



Equality Plan



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Introduction

Article 14 of the Spanish Constitution declares the right to gender equality and non-discrimination between women and men, while entrusting public authorities with the obligation to promote the requisite conditions to ensure effective equality.

With a view to ensuring and sustaining compliance with this universal legal principle, Organic Law of 22 March 2007 on Effective Equality for Men and Women was enacted, the purpose of which is to: “make effective the principle of equality of treatment and opportunities between men and women, particularly by eliminating discrimination against women in all walks of life and, especially, in political, civil and labour spheres.”

Subsequently, Royal Decree-Law 6/2019 of 1 March on urgent measures to ensure equality of treatment and of opportunities between men and women in employment and occupation was passed. This has further complemented that rule by establishing new legal requirements for companies with respect to equality.

Among other requirements, it established that companies with over 50 employees are obliged to draft an Equality Plan to indicate measures to avoid any type of employment discrimination between men and women. Previously, this requirement only applied to companies with over 250 employees.

The Elecnor Group has consistently indicated its commitment to Equality and Non-discrimination in its specific principles of action for Corporate Social Responsibility. Indeed, back in 2018, the Elecnor Group took part in the “Equality in Business” (“Igualdad en la empresa”) labelling project that year, in collaboration with the Ministry of Health, Social Services and Equality, to promote the balanced presence of men and women in the company.

Furthermore, the Elecnor Group Board of Directors acknowledges the development of equal opportunity-based labour relations, non-discrimination and respect for diversity as a strategic objective.



Context, women's employment in the Spanish labour market

By activity sector

In 2020, of the total number of working women, the highest percentage according to activity sector was women's presence in the wholesale and retail business activity (17.0%).

Health and social services activities ranked second (15.4%), while the education sector (9.9%) had the third highest level of women's presence.

The following activities returned the lowest presence of women:

- Extractive industries had 0.1% of women employees;
- Electricity, gas, steam and air conditioning supply had 0.3% women employees;
- Water supply, sewage, waste management and decontamination activities (0.3% women employees).

In 2014, 85.3% of all the women working in the EU-28 were employed in the services sector, 10.9% in industry and 3.8% in agriculture.

That same year, 90.3% of all women working in Spain were employed in the services sector, 7.6% in industry and 2.1% in agriculture.

By type of occupation

In 2020, of the total number of women working, the highest percentage (27.6%) corresponded to activity 5. Catering, personal, protection and sales services.

Activity 2 (23.9%) ranked second. Technicians, scientists and intellectuals, while activity 4 figured third (15.5%) in the ranking. Accountants, clerks and other office employees.

Activity 0 reflects the lowest percentages. Military personnel and activity 6 (0.1%). Qualified workers in the farming, livestock, forestry and fisheries sector (0.9%).

By professional situation

In 2020, the highest percentage of working women corresponded to salaried women (87.8%), 66.7% of whom were private sector wage earners. Some 12.1% were self-employed, 8.6% of which were entrepreneurs without employees or independent workers, 3.0% were employers, 0.4% corresponded to helping out in the company or family business, while 0.1% to members of a cooperatives.

By job title

In 2020, 75.1% of working women were employees (having bosses and no subordinates), 8.0% were independent workers (with no bosses or subordinates). 6.5% were middle managers, 4.9% held positions of responsibility such as workshop or office managers, overseers or similar, while 4.4% were managers of a small company, department or branch office. In terms of medium-sized or large enterprises, 0.4% were directors.

Elecnor Group strengths and weaknesses

Before dealing with each point in the Equality Plan, we ought to take a look at the company's strengths and weaknesses in this matter. In this regard, studies conducted at Elecnor since 2013 provide data that give an insight into the reality of the company in this area. Accordingly, the Elecnor Group will be able to design actions with a better chance of success.

