

2018

CORPORATE SOCIAL
RESPONSIBILITY
REPORT





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ABOUT COMSA CORPORACIÓN



MAIN MILESTONES 2018

International Presence

- New infrastructure contracts (excavation and maintenance of the Amagá tunnel, Pacifico 1 motorway) and industrial engineering (Coviandes and Conandino ITS systems) in Colombia.
- Renewal and extension of contracts for electrical installations, fibre optics and network and telecommunications support at the CERN headquarters (France and Switzerland).

Economic area

- Turnover of €1,101 M.
- 10% increase in order backlog.

Transparency, Ethics and Integrity

- Review of the criminal compliance model for international subsidiaries.
- Extension of the commitment to ethics and integrity to the supply chain.

Innovation Management

- Launch of “The Inncom Challenge” programme for start-ups with the aim of commercialising innovative solutions for the construction sector.
- 20% increase in the number of projects awarded in R&D.

Human Team

- Implementation of the *COMStruimos* (COMSA Constructs) Strategic Plan.
- Atlante Prize awarded by Foment del Treball for Innovation in Preventive Communication.

Environmental Impact and Contribution

- Calculation of the carbon footprint of COMSA Corporación (scope 3).
- DRIVE project for the improvement of the energy efficiency of buildings.

Social Impact and Contribution

- Improvement of mobility in the municipality of El Rosario (Peru) with the construction of two new bridges in the form of a donation to the community.
- Economic contribution to the Red Cross of Puebla (Mexico) to collaborate in the work of assistance and maintenance of the victims of the earthquakes.



Construction of the Perelada Group winery, Girona (Spain)



Maintenance of electrical installations at the CERN headquarters in Preveissin (France) and Meyrin (Switzerland)



Amagá Tunnel on the Pacifico 1 motorway (Colombia)

LETTER FROM THE CHAIRMAN



Jorge Miarnau, chairman of COMSA Corporación

Dear clients, suppliers, collaborators and workers, welcome to the Corporate Social Responsibility Report for fiscal year 2018.

Following the line begun in 2017 with the publication of our first CSR Report, in the successive pages we share with all of you the issues of greatest interest in the areas of economic, environmental and social sustainability. Aligned with our Good Governance and Transparency policies, and under the principles of continuous improvement, this Report broadens its scope both in terms of group companies and, above all, in terms of information content, in accordance with the Guide to Indicators for Sustainability Reports of the Global Reporting Initiative.

The year 2018 was marked by our firm commitment to the internationalisation of our activities, which now represent 55% of the total turnover of more than €1,101 M, to which more than 8,300 people who are part of COMSA Corporación have

contributed, more than 4,500 of whom are in the international area. In the same vein, the order backlog, which exceeds €1,700 M and has increased by more than 10% compared to 2017, also has a high international component, with more than 57%.

Another aspect that has marked 2018 has been the advance in the strategic line of divestments in non-core businesses, the fruits of which allow us, reasonably, to continue on the path of planned, balanced and sustainable growth.

This will be helped by innovation, which has historically been a differential factor in our organisation, and which we are adapting to a global and changing world. The launch in 2018 of the programme The InnCom Challenge will allow COMSA Corporación, over the next few years and in close collaboration with start-up's around the world, to promote and lead aspects as relevant in the short and medium term as the digitalisation of the sector and energy efficiency, with the aim of reducing greenhouse gas emissions, thus contributing to the mitigation of climate change. In this sense, in 2018 we extended the measurement of our carbon footprint to scope 3.

Also, in 2018 we implemented new policies and measures in the circular economy, as well as in the rational and sustainable use of materials in our activities, the results of which will be reflected in the coming years.

To this improvement in global conditions must be added the improvement in the welfare of people

who, directly and indirectly, are part of COMSA Corporación. Contributing to the creation of value in the communities in which we are present, from an economic, environmental and social point of view, is one of our organisational values. Thus, in 2018 we received new recognitions, among which I would like to highlight the Atlante Prize for the best initiative in awareness, information and training in the field of Occupational Risk Prevention.

To make all of the above possible, we will continue to have an impact on the personal and professional development of our people, through the *COMStruimos* Project, a strategic Human Resources plan initiated this year. This plan, together with other initiatives, will contribute to providing a well-being environment in which behaviour in accordance with the principles of integrity and responsibility continues to be the hallmark of those of us who form part of COMSA Corporación.

I would like to thank clients, suppliers and collaborators for allowing us to continue to count on your trust and support. And, to those who form part of COMSA Corporación, for your dedication, implication and commitment to the challenges and opportunities that present themselves to us.

Jorge Miarnau
Chairman of COMSA Corporación



MORE THAN 125 YEARS OF HISTORY

Founded in 1891 in Reus, COMSA focused its activities, in its early years, on track works and station renovation. Its knowledge of infrastructures and the skills of its professionals quickly made COMSA one of the eminent railway companies of the time.

Already in the 1940's, coinciding with the second generational change, began the diversification of its activities, with new areas of civil engineering, starting the construction of all kinds of works.

In the 1960's, the third generation of the family promoted the mechanisation of the track works, and began the expansion of the company throughout the Spanish territory, which was consolidated in the following years, culminating in the participation in the first Spanish high-speed railway project, the Madrid-Seville line.

Upon the centenary of the company, and coinciding with the arrival of the fourth family generation, COMSA began its internationalisation, setting up in Portugal, followed by a rapid expansion towards Europe and Latin America.

The first decade of the 21st century saw the integration of Grupo COMSA and Grupo EMTE, today known as COMSA Corporación, with the vocation of offering comprehensive services with a high technological component focused on the development of communications and territorial structuring in any geographical area.

The more than 125 years of experience of this group, together with the high specialisation in the construction and modernisation of transport infrastructure, make COMSA Corporación a reference partner for clients and collaborators.

Committed to sustainable growth and innovation, COMSA Corporación is fully focused on quality, professionalism and client satisfaction, with respect for the communities and the environment in which it operates, always acting under the principles of sustainability, integrity and responsibility.



Track renovation work between Celrá and Figueres, 1961 (Spain)



Maintenance of Line A of the Mexico City Metro (Mexico)



MISSION, VISION AND VALUES

MISSION

To provide society with integrated infrastructure, engineering, environmental and technological services following principles of professionalism, quality and innovation, thereby meeting customers' needs and fostering an environment of human development within a framework of profitable and sustainable growth.



High-speed line Madrid-Zaragoza-Barcelona-French Border. Section Calatayud-Lleida (Spain)

VISION

To be leaders, consolidating the profitability of various business lines and driving international growth, while pursuing goal of contributing to economic, technological and social progress.



Ornamental fountain maintenance of Warsaw, Paris (France)

MISSION, VISION AND VALUES

OUR VALUES



Global vision, working with a global strategy based on exploiting synergies between the different business lines in order to provide customers with an integrated service with high added value solutions, thereby strengthening the group.



Customer focus, concentrating efforts on meeting customers' needs with innovative solutions which exceed their expectations.



Results oriented in order to position COMSA Corporación as a benchmark group in the sector, ensuring the efficient management of its resources.



Human team, since people are one of the corporation's principal assets and their talent must be nurtured as a guarantee of its collective success.



Excellence and initiative in the search for new opportunities based on the professionalism and talent of its human resources, with a commitment to provide the best solutions to each customer and implement projects with the highest standards of quality.



Innovation and technology as an asset in the value chain, enabling customer offers that include advanced technological solutions in anticipation of their needs and improve the efficiency of their projects.



Environmental responsibility, with a clear commitment to society and the environment in all its activities.



COMMITMENT TO THE UNITED NATIONS SDGS

COMSA Corporación presented its first Corporate Social Responsibility Report in 2018, which compiles the group's main milestones and challenges in the area of sustainability, understood as a balance between economic growth, the reduction of environmental impact and social progress in its environment.

As a result of this effort to integrate sustainability throughout the corporation, the company's actions were aligned for the first time on the basis of the Sustainable Development Goals (SDGs), promoted by the United Nations.

The four SDGs to which COMSA Corporación contributes directly through its activity are:



Industry, innovation and infrastructure:

One of the pillars that sustains the prestige of COMSA Corporación is innovation in its activities.

In 2018, the company managed innovation projects related to energy efficiency and the improvement of productive processes and digitalisation for an amount of more than 7 million euros.

COMSA Corporación's own activity involves the construction of modern and efficient infrastructures that facilitate access to basic services such as electricity, water and transport, thus contributing to the development of the communities in which it operates.



Sustainable cities and communities:

In 2018, 13 sustainable building projects were built with LEED or BREEAM certificates which, together with measures that increase the energy efficiency of the projects, make the company contribute to reducing the environmental impact generated by urban centres.



Responsible production and consumption:

The company's commitment to the circular economy contributes to increasing the efficient use of resources, valuing sub-products by reintroducing them into the system as raw material, thus contributing to the reduction of waste.

Projects such as Neoballast, which extends the useful life of the infrastructure by reusing rubber from end-of-life tyres, or Albepav, a sustainable and highly durable asphalt using recycled glass, are examples of COMSA Corporación's commitment to a sustainable economy.



Climate action:

The company has established 2018 as the base year from which CO₂ emission reduction policies will be developed, and will continue to work to identify new emissions counted within scope 3.



COMMITMENT TO THE UNITED NATIONS SDGS

In addition, COMSA Corporación incorporates other specific actions that develop specific aspects of other SDGs, among which it is worth highlighting:



Good Health and Well-being:

COMSA Corporación's commitment to health and safety is maximum and extends it to all its collaborators. In this regard, the variable remuneration of those directly responsible for operations has been linked to the implementation of the established health and safety standards.



Gender equality:

COMSA Corporación works to promote equal opportunities and, therefore, meritocracy and diversity are valued in the selection and promotion of talent. For example, work is being done on the development of measures that promote work-life balance as a tool for extending equal conditions beyond the workplace.



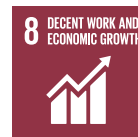
Clean water and sanitation:

Throughout its history, the company has participated in drinking water treatment, purification and desalination projects on four continents, collaborating in the comprehensive management of water. Internally, it also promotes its efficient use as in the case of the reuse of rainwater at GMN's plant in Maials (Spain).



Affordable and non-polluting energy:

The development of the renewable energy sector is part of the company's business. In this sense, in 2018, through the management of photovoltaic and wind farms, the company contributed to the production of 332,195 MWh of renewable energy.



Decent work and economic growth:

The company's commitment to its employees is to promote safe and secure working environments for all workers. In the same way, the company encourages the continuous training of its employees, as well as the integration of young people into the labour market, as in the case of Brazil, where after going through a training phase, 14 young people have been hired as apprentices.



Alliances to achieve the objectives:

The company establishes alliances with different entities to maximise results in areas such as innovation, the environment and social action, as well as cross-cutting alliances in sustainability such as adherence to the Global Compact or collaboration with the Barcelona + Sustainable network.



COMMITMENT TO THE UNITED NATIONS SDGS

COMSA Corporación has maintained a commitment to the 10 Principles of the Global Compact in the areas of Human Rights, Labour Standards, the Environment and the Fight against Corruption for years, individually by different companies in the group.

In 2018, the management of the company has decided that this commitment will be assumed globally by all the companies of the business group. COMSA Corporación's adherence became effective in 2019.



Adaptation of the Granada station for high-speed trains (Spain)



CORPORATE GOVERNANCE



COMSA Corporación headquarters in Barcelona (Spain)

COMSA Corporación is the result of the integration, in 2009, of two family business groups. Both groups had historically maintained a close working relationship that enabled them to offer their clients comprehensive solutions for their projects. This vision has allowed COMSA Corporación to become today a reference in the sector of infrastructure and Industrial Engineering.

In the integration process, COMSA Corporación has maintained one of the most significant characteristics of both groups, which is the fact that it is owned by the Miarnau family, with 70% of the shares, and the Sumarroca family, with 30% of the shares, in addition to being the leading unlisted Spanish company in the sector in terms of turnover.

This status of a family business largely determines the model of operation and corporate governance, as well as the decision-making process.



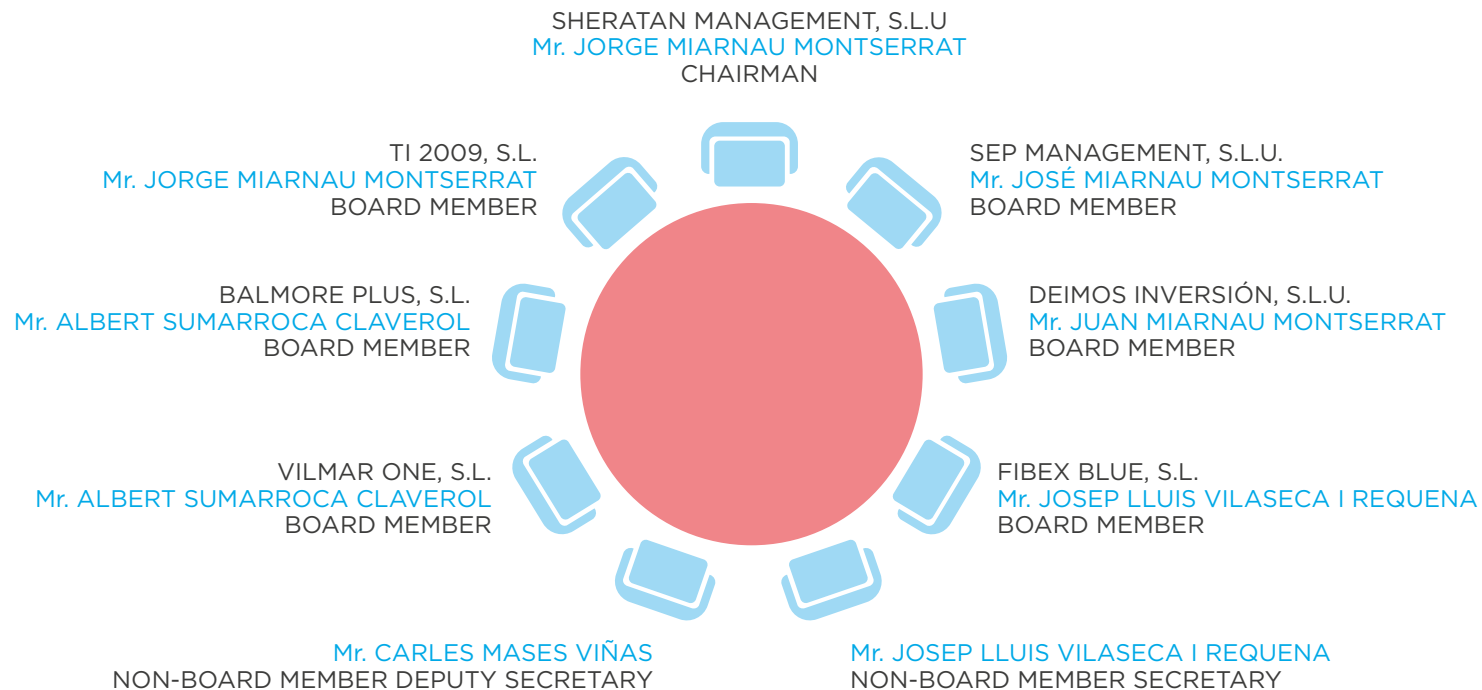
CORPORATE GOVERNANCE

BOARD OF DIRECTORS

The highest governing body of the company is the Board of Directors, appointed by the general shareholders meeting and made up entirely of proprietary directors, who are elected by the general shareholders meeting from among the shareholders for their knowledge of the business, management experience and proven training over time.

