² Senior management, workers holding executive and managerial positions at the Grupo Aldesa are included

³ Skilled tradesmen and operatives are included



3.6.6. Equality

Grupo Aldesa aims to ensure that all aspects impacting on its members are based on respect for individuals and its own corporate values.

These objectives are set out in the Quality Plans agreed between the company and social representatives, reflecting the measures and actions agreed as set out in standards that naturally govern both the behaviour of the individuals who belong to the organisation, and the processes that define the ways in which our group works, the Equality Plans being living documents subject to any necessary innovations and modifications, so as to adapt these Equality Plans to the social and employment reality at the time in question.

Through these Equality Plans, Grupo Aldesa highlights its commitment to equal opportunities for men and women, the absence of direct or indirect discrimination based on gender or sexual orientation, and the balancing of family obligations.

Grupo Aldesa applies its employment integration and accessibility principles for underprivileged groups, above all those with disability, people at risk of social exclusion and young unemployed people, through selection processes conducted at the company and through application of the Social Integration of Disabled Persons Act, contracting service provision and goods acquired from Special Employment Centres.

Through this firm belief and commitment to Equality, the Equality Plan covers operational areas in spheres such as recruitment, hiring, salaries, training, working hours, working time, professional promotion, work-life balance, risk prevention and actions in cases of harassment and gender violence.

The aim of the procedure to prevent and address cases of harassment so as to establish measures focused on preventing and avoiding situations of harassment at the company and to assist in identifying any situation of professional, sexual or gender-related harassment and discrimination.

3.7. Consumers / Clients

Grupo Aldesa provides high levels of quality in the products and services that it develops for its clients, and that are passed on to the corresponding consumers or users. This commitment is set out in the Quality Policy which ensures that the final product is safe, reliable, and complies with all applicable specifications, standards, and codes.

The general objectives of our Quality Policy focus on:

- Consolidating quality as a basic element in the culture of Grupo Aldesa companies.
- Strengthening all employees' identification and sincere commitment to the Quality Policy.
- Bolstering participatory quality management which takes advantage of the capabilities of the entire workforce.
- Permanently optimising the global business process.

Grupo Aldesa has for almost two decades now held certification for its Quality Management, thereby guaranteeing compliance with client requirements in terms of satisfaction, as well as legal and regulatory requirements to reduce defects and establish a framework for the continuous improvement of processes. The principal companies of Grupo Aldesa have Quality Management Certificates, based on the ISO 9001 standard. At the same time, no detail is overlooked in the planning of tasks required by each project, and if the periodic monitoring of partial deadlines detects the slightest delay, consideration is given to increasing the team and working shifts.

By ensuring compliance with project specifications, legal requirements, standards and codes applicable to the finished product, it furthermore guarantees the health and safety of consumers.

3.7.1. Systems for claims

In accordance with this same approach of ascertaining the satisfaction of our clients, one of Grupo Aldesa's main concerns is to understand and measure client satisfaction. To this end, direct surveys and interviews are conducted periodically to obtain their point of view on the fulfilment of their expectations and their perception of the final quality of the projects executed. This serves as the basis for establishing improvement measures every year.

In the sphere of highway operations under a concession regime, claims received from users are registered and monitored, as detailed in the enclosed table for the 2021 financial year:

	Number of claims	
	2020	2021
Total	35	81
Closed	32	77
In progress	3	4

The remaining business units of Grupo Aldesa do not report the results of "complaints received and resolution thereof", as due to their complexity and heterogeneity they do not guarantee the reliability of the data.

3.8. Company

As part of its operational strategy, Grupo Aldesa undertakes to contribute to the achievement of the Sustainable Development Goals (SDG), measures intended to put an end to poverty, protect the planet and guarantee the overall well-being of people, requiring the cooperation of civil society and public and private sectors.

Within the current economic context of sustainability, Grupo Aldesa must set itself goals which go beyond achieving the maximum profit, establishing not only an economic goal, but also a social goal. In terms of social development, the strands addressed are: local employment, infrastructure development, environment and education.

The social action of Grupo Aldesa focuses on the development of projects connected with its activities, creating value within those communities where it has a presence, with the possibility of contributing more than the mere execution of the project, in accordance with certain defined strategic approaches:

- Access to basic infrastructure services to generate value and improve quality of life.
- Development of initiatives focused on training, development and local community employment in those countries where Grupo Aldesa operates.
- Active participation in education, sport, empowerment and community social actions generating value. Grupo Aldesa also supports cultural and sporting development through the sponsorship of events taking place in those communities closest to the operational areas where it conducts its business.
- Sustainable management of natural resources, health and environment.

In works executed by Grupo Aldesa, local recruitment schemes are implemented when construction projects are launched, as in Mexico, Peru, Norway, Slovakia, Poland and Spain. In those countries where this has not taken place, the reason is the scope of the operation (JV, project manager or relative responsibility). Materials have been donated upon conclusion of works (traffic signs or office materials), as well as arrangements for the benefit of associations with regard to office furniture. We are currently holding solidarity initiatives against hunger, a solidarity stoppers agreement with the Seur Foundation, a donation of solar panels and agreements with special employment centres for people with intellectual disabilities.

3.8.1. Partnerships and sponsorship

Grupo Aldesa undertakes internal awareness-raising campaigns addressing the need to apply the principles of sustainable development, and takes part in various events, including congresses, seminars and conferences, connected both with the promotion of its activities and Corporate Responsibility, giving it the opportunity to inform the wider business fabric of various aspects connected with sustainability. Grupo Aldesa's companies likewise play an active role in organisations and associations which promote the responsible development of their respective sectors.