The following table indicates the company's strengths and weaknesses with respect to different variables, and using the Gender Gap in the Elecnor Group (difference between the participation of men and women in percentile points) as a point of reference:

VARIABLE	WEAKNESSES	STRENGTHS
<p>Activity</p> 	<p>Elecnor works in one of the branches of activity with the lowest percentage of women's presence (0.3% in 2020).</p>	<p>Nevertheless, women's presence in the Elecnor Group in 2016 was 12.42%. Clearly bettering their presence percentage in the sector.</p>
<p>Position</p> 	<p>In the 2020 labour market, 75% of women are employees, in other words, they have bosses and no subordinates.</p>	<p>In the Elecnor Group, 62.23% of women employees are in middle management positions or higher.</p>
<p>Training</p> 	<p>In Spain in 2017, the rate of male graduates in the fields of science, mathematics, engineering, industry, IT, construction per 1,000 inhabitants between the age of 20-29 was 30.4‰, while for women it stood at 13.1‰.</p>	<p>Some 57.58% of women in the Elecnor Group work in the company's Technical Area.</p>
<p>Age</p> 	<p>In the Elecnor Group, 17% of our male staff are under 30 years of age.</p>	<p>In the Elecnor Group, 25% of the women are under 30 years of age, which clearly attests to the Group's commitment to employing women.</p>
<p>Contract term</p> 	<p>In the Elecnor Group, 47% of the men and 32% of the women have a temporary contract.</p>	<p>In the Elecnor Group, 53% of the men and 68% of the women have a permanent contract.</p>

Work areas

Selection and hiring process

Human resources are essential factors in the maintaining and growing company business, thus only the best staff must be selected and hired for each company activity. The Elecnor Group has a public, written, internal selection and mobility policy, which lays down the guidelines and steps to be followed. This is a discrimination-free policy.

Even so, this Equality Plan establishes the following commitments:

- Ensure the maintenance in selection and hiring processes of objective procedures and policies based on the principles of merit, capacity and person-position suitability.
- Assess job candidates on the basis of their suitability, making sure at all times that the jobs with different areas of responsibility are held by the most suitable people against a background of equality of treatment and the complete absence of gender-based discrimination.

Among the actions to be undertaken, the responsibility of the Recruitment Manager is as follows:

- Include the commitment to integrating equality of opportunities and non-discrimination for reasons of gender, race, age, etc., in the Internal Selection and Mobility Policy.
- Establish, to this end, a series of specific guidelines on equality in the Selection Policy.
- Analyse indicators in the management reports that measure the progress being made by the Plan in the company, such as, for instance, developments in recruiting by area, activity, training and gender.
- These indicators will be studied by the Equality Plan Monitoring Committee every year.



Professional classification

This point in the company Equality Plan seeks to ensure that there is no direct or indirect discrimination between men and women. As provided for under Royal Decree-Law 6/2019, a job will be said to be equal to another when the nature of the functions or tasks effectively entrusted, the educational, professional and training requirements to do it, any factors strictly related to its performance and the labour conditions under which the activity is carried out are equivalent.

The following measures are established to comply with the foregoing; measures which will be supervised by the company HR manager.

- The definition of professional groups will be in keeping with systems based on a correlational analysis between gender bias, jobs, classification criteria and remuneration to ensure the absence of discrimination either directly or indirectly between men and women. The aforementioned analysis will be given proper form to in a report in which professional jobs, groups and categories are defined in detail.
- Neutral terms will be used in professional naming and classification without any gender implication.
- Factors will be analysed to justify differences between groups, categories and jobs. To this end, a regular assessment will be conducted on job classification to enable the remedying of situations which may be caused by undervaluation of women's work. Lastly, a report will be drafted to analyse the explanations given for the differences detected.



Training

The Elecnor Group understands that developing professionals is a key factor for the organisation's success. To this end, the following commitments are undertaken:

- The company will promote training actions that equally facilitates the development of skills and competencies, regardless of gender.
- Both men and women will be ensured equal access to in-house training to drive professional development and adaptability to job requirements.
- The participation of people returning to work after extended leaves of absence for family reasons in appropriate training courses for their professional retraining will be facilitated.