The Chairman of the Board of Directors, Jorge Miarnau Montserrat, is appointed by the other Board members and has executive functions. Among these, he presides over the Executive Committee and has direct responsibility for the supervision of the Corporate Financial, Legal and Human Resources Areas.

COMPOSITION OF THE BOARD OF DIRECTORS



CORPORATE GOVERNANCE

The matters dealt with by the Board of Directors are:



In addition, the Board of Directors promotes on a recurring basis, as one of its functions as the highest governing body, the development of objectives, strategy, values, principles and the definition of the mission of COMSA Corporación and the companies in the group.

When taking decisions that may affect stakeholders, the Board of Directors requests relevant reports, both externally, through independent consultants and sector bodies, and internally, through the company's own experts in environmental, social and economic matters.

Likewise, the Board of Directors meetings are attended as guests by the company's top executives in the Corporate function, D. Ferran Perea Samarra, and in the Business function, Guillermo Lorenzo Rodrigo, who provide any clarifications required by the Board, and report to the full Board on the decisions taken by the Executive Committee and by the Operating and Operational Committees.

At least once every six months, in the second and fourth quarters of the year, the Board of Directors carries out an overall evaluation of the main business performance indicators.

The Board of Directors entrusts the Ethics Committee with the adoption of corporate reputation and ethical behaviour policies, as well as the supervision and control of the application of the principles and values that govern the activities of COMSA Corporación.

CORPORATE GOVERNANCE

EXECUTIVE COMMITTEE

Composed of Jorge Miarnau Montserrat, Juan Miarnau Montserrat, José Miarnau Montserrat, Guillermo Lorenzo Rodrigo and Ferran Perea Samarra, the Executive Committee, which is not a committee of the Board of Directors, has decision-making delegated to it, within certain limits, to the extent that it is made up of a majority of executive directors.

Among the matters that the Board of Directors entrusts to the Executive Committee, which it in turn delegates to executive bodies, are the following:



Economic area, through the General Financial Department and the Financial Business Department.



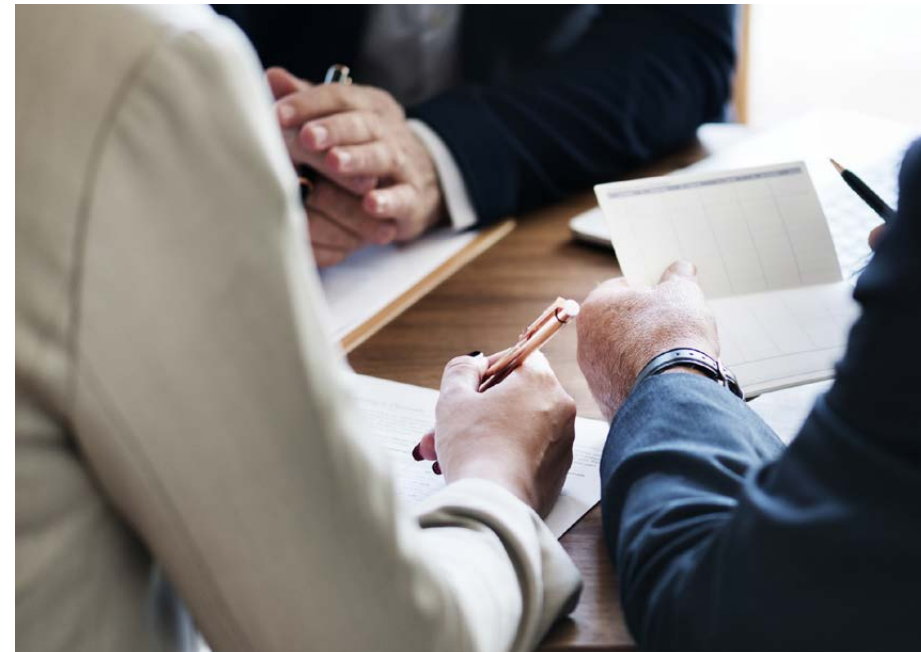
Environment and health and safety, through the General Business Department and the Technical and Innovation Department.



Social area, through the General Business Department and the Corporate and Operational Human Resources Department.

In order to group these three areas together, the Board of Directors entrusts the Management of the Technical and Innovation Area with the preparation of the Corporate Social Responsibility Report which, approved by the Board, serves as the basis for the analysis, determination and implementation of improvement measures.

For its part, the Executive Committee meets on a monthly basis to monitor the evolution of the main business indicators and objectives, as well as COMSA Corporación's main ongoing operations. The Directors of the Corporate Areas may attend these meetings as guests.



CORPORATE GOVERNANCE

OPERATING AND OPERATIONAL COMMITTEES

Quarterly Committee meetings are held for each of the Business Areas, except for the Infrastructures and Industrial Engineering Business Area, for which a monthly meeting is held.

These committees analyse and control the main management and operational indicators that guarantee the fulfilment of the established objectives, and may be attended as guests, by directors and controllers of the respective Business Areas.

In addition, other Operational Committee meetings are held, whose main competencies consist of controlling and monitoring the areas with the greatest impact on the company's good governance. Among these Operating Committees, the most important are the following:

The analysis of the information and critical concerns of the Organisation are channelled upstream, from the Operating and Operational Committees, to the Executive Committee and, finally, to the Board of Directors, through the senior executives of the company.



Contracting



Communication



Legal



Human
Resources



Innovation



Finance





TRANSPARENCY, ETHICS AND INTEGRITY

COMSA Corporación ensures that all its professionals behave ethically and with integrity as an essential priority in all its activities. Under the principle “we take care of people just as we take care of our projects”, the company understands that sustainability is only possible in an environment of respect for people’s dignity and fundamental rights.

These principles of behaviour are reflected in the Code of Ethics and in the specific policies derived from it, which indicate the guidelines of behaviour and conduct of all those who make up COMSA Corporación, with a zero tolerance criterion with respect to strict compliance with current regulations on corruption and bribery, and in favour of respect for human rights and the social and environmental environment in which its activities are carried out, as well as free competition.

COMSA Corporación’s Code of Ethics, revised in 2016, is developed in specific policies, manuals and protocols, including the Manual on Prevention and Response to Crime, the Criminal Compliance Policy, Equality Plans, and the Protocols on Prevention of Harassment in any of its forms.

Compliance with the Code of Ethics guarantees action in accordance with COMSA Corporación’s commitment to carry out its projects in compliance with the legal requirements in force in each geographical area, based on the most current international standards, such as the International Bill of Human Rights, the Conventions of the International Labour Organization (ILO), the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises, among others.

DECALOGUE OF EXPECTED BEHAVIOUR IN COMSA CORPORACIÓN

- 1 Respect for internationally accepted laws and practices.
- 2 Protection for responsible use of resources and information.
- 3 Transparency and reliability of financial information, transmitting complete and understandable way.
- 4 An express prohibition on improper payments or entertainment intended benefits for the organisation or for oneself.
- 5 Acting with loyalty to the organisation, avoiding any situation of interest.
- 6 Acting with impartiality and objectivity in the selection of suppliers and collaborators.
- 7 Fair competition.
- 8 Prohibition of any kind of discrimination, abuse of authority it in a truthful, or physical, psychological or moral harassment.
- 9 Rigorous compliance with internal and external occupational to obtain health and safety standards.
- 10 Respect for the environment, minimising negative impacts on the conflict of environment and maximising the purposes on the community.

TRANSPARENCY, ETHICS AND INTEGRITY

The Code of Ethics is one of the main tools by means of which COMSA Corporation puts into practice the principle of due diligence in matters of ethics and integrity, with a focus on prevention, detection and, where appropriate, eradication of bad practices, using for this purpose the cycle of continuous improvement.

During 2018, COMSA Corporación continued with the systematic review of its policies and protocols regarding ethical behaviour and integrity, in a continuous process of adaptation to new realities, which may be determined both by regulatory changes and by new geographic areas of action.

Specifically, in 2018, specific requirements of countries such as Argentina, Brazil, Mexico and Peru were reviewed and specific risks such as conflict of interest and bribery, illegal gratification and economic extortion were analysed across the board. In addition to these aspects, by 2019, the Board of Directors is considering the creation of an Audit Committee and a Conflict of Interest Committee.

With regard to the conflict of interest and loyalty to the organisation, the company has set up a process for employees to declare, individually, their possible links with companies. In addition, the members of the company's highest governing body make an annual declaration of their duty of loyalty and the duty to avoid situations of conflict of interest.

As a line of work for 2019, COMSA Corporación has planned to extend these declarations to all incorporations of employees, as well as to update the relationship maps of the members of the staff of the company.

Although included in the Code of Ethics, respect for human rights deserves a specific point of detail due to its relevance in the principles and values of COMSA Corporación.



Team meeting at the headquarters, Barcelona (Spain)

TRANSPARENCY, ETHICS AND INTEGRITY

In particular, the company expresses its total rejection of child labour, forced labour, as well as any type of work involving harsh, extreme, inhuman or degrading conditions, as well as its total defence of the rights of minorities and indigenous peoples in any geographical area in which it carries on its activities, and respect for freedom of association and collective bargaining.

In the same vein, COMSA Corporación expresses its commitment to the development of the four pillars of the decent work agenda, i.e. job creation, social protection, rights at work and social dialogue, which are central elements of United Nations Sustainable Development Goal 8.

All of the above implies continuous training in these matters for all COMSA Corporación employees and executives, who must know and apply the instruments and the principles and rules that make up the organisation's compliance culture. In addition to promoting and implementing training among its employees, COMSA Corporación has introduced these principles in its value chain, making its collaborators participate in this business culture.

In addition, in order to guarantee compliance with the principles included in the Code of Ethics, COMSA Corporación has established monitoring and control mechanisms to address potential non-compliance. Thus, the company has an Ethical Channel, in which all employees can report in good faith behaviour and practices that are not in line with the provisions of this code in any of its areas, and especially in relation to any form of corruption, bribery or violation of human rights, including those related to health and safety, both in their application by COMSA Corporación employees and in their relations with third parties.

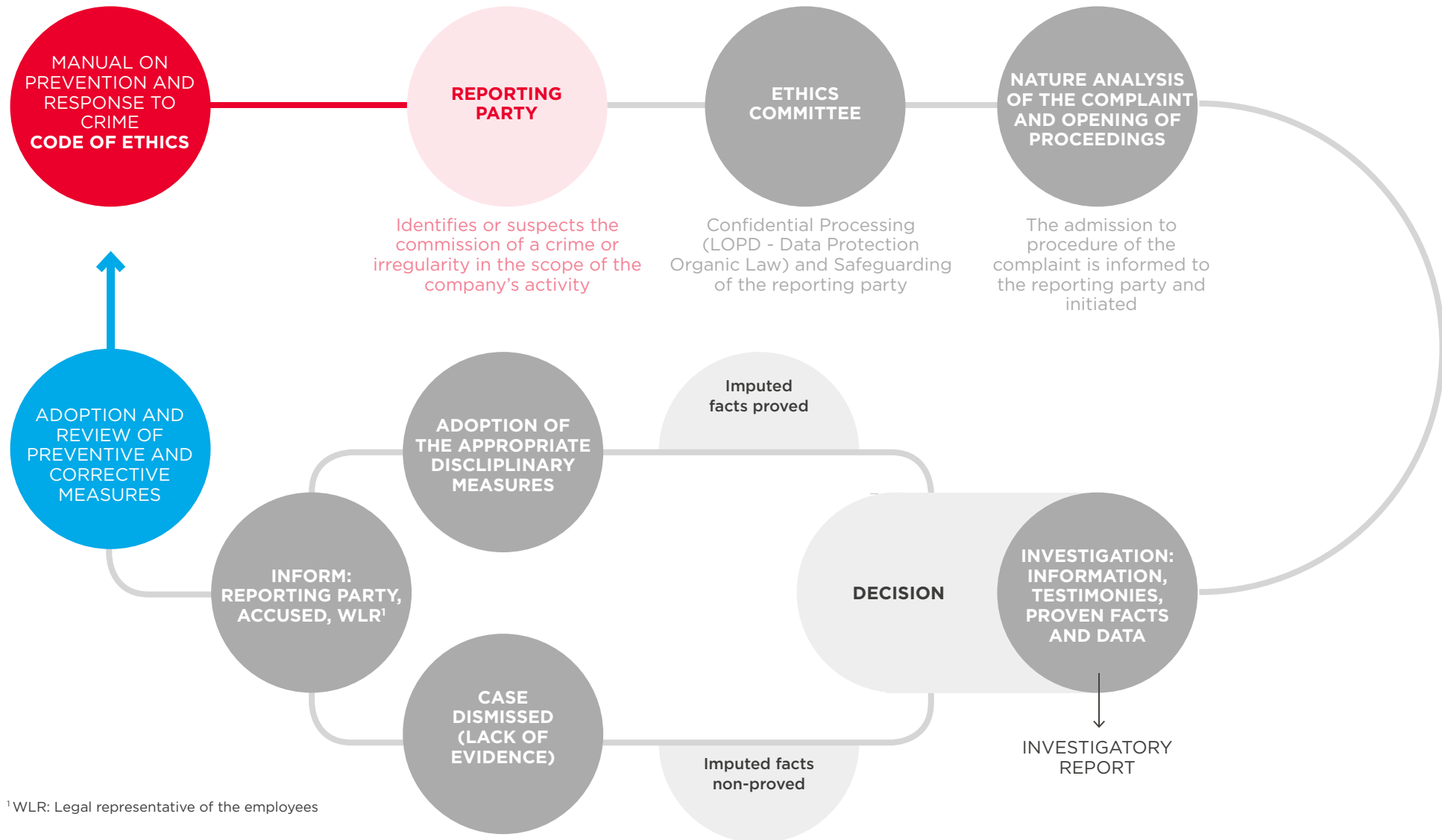


Project start-up meeting, Barcelona (Spain)