1. Spanish Road Association (AEC)	11. Mexican Chamber of the Construction Industry (CMIC)
2. Mexican Association of Railways A.C. (AMF)	12. Official Spanish Chamber of Commerce of Chile
3. Mexican Association of Tunnel and Underground Works Engineering (AMTOS)	13. Official Spanish Chamber of Commerce of Uruguay
4. National Association of INDEPENDENT Manufacturers (ANCI)	14. Polish Chamber of the Chemical Industry (PIPC)
5. Polish National Intelligent Traffic Systems Association (ITS POLSKA)	15. Polish Chamber of Railway Equipment Producers and Railway Service Providers
6. Polish Association of Construction Industry Entrepreneurs (PZPB)	16. Andalusian Renewable Energies Cluster (CLANER)
7. Polish Land Transport Chamber of Commerce (IGTL)	17. Higher Council for Scientific Research (CSIC)
8. Polish-Chinese Chamber of Commerce	18. Construction Labor Foundation
9. Polish-Spanish Chamber of Commerce	19. ICEX Spain Export and Investor (Colombia)
10. Spanish Chamber of Commerce of Mexico (CAMESCOM)	20. Spanish Photovoltaic Union (UNEF)

In terms of sponsorship, Grupo Aldesa has sponsored the XVI Highway Conservation Days: "The Road: Essential Infrastructure", promoted by the Ministry of Transport, Mobility and Urban Agenda and held from 26 to 28 October 2021 in Seville, Spain.

3.9. Subcontracting and suppliers

Grupo Aldesa conducts an evaluation of suppliers before contracting their services. Subsequently, once the services have been provided then the suppliers are re-evaluated in order to monitor the plus and minus points they build up. The evaluation criteria include environmental criteria. This whole process is conducted in accordance with the corporate Supplier Evaluation procedure and the procedures developed in each Country.

Grupo Aldesa includes environmental criteria among its supplier approval requirements, such as, for example, ISO 14001 certification, which has a positive impact on the cataloguing and classification of each supplier. Subcontractors are also required to be familiar with the Code of Ethics.

The contractual requirements include a subsection concerning environmental aspects, and compliance with environmental requirements connected with the activity to be performed is conducted while work is undertaken.

Once the job is complete the supplier's level of performance is re-evaluated, likewise taking into account environmental aspects.

Suppliers are supervised by means of periodic inspections and/or audits to ascertain fulfilment of the environmental standards and procedures, and compliance with the legal requirements associated with their activities.





No. of suppliers evaluated	
Category A	2.06%
Category B	13.34%
Category C	84.56%
Category D	0.04%
Total	43,435

Key	
CAT. A	Companies with non-certified Quality or Environmental Management System and companies with certified products
CAT. B	Companies with non-certified Quality or Environmental Management System and companies with satisfactory prior experience.
CAT. C	Companies with no Quality or Environmental Management System and without prior experience, or those without information available about their Management System.
CAT. D	Unacceptable companies, which cannot even be maintained in Category C.

3.10. Environmental matters

3.10.1. Environmental management

3.10.1.1. Current and foreseeable impacts of the company's activities on the environment and, where applicable, health and safety.

Grupo Aldesa has identified environmental aspects and their possible environmental impacts that could result from its activities. Grupo Aldesa adopts preventive and operational environmental control standards in order to prevent and mitigate such potential impacts at present, and in the future in the event of a foreseeable increase in operations.

In the Construction Area the main impact of works is the volume of inert waste generated. This is mainly the product of excavation and demolition, rubble, timber and rebar. In this regard, and with a commitment to environmental improvement, work is carried out day by day to reduce the volume of waste so that it does not end up in landfill sites. Prevention comes first, properly planning the activities and analysing construction alternatives to prevent, reduce, and minimise waste. For waste that cannot be prevented, alternatives are sought, such as reusing it at the work site or sending it to other projects that require excavated earth, thereby avoiding the need for new quarries.

An alternative to landfill is to use the surplus material for soil improvement on farms, or environmental restoration schemes. These involve properties with needs either because of the terrain contours or their degraded condition.

In the case of debris, the remains of concrete, wood, steel and metal material, they are handed over to authorised entities for subsequent recycling or recovery. As for hazardous waste, such as empty containers for the different products used in construction (sprays, paints, resins, foams and silicone) and waste inherent in the maintenance of machinery (brake fluid, filters, used oil, etc.), this is segregated and managed at each of the works sites and centres through authorised companies.

At the same time, to prevent spillages at work sites, several systems for containing possible spillages are established, such as fuel storage sites. Other types of spillages, such as those produced when cleaning the concrete-mixing drums or bentonite sludge frequently used in construction projects, are collected at recycling sites for their subsequent treatment.

As for the control of noise and atmospheric emissions, the noisiest activities are controlled, mainly due to the very nature of the machinery used at work sites, requiring correct preventive maintenance and the use of recently manufactured machinery, also confirming that official technical inspections are up-to-date. All site personnel have the necessary protective equipment to minimise the effects on occupational and environmental exposure to noise.

In the Industrial Area, similar environmental control guidelines, adapted to the specific activities and peculiarities of this division, are implemented.



3.10.1.2. *Environmental certification or evaluation procedures*

Grupo Aldesa has traditionally registered an interest in achieving and demonstrating a high level of commitment to the environment and the preservation of the natural world, as expressed in the guidelines set out in its environmental policy.

The main Aldesa Grupo companies currently hold Environmental Management certification in accordance with standard ISO 14001, guaranteeing compliance with the applicable environmental regulations and legislation, the deployment of processes which avoid, reduce and control pollution, placing the emphasis on prevention, while also establishing continuous improvements in Grupo Aldesa's environmental performance.

Grupo Aldesa establishes a construction project Environmental Management Plan which not only identifies and evaluates environmental aspects caused by construction site activities (waste, atmospheric emissions, discharges and noise), but also identifies the eventual impacts to establish an operational control program, and the environmental legislation, to oversee its own legal compliance and that of subcontractor companies, and establishes environmental improvement targets.

Grupo Aldesa also has in place a number of good practice manuals that are distributed to employees. It likewise shares its environmental concern with suppliers and partner companies, ensuring that their employees have the necessary training and environmental awareness to perform their activities.

