



Integrated Environmental  
Management,  
Quality Management,  
Occupational Risk  
Prevention,  
Energy Management,  
R&D&i Management  
and Information  
Security Policy

## 1. Introduction

Elecnor is a global corporation with a firm purpose: to be the source of change and progress, taking infrastructures, energy and services to territories all over the world so that they can develop their potential. A purpose that follows a business model based on two key business activities that mutually complement and reinforce each other.

**Infrastructures**, with the execution of engineering projects, construction and services in the sectors of electricity, power generation, gas, telecommunications and systems, railways, maintenance, facilities, construction, water, environment and space.

**Concessions**, which involves promotion, external financing, construction, and management of energy assets, as well as investment in them.

Within the framework of their model of Corporate Responsibility, the management of Elecnor has wanted to give the utmost rigour to its policies of Environmental Management, Quality Management, Occupational Risk Prevention, Energy Management, R&D&i Management and Information Security. These six driving forces make up the Integrated Management Policy of the Elecnor Group, each with its own objectives and strategies, but all with the same mission: the continuous improvement of the organisation.

As proof of Elecnor's rigour with respect to policies, it has based its Integrated Policy on precise knowledge of the nature and magnitude of its environmental impact, customers' expectations, the risks to workers posed by its activities and products, energy use and consumption in its installations and projects, and the firm decision to back R&D&i, which ensures constant compliance with the standards established for confidentiality, availability and integrity regarding its IT assets. Furthermore, the Elecnor Group has voluntarily taken on the requirements contained in the standards for auditing and certification.

## 2. General principles

Elecnor has established the principles to which it is committed and which should govern how the whole organisation operates regarding Environment, Quality Management, Occupational Risk Prevention, Energy, R&D&i and Information Security, so that they serve as a reference to define and revise objectives that continuously improve the effectiveness of the management systems.

These principles are as follows:

- Strict compliance with current applicable legislation and other requirements that Elecnor observes in all the markets in which it operates.
- Customer satisfaction.
- Prevention of damage to and deterioration of the Group's employees' health, by improving their working conditions in order to increase the level of protection of their health and safety.
- Prevention of pollution.
- Efficient energy use and consumption.
- Creation of a positive impact of its activities on the social environment.
- Improvement of competitiveness through R&D&i.
- Effective and efficient protection through a focus on information use that is preventive, perceptive, responsive and dynamic.

### 3. Principles of conduct in Environmental Management

Aware that the main environmental impact of its activities comes from its use of resources and generation of waste in the activities of construction and demolition, Elecnor has defined and applied the most efficient correction mechanisms in order to minimise the scope of this impact.

Similarly, the Group has taken on certain activities that contribute to the protection of the natural environment and its resources and made them an intrinsic part of its business operations. These activities include, among others, generation of renewable energy, water treatment and recycling or efficient energy use in all of its operations, as established in Elecnor's Energy Management Policy.

In general terms, the strategy of the Elecnor Group in terms of Environmental Management is governed by the following principles of conduct:

- Incorporation of the environmental aspect into the decision-making processes regarding investments and the planning and realisation of activities, by fostering consideration of this aspect in cost-benefit analyses.
- Promotion of the protection, conservation and sustainable use of the natural environment (air, water, soil, flora, fauna and landscape) through the adoption of specific preventive, palliative and compensatory measures, aimed at the prevention or the restoration of zones which may be affected by the Group's activities.
- Responsible and efficient management of water resources, by looking after every aspect of the full cycle, supporting social development and the conservation of ecosystems.
- Involvement of all of its interest groups (employees, shareholders, customers, suppliers and society in general) in the joint search for useful solutions to the challenge of conserving and developing the environment and the sustainable use of natural resources.

### 4. Principles of conduct in Quality Management

Quality has formed part of Elecnor's culture since its very beginnings, with a clear focus on customer service which sets it apart from the rest of the field.

In general terms, the strategy of the Elecnor Group in terms of Quality Management is governed by the following principles of conduct:

- The starting-point is always an understanding of the customers' real expectations when it comes to designing and supplying products and services.
- Development of the mentality of continuous improvement at all levels of the organisation, excluding conformism, lack of rigour and other attitudes which represent a barrier to this principle.
- Involvement of each member of staff in the Quality challenge, so that they all take on a sincere personal commitment to customer service.

### 5. Principles of conduct in Occupational Risk Prevention

The employees' health and safety are essential values for Elecnor. In general terms, Occupational Risk Prevention strategy is governed by the following principles of conduct:

- Supplying the material resources to contribute to safety.

- Emphasis on training in prevention techniques.
- Development of awareness campaigns among employees and managers.
- Ongoing site inspections and audits and adoption of suitable corrective measures.

Although no company initiative can be effective without the full collaboration of all employees, who are requested to:

- Perform their jobs according to the regulations, instructions and procedures regarding operations as established by the Group.
- Use personal or collective protective equipment supplied by the Group properly.
- Use equipment, tools, vehicles and any other resources used to perform their jobs in a suitable way.
- Not to perform tasks that pose a serious imminent risk to employees. They should inform their immediate superior so that the necessary steps to be taken can be determined.

## 6. Principles of conduct in Energy Management

Elecnor undertakes the promotion and development of operations aimed at efficient Energy Management as a factor that differentiates the organisation, as well as the commitment to environmental sustainability in all the company's activities.

In general terms, the strategy of the Elecnor Group regarding Energy Management is governed by the following principles of conduct:

- Understanding the use and consumption of energy in the Group's installations and projects, ensuring that the information is readily available and establishing the necessary measures to reach objectives and goals in a constant endeavour to improve energy performance.
- Constantly searching for a balance between financial profitability and energy efficiency in acquiring energy and products, as well as in designing installations.
- Raising awareness among employees and suppliers regarding the importance of efficient and responsible energy use and consumption.

## 7. Principles of conduct in R&D&i

Elecnor focuses its R&D&i activities on those aspects that add value and allow the company to differentiate itself from its competitors. The technological areas of interest are related to energy, the environment, sustainability, infrastructures and ICTs, among others.

R&D&i activities are strategic in order to guarantee Elecnor's competitiveness and sustainability and they are developed in accordance with the following principles of conduct:

- Elecnor promotes the systematic generation of innovative ideas within the company and backs them until turning them into R&D&i projects.
- The systematic use of R&D&i tools is aimed at generating new opportunities and projects in this field.
- These projects are the power behind Elecnor's R&D&i management system and are focused on increasing capacity and competitiveness.

## 8. Principles of conduct in Information Security

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Elecnor sees information security as an integral process that continues over time. This security should be composed of all the technical, human, material and organisational elements necessary to ensure that it is appropriately managed.

Therefore, security measures have been put in place to reduce the possible appearance of threats and so that any security incidents which arise may be detected, can be dealt with in time and do not seriously affect the information being handled or the services being provided, whilst enabling their restoration.

To this effect, the principles of conduct are the following:

- To define, develop and put into operation the necessary technical, legal and management controls to ensure compliance with the risk levels approved for the organisation at all times.
- To create a "security culture", both internally with all the staff and externally with customers and suppliers. In particular, to promote this security culture and its implementation in the services Elecnor offers to its customers.

The management undertakes to promote the development of the strategies contained in this Integrated Management Policy and to provide the necessary resources to this effect.

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