TRANSPARENCY, ETHICS AND INTEGRITY

COMSA CORPORACIÓN ETHICAL CHANNEL



¹WLR: Legal representative of the employees

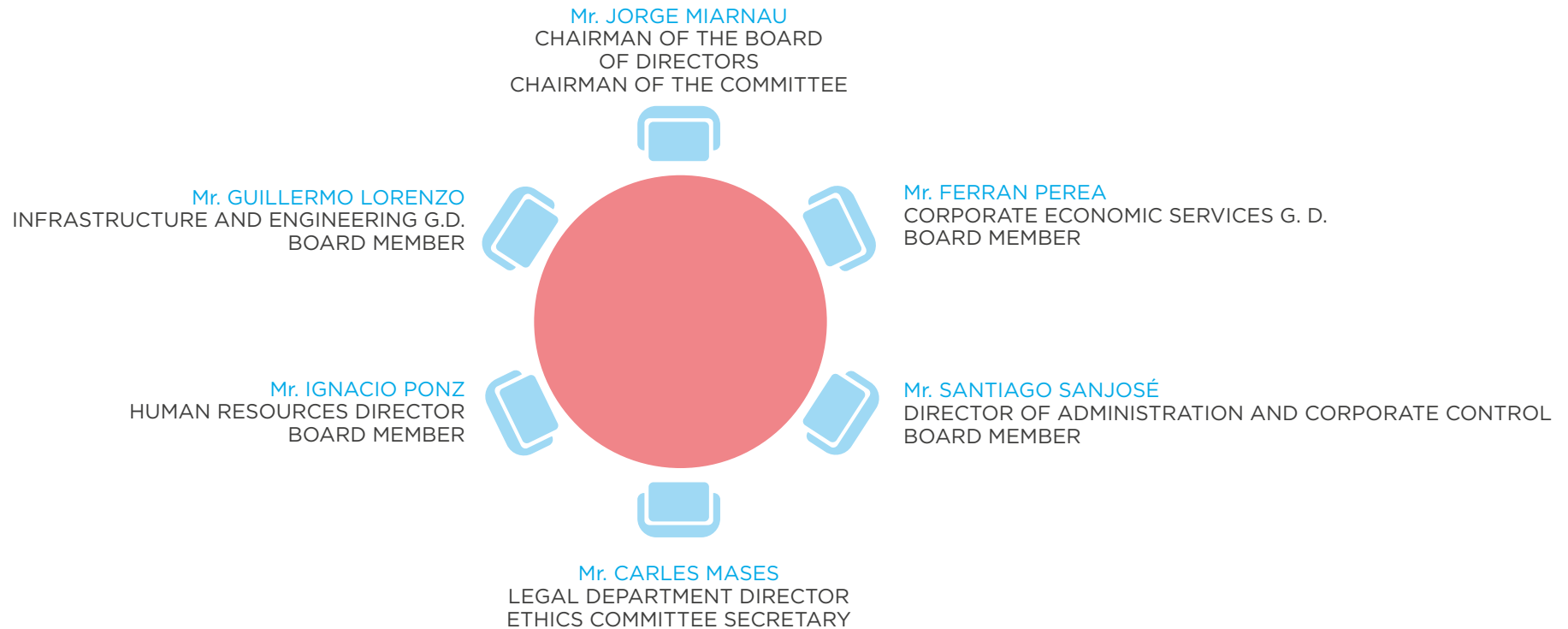


TRANSPARENCY, ETHICS AND INTEGRITY

The Code of Ethics includes, as a requirement for all employees, the obligation to report any behaviour observed that is contrary to the code of conduct derived from it. To this end, the Ethical Channel is designed in such a way as to guarantee confidentiality, fair treatment, and action under the principle of non-retaliation.

During 2018 there were no complaints submitted through the Ethical Channel.

The analysis, investigation, evaluation and resolution of behaviours not aligned with the Code of Ethics of COMSA Corporación is carried out by the Ethics Committee, composed by:





**ECONOMIC
SPHERE**

BUSINESS MODEL

COMSA Corporación contributes, with more than 125 years of experience, in the development of advanced infrastructures with a high technological component, with the aim of promoting economic growth and the territorial structuring of the countries in which it carries on its activity, with the vocation of offering solutions with high added value, under the highest quality standards, and with the principles of sustainability as fundamental factors in satisfying the needs and expectations of its clients.

In 2018, COMSA Corporación managed a staff of 8,399 employees that allowed to achieve a turnover of €1,101 M. In line with its strategic plan, 55% of this turnover corresponds to its international activity.

Thus, COMSA Corporación exports its century-old knowledge and experience in the construction and maintenance of infrastructures all over the world, and is currently present in Algeria, Argentina, Brazil, Cape Verde, Chile, Colombia, Croatia, Denmark, Spain, France, Latvia, Lithuania, Morocco, Mexico, Paraguay, Peru, Poland, Portugal, Romania, Sweden, Switzerland and Uruguay.

COMSA Corporación structures its activity by strengthening its main business area, Infrastructure and Industrial Engineering, and three other business areas, Concessions, Renewable Energy and Development and Technology, which contribute to the development of the former.

INFRASTRUCTURE AND INDUSTRIAL ENGINEERING

In this area the activities of Infrastructure, Industrial Engineering and Maintenance and Services are developed.

Infrastructure

COMSA specialises in turnkey railway projects covering the construction and maintenance of high-speed lines, trams, metropolitan and regional railways.

In the field of civil works, COMSA carries out integral works for roads, tunnels and bridges, singular buildings, as well as hydraulic, port and airport projects.

COMSA is the first Spanish unlisted construction group and has a solid international presence in markets such as Argentina, Brazil, Croatia, Colombia, Denmark, Mexico, Lithuania, Peru, Poland, Romania, Sweden and Uruguay.



BUSINESS MODEL

Industrial Engineering

COMSA Industrial has more than 50 years of experience in the development of engineering projects with a high technological component, focusing on the design and execution of facilities for the infrastructure, industrial and services sectors.

The company specialises in turnkey projects for electromechanical and industrial installations, ITS and tunnel control systems, electrical and railway systems, fire protection, installations for the biopharmaceutical sector, airports, telecommunications, as well as transport and electrical distribution.



Maintenance and Services

COMSA Service is a multidisciplinary service company in the field of maintenance and energy efficiency, specialising in the integral maintenance of buildings and installations, with the aim of guaranteeing their optimal functioning and extending their useful life, as well as in property management, technical assistance, energy optimisation and carbon neutrality.

COMSA Service is also an expert in the design, construction and conservation of ornamental fountains, including the decorative treatment of water, light, image, fire and sound.

With a vocation for integral service, COMSA Solutions was created in 2018, specializing in auxiliary cleaning, concierge and gardening services, among others, and COMSA Security, focused on the installation and maintenance of security systems.



High, medium and low voltage electrical works in Lima (Peru)



Improving energy efficiency and maintenance in buildings (Spain)

BUSINESS MODEL

RENEWABLE ENERGY

This area includes companies that manage renewable energy projects and assets, such as wind, photovoltaic, solar thermal, biomass, hydraulics and degasification.



CONCESSIONS

This activity groups together investments in concessioned transport and real estate infrastructure companies, offering additional business opportunities.



DEVELOPMENT AND TECHNOLOGY

The Development and Technology Area brings together the group's complementary activities, such as radio frequency broadcasting systems, water technology, the management, treatment and valuation of end-of-life tyres, and the consultancy and development of computer projects.



La Serena reservoir intake tower, Badajoz (Spain)

RISK AND OPPORTUNITY MANAGEMENT

Risk management at COMSA Corporación is based on the identification, evaluation and mitigation of risks as a key factor for the detection of new opportunities and the enhancement of our competitive advantages.

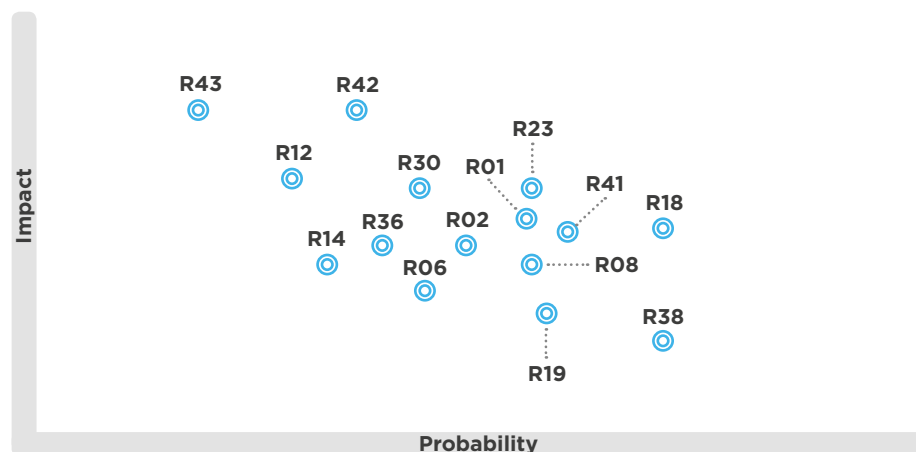
COMSA Corporación is exposed to risks that are directly related to the carrying on of its activity, whether they have to do with the geography and countries in which it operates, and/or with the socio-economic, environmental and legal environment, among others.

Thus, Infrastructure and Industrial Engineering projects have a high variability in terms of volume, which is largely determined by the type of activity, very diversified in the case of industrial engineering.

The geographical scope also determines the economic volume of COMSA Corporación's target projects, which, together with the adjusted margins in which the sector operates, make an adequate selection of projects and optimum risk management essential, both in the bidding phase and subsequently in the execution phase.

In 2017, COMSA Corporación carried out an identification and evaluation of the main risks, obtaining the following key risk map:

Map of Key Risks in COMSA Corporación



- | | |
|--|--|
| R01 Own damage in project execution | R19 Exchange rates |
| R02 Errors during construction | R23 Reputational risk |
| R06 Breach of contract with third parties | R30 Partner actions |
| R08 Health and Safety | R36 Reporting of project progress information |
| R12 Administrative civil and criminal liability | R38 Loss of talent |
| R14 Damage to the environment | R41 Contractual clauses |
| R18 Delays or insolvencies of clients | R42 Compliance with the Strategic Plan |
| | R43 Loss of ability to contract |

RISK AND OPPORTUNITY MANAGEMENT

During 2018 different steps were taken to eliminate or minimise these risks, among which the most noteworthy:

- Review of internal contracting and project planning procedures, with special emphasis on the identification and evaluation of operational risks and opportunities (R01, R02, R06, R18 and R41).
- Implementation of the HR Strategic Plan, *COMStruimos*, focused on retaining and attracting talent (R38).
- Extension to the international sphere of the specific Health and Safety objectives linked to the remuneration model (R08).
- Revision of the Code of Ethics of COMSA Corporación, in its adaptation to new requirements in international environments (R12, R23 and R30).
- Review of internal procedures for identification and assessment of environmental risks (R14).
- Implementation of COMSA Experience: a tool created to capture and exploit the capabilities of the group (R43).
- Integration of the operative function of the legal department in the operative layer of the Infrastructures and Industrial Engineering business (R42).

OBJECTIVE

During 2019 it is planned to delve deeper into these key risks, as well as to implement a system of periodic evaluation which, on the one hand, re-evaluates the identified risks, once mitigation and control measures have been implemented, thus assessing both the effectiveness of these controls and the persistence of residual risks, and, on the other hand, identifying emerging risks for their evaluation and determination of criticality.



Second phase of Line 4 of the Sao Paulo Metro (Brazil)

CORPORATE STRATEGY

COMSA Corporación's 2016-2020 Strategic Plan is structured around four fundamental objectives:

1. To focus the group's activity on the business areas of Infrastructure and Industrial Engineering, integrating the functions of support and assistance for production, with the aim of ensuring maximum organisational efficiency.

During 2018, the integration of cross-cutting areas and business areas linked to the core business continued and, additionally, the integration of the management of COMSA Corporación's railway machinery fleet was initiated.

2. Divestment of non-strategic assets that do not offer the possibility of generating synergies with Infrastructure or Industrial Engineering activities.

During 2018, divestments were made for a total amount of €180,7 M. As a result, the divestment targets for the period in which the Strategic Plan is in force had already been reached at 31 December 2018.



Refurbishment of the Algorta to Salto Grande and Piedra Sola to Algorta railway track (Uruguay)



Divestment of the industrial waste division of COMSA Medio Ambiente, Bolaños de Calatrava (Spain)

CORPORATE STRATEGY

3. Internationalization of the activities, using the specialties in which COMSA Corporación makes use of its competitive advantages, both technical and management, acting as a spearhead to capture new opportunities.

In 2018, projects such as the Odense tramway system (Denmark), an emblematic project for COMSA Corporación, were launched and the objectives established were met with the consolidation of activity in target markets, both in Latin America, with the awarding of new infrastructure and industrial engineering projects in Colombia and Mexico, as well as in European markets such as Sweden, for infrastructures, and France and Switzerland for industrial engineering.

All of the above means that, in 2018, COMSA Corporación's international activity exceeds 55% of the group's turnover. In addition, 57% of the business portfolio is now in international activities.

The objectives for 2019 focus on consolidating and expanding activity in Latin American markets, such as Peru, Colombia and Mexico, as well as in European markets, whether stable markets, such as Portugal, or new business opportunities, such as the Balkan Peninsula.

4. Promote Innovation as a differential factor, developing an open innovation model, based on Corporate Venturing.

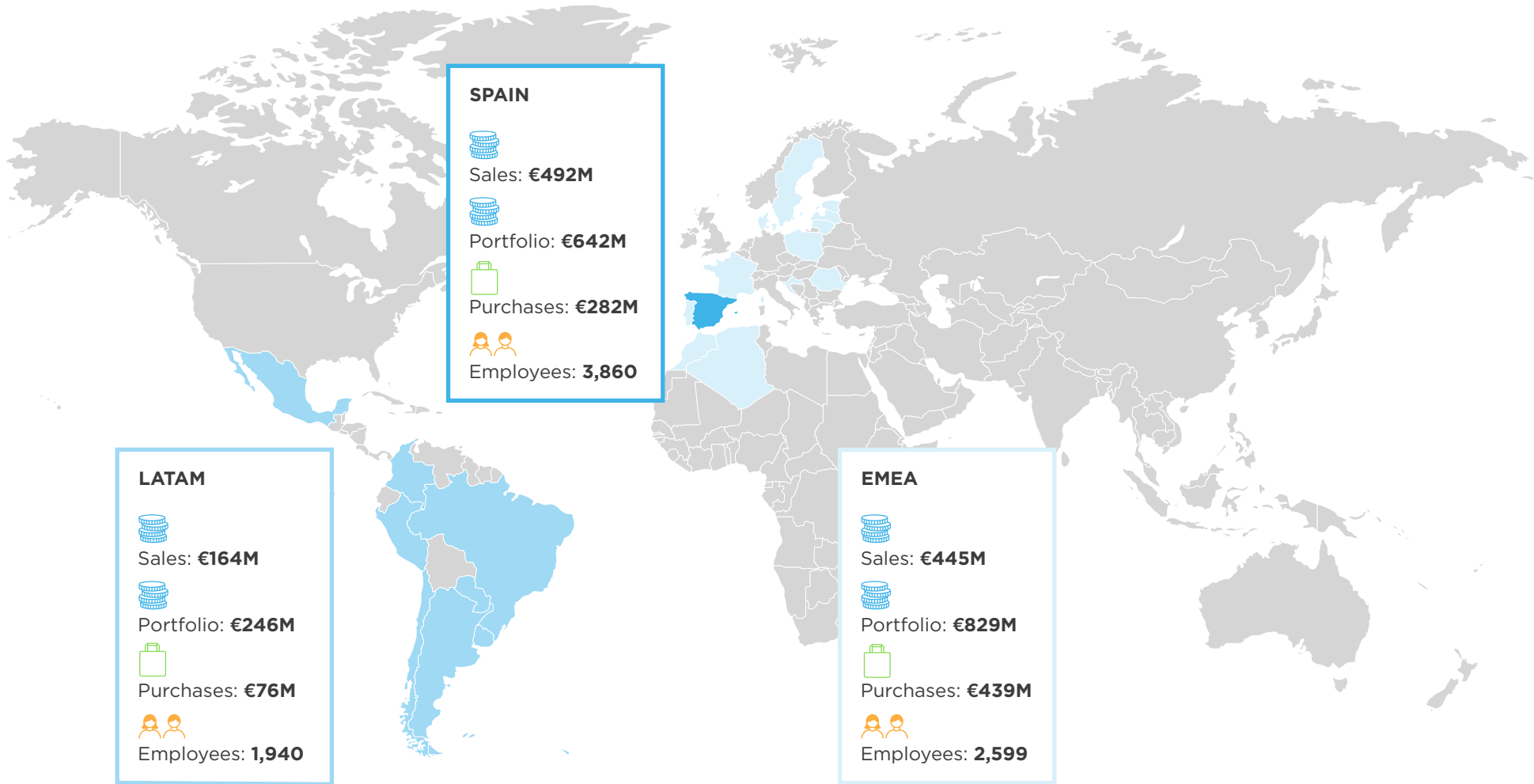
During 2018, COMSA Corporación consolidated its upward trend in the portfolio of innovation projects. Currently 33 initiatives are being developed, of which 29 were launched in 2018, and which represent a budget greater than 7 million euros.

In order to maintain the momentum for innovative initiatives, the **"InnCom Challenge"** programme was launched at the end of 2018 with the aim of supporting the development of companies that have solutions based on emerging technologies applied to the areas of digitalisation of connections and improvement of services related to energy efficiency in facilities management.





MAIN FIGURES IN 2018



VALUE CREATION

COMSA Corporación's strategy in Corporate Social Responsibility has been promoted, since its inception, by Senior Management. Based on the conviction that ethical and responsible action is essential for business sustainability, the company maintains a stable, sustainable and integrating commitment, in which the participation of all stakeholders in the value chain, the encouragement and promotion of the talent and creativity of its professionals, and the commitment to continuous improvement are its backbone.

Among the main initiatives that have been launched, COMSA Corporación consolidates measures of shared prosperity and promoting the common good. An example of this type of initiative are those carried out in the area of the personal and professional development of the company's staff, which include policies of conciliation and the right to disconnection, or the participation of clients in the development of products and services that cover both explicit needs, as well as expectations for the present and future.

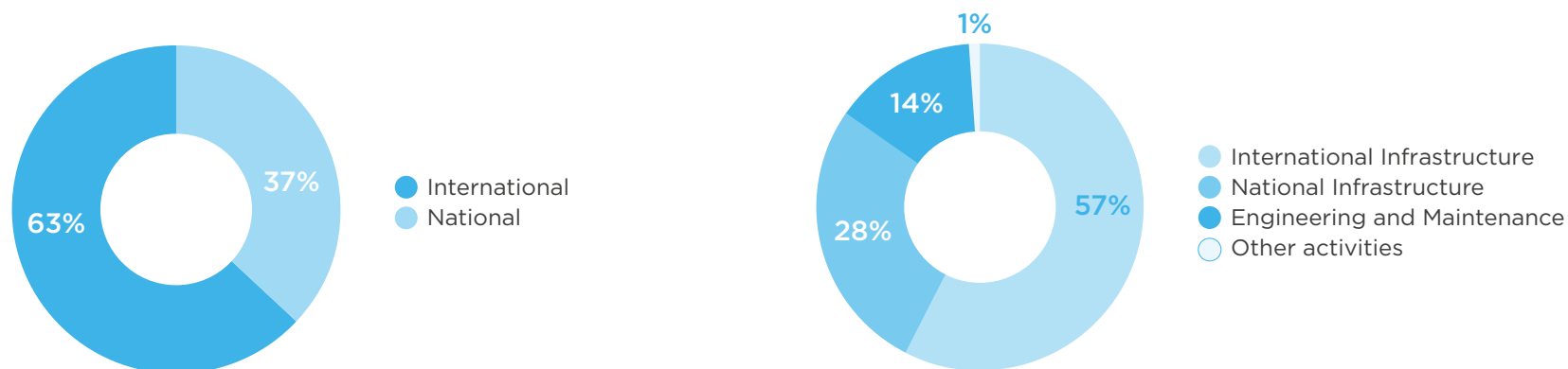
These same principles are the basis of the commercial relationship with suppliers and collaborators, in which trust and the drive of initiatives for common

benefit have the objective of producing stable and lasting relationships, creating value by means of the generation of quality and wealth employment in the countries in which COMSA Corporación carries on its activities.

In 2018, COMSA Corporación contributed to the productive growth of society, generating stable and quality employment, with an average workforce of 8,399 people and more than 16,000 collaborating companies, of which 96.5% are companies located in the countries where the activities are carried out. All in all, the activity generated by the company in 2018 has involved 14,754 direct jobs in its work centres, including its own employees and collaborators.

In addition to its own business activity, COMSA Corporación provides support for social causes in the territories in which it is present, whether it is providing support to cultural, sports, environmental or training institutions and the integration of groups at risk of exclusion, with a vision of contributing directly and indirectly to the achievement of the United Nations Sustainable Development Goals.

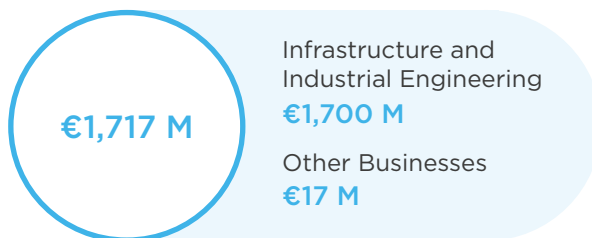
Portfolio distribution



VALUE CREATION

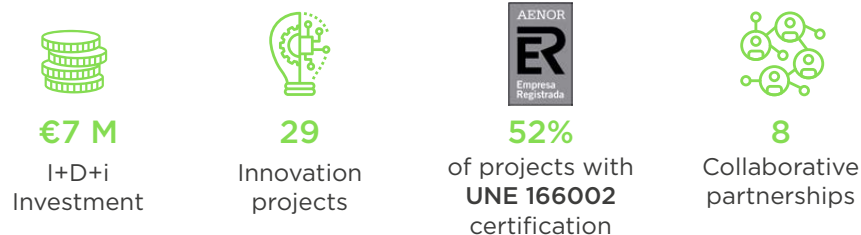
MAIN BUSINESS FIGURES IN 2018

SALES (€M)



PORTFOLIO (€M)

INNOVATION



ENVIRONMENTAL CONTRIBUTION



SOCIAL AREA





ENVIRONMENTAL SPHERE

ENVIRONMENTAL CONTRIBUTION

COMSA Corporación, aware of the impact its activities have on the environment, assumes its commitment to the communities in which it is present, working to minimize its impact on climate change, increase resource efficiency and develop more sustainable projects. All of this reduces the company's environmental footprint, with a responsible use of natural resources.

The environmental risks and opportunities associated with the activities of COMSA Corporación are identified through the analysis of the processes and operations developed in the different business areas. These are included in the company's General Risk Map.

The methodology for carrying out the environmental risk analysis has been developed at a general company level. For this study has been taken into account in the context of the organization, in addition to the needs and expectations of stakeholders.

In addition, for each project, specific risks are identified according to location, environmental and volumetric criteria, and are addressed through Environmental Monitoring Programmes.

Among the main risks identified by COMSA Corporación in its activities, we can highlight:

- Pollution of soil, aquifers, watercourses, waters and the seabed by accidental dumping of hazardous products and waste.
- Negative impacts on biodiversity.
- Noises and vibrations.
- Effects on the historical and artistic heritage.
- Uncontrolled dumping of waste.
- Atmospheric pollution by combustion gases from machinery and equipment and by particle emission.
- Fires.



Repair work on the 98 Bis Artificial Track Tunnel for the 200 Madrid-Barcelona Sants Line (Spain)

ENVIRONMENTAL CONTRIBUTION

COMSA Corporación's Environmental Policy establishes the company's action principles defining its commitment to:

- Promoting the circular economy
- Combatting climate change
- Reducing the carbon footprint
- Reducing water consumption
- Improving energy efficiency
- Reducing waste generation
- Respecting biodiversity

“82% of COMSA Corporación's sales are executed under the guidelines of the International standard ISO 14.001:2015”

The commitments acquired in the Policy are materialised in the Environmental Management System, certified on the basis of the ISO 14001:2015 standard, integrated with quality management and which guarantees, by means of periodic audits in the work centres, and the continuous improvement of their environmental behaviour.



**COMSA Corporación
Environmental Policy**

COMSA Corporación develops Environmental Vigilance programmes in all its projects, evaluating the impacts of the life cycle and implementing measures that minimize the environmental impact derived from the execution of the project, and that contribute an added value for the improvement of the environmental conditions of the zone.

In this sense, and as an additional measure, the company has taken out a voluntary environmental liability insurance that covers the risks described above.



Construction of the Reguerón Motorway, Murcia (Spain)

Environmental requirements are transmitted to COMSA Corporación's supply chain converting them into contractual requirements, which are systematically evaluated and serve as criteria in the selection of suppliers.



ENVIRONMENTAL CONTRIBUTION

CIRCULAR ECONOMY

COMSA Corporación considers the circular economy as one of the strategic axes of its activity, integrating the life cycle approach in its management.

The construction sector has a considerable environmental impact due to the amount of natural resources it mobilizes and the high percentage of waste it generates. This is why the company understands that the application of the circular economy is key to the transformation of the sector.

For this reason, COMSA Corporación is governed by the standards established in the **Circular Economy Pact of the Ministries of Agriculture and Fisheries, Food and Environment and Economy, Industry and Competitiveness** of the Government of Spain, which promote the reduction of the use of non-renewable non-turkey resources, the reuse of waste as raw materials, recycling, the incorporation of eco-design criteria, and public awareness, mainly.

COMSA Corporación specifically promotes the use of recycled and/or certified construction materials, offering the client this type of alternatives that are more respectful of the environment when selecting the materials to be used.

Additionally, as described below, **COMSA Corporación considers innovation as an internal ally** with which to make possible the true transition to the circular economy. Through innovation, the company promotes the development of new materials and construction techniques that contemplate the rational, efficient and responsible use of resources, applying these criteria in the design phases and under a vision of energy efficiency and improvement in the performance and durability of the infrastructures in which it carries out its activity.

NEOBALLAST PROJECT

Neoballast is presented as an innovative and sustainable solution to improve the economic and environmental performance of railways, bringing significant socio-economic benefits to all society.

With a recycled rubber coating from end-of-life tyres (NFU), Neoballast increases not only the service life of the ballast layer, but also the overall service life of the track.

It is capable of significantly reducing the extraction of aggregates for new ballast, through the improvement introduced in its durability by the rubber layer, as well as through the reuse of the clogged ballast to be recycled.



ENVIRONMENTAL CONTRIBUTION

WASTE GENERATION

In the area of management of the waste produced in COMSA Corporación projects, efforts have focused on minimising the waste generated, segregation at source and encouraging the recycling, reuse and recovery of this waste, as opposed to disposal through controlled deposit.

Non-hazardous waste generated

2,124,740 t

Hazardous waste generated

1,328 t

OBJECTIVES

- Establishment of a plan to dispose of single-use plastic disposables from all plants.
- Prioritization of circular economy approaches of waste valuation and recycling treatments as opposed to landfill.

“23,699 tonnes of end-of-life tyres valued for reuse in 2018”



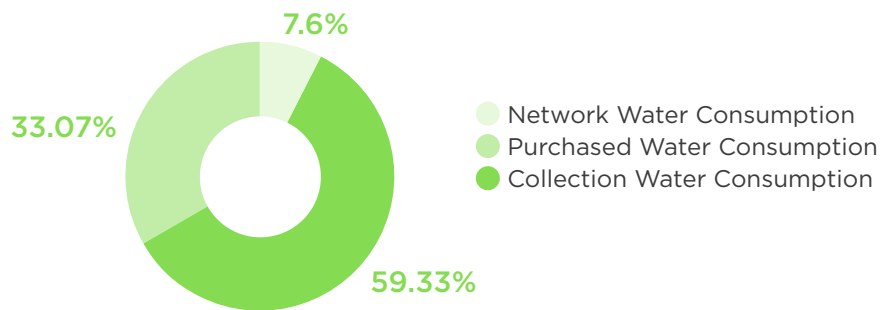
GMN subjects end-of-life tyres to a recovery process by separating their components and recycling the rubber for reuse. Maials Plant (Spain)

ENVIRONMENTAL CONTRIBUTION

WATER

The activities carried on by COMSA Corporación are associated with a notable consumption of water, especially in Infrastructure works, while in Industrial Engineering and Maintenance and Services activities it is not relevant.

Water consumption by source



COMSA Corporación's water consumption in 2018 was 515,446.30m³, mainly from collection.

Lines of action to reduce water consumption

- Implement adequate measurement systems (at the project, company and corporation level) that allow a detailed knowledge of the main sources of consumption.
- Optimise water consumption by collection during the execution of projects.
- Carry out awareness campaigns to achieve a more efficient and responsible use of sanitary water in offices by staff.

“Use of rainwater for the process of revaluation of end-of-life tyres”



GMN plant in Maials, Lleida (Spain)

Calculation of the Water Footprint in 2018



15.48 t CO2 eq



ENVIRONMENTAL CONTRIBUTION

CLIMATE CHANGE

COMSA Corporación aligns its business objectives with the protection of the environment, working to reduce greenhouse gas emissions and, in particular, those of CO₂ generated by its activity.

“Carbon Disclosure Project (CDP) Climate Change Management Report 2018”



COMSA Corporación, through its Renewable Energy Business Area, designs, builds and manages various energy infrastructures that contribute to guaranteeing universal access to sustainable energy.

Part of this activity focuses on renewable generation facilities (photovoltaic, wind, solar thermal, biomass, hydraulics and degasification).

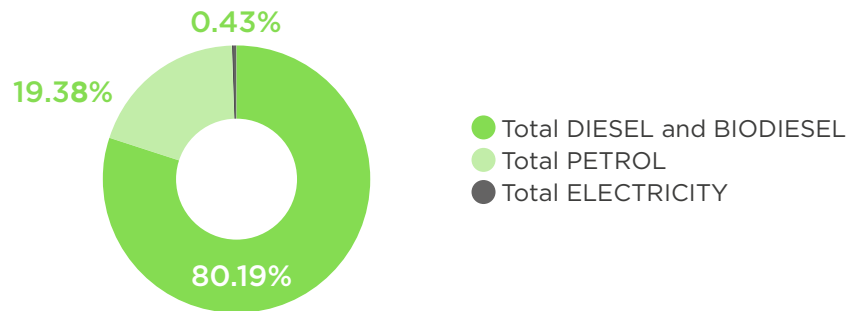
It also offers energy efficiency improvement services for its clients, contributing with its activity to a more efficient use of energy and promoting cleaner energy, in all environments.

Energy

Energy is one of the main resources used by the company and is a key aspect for the implementation of any process and activity.

“1.7 MWh generated in photovoltaic installations for self-consumption in 2018”

Distribution of the energy consumed in COMSA Corporación



The total energy consumption of COMSA Corporación during 2018 was 7,917,368.02 GJ.



Solar plant built by TFM on Salt Island, Cape Verde (Africa)

ENVIRONMENTAL CONTRIBUTION

Fuel

The activities with the highest energy consumption are the travel of the vehicle fleet, as well as the use of machinery and construction activities.

In order to minimise this consumption, the company develops vehicle rental and renting policies prioritising those with the lowest consumption and limited greenhouse gas emissions.

“80.5% of the fuel used at COMSA Corporación is diesel oil”



Renovation of the Monjes - Timbúes railway track section, in the province of Santa Fe (Argentina)

In 2018, COMSA Corporación began to incorporate vehicles for electricity and LPG consumption, with the aim of progressively replacing the most polluting means of transport, thus contributing to the reduction of greenhouse gas emissions.



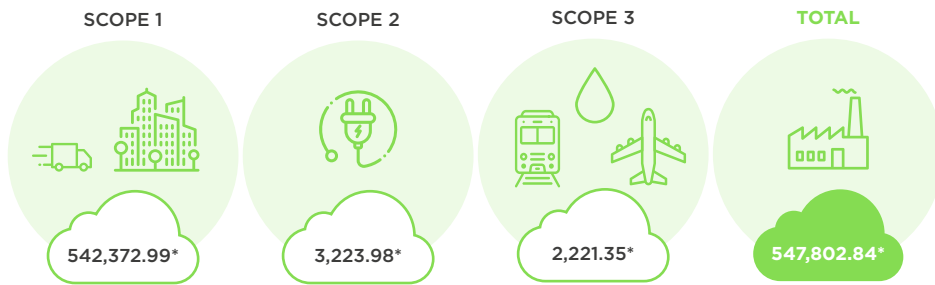
COMSA Service electric vehicle (Spain)

ENVIRONMENTAL CONTRIBUTION

Direct greenhouse gas emissions

In 2018, the company extended the calculation of greenhouse gas emissions corresponding to travel and travel of its workforce¹ and water² consumption so that scope 3 of these emissions can be reported.

Greenhouse gases (GHG)



*T CO₂ e/year

COMSA Corporación's strategy in the fight against climate change is based on the correct management of direct emissions and fossil fuels, prioritising the use of renewable resources, energy saving and efficiency and sustainable mobility.

“In order to reduce emissions related to staff travel and transport from home to work, the Sustainable Mobility Plan was implemented in 2018”

¹ Data for activities in Spain.

² Data for the full scope of the Report.

Measures to combat climate change:

- Reduction of direct emissions through the implementation of new production processes.
- Reduction of indirect emissions, promoting the use of renewable energies, promoting the efficient use of energy and fuels, and encouraging sustainable mobility.
- Employee training and awareness-raising for clients and sub-contractors.



OBJECTIVES

- 10% reduction in CO₂ emissions between 2018 and 2020.
- Increase by 5% the energy from renewable sources for fixed centres.
- Increase the fleet of less polluting vehicles.



ENVIRONMENTAL CONTRIBUTION

COMSA Corporación contributes to mitigating the effects of greenhouse gas emissions by implementing policies related to the application of sustainable construction standards.

BREEAM®



“Execution of 13 projects with Energy Certification in 2018”

These certifications provide a comprehensive framework for evaluating the efficiency of water, energy and material selection to ensure better indoor air quality and more comfortable and safe lighting and noise levels for users. As a result, these buildings have less use of resources and are less costly to maintain, showing a greater commitment to sustainability, and offer safer environments.

In addition, COMSA Corporación promotes sustainability practices, implements energy efficiency measures in the company’s buildings and offices and certifies its main corporate headquarters under the ISO 50001 energy management standard.

The energy audits of buildings can determine the actions to be carried out to optimize the performance of air conditioning (heating and cooling), improve thermal insulation, efficiency in lighting and automation of facilities associated with them.



BREEAM In Use Certification of the Numancia 1 office building in Barcelona (Spain)



ISO 50001 certification of the office building at Av. Roma, 25 in Barcelona (Spain)

ENVIRONMENTAL CONTRIBUTION

BIODIVERSITY

COMSA Corporación's activities affect the natural environment in which the works are carried out. Therefore, the company tries to minimize its impact on biodiversity, especially when they take place in protected areas or areas of high ecological value.

If significant impacts are identified during project execution, the project is modified as far as possible, adopting the best available techniques and the necessary measures to reduce or minimize the impact. In the event that it cannot be completely avoided or mitigated, compensatory measures are taken.



Placement of nest box in the project of conservation and reproduction of the European ratchet in the Empordà, Girona (Spain)



Protection of the Limonium Girardianum, a species of special interest, in the Garraf Tunnel work, Barcelona (Spain)

ENVIRONMENTAL CONTRIBUTION

The implementation of measures for the conservation of flora and fauna is one of the environmental principles applied in their planning. These measures are based on physical protection, transplantation or transfer, as well as respect for the life cycles of the plant and animal species concerned.



Donation of white cedars in Puebla (Mexico)



Recovery of autochthonous fish affected by the construction of the Reguerón motorway in Murcia (Spain)



ENVIRONMENTAL CONTRIBUTION

NOISE

COMSA Corporación is aware of the acoustic impact caused by the activities it carries out, especially by the use of heavy machinery in its projects.

Some of the transport infrastructure works must be carried out at night to minimise the impact on the mobility of the population, especially in densely populated urban areas, meaning that noise can have a significant impact.

This is why one of the company's objectives is to make the management of the works compatible with respect for the environment in which they are carried out, in order to ensure sustainable coexistence with local communities and native fauna.



Installation of acoustic screens during the extension of the FGC underground works in Sabadell (Spain)

Measures to combat noise:

- Noise monitoring systems in urban areas or areas of special interest.
- Replacement of machinery with the highest noise emission.
- Installation of acoustic screens in the areas with the highest emissions.
- Protection of workers with specific equipment.

ENVIRONMENTAL COMPLIANCE

COMSA Corporación has a Procedure for the Identification and Evaluation of Legal Requirements in the projects it executes as well as in the fixed centres.

COMSA Corporación's effort and commitment to go beyond the legal requirements regarding environmental protection led to a single environmental incident in 2018.



INNOVATION MANAGEMENT

INNOVATION IN COMSA CORPORACIÓN

Since its foundation more than 125 years ago, COMSA Corporación has considered innovation as a differential factor of maximum added value for its clients, integrating it as one of the fundamental pillars of its business culture and corporate values.

For this reason, COMSA Corporación continues to develop advanced technological projects aimed at obtaining value, promoting a culture of innovation and the creation of competitive advantages and fruitful collaborations with clients and other agents in the scientific ecosystem.

In order to achieve excellence in each of the phases of an innovative project, COMSA Corporación is governed by the principles established in AENOR's UNE 166002 standard, from which certification was obtained in 2007.

Thanks to this strategic approach, COMSA Corporación is able to incorporate all the Business Units to the innovative process, which assures a successful exploitation of results, both internally and in its direct commercialization.

“Currently COMSA Corporación has 33 ongoing innovation projects.

In 2018, R&D activities and projects worth more than 7 million euros have been carried out”

MOST NOTABLE PROJECTS IN PROGRESS

	National	European
Railway	Resiltrack, Desvios	Neoballast, S-Code, IN2RAIL
Civil Works	PAVIRE, Albepav, SINATU	GEOFIT
Building and Smart Buildings	Refer, BIM table, INSPECTOR	Geotech, Life BIPV, DRIVE, Hybuild, BIPVBOOST
Air navigation and communications	Inma	5G-PICTURE
ORP	BIMYOTICS	
Digitalisation	BIMTable	SPHERE

In addition, the company collaborates with sectorial and other more specialized entities to promote the development of the sector:

Area of construction:

- Association of Infrastructure Construction and Concession Companies (SEOPAN)
- Spanish Construction Technology Platform (PTEC)

Railway sector:

- Spanish Railway Association (MAFEX)
- Spanish Railway Technology Platform (PTFE)

Energy efficiency area:

- Catalonia Energy Efficiency Cluster (CEEC)
- Agency for Enterprise Competitiveness, RIS3CAT energy project
- Energy Efficient Buildings (E2B)
- KIC Innoenergy Iberia.

INNOVATION MANAGEMENT

INNOVATION IN INFRASTRUCTURE MAINTENANCE

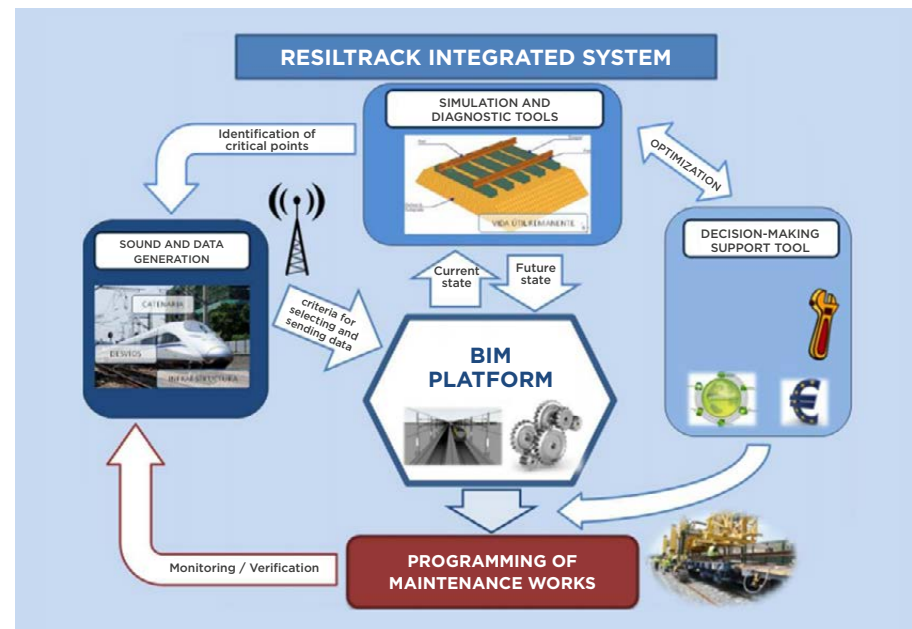
The growing concern about the impact of the consumption of construction materials on the environment translates into the need to extend the useful life of infrastructures and, consequently, into a firm commitment to intelligent and efficient maintenance that renders unnecessary the overexploitation of natural resources that results from their insufficient durability.