3.10.1.3. *Resources dedicated to environmental risk prevention*

Grupo Aldesa has established within its organisation an Environment Department focused on the environmental supervision of its activities, to ensure that they are continuously monitored so as to prevent potential adverse effects.

Grupo Aldesa likewise makes use of an external specialist environmental legislation service, to support the Environment Department in the identification and application of legal environmental requirements.

3.10.1.4. *Application of the precautionary principle*

Grupo Aldesa applies its environmental management with a preventive focus. Among other aspects, they serve to identify environmental aspects, the potential impacts and risks thereof, and the preventive and mitigating actions required in order to preserve the environment.

The guidelines on which the precautionary principle is based are set out in the Grupo Aldesa Environmental Policy:

- Commit to environmental protection, including other commitments specific to its environment.
- Compliance with the applicable environmental regulations and legislation, and any requirements which the company signs up to in this regard.
- Usage of processes, practices or materials which avoid, reduce or control pollution, based on a principle of prevention.
- Continuous intensification of environmental management, to obtain improvements in Grupo Aldesa's environmental performance.
- Establishment and regular review of environmental objectives and targets, in accordance with the undertakings assumed in this declaration.
- Information and involvement of the personnel affected as to the methods for development and application of the environmental management system.

These Environmental Policy principles are undertaken within the framework of an Environmental Management System based on the ISO 14001 standard which ensures compliance with applicable environmental law and regulations and the use of processes that prevent, reduce and control pollution, stressing prevention and establishing on-going improvement in the Company's environmental performance.



3.10.1.5. *Amount of provisions and guarantees for environmental risks*

Grupo Aldesa includes within its Corporate General Liability Policy a section covering possible accidental pollution, with a limit of €15,000,000, and Environmental Liability, with a limit of €1,000,000.

3.10.2. *Pollution*

3.10.2.1. *Measures to prevent, reduce or offset carbon emissions with a serious impact on the environment*

Grupo Aldesa has protocols in place to prevent, reduce or offset any possible emissions that could affect the environment, applying the following corporate procedures for this purpose:

- Identification and appraisal of environmental aspects.
- Identification of and response to potential accidents and emergency situations.
- Monitoring and measurement.
- Control of noise pollution.
- Control of atmospheric emissions.

Grupo Aldesa establishes Environmental Management Plans under the terms of which actions including the following are taken:

- The environmental aspects generated by the activities which are carried out at these sites are identified and evaluated (mainly waste, atmospheric emissions, spillages and noise). The criteria employed to conduct this evaluation of environmental aspects are: nature and toxicity, magnitude, impact on the receiving medium, likelihood of occurrence and severity of the consequences.
- For each of the environmental aspects, the potential risks and impacts that they could have for the environment are identified.
- Subsequently, the applicable environmental legislation is identified (e.g. national, autonomous region and local), as well as the possible environmental requirements derived from licences, authorisations or environmental impact statements. In order to facilitate this task of identification an external specialist service is also used, providing the necessary support in order to identify legislative developments as they occur.
- Once the requirements and obligations have been identified, actions are put in place for direct implementation by employees or by partner companies. To this end, an Environmental Inspection Programme ('PIM') is established which sets out the inspections to be carried out, those responsible for doing so, their frequency and their results.

As for light pollution, Grupo Aldesa complies with the legislation established regarding this environmental aspect, although its impact is not considered to be material, since the Group's activities are mainly performed during the day.

3.10.3. *Circular economy*

The waste management strategy focuses on Minimisation of waste, taking into account the legal requirements in this regard and the principle of the three Rs (Reduction at source, Reuse and Recycling), which we take into account in our Minimisation principles:

- Reduction at source, through understanding and analysis of our processes.
- Reuse, at our site or elsewhere.
- Recycling (material recovery), prioritising this type of treatment over and above any other options that would lead to elimination, including energy generation.
- Selection of the best external management, avoiding permanent dumping as the end destination, or any other type of elimination technique.

The principles underpinning Reuse and Recycling are most easily applicable in the case of Urban Equivalent Waste (scrap, paper/cardboard, plastics, timber, rubber, glass, etc.) and Inert Waste (demolition rubble, surplus, bricks, etc.).

Waste generated during the works execution phase will be managed in accordance with the applicable regulations, and we would in this regard highlight the following general measures to be applied:

- Installation and identification of specific and properly labelled intermediate containers for the segregation and storage of non-hazardous waste and hazardous waste, in the site huts.
- Following final storage of waste, removal by authorised Waste Managers will be planned.
- The storage of hazardous waste must under no circumstances exceed the deadlines established in the legislation.
- Waste handed over to authorised companies, and control and monitoring of the final destination by means of the corresponding documented accreditation.

In accordance with the priorities established in Grupo Aldesa Environmental Policy, for each country with regard to waste, actions planned for the management of waste generated on site will aim to minimise and prevent, so as furthermore to achieve environmental improvements, such as reduced transportation of surplus and reduced energy consumption.

As information confirmed at the date of presentation of this report, Grupo Aldesa reports on the amount of waste generated in the countries driving the activity, accounting for 100% of total Group turnover:

	Quantity (tonnes) of waste generated					
	Inert		Hazardous		Urban solid ⁷	
	2020	2021	2020	2021	2020	2021
Spain	9,386	75,595	49	44	0	0
Mexico	1,101	1,559	34	6	0	18
Poland	51,242	5,242	0	458	0	0
Peru	500	39,475	3	0	0	0
Chile	-	996	-	0	-	678
Total	62,229	122,867	86	508	0	717

Quantitative environmental data can vary considerably in the evolution of individual countries due to a direct dependence on the number of projects, the size or typology of projects that generate greater or lesser resource consumption or waste generation.

3.10.4. Sustainable use of resources

3.10.4.1. Consumption of water and supply of water in accordance with local limitations

Water consumption is one of the environmental aspects of Grupo Aldesa activities. The environmental monitoring of consumption of this natural resource is undertaken in accordance with the corporate procedure for "Control of discharges and catchment of water", and also under the terms of the various laws applicable at each site.

⁷ This type of waste is only managed by the contractor in Mexico and Chile for legal reasons



Information confirmed at the date of presentation of this report is set out below as to water consumption in the countries driving Grupo Aldesa operations, accounting for 100% of total Group turnover:

	Water consumption (m ³) ⁸	
	2020	2021
Spain	15,360	17,444
Mexico	19,737	5,541
Poland	6,303	6,539
Peru	1,287	1,422
Chile	-	78,932
Total	42,740	109,798

With the aim of adapting to the consequences of climate change and mitigating, as far as possible, its adverse effects, the rational and efficient use of this resource, the following has become essential to Grupo Aldesa:

- Internal and external awareness for the rational use of water.
- Mitigation procedures with high-tech environmental materials to reduce as much water use as possible to reduce air emissions.
- In order to reduce the misuse and inappropriate consumption of water, the track irrigation plan was implemented, with the planning and control of quantities discharged as part of the production and dust control process.
- Signage and protection of water sources on site.

3.10.4.2. Raw materials consumed

The consumption of raw materials reported by Grupo Aldesa sets out the data obtained from the most representative countries (Spain, Mexico and Poland), accounting for 91% of total Group turnover:



⁸ Mains water consumed in different Grupo Aldesa activities (offices and construction sites). The consumption of water covered by the client on certain construction projects undertaken on the client's own premises is not considered to be material.

Raw materials consumed ⁹			
Material	Unit of measure	Quantity	
		2020	2021
Steel	tonnes	14,910	27,236
Binders	tonnes	7,672	3,907
Aggregates	tonnes	732,500	244,722
Concrete	M ³	154,807	94,970
Bricks	UNITS	5,398,056	1,770,549
Mortars and adhesives	M ³	33,830	29,210
Flooring and tiling	UNITS	213,590	71,569

Quantitative environmental data can vary considerably in the evolution of individual countries due to a direct dependence on the number of projects or the size of projects that generate greater or lesser raw materials consumption.

In 2021, raw material consumption continues to be impacted by the public health emergency caused by the international coronavirus pandemic (COVID-19) and its direct impact on the business at the production and procurement level.

3.10.4.3. Measures adopted to improve usage efficiency

In order to improve efficiency in the use of the different raw materials, Grupo Aldesa conducts monitoring of the handling, storage, packaging, conservation and delivery of materials and works units, in order as far as possible to prevent any harm to people, raw materials, works units in the process of execution and/or end products/completed works units, in particular critical, sensitive, perishable or high-value elements, serving to prevent:

- Misuse or poor choice of handling resources during transfer, loading and offloading.
- Storage conditions that are inappropriate for the type of material or product in question, to be understood as ambient conditions, excessive stacking, contact with damp or dirty floors, etc.
- Product protection that is not appropriate for the type of transport and the storage conditions up until installation.
- Conditions for the protection of finished works units up to delivery thereof.

3.10.4.4. Measures taken to improve energy efficiency

With the aim of contributing to energy efficiency and mitigating as far as possible its adverse effects, the rational and efficient use of natural resources is necessary, especially those energy resources that entail the emission of greenhouse gases, since, as we all know, these are harmful to both the natural environment and the work and social environment of our cities.

As part of its commitment to contribute to this improvement, during 2021 Grupo Aldesa continues to adhere to one of the most recognised international standards in the field of efficient and sustainable energy management, namely ISO 50001.

⁹ Data obtained on the basis of the average price per contract



Grupo Aldesa has implemented this international standard in the buildings of the Headquarters of C/Bahía de Pollensa, as well as in the entire fleet of vehicles that our company uses in the performance of our activities.

Grupo Aldesa conducts a range of measures in order to improve energy efficiency, including:

- Awareness-raising for employees through measures such as the creation of a good practice guide, on-site talks, posters, communication newsletters, etc.
- Efficient lighting equipment, replacing traditional incandescent bulbs with fluorescent or energy-efficient lamps. Analysis of the indoor and outdoor lighting technology used at Grupo Aldesa's companies offices, and replacement of traditional lighting with LED technology light fittings.
- Installation of centralised control of lighting, implementing presence detectors and modifying the switching of lighting circuits.
- Review of electricity subscriber contracts and maximum power ratings installed.
- Maintenance plan, inspection of cooling systems to avoid possible coolant losses, as a result of the application of reduction measures and maintenance at regional offices.

With regard to the vehicle fleet:

- Policy of renewing the fleet with vehicles generating lower CO₂ emissions.
- Correct maintenance plan and continuous renewal of the vehicle fleet. Improved efficiency of each vehicle through monitoring and individual inspections.
- System for the control, monitoring and justification of fuel consumption and routes throughout the vehicle fleet, and subsequent processing of information.

3.10.4.5. *Use of renewable energies*

Grupo Aldesa is committed to the use of renewable energies, to which end a range of measures are implemented, such as the contracting of energy from 100% renewable sources for use at head office (offices and fixed electric vehicle charging system).

3.10.4.6. *Main consumption inputs:*

One of the key aspects in Grupo Aldesa's environmental protection commitment involves controlling the use of natural resources, including fuel, and electricity.

In a continuous improvement exercise, Grupo Aldesa standardised reporting of data of the type "main consumption" and "emissions", allowing for the inclusion of proven breakdowns:





	Diesel consumption (L)		Electricity consumption (KWH)		Fuel consumption (L)	
	2020	2021	2020	2021	2020	2021
Spain	915,230	948,259	1,160,132	1,000,791	83,448	72,612
Mexico	964,358	492,295	4,061,632	1,461,358	152,236	968,951
Poland	59,807	12,980	2,721,968	172,738	218,752	143,177
Peru	10,239	26,785	25,501	40,723	0	0
Chile	-	143,106	-	0	-	0
Total	1,949,634	1,623,425	7,969,233	2,675,610	454,436	1,184,740

	Emissions, scope 1 (TN CO ₂ EQ) ¹⁰		Emissions, scope 2 (TN CO ₂ EQ) ¹¹	
	2020	2021	2020	2021
Spain	2,462	2,624	347	310
Mexico	2,711	3,077	1,259	453
Poland	648	359	844	54
Peru	25	66	7	13
Chile	-	351	-	0
Total	5,846	6,477	2,457	830

3.10.5. Climate change

One of the main environmental problems of modern society is climate change. Reducing carbon dioxide emissions to air has become a key concern at the Grupo Aldesa and the reason for considering it a priority objective.

Growing energy consumption and the increase in the transport sector mean that CO₂ emissions are a serious problem that must be taken into consideration since these emissions are the main cause of global warming. In response to this situation of environmental degradation, Grupo Aldesa has boosted environmental innovation by focusing its efforts on the production of energy from renewable sources:

- More efficient production of solar-based electrical energy that can replace conventional sources.
- Implementation of energy efficiency and CO₂ reduction improvements.
- Improvement in the efficiency of the management of industrial waste.
- Creation of new solutions in the integral water cycle through the use of regenerated and/or reused water.
- Measurement, analysis and mitigation of possible impacts of the activity on the environment.

¹⁰ Emission Factor (Diesel) = 2.456 Kg CO₂/L; 2.686 Kg CO₂/L; 2.868 Kg CO₂/L - Emission Factor (Petrol) = 2.244 Kg CO₂/L - Emission Factor (XTL) = 0 - Emission Factor (Fuel Oil) = 3.127 Kg CO₂/L - (Source: OECC - Miteco)

¹¹ Emission Factor (Electricity) = 0.31 kg CO₂/kWh - (Source: OECC - Miteco)

Grupo Aldesa continues to promote initiatives and actions to reduce its ecological footprint and minimise greenhouse gas emissions (GHGs), by implementing a reporting system in this regard. The scope of the current greenhouse gas emissions inventory is verified by the certification firm BUREAU VERITAS in accordance with standard ISO 14064.

The ISO 14064 standard identifies, records, verifies and audits the emissions produced, to subsequently submit the voluntary report to the Ministry of Ecological Transition and Demographic Challenge (MITECO), establishing continuous improvement targets aimed at more sustainable performance.

Grupo Aldesa's commitment to combating climate change takes the form in Spain of registration by the main companies of Grupo Aldesa with the register of carbon footprints, offsetting and CO₂ sequestration projects of the Ministry for Environmental Transition:



The objective of the Emissions Inventory Project is to provide a precise idea of GHGs generated by each activity to compare the situation against its peers and to identify improvement options. In 2021, work was ongoing on the calculation, analysis, and measurement of emissions based on three different scopes:

- Scope 1: Direct sources of emission. Those associated directly with production activity.
- Scope 2: Indirect emissions. Emissions which are generated indirectly. An example would be those emitted to produce the electrical energy consumed by the company belonging to Grupo Aldesa.

The segmentation of activities aims to facilitate identification of the different activities that Grupo Aldesa undertakes, allowing for the application of uniform GHG emissions calculation procedures at each of them. This second version of the Carbon Footprint calculation includes office activities and operational segments connected with construction works, services and maintenance, and also workshops and warehouses.

The operational segments identified are:

- Works execution, services and maintenance
- Offices
- Workshops and warehouses

The "works execution, services and maintenance" operational segment includes the following activities:

- Civil engineering construction
- Buildings construction
- Refurbishment construction
- Infrastructure construction
- Industrial works construction
- Photovoltaic solar plant construction
- Electrical infrastructure construction



- Telecoms networks construction
- Solar plant maintenance
- Temporary offices during works execution

This segment also includes minor works for the replacement of equipment or expansion of installations, as well as plant and installations maintenance services.

Office activities are those that take place at workplaces where Governance and Management, engineering, consultancy, administration, financial and commercial activities are performed.

The functional classification of workplaces within the office segment is as follows:

- Offices used by Grupo Aldesa (headquarters and regional offices).
- Offices incorporated within production sites, warehouses and workshops.

The activity is that inherent to the workplaces where warehousing activities are performed, along with other industrial sector activities such as packaging of electrical or telecoms equipment, equipment repair, etc.

These workplaces typically also contain warehouses storing raw materials, products and working materials, with forklift trucks and other instruments for its handling.

3.10.5.1. Reduction targets established voluntarily in the medium and long terms to reduce greenhouse gas emissions and resources implemented for this purpose

Medium- and long-term Improvements Plan:

- Training and awareness-raising of employees through measures such as the creation of a good practice guide and a buildings usage and maintenance guide.
- With regard to electrical equipment, covering all types of IT equipment (computers, printers, scanners, etc.) which account for around 15% of office energy consumption, certain of the following tips will be adopted to reduce consumption:
 - a. Use of laptop rather than desktop computers.
 - b. Use of connector strips with a switch and/or programmable sockets.
- Lighting represents another major building and office energy expense (around 25%), which could be reduced by implementing the following reduction practices:
 - a. Use of energy-efficient lighting equipment (fluorescent or low-wattage lamps).
 - b. Installation of centralised control of the Lighting Installation, installing presence detectors for each group of workstations, and modifying the switching procedures for lighting circuits.
 - c. Review of electricity subscriber contracts and maximum power ratings installed, changing the contracted power rating for each of the billing periods at those regional offices where this is deemed appropriate on the basis of historical consumption records over the past 12 months that are lower than the power level currently contracted.
- Measures to reduce climate control consumption would include:
 - a. Installation of centralised climate control monitoring systems.
 - b. Maintenance plan, inspection of cooling systems to avoid possible coolant losses as a result of the application of measures for reduction, maintenance and environmental awareness-raising at regional offices, taking into account at all times the ratio of consumption in accordance with the number of workers present at Grupo Aldesa at that time.

- Examine the possibility of contracting green source certificates from the electricity supplier for any regional offices that do not have this service currently contracted.
- A number of measures to reduce fuel consumption in the Vehicle Fleet:
 - a. Awareness-raising Plan to reduce consumption in transport: Training in more efficient driving techniques.
 - b. Correct vehicle fleet maintenance plan and continuous renewal of the vehicle fleet. Improved efficiency of each vehicle through monitoring and individual inspections.
 - c. Policy of renewing the fleet with vehicles generating lower CO₂ emissions.
 - d. System for control and monitoring of vehicle fleet fuel consumption, monitoring, control and justification of routes, and information processing.
 - e. Provision for urban use of an electric vehicle at the headquarters of the Madrid offices.

The planned reduction targets are initially being applied to Spain, before then being extended to the other countries:

Planned reduction targets								
Country	Reduction in scope 1 T CO ₂ Eq (fuel)		Reduction in scope 2 T CO ₂ Eq (electricity)		Emissions of T CO ₂ Eq scope 1+2		Saving	
	2020	2021	2020	2021	2020	2021	2020	2021
Spain	29.9	29.9	86.9	86.9	2,809	2,890	4%	4%

3.10.6. Biodiversity protection

Grupo Aldesa ensures that it preserves the surroundings where it undertakes works and service projects. To this end it conducts a prior analysis of those environmental aspects that could interact with the natural environment, thereby establishing the required preventive and protective measures.

These measures are included within the environmental management plan initiatives established for construction works, including the corresponding environmental monitoring programmes to the extent necessary.

Actions associated with construction works located in sites of environmental interest are particularly noteworthy, including the following:

- Measures are implemented to preserve endemic species and those that are threatened or in danger of extinction, through fulfilment of the terms and conditions of the Environmental Impact Statements (EIS).
- Actions are taken to restore ecosystems through reforestation, drainage works and filtering dams, in the case of soil impacted and degraded by water and wind erosion.
- Action is taken at the construction stage to monitor and fulfil flora and fauna protection programmes, involving the responsible authorities and other stakeholders.
- Upon final handover of each project, a check is performed to ensure that provisional installations are completely removed, with the site being restored to the condition in which it was initially received.
- Mitigation measures are implemented to minimise the impacts generated on the different environmental components that make up the ecosystems affected (water, flora, fauna, soil and atmosphere).
- Strategies are established to exclude areas including natural water courses and protected natural areas during the planning and administration of environmental procedures.

- Rescued species of flora in danger of extinction are maintained at rural plant nurseries for subsequent replanting in areas similar to their original location.
- In accordance with the mitigation measures dictated in environmental rulings, wildlife crossings are established in biological corridors.
- Construction personnel receive guidance and awareness-raising from the moment of recruitment, informing them that they are strictly forbidden from hunting, collecting, capturing or showing aggression towards wild animals, informing them that the entire area under construction is a fragile system with vulnerable species in the vicinity, while indicative signs and notices are installed with regard to animal crossing points, and restriction or prohibition signs.

3.10.6.1. Impacts caused by activities or operations in protected areas

By applying measures to preserve and restore biodiversity, Grupo Aldesa ensures that the environmental impact is minimal and is compatible with the natural setting where the work is performed, thereby complying with environmental requirements in each project.

Grupo Aldesa does not currently have operations centres located within or alongside protected areas or areas of great value for biodiversity.

3.11. Tax information

3.11.1. Profits obtained country by country

At 31 December 2021 the pre-tax profit of the main countries where Euroinfra operates was as follows (in thousands of euros)

Country	(Consolidated) pre-tax profit/loss, thousand €	
	2020	2021
Companies in Spain	-15,006	-27,850
Companies in Mexico	-24,833	-64,255
Companies in Poland	-18,516	-8,574
Companies, other ¹²	-4,622	-12,268
Total euros	-62,977	-112,947

These figures are based on the consolidated pre-tax profit/loss reported by the organisations that lie within the scope of Euroinfra in the 2021 financial year in the various jurisdictions, excluding those companies consolidated under the equity method.

3.11.2. Profits taxes paid

At 31 December 2021 the profits tax paid by Euroinfra amounted to a total of **4,668** thousand euros (8,172 thousand euros in 2020).

The variation in the amount compared with last year's figures is mainly the result of a reduction in the activity of Grupo Aldesa, along with the divestment through the sale of group companies from the energy division and the payment of inspections from previous financial years.

3.11.3. Public subsidies received

At 31 December 2021 the amount of public subsidies received by Euroinfra amounted to 100 thousand euros (131 thousand euros in 2020), all of them received in Spain.

¹² Chile, Colombia, Denmark, Guatemala, India, Luxembourg, Norway, Paraguay, Peru, Romania and Uruguay

4. Table of Contents

Table of contents required by Act 11/2018, of 28 December, amending the Commercial Code, the revised text of the Capital Companies Act approved by Royal Legislative Decree 1/2010, of 2 July, and Act 22/2015, of 20 July, on Accounts Auditing, regarding non-financial reporting and diversity.

General spheres

Spheres	Reporting framework	Reference	Comments/Reason for the omission
Business model	<ul style="list-style-type: none"> GRI 102-1 Name of the organisation GRI 102-2 Activities, brands, products and services GRI 102-3 Location of headquarters GRI 102-4 Location of operations GRI 102-5 Ownership and legal form GRI 102-6 Markets served GRI 102-7 Size of the organisation GRI 103 Management policies GRI 102-15 Main impacts, risks and opportunities 	Pages 1, 2, 3, 4, 5, 6,7,8	

Environmental matters

Spheres	Reporting framework	Reference	Comments/Reason for the omission
Environmental Management	Current and foreseeable effects of company activities	GRI 102-11 Precautionary principle or approach Qualitative description of the main current and foreseeable effects	Pages 26, 27
	Environmental certification or evaluation procedures	GRI 103 Management approach Qualitative description of evaluations and certifications	Page 27
	Resources dedicated to environmental risk prevention	GRI 103 Management approach Qualitative description of internal and external teams	Page 27
	Application of the precautionary principle	GRI 102-11 Precautionary principle or approach	Pages 27, 28
	Quantity of provisions and guarantees for environmental risks	GRI 103 Management approach Qualitative description of the Group's obligations	Page 28
Pollution	Measures to prevent, reduce or offset carbon emissions (also including noise and light pollution)	GRI 103 Management approach Qualitative description of the main measures and actions	Page 28
Circular economy and prevention and management of waste	Measures to prevent, recycle, reuse; other forms of recovery and waste elimination	GRI 306-2 Waste by type and elimination method	Pages 28, 29 (1)
	Actions to combat food waste	n.a.	n.a. Given the nature of Grupo Aldesa's activities, this indicator is not deemed to be material
Sustainable use of resources	Consumption of water and supply of water in accordance with local limitations	GRI 303-1 Water extraction by source	Page 30 (1)
	Raw materials consumed	GRI 301-1 Materials employed by weight or volume	Pages 30, 31 (1)
	Measures adopted to improve usage efficiency	GRI 301-1 Materials employed by weight and volume Qualitative description of the measures adopted	Page 31
	Direct and indirect energy consumption	GRI 302-1 Energy consumption within the organisation	Pages 32, 33 (1)
	Measures taken to improve energy efficiency	GRI 302-1 Energy consumption within the organisation Qualitative description of the measures adopted	Page 31,32
	Use of renewable energies	GRI 302-1 Energy consumption within the organisation Qualitative description of the use of renewable energies	Page 32

Climate change	Important elements of greenhouse gas emissions generated	GRI 305-1 Direct GHG emissions (Scope 1) GRI 305-2 Indirect GHG emissions from energy generation (scope 2)	Page 33	(1)
	Measures adopted to adapt to the consequences of climate change	GRI 103 Management approach Qualitative description of the measures	Pages 33, 34, 35	
	Reduction targets established voluntarily	GRI 103 Management approach Qualitative description of the targets established	Pages 35, 36	
Protection of biodiversity	Measures taken to preserve or restore biodiversity	GRI 103 Management approach Qualitative description of the measures	Pages 36, 37	
	Impacts caused by activities or operations in protected areas	GRI 103 Management approach Qualitative description of impacts	Page 37	

(1) The information reported does not cover 100% of the Grupo Aldesa. For further information about the specific scope, see the explanation on the page indicated.

Social and staff-related matters

Spheres	Reporting framework	Reference	Comments/Reason for the omission	
Employment	Total number and distribution of employees by gender, age, country and professional category	GRI 102-8 Information on employees and other workers GRI 405-1 Diversity of governance bodies and employees	Pages 12, 13 (2)	
	Total number and distribution of employment contract types	GRI 102-8 Information on employees and other workers	Page 14 (2)	
	Annual average for permanent, temporary and part-time contracts by gender, age and professional category	GRI 102-8 Information on employees and other workers Number of contracts by type at close of financial year, broken down by gender, age and professional category	Pages 14, 15 (2)	
	Number of dismissals by gender, age and professional category	GRI 401-1 New employee hires and staff turnover Total number of dismissals broken down by gender, age and professional category	Page 17 (2)	Dismissals are reported where categorised as unfair or objective, excluding the end of project-specific contracts
	Salary Gap	GRI 405-2 Ratio of base salary and remuneration of women vs men This statistic is reported in accordance with an internal criterion based on the following formula: $SG = (RM - RW) / RM$ Where, $RM = \sum \text{remuneration of men} / \text{no. of men}$ $RW = \sum \text{remuneration of women} / \text{no. of women}$	Page 16 (2)	See comments on average remuneration
	Average remuneration by gender, age and professional category	GRI 405-2 Ratio of base salary and remuneration of women vs men Average remuneration including fixed and variable	Page 16 (2)	Consideration was not given in the average remuneration to the remuneration of expatriate personnel because of the specific nature of their conditions
	Average remuneration of directors by gender	GRI 405-2 Ratio of base salary and remuneration of women vs men Average remuneration including fixed and variable	Page 16	The gender breakdown is not included as at the close of 2021 all the directors were men.
Average remuneration of executives by gender	GRI 405-2 Ratio of base salary and remuneration of women vs men Average remuneration including fixed and variable	Pages 16, 17 For the purposes of this disclosure, "officers" are understood to include only the members of the Management Committee	The current composition of the members of the Management Committee, eleven men and one woman, does not allow information to be provided as to the average remuneration with a breakdown by gender, since such a presentation would wrongly allow the individual specific remuneration of one of its members to be deduced, without any legal obligation to	



				publish this information, and the company is therefore required to maintain the strictly private and confidential status of said figures.
	Implementation of work disconnection policies	GRI 103 Management approach Qualitative description of the policies in force	Page 18	
	Employees with disability	GRI 405-1 Diversity of governance bodies and employees	Page 17	(2)
Working structure	Organisation of working time	GRI 103 Management approach Qualitative description of the organisation of working time	Page 18	
	Number of hours of absence	GRI 403-2 Types of accident and accident frequency rate, occupational diseases, days lost, absence and number of deaths by occupational accident or professional illness Number of hours of absence	Page 18	
	Measures intended to assist in work-life balance and encourage joint responsibility by both parents	GRI 103 Management approach Qualitative description of the measures	Page 18	
Health and Safety	Health and safety at work conditions	GRI 103 Management approach	Pages 18, 19	(2)
	Number of working accidents and occupational diseases by gender, frequency rate and seriousness by gender	GRI 403-2 Types of accident and accident frequency rate, occupational diseases, days lost, absence and number of deaths by occupational accident or professional illness	Page 19	(2)
Social relationships	Organisation of social dialogue	GRI 103 Management approach Qualitative description of the organisation of social dialogue	Page 20	
	Percentage of employees covered by collective agreement in each country	GRI 102-41 Collective bargaining agreements Percentage of employees covered by collective agreement out of the total employees	Pages 19, 20	(2)
	Account of collective agreements, in particular in the field of health and safety at work	GRI 403-4 Health and safety issues dealt with in formal agreements with trade unions Qualitative description of the account	Pages 19, 20	
Training	Policies implemented in the field of training	GRI 103 Management approach Qualitative description of the policies	Pages 20, 21	
	Total number of hours of training by professional category.	GRI 404-1 Average hours of training per year per employee Total number of hours of training with a breakdown by country and topic Number of hours of training with a breakdown by country and professional category	Pages 21, 22	(2)
Equality	Measures adopted to promote equal treatment and opportunities for men and women	GRI 103 Management approach Qualitative description of the measures	Page 23	
	Equality plans with measures adopted to promote employment, protocols to combat sexual and gender-related harassment	GRI 103 Management approach Qualitative description of the plans in force	Page 23	
	Integration and universal accessibility for people with disability	GRI 103 Management approach Qualitative description of integration measures	Page 23	
	Policy for combating all types of discrimination and, where applicable, diversity management	GRI 103 Management approach Qualitative description of diversity management	Page 23	