Among the actions to be undertaken, the responsibility of the Training Manager is as follows:

- Train the staff in general with respect to equal opportunities and, especially, the personnel related to company organisation (HR, managers and executive personnel) to ensure objectivity and non-discrimination when selecting, classifying, promoting, or accessing training, etc.
- Include this training in the People First (On-boarding) training itinerary, specifying the commitment acquired to real equality of opportunities and employee protection on becoming a member of the Elecnor staff.
- Establish indicators in management reports that measure the progress being made by the Plan in the company, such as, for instance, participants and the number of hours in training actions by gender and area.



Promotion

A job assessment system has been developed in the Elecnor Group to assess jobs according to the functions and responsibilities they implicitly entail, regardless of the person who is in the job.

The different promotion systems in place in the Elecnor Group aim to stimulate employees' personal development to acquire new competencies that prepare them to carry out new functions and get better results.

The following commitments are established in these systems:

- Objectivity and non-discrimination will be guaranteed with respect to job promotion.
- A stop will be put to the creation of barriers that make it difficult for women to get promotion.
- Equality of treatment and assessment in selection tests will be guaranteed for anybody who is exercising an entitlement to work-life balance.
- Equality of opportunities will be guaranteed for those people who express an interest in a promotion process and who are currently on extended leave of absence for family reasons (Article 46.3 of the Workers' Statute).

Among the actions to be undertaken, the responsibility of the HR Manager is as follows:

- Manage the development of Human Capital by means of Competencies Management, identifying people's capacities using an objectively measurable and quantifiable professional profile, assessing potential and performance based on the actions and expected results of each person in their job.
- Support the training of women for positions of leadership, both as directors and senior executives as well as team/works managers.
- Create a tool to enable indicators to be established in management reports that measure the progress being made by the Plan in the company, such as, for instance, promotions by level, gender and area.



Working conditions

The company aims to incorporate the gender issue into its occupational health and safety policy and risk prevention tools to adapt them to employees' physical, biological and social needs. To this end, the HR team will develop the following measures:

- Review and disseminate the action protocol for risks to pregnancy and breastfeeding.
- Consider the gender-related variables in data collection and processing systems and in the study and research into gender in risk prevention to detect and avoid possible, gender-linked harmful job situations.
- Draft a report on accidents at work by gender and job category.

Furthermore, the Elecnor Group is committed to detecting, analysing and assessing the gender wage gap. To this end, the company will analyse the employees' remuneration with respect to gender and in accordance with staff professional categories. A detailed analysis, broken down by gender, will also be done on employees' type of contract (temporary/permanent) and if the working hours allow for flexi-time or shift work is carried out.



Work-life balance

The entitlement to work-life balance is acknowledged. Accordingly, attempts will be made to foster greater co-responsibility between men and women when it comes to family obligations. Indeed, it should be pointed out that Royal Decree 6/2019 introduces an added possibility to the reduced working day, namely, the working day adjustment.

Furthermore, the new regulation introduces novelties with respect to the previously existing leave permits. Among the most noteworthy of these are the following:

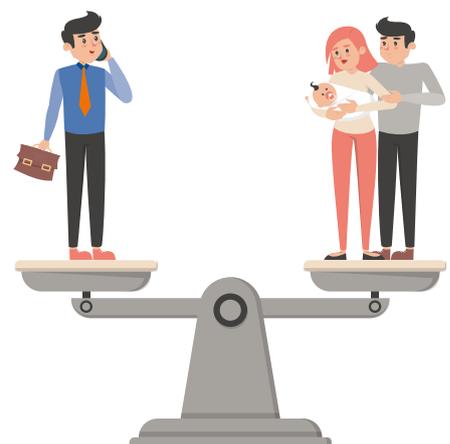
- Possibility of both parents simultaneously enjoying breastfeeding permits. In fact, if both parents request it for the same duration and under the same system, a temporary extension of the permit is provided for.
- As far as the extended leave of absence to care for a minor is concerned, an extension to the permit is also provided for with respect to cases in which both parents enjoy the permit for the same duration and under the same system.
- Bringing into line of paternity and maternity leave (from now only referred to uniquely as “childbirth leave”), which in 2021 was established at 16 weeks for both parents.