On the other hand, in addition to contributing to sustainability by avoiding an excessive proliferation of new buildings, it is also essential to mitigate the effects of climate change. From this perspective, COMSA Corporación contributes to providing resilience to infrastructures as one of the main objectives of its portfolio of Innovation projects dedicated to predictive maintenance.

In 2018, the Public Administration supported two initiatives related to predictive maintenance based on sensorisation and advanced infrastructure modelling.

Firstly, the Centre for Industrial Technological Development, an organisation attached to the Ministry of Science, Innovation and Universities, through the CIEN Strategic Projects call, granted aid to a consortium led by COMSA Corporación to improve the resilience to climate change of railway infrastructures (**RESILTRACK**).

The objective of **RESILTRACK** is the design of a system that allows us to know the state of the railway infrastructure and its effect on adverse client phenomena in real time, as well as to foresee its behaviour in order to act where it is necessary, thus obtaining railway and road infrastructures that are resilient to the effects of climate change.



Conceptual representation of the RESILTRACK System and its fundamental blocks

On the other hand, the use of digitalisation as the fundamental pillar in COMSA Corporación's strategy to develop advanced methodologies for infrastructure maintenance has received the support of the Ministry of Economy, Industry and Competitiveness through the call for CHALLENGES-Collaboration by means of the granting of a loan for the execution of the **PAVIRE** project. Within the framework of the **PAVIRE** project, developed jointly with the International Centre for Numerical Methods in Engineering, a Computer Communication Platform will analyse the data generated by users through their mobile phones while driving for the detection of deteriorated areas on the pavement and the characterisation of different driving patterns in order to reduce fuel consumption, CO2 emissions and accidents at the wheel.

INNOVATION MANAGEMENT

NEW MATERIALS

The development of new sustainable products is another of the cornerstones of COMSA Corporación's commitment to the environment. These products must meet a dual requirement: to use recycled materials and to provide advanced performance.

From a circular economy perspective, the **ALBEPAV** project, financed by the Centre for Industrial Technological Development, focuses on the use of recycled glass aggregate to create a sustainable deficit with greater thermal inertia and high durability. Thanks to the use of tempered mixtures, **ALBEP-AV** asphalt minimises energy consumption in its manufacture, as well as the risks for operators in the work, as it reduces their exposure to hydrocarbon vapours and the risks inherent in high temperatures.

Also in the field of the circular economy, the **NEOBALLAST** project, funded by the European Union's Fast Track to Innovation Programme, has entered the industrial production phase of a new type of ballast that uses recycled rubber to exponentially increase the durability and noise and vibration insulation properties of the ballast, thereby reducing the environmental impact on quarries and mitigating the impact on the health of the population living near urban railway tracks.

The first phase of **NEOBALLAST** production will be used to carry out a full-scale test on a railway track in service thanks to the collaboration of the Railway Infrastructure Administrator (Adif).



Test section with Albepav sustainable asphalt, Balaguer (Spain)



Application of Neoballast in a test section, Caldes de Malavella (Spain)

INNOVATION MANAGEMENT

INNOVATION AND ENERGY EFFICIENCY

Within the framework of the Community RIS3CAT of Energy financed by the *Generalitat de Catalunya* (Catalonia Autonomous Community Government) through ACCIÓ, **COMSA Corporación leads the REFER project** for the energy management of restored and intelligent buildings with photovoltaic generation, electrical storage and optimisation of the air conditioning system.

The **REFER** project has installed a disused battery from an electric vehicle in the Tirant lo Blanc library in Montgat, Barcelona, with the aim of storing the surplus energy generated during periods of low consumption and using it at peak hours. In this way, the technology developed allows a second useful life to be given to electric car batteries through their use in the efficient energy management of buildings.



The REFER project applied to the Tirant lo Blanc library in Montgat (Spain)

Another of COMSA Corporación's strategic bets in the field of energy efficiency focuses on the integration of geothermal energy generation systems in the building. As part of this strategy, COMSA Corporación participates in the **GEOFIT** project, financed by the European Union Horizon 2020 Programme, for the incorporation of geothermal solutions to the refurbishment of buildings.

As part of the GEOFIT project, new components have been developed, including a novel hybrid heat pump and a set of advanced management and modelling tools and technologies such as the GEOBIM platform.



Laboratory tests on heat exchangers for GEOFIT, Vienna (Austria)
Photo courtesy of AIT Austrian Institute of Technology GmbH

INNOVATION MANAGEMENT

CORPORATE VENTURING

COMSA Corporación has participated in the third edition of the **CleanTech Camp** programme, an initiative to support business ideas related to the sector of sustainability, energy efficiency and renewable energies arising in Spain and Portugal.



CleanTech Camp Programme Banner

With the aim of promoting technology transfer and entrepreneurship in the field of clean energy, the programme seeks to attract entrepreneurs, researchers and professionals with proposals in some of the key themes in the field of clean energy: Internet of Things, Artificial Intelligence, energy efficiency, Smart Cities, renewable energies, sustainable mobility, Smart Grids and, finally, cybersecurity and blockchain.

COMSA reinforces its commitment to digital transformation and open innovation through a collaboration agreement with The Collider programme of the Mobile World Capital Foundation.



Within the framework of the aforementioned agreement, the Smart Tower start-up has been set up for the marketing of remote monitoring services for electric towers and other infrastructures.



Smart Tower remote monitoring device, Terrassa (Spain)



INNOVATION MANAGEMENT

DIGITILISATION

COMSA Corporación presented during 2018 the programme “**The InnCom Challenge**”, an initiative that aims to support the development of companies that have solutions based on emerging technologies applied to the areas of digitilisation of construction and maintenance of infrastructure, or specialised in improving services related to energy efficiency in the management of facilities.

The details of the 2018 call can be consulted on the website inncom.io.



“Nominations have been submitted from more than 30 countries, with special participation of start-ups from the United States, Israel, Germany, the United Kingdom and Spain”

The finalists will have the support of the business group in the process of validation, scaling and marketing of the product for dissemination nationally and internationally, and in contact with potential investors, among others.



INNOVATION MANAGEMENT

BIM

Faced with the growing expansion in the BIM methodology sector, COMSA Corporación decided to innovate in the design of projects by integrating the use of BIM. To this end, the company has created its own BIM Unit, which is integrated into the Technical and Innovation Area, and which is made up of various professional profiles to cover all the company's business areas.

The BIM methodology has been implemented by COMSA Corporación in several projects, such as the execution of a pharmaceutical plant for Laboratorios Catedral in Paraguay and the construction of a 5-star hotel in Barcelona, or the Wineries of Grupo Perelada, among others.

“18 Projects executed in 2018 with BIM methodology”



Work of the Administrative Campus of the *Generalitat*, Barcelona (Spain)

The use of BIM technology makes it possible to “**Build before building**”, that is to say, to build virtually before executing the work.

On the other hand, COMSA Corporación does not limit itself to using BIM software and has several projects related to the development of its own technology. In this way, the advantages of the BIM method are transferred to the field in order to optimise project management, facilitate decision-making through changing scenarios and reduce costs.

Based on the aforementioned commitment to innovation in the BIM environment, COMSA Corporación has designed BIMTable, a tool that allows projects to be followed in situ in a collaborative environment, and which was presented at the BIMExpo fair in Madrid, generating great expectation.



Applications of the BIMTable in the development of projects



**SOCIAL
SPHERE**



COMSA CORPORACIÓN TEAM

Human capital is the greatest asset for the creation of value of COMSA Corporation, and is the guarantee of success in all the projects in which it participates.

Under this principle, the company offers inclusive, healthy and non-discriminatory working environments, in which everyone can grow and develop their own professional project, and in which talent, professionalism and performance are the success factors.

In the area of people management, COMSA Corporation's risk map identifies and evaluates as significant risks the materialisation of accidents at work and the loss of talent.

In COMSA Corporation, both risks have been treated as a priority throughout its history, establishing the necessary mechanisms to analyse, establish and implement specific policies and procedures with the objective of creating interdependent teams as a model of leadership.

COMSA Corporation's Human Resources Policy reflects this commitment to employees and, in 2018, the company launched the *COMStruimos* Scheme, a Strategic Human Resources Plan which, with a three-year horizon, incorporates lines of integral management of human capital.

COMSTRUIMOS SCHEME

LINES OF ACTION:

1. Review of the basic competences map.
2. Review of remuneration policy, based on internal equity and external competitiveness.
3. Standardisation of the performance evaluation model.
4. Updating the company's talent map.
5. Drafting of succession plans for strategic positions.

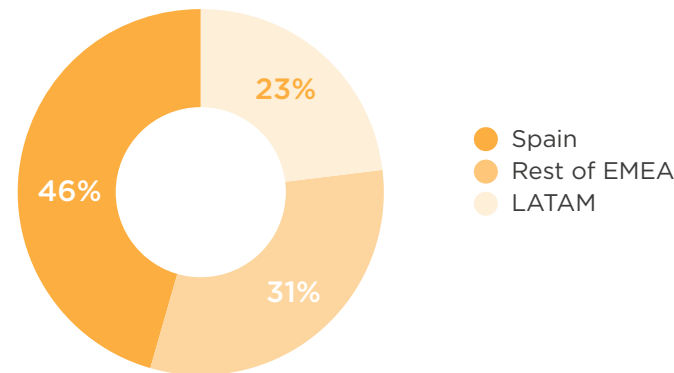
¹ Senior positions include Directors, Delegates, Managers, Area Heads and Department Heads.

HUMAN CAPITAL

The COMSA Corporation team is cohesive around the values and principles of its business culture. Thus, based on the company's mission and vision, it articulates the shared value of offering comprehensive infrastructure services, industrial engineering, maintenance, environment and technology, always under the principles of professionalism, quality and innovation, driving international growth, thus contributing to the economic, technological and social progress of the countries where it operates.

This cross-cutting and global vision means that COMSA Corporation needs a diverse team, made up of differentiated professional profiles that generate wealth and prosperity in all the geographies in which the company operates. A sign of this commitment is the fact that 95.8% of senior positions¹ are covered by local staff.

Number of employees by geographical area





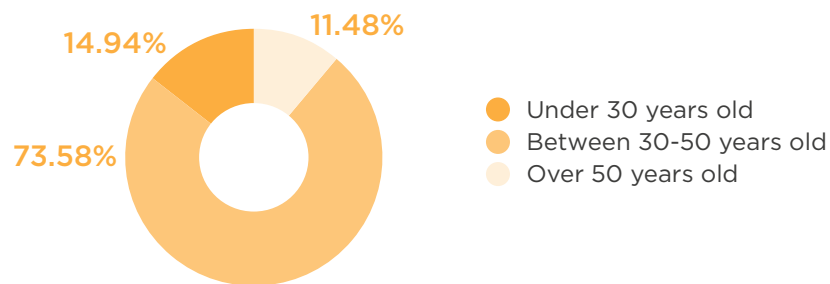
COMSA CORPORACIÓN TEAM

FIGURES BY GENDER

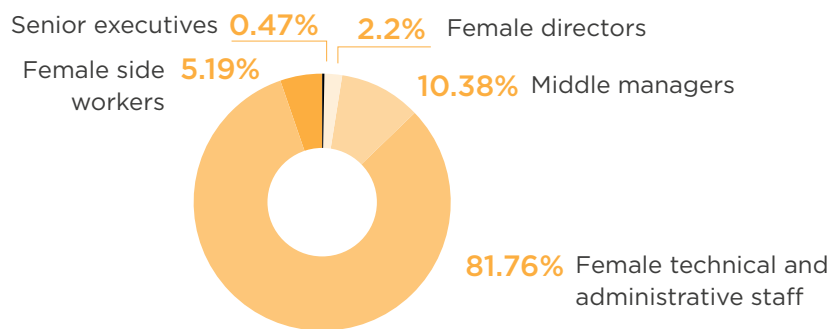


WOMEN (13%)

Distribution by age

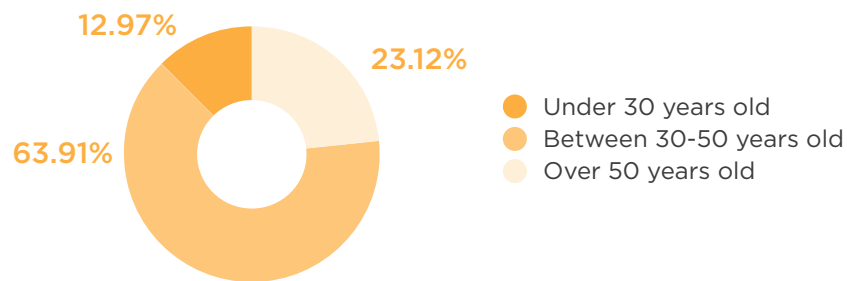


Distribution by category

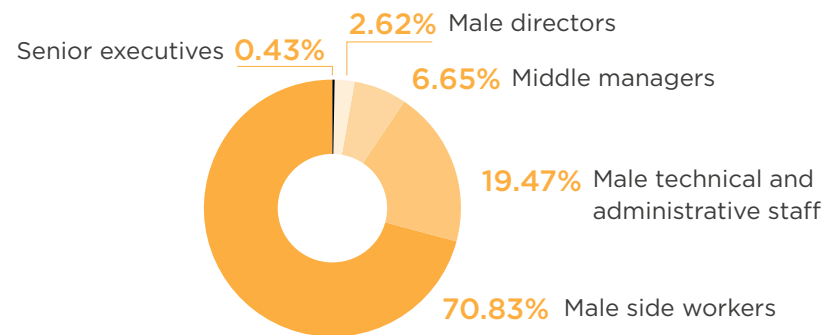


MEN (87%)

Distribution by age



Distribution by category





COMSA CORPORACIÓN TEAM

FIGURES BY GENDER

Some of the characteristics of the construction and industrial engineering sectors mean that people management indicators are, at least partially, a reflection of these characteristics. One of them is the temporality of the projects and their relocation, understood as a productive model in a discontinuous geographical environment in the short term, which significantly conditions the form of job creation, both in terms of hiring modality, and in its duration. Despite this, COMSA Corporación is committed to the creation of quality employment that contributes to the development of the communities in which it operates. In 2018, 61% of contracts were open-ended, with 95% of them full-time.

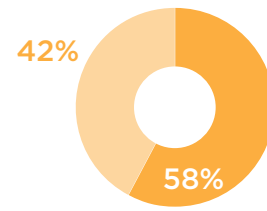
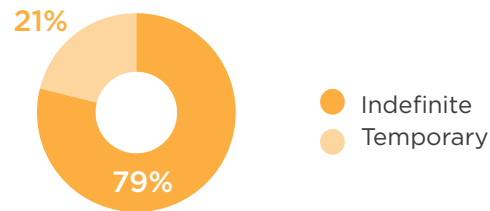


WOMEN

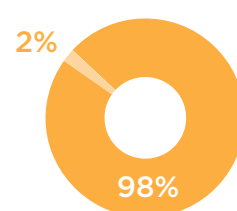
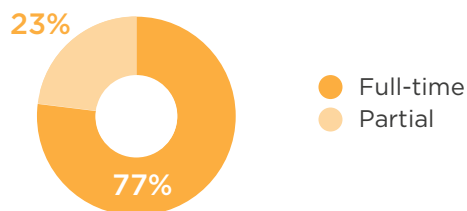


MEN

Type of contract



Full-time or part-time



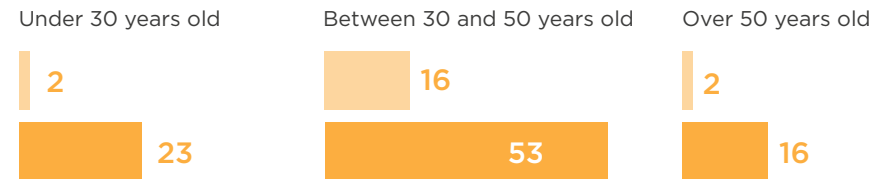
TURNOVER

The temporality of the activities in a certain geography also conditions the occasional need to adjust the contracts, with the objective of adapting to the productive and organisational reality of the different businesses and projects. Thus, the turnover rate is conditioned by the departures produced by the termination of contracts, which represent 54% of the total departures in 2018.

In the same way, the termination of contracts for non-voluntary reasons of the workers has been a consequence of specific needs of adjustments to the reality of the productive and organisational conditions of the different companies of the group.

Number of dismissals

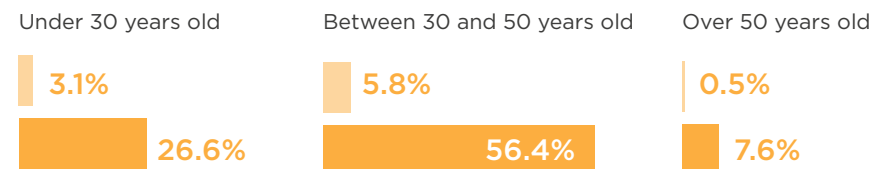
● women ● men



In 2018, the rate of voluntary departure from the workforce¹ was 11.5%, distributed according to sex and age, as follows:

Percentage of voluntary departures

● women ● men



¹ Includes retirements



COMSA CORPORACIÓN TEAM

REMUNERATION

COMSA Corporación's commitment to transparency and equality is reflected in the annual publication of the remuneration of the Board of Directors in the corresponding management report. The amount accrued in 2018 by the current members of the Board of Directors in respect of all remuneration items (salaries, gratuities, per diems and remuneration in kind) amounted to 371 thousand euros.

Remuneration at COMSA Corporación is established on the basis of the salary structure established in the applicable collective bargaining agreements, which are generally composed of base salary, seniority and additional bonuses related to specific conditions, quality and/or quantity of work.

COMSA Corporación's remuneration model is made up of:

- **Fixed salary:** Corresponding to the professional category, the collective agreement and the country.
- **Variable remuneration:** Depending on the employee's responsibilities, in addition to the fixed salary, the employee receives a variable that is made up of three parts:
 - Achievement of the group's general objectives.
 - Achievement of the objectives of the unit, company or country.
 - Individual worker performance.
- **Flexible remuneration:** The company offers employees the possibility of voluntarily deferring their remuneration package, substituting part of it with products or services, in such a way that the employee has a remuneration optimised to their needs. Through this option they can pay for transport, dietary, medical or life insurance, as well as nurseries and training programmes.

In 2018, 83% of employees in Spain¹ had access to this type of remuneration and their performance was evaluated and transmitted formally.

As indicated above, COMSA Corporación is committed to the creation of quality employment that contributes to the development of the communities in which it operates. In this sense, the ratio between the initial salary received by COMSA Corporación employees and the local minimum salary is 1.28 in countries where this ratio is comparable².

The wage gap data included in the GRI table at the end of this document refers to the reality in Spain. At the international level, it was not possible to carry out robust calculations derived from remuneration concepts due to the lack of homogeneity of jobs and the particularities of the information available, both quantitatively and qualitatively, in terms of compensation. The main difficulties for its analysis lie in the great diversity of application agreements, working conditions inherited by compulsory subrogations in certain types of contracts, seniority, and other factors. The same factors logically mean that the calculation of the wage gap also lacks objective representativeness.

For 2019, the company has planned reporting and control mechanisms that allow analysis of these people management indicators.

¹ Employees from the administrative category.

² The countries are Spain, Argentina, Brazil, France, Mexico, Peru, Portugal and Colombia.

COMSA CORPORACIÓN TEAM

TRAINING

As has been pointed out in the *COMStruimos* Strategic Scheme, talent within the company is an indisputable value, and it is not only necessary to identify it in the selection of people, but once these people join the company it is essential to promote the growth of this talent through training both retraining and new skills. This aspect, in addition to attracting new candidates, is one of the most relevant points for retaining talent within the business.



Course on good environmental practices in offices and energy efficiency in COMSA Corporación's e-Learning platform.

In this sense, in 2018, a total of 89,185 hours of training were given, both in person and through the new online platform or "e-learning", through which it was possible to streamline the organisation of training.

This new tool, with its intuitive and visual operation, not only enabled an increase in the number of training courses per employee, but also, thanks to the flexibility provided by distance training, the worker can organise himself freely to carry it out when it least interferes with his work tasks and personal life, as happens in some face-to-face courses in which the employee has to move from his usual workplace.

TRAINING 2018

Investment in Training

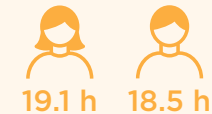
575,619€

Total hours of training

(face-to-face and online training)

89,185 h

Average hours of training



The contents of the training carried out in 2018 were mainly specific to the knowledge and skills specific to each job, training in occupational risk prevention and safety, languages, certifications and their requirements, personnel management and updates of regulations and procedures.



COMSA CORPORACIÓN TEAM

EQUALITY

As established in the company's Code of Ethics, equal opportunities, non-discrimination, decent work and respect for human rights are fundamental criteria for promotion and professional development at COMSA Corporación.

These criteria are shared through the specific training and information processes that are systematically carried out on the staff.

In spite of this, due to the great link with the physical force that has historically been present in the sector, gender distribution in the majority of professional categories is strongly masculinised, and it is that the incorporation of women into the construction and engineering sector has taken place, above all, in recent years. In order to encourage a progressive increase in the number of women in the company, various measures included in the **Equality Plan** have been implemented. Among them, the one that indicates that, in the face of equal conditions among candidates, priority should be given to the recruitment or promotion of women.

At COMSA Corporación, our commitment to equal opportunities goes beyond the workplace. The company understands that the organisation of employment must favour this equality on a personal and family level, improving, in addition, the well-being of the workforce.

Within this framework, the company has established policies and actions that favour work-life balance, flexibility and disconnection, in the context of the different realities and organisational needs of the different work centres. Examples of this type of measures adopted in Spain are:

- Flexible working hours in its offices.
- Shorter working days on Fridays.
- Shorter working hours in the summer period.
- Flexible choice for annual vacation periods, including after the end of the calendar year.

In this regard, a total of 176 persons, 80.6% of whom were men, took paternity or maternity leave.

As for the right to disconnect, COMSA Corporación recognises it as a key factor in the respect of personal and family life. It is for this reason that the company is in the process of drawing up a Disconnection Policy, the main objective of which is not to connect digitally outside working hours, except in positions whose obligations or responsibilities cannot be postponed due to the position held.

Some of the lines of work to favour this digital disconnection are aimed at the use of collaborative work environments, in which the sharing of information between the different members of a work team does not make it essential to interconnect between them.





COMSA CORPORACIÓN TEAM

INCLUSION AND DIVERSITY

COMSA Corporación promotes the inclusion and diversity of its staff in the conviction that individual talent and the different ways of interpreting and understanding each of the people who make up its team enrich the actions they carry out on a daily basis, and have a positive impact both on their professional environment, on the team and their clients, and on the personal sphere.

In addition to complying with the guiding principles of the Code of Ethics with regard to non-discrimination and equal opportunities, the company is firmly committed to the incorporation of local personnel in the projects it carries out, thus contributing to the economic development of the communities in which it operates. In 2018, local staff accounted for 84% of the total COMSA Corporación.

In addition, the company has implemented policies and procedures for the incorporation of people with difficulties in accessing employment, materialised in different projects. One of these initiatives is the treatment of women at risk of exclusion for the BR-101 Duplication Project in Alagoas, Brazil.

With the commitment of being an increasingly diverse and socially responsible company, promoting a respectful working environment, COMSA Corporación has planned for the next few months to carry out training in inclusive leadership programmes for executives and middle managers, as well as specific courses for selection technicians in relation to inclusive recruitment processes.

On the other hand, COMSA Corporación has a Protocol for the Prevention of Psychological, Sexual and Sex-Based Harassment, the objective of which is to prevent and, where appropriate, punish all those conducts that threaten the dignity, equality and moral and sexual freedom of all the company's workers. This protocol establishes the complaint channels, guaranteeing confidentiality throughout the process. During 2018, no complaints of harassment were filed in any form.





COMSA CORPORACIÓN TEAM

HEALTH AND SAFETY

Since its inception, COMSA Corporación, aware that people have the most important value and the greatest guarantee of the future for the company, has maintained a continuous commitment to offering optimum health and safety conditions to all its workers and collaborators. To this end, the company has developed an Occupational Health and Safety Management System that goes beyond legal and regulatory requirements and includes strategic precepts aligned with the principles of decent work of the International Labour Organisation, and with SDG 3, Good Health and Well-being, of the Sustainable Development Goals promoted by the United Nations.

The lines of work established in COMSA Corporación have as a priority objective to make possible its vision of a scenario of zero damages, promoting a culture in which prevention is prioritised over correction, and which is based on five inalienable principles that make up the Health and Safety Policy.



COMSA Corporación Health and Safety Policy

Health and Safety Policy

1. Planning and innovation, avoiding routine and false trust, and innovating to eliminate or reduce risks.
2. Coordination and participation of all staff.
3. Rigour and professional competence.
4. Availability of adequate resources for each activity.
5. Systematic review of all processes as a basic tool for continuous improvement.



Planificación de trabajos en Lima (Perú)



COMSA CORPORACIÓN TEAM

Prevention planning

Planning is the fundamental axis on which COMSA Corporación's Health and Safety management revolves. The company has technical specialists in this field, who make up its preventive organisation, and who rely on specialised services, such as Occupational Medicine, to provide global coverage and vision of the occupational risks to which the productive and cross-cutting processes of the organisation are subject.

This global vision makes it possible to carry out an identification of the dangers, both at a general level for recurrent activities, i.e. in the workplace, and at the particular level of each project.

The identified risks are evaluated by competent technicians belonging to the preventive organisation, based on verified and documented procedures, which use criteria of probability of occurrence and severity of damages in case of materialisation.

As a result, the company is in a position to plan and implement prevention measures at source that eliminate the risks or, if such elimination is not feasible, reduce them to a level that makes the degree of risk moderate. COMSA Corporación's Health and Safety Policy does not allow, in any case, processes involving high or very high levels of risk.



Track renovation in Maçanet de la Selva-Caldes de Malavella (Spain)

Implementation and control of working conditions

The planning for the implementation of preventive measures, both at the general level and at the individual level of each project, is documented according to the criteria of the highest worldwide standards.

These preventive measures can be technical, collective protection or individual protection, as well as organisational or related to human factors, in which the training, information and awareness of trainees is fundamental. An example of COMSA Corporación's commitment to Health and Safety training is the volume of courses taken in Spain, which reached 50% of the total investment in 2018. Another significant factor is the certification of its own electrical risk training centres in Madrid and Seville, according to AENOR's TELCO standard.

In addition, the company has also promoted collaboration agreements with training centres such as the University of Las Palmas de Gran Canaria, Professional Training Institutes in Girona, and other prestigious training entities. All this with the aim of keeping the staff permanently trained and educated and, at the same time, collaborating with the development of talent in the social environment in which it carries out its activity.

The verification of the effectiveness of the measures implemented is carried out through systematic controls of the conditions, organisation and working methods, as well as the health of workers, supplemented by voluntary internal and external audits, throughout the geographical area in which COMSA Corporación operates.