(2) The information reported does not cover 100% of the Grupo Aldesa. For further information about the specific scope, see the explanation on the page indicated.



Information regarding respect for human rights

Spheres	Reporting framework	Reference	Comments/Reason for the omission
Application of due diligence procedures in the sphere of human rights	GRI 103 Management approach GRI 102-16 Values, principles, standards and norms of behaviour Qualitative description of the management performed	Page 11	
Prevention of risks of human rights breaches and, where applicable, measures to mitigate, manage and remedy possible abuses committed	GRI 103 Management approach Qualitative description of the management performed	Page 11	
Reports of cases of human rights abuses	GRI 406-1 Cases of discrimination and corrective actions taken Number of reports received during the year	Page 11	
Promotion and fulfilment of the provisions of fundamental ILO conventions connected with respect for freedom of association and the right of collective bargaining, elimination of discrimination at work and in employment, elimination of forced or bonded labour and effective abolition of child labour	GRI 407-1 Transactions and suppliers whose right to freedom of association and collective bargaining could be at risk Qualitative description of the management performed	Page 11	

Information on combating corruption and bribery

Spheres	Reporting framework	Reference	Comments/Reason for the omission
Measures adopted to prevent corruption and bribery	GRI 103 Management approach GRI 102-16 Values, principles, standards and norms of behaviour Qualitative description of the management performed	Pages 9, 10, 11	
Measures to combat money laundering	GRI 103 Management approach Qualitative description of the measures	Pages 9, 10, 11	
Contributions to foundations and non-profits entities	GRI 413-1 Operations with local community involvement, impact assessments and development programmes Amount of contributions in euros	Page 11	

Information about the company

Spheres	Reporting framework	Reference	Comments/Reason for the omission
Company commitments to sustainable development	Impact of the company's activity on employment and local development	GRI 103 Management approach Qualitative description of the impact	Page 24
	Impact of the company's activity on local populations and on the region	GRI 203-1 Infrastructure in investment and services supported Qualitative description of the impact	Page 24
	Relationships maintained with actors from local communities and means of dialogue with them	GRI 102-43 Focus on stakeholder participation Qualitative description of relationships	Page 24
	Actions for partnership or sponsorship	GRI 102-12 External initiatives Qualitative description of the actions	Page 25
Subcontracting and suppliers	Inclusion of social, gender equality and environmental issues in the purchasing policy	GRI 102-9 Supply chain Qualitative description of management performed regarding inclusion	Pages 25, 26
	Consideration in the relationship with suppliers and subcontractors of their social and environmental responsibility	GRI 102-9 Supply chain Qualitative description of the management performed	Pages 25, 26
	Systems for supervision and audits, and the corresponding results	GRI 103 Management approach Qualitative description of the management performed and percentage of suppliers evaluated during the year	Pages 25, 26
Consumers	Measures for the health and safety of consumers	GRI 103 Management approach Qualitative description of the measures	Page 23



	Systems for claims	GRI 103 Management approach Qualitative description of the system for claims	Page 24	
	Complaints received and resolution thereof	GRI 103 Management approach Number of claims and breakdown by status	Page 24	
Tax information	Profits obtained country by country	GRI 103 Management approach Pre-tax profit/losses by country	Page 37	
	Profits taxes paid	GRI 103 Management approach Profits tax paid in accordance with the Country by Country Report criterion	Page 38	It is held that, in accordance with the literal terms of Act 11/2018, of 28 December, modifying the Code of Commerce, the recast text of the Capital Companies Act, approved by Royal Legislative Decree 1/2010, of 2 July, and Accounts Auditing Act 22/2015, of 20 July, regarding non-financial reporting and diversity, there is no requirement for a breakdown by country of information regarding profits taxes paid and public subsidies received. This breakdown is therefore not reported.
	Public subsidies received	GRI 201-4 Financial assistance received from the government Public subsidies received	Page 38	



The Non-Financial Reporting Statement for Euroinfra Inversión, S.L.U. and Subsidiaries was formulated by the Joint Directors of the Parent Company, Euroinfra Inversión, S.L.U., at its meeting of 31 March 2022, and is extended to this sheet of standard paper.

The Directors of the Company:

[Illegible signature]

Signed: Mr Jing Lyu
Sole Director

Certificación de Traductor Jurado

Doña Paloma Valenciano Martínez-Orozco, Traductora Jurado de inglés en virtud de título otorgado por el Ministerio de Asuntos Exteriores, Unión Europea y Cooperación, certifica que la que antecede es traducción fiel y exacta al inglés de un documento redactado en español.

Sworn Translator Certification

I the undersigned Paloma Valenciano, sworn translator for the English language qualified by the Spanish Ministry of Foreign Affairs, European Union and Cooperation do hereby certify that the foregoing is a true and faithful translation into English of the original Spanish document.

Madrid, 30th June 2022