To this end, the following commitments are undertaken:

- All employees, who so request it, will be informed of and duly explained about all the aspects of the work-life balance law, as well as any other entitlements and permits they have a right to under the law and pursuant to applicable Collective Bargaining Agreements depending on their particular family circumstances.
- Any such communication will also state that any exercise of the work-life balance entitlements in question will not impact negatively on their possibilities of promotion, their retribution levels or on their access to certain company benefits and incentives.

Among the actions to be undertaken, the responsibility of the HR Manager is as follows:

- In-house training must be given during normal working hours to ensure work-life balance for those employees who are doing the training in question as result of job promotion.
- Implement the policy of not holding meetings in the final hours of the working day or, if doing so, setting a maximum time duration for the meeting.
- Flexible working hours, compressed working schedules in the summertime, study support, leaves of absence/reduced working days to care for children, discount agreements with insurance companies.
- Create a tool to enable indicators to be established in management reports that measure the progress being made by the Plan in the company, such as, for instance, developments in the granting of reconciliation permits by gender.



Women's under-representation

Two particular objectives are sought in this area. Firstly, to guarantee equality of treatment and opportunities for men and women with respect to promotion, based on objective, quantifiable, public and transparent criteria. Secondly, to encourage professional promotion in the company until reaching a balanced presence of men and women in coordination and management positions.

To this end, the following measures are established which will be supervised by the company HR manager:

- Inform the entire staff transparently and in due time about vacancies open to internal promotion by making them public and accessible.
- Annually update the register that reveals staff levels of study and training, broken down by gender and job.
- Annual monitoring of promotions broken down by gender, indicating the professional group and source and target operational position, contract type, working day scheme and promotion type.
- Keep statistical information on and regularly monitor the proportion of women in senior positions, at executive levels and in middle management positions.
- Analyse personnel policies and internal promotion practices to detect barriers that make full equality difficult to achieve between men and women.
- Implement positive actions to encourage mobility and the promotion of employees to jobs and professional groups with greater responsibilities.
- Boost the presence of women in promotion processes for jobs in which women are under represented.
- Internally disseminate promotions to the management group transparently and specifying positive discrimination actions.



Remuneration

The Elecnor Group has been implementing a remuneration system that guarantees neutrality at all times with no conditioning factors whatsoever on the basis of gender, a circumstance that will continue over time. When it comes to conducting studies on remuneration, the Elecnor Group uses blind data in which the job is taken into account, and not the person.

To this end, the following commitments are undertaken:

- A remuneration system will be kept in place that observes objectivity, fairness and non-gender discrimination criteria.
- It will be made sure that the remuneration system aims to reward achievement, without discriminating on gender grounds.
- Equality of treatment and assessment in applying the remuneration system will be guaranteed for anybody who is exercising an entitlement to work-life balance.

Among the actions to be undertaken, the responsibility of the HR Manager is as follows:

- Create a tool to enable indicators to be established in management reports that measure the progress being made by the Plan in the company, such as, for instance, developments in fixed and variable salaries by professional categories and gender.



Improvements to labour and social protection

Mindful as the company is of the importance of working safely, properly and comfortably, the following commitments are undertaken:

1. Occupational health

The choice of furniture, tools and other material normally used by the staff will be based on different ergonomic principles, depending on whether the user is a man or woman.

Work situations will be avoided for pregnant women in which they or their unborn child may be exposed to danger. To this end:

- Applicable Occupational Risk Prevention regulations for pregnant women will be made known and publicised.
- The Joint Prevention Service must conduct a risk assessment for all jobs taking into account the possibility that the employee doing the job, or who is to do it in the future, is pregnant or breastfeeding, in such a way as to determine if the agents present at the workplace figure on the list contained in Annex VII to Royal Decree 298/2009 of 6 March, and may entail a risk for the health of the woman, foetus or child.
- Pregnant women will have preference to do a different job or perform a different function that is compatible with their condition; a preference which shall remain in effect until the state of health of the employee or her child enables her to return to a job or function similar to her original one.
- Employees must inform HR management of their pregnancy or that they are breastfeeding as soon as they become aware of this condition.