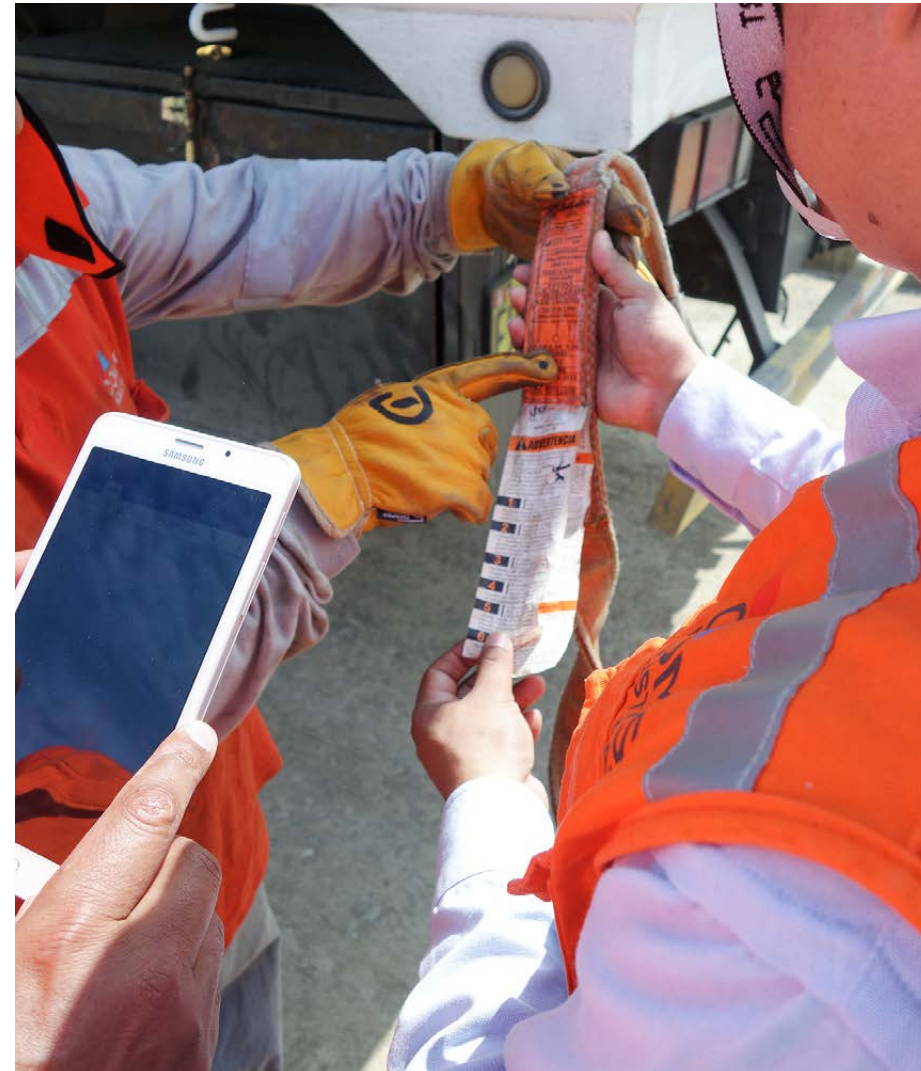
COMSA CORPORACIÓN TEAM

Consultation and participation

The systematic review of the entire previous cycle, with a vision of continuous improvement, relies on the participation of the workforce, maintaining permanent channels of communication. Thus, for the company's own workers, Health and Safety Committees are established under different terminologies specific to each geography, joint company-worker bodies, which periodically analyse management actions and indicators, and in which the workers' representatives propose measures or lines of action that can complement and improve those already implemented or those proposed by the company's representation.

By 2018, 100% of COMSA Corporación's personnel had consultation and participation tools in the area of occupational health and safety.

In addition, COMSA Corporación's management system establishes the obligation to hold periodic coordination meetings in the different projects, in which the representatives of the workers of the collaborating companies participate, and in which actions are planned and established as a consequence of the pooling of risk management.



Control status of harness, Line 4 Metro Sao Paulo (Brazil)



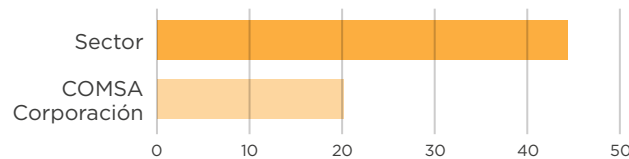
COMSA CORPORACIÓN TEAM

Evolution of accident rate

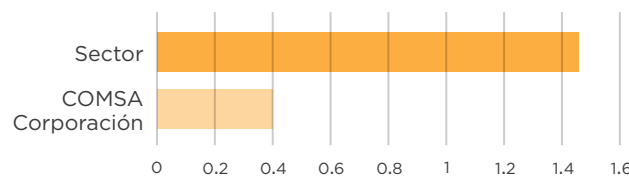
The result of this cycle of continuous improvement is the gradual reduction in the number of occupational accident indicators.

By 2018, these indicators for own personnel give the following results:

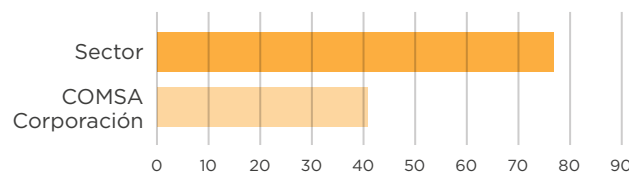
Frequency rate



Severity rate

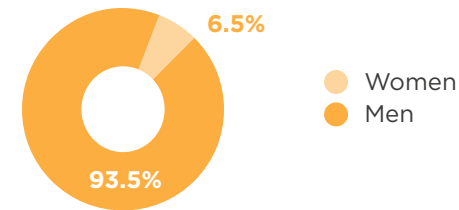


Incident rate



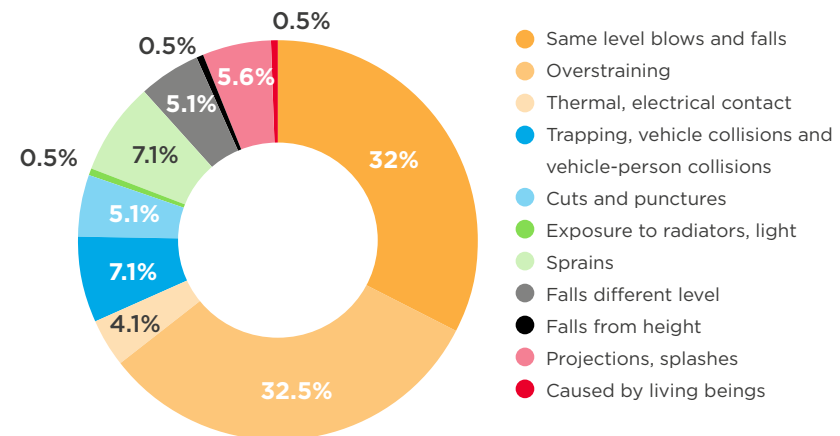
Data on the Construction Sector in Spain for the year 2017 (latest available at the date of preparation of this report). Source: Ministry of Employment, Migration and Social Security.

The distribution of accidents by sex shows a greater incidence in men (93.5%) than in women (6.5%), a logical distribution if we take into account both the distribution of the composition of the workforce and, fundamentally, the factors of exposure to risk. In 2018, no cases of occupational illnesses were detected.



The analysis of the causes of the accidents in 2018, at a global level, produces the following results:

Types of accidents





COMSA CORPORACIÓN TEAM

Commitment to continuous improvement

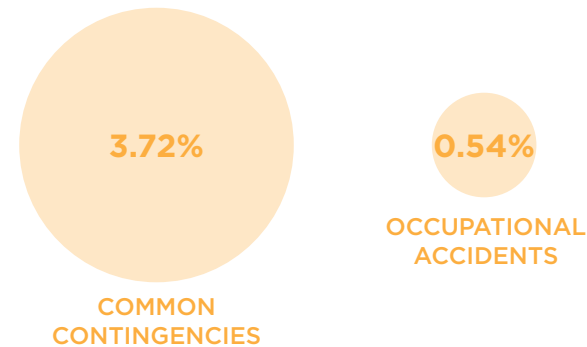
In 2018, COMSA Corporación launched different initiatives aimed at reducing both the number and severity of the main types of accidents. These measures include long-distance projects such as mobility at work and musculoskeletal disorders, both of which are multi-year plans aimed at reaching the entire workforce but focused on risk groups.

In addition, in agreement with the representation of workers, and in line with SDG 3, the company has launched different initiatives, such as the prevention of alcohol and drug consumption, the systematic review of the management of psychosocial risks, including the implementation of the Protocol for the prevention and detection of stress, and the implementation of defibrillators in corporate headquarters and main logistics centres in Spain, converting them into cardio-protected centres.

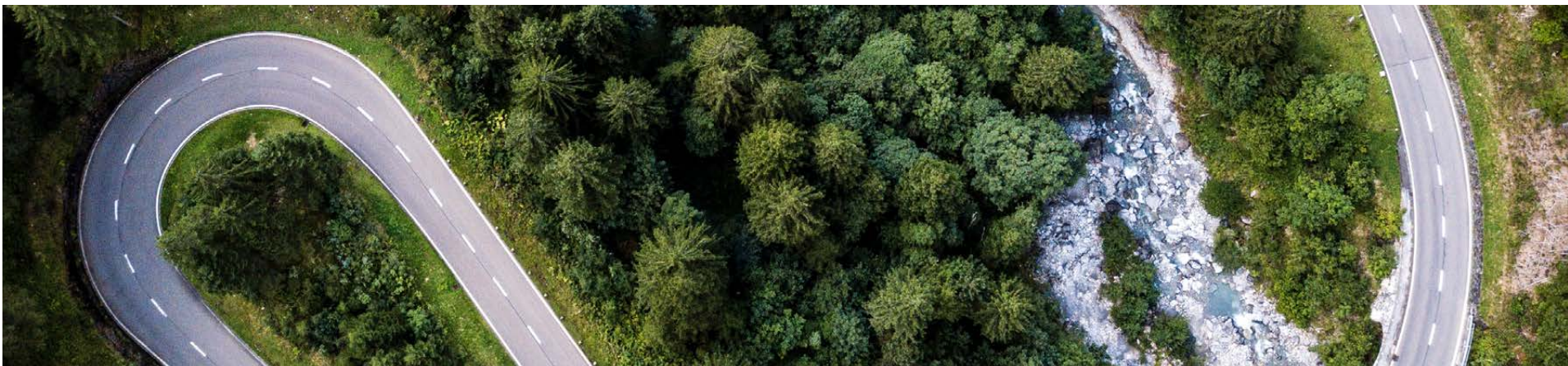
With this type of action, the company also wants to consolidate the culture of promoting healthy lifestyles and well-being.

Absenteeism

Absenteeism data for 2018 for COMSA Corporación in Spain show 49,430 missed days, with the following rates:



An analysis of medium- and long-term measures is planned for 2019 since COMSA Corporación considers that these rates are not reasonable, in accordance with the principle of maximum protection for its workers.





COMSA CORPORACIÓN TEAM

COMSA CORPORACIÓN MOBILITY PLAN

COMSA Corporación launched an ambitious Mobility Plan in 2018, the development of which is expected over the next two years, and whose objective is to analyse and evaluate risk factors associated with employee mobility in order to establish policies, tools and good practices that contribute to the improvement of both health and safety conditions and the environment.

The first phase of the Plan consisted of knowing the mobility habits of employees, and the initial results yield the following conclusions:

- The main means of transport is the car, which is the usual vehicle for 55% of journeys.
- More than half of the workforce spends between 30 and 60 minutes travelling from home to work.
- One in three workers travels more than 8 hours a week, which represents more than 20% of the working day.
- 20% of staff regularly use the train or aeroplane for commuting during working hours.
- The main risk factors are related to travel in adverse weather conditions and/or at night, and to the use of mobile phones in the vehicle.

Recognitions

COMSA Corporación's commitment to safety and health has been rewarded with the awarding of the Atlante Prize for the Promotion of National Employment, in its 9th edition, as an example of success in the effective implementation of occupational risk prevention.



Presentation of the Atlante Prize in its 9th edition to Alfonso Argüeso, Head of the Prevention Service of COMSA Corporación, Barcelona (Spain)



EXTERNAL COLLABORATORS

COMSA Corporación works to integrate the company's ethical, social and environmental principles throughout the entire value chain, both in the selection of suppliers and in collaboration with clients, where it strives to extend its values.

Thus, affinity with regard to the principles of conduct is an indispensable element within the purchasing strategy, through which the initial selection of the suppliers with whom we work is made.

ENVIRONMENT

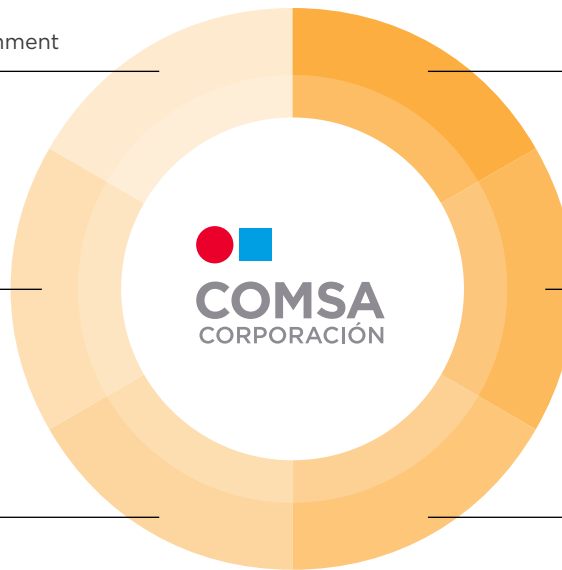
Minimise the impact of the business on the environment

SOCIETY

Protect children and disadvantaged groups

ECONOMY

Sustainable investment in a responsible company



EMPLOYEES

Belong to an ethical, integrated company that retains and develops its talent

CLIENTS

Satisfy needs with innovative solutions to exceed expectations

SUPPLIERS

Enhance the economic prosperity of the environment

In this sense, the company prioritises the selection of partners and collaborators with affinity to its values and principles, maintaining a bilateral dialogue, transparent and effective, which facilitates the development of tools and solutions both sustainable and innovative.

This indispensable requirement reduces risks and fosters a culture of responsibility throughout the value chain. Thanks to the collaboration with these responsible companies, the company is able to offer its clients competent and efficient solutions.



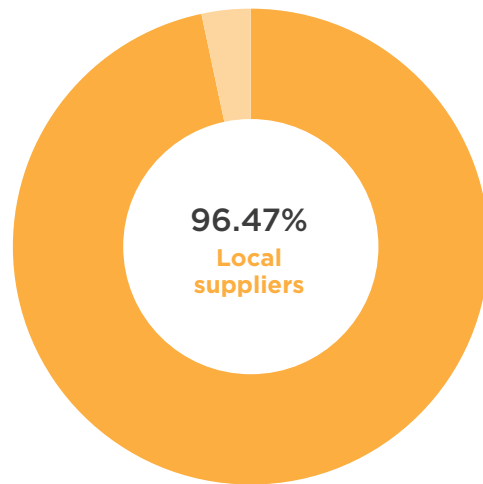
EXTERNAL COLLABORATORS

The Purchasing area of COMSA Corporación actively contributes to the Sustainable Development Goals, encouraging local contracting, the acquisition of sustainable materials and applying a policy of zero tolerance to potential situations of child labour, forced labour, serious risk to workers' health, or behaviour contrary to the company's Code of Ethics.

COMSA Corporación Suppliers 