2. Preventing sexual and gender-based harassment

Elecnor firmly rejects and has a policy of zero tolerance as regards behaviour or actions that constitute any form of sexual, moral or sexually-based harassment, and undertakes to actively, effectively and resolutely collaborate in the prevention, detection, correction and sanctioning of any conduct constituting harassment.

The company will prevent and avoid harassment by means of a whistleblowing channel in Corporate Compliance and a Protocol to Prevent Situations of Workplace and Sexual Harassment:

- The Elecnor Group hereby states its concern with preventing, avoiding, dealing with and, where appropriate, sanctioning cases of workplace or sexual harassment in the company.
- Those in charge of the different management areas must take care to ensure a work environment free from all forms of harassment in their respective areas. Accordingly, they must react and report all types of behaviour that are suspicious of causing any form of harassment.
- The Elecnor Group undertakes to investigate all reports of harassment that are processed in accordance with the Corporate Compliance Manual, which will ensure the right to privacy and confidentiality of the issues dealt with and the people involved.
- All company employees will be entitled to use the whistleblowing channel under a guarantee of not being subject to intimidation, unfair or unfavourable treatment, while also ensuring complete confidentiality regarding the investigation of the report.
- Workplace or sexual harassment will be considered as a workplace misdemeanour that will lead to the company adopting disciplinary measures in accordance with the gravity of the events.

The Crime Prevention and Response Committee will supervise compliance with this Protocol through the whistleblowing channel put in place.



Communication

Owing to the fact that equality begins as of the company's communication with its major shareholders (employees, shareholders and customers), the Elecnor Group reflects its commitment to Equality and Non-discrimination in its specific principles of action for Corporate Social Responsibility and Corporate Compliance.

To this end, the following commitments are undertaken:

- The gender perspective will be incorporated into both internal and external communication, to which end a Communication Policy will be drafted.
- In all company communications and information, as well as in its public dissemination, publicity and recruiting actions, special care will be taken to use neutral, non-sexist language.
- This process will bear in mind that communication encompasses language, images and content.

Among the actions to be undertaken, the responsibility of the Communication Manager is as follows:

- Post the Equality Plan on the company website to ensure its availability to all stakeholders who wish to consult it, along with company CSR and Corporate Compliance.
- Establish permanent information channels about integrating equal opportunities into the company.



Definitions of the terms used in the Organic Law on Equality and Royal Decree 6/2019

Principle of equality between men and women:

means the absence of all direct or indirect discrimination based on gender, especially that arising from maternity, the taking on of family obligations and civil status.

Equality Plan: a set of ordered measures adopted after diagnosing the situation geared towards the company achieving equality of treatment and of opportunities between men and women and eliminating gender-related discrimination.

Direct and indirect discrimination: direct gender-based discrimination is understood as those situations in which a person is, has been or may be treated, on account of their gender, in a less favourable manner than another person in a similar situation.

Indirect gender-based discrimination is understood as those situations in which an apparently neutral attitude, criterion or practice puts people of a particular gender at a disadvantage with respect to people of the other sex, save for those exceptions provided for by law.

Whatever the case, all forms of indirect or direct gender-based discrimination will be understood as discriminatory.

Gender-based and sexual harassment: sexual harassment is understood as any verbal, physical or conduct of a sexual nature that seeks to or results in violating the dignity of a person, particularly when an intimidatory, degrading or offensive environment is created.

Gender-based harassment is understood as any conduct with respect to a person's gender that seeks or manages to violate their dignity and creates an intimidatory, degrading or offensive environment.

Whatever the case, all sexual and gender-based harassment shall be understood as discriminatory.

Freedom from reprisals: gender-based discrimination shall be understood as the occurrence of any adverse or negative treatment received by a person as a result of presenting a complaint, claim, report, lawsuit or appeal of any type, seeking to prevent their discrimination and calling for effective compliance with the principle of equality of treatment between men and women.

Work of equal value: it is hereby established that work shall be of equal value in reality when the following factors are deemed to be equivalent: the nature of the functions or tasks entrusted, the educational/professional/training conditions required to do the work, factors strictly related to its performance, the labour conditions under which the activities in question are carried out.

Approved by the Board of Directors

January 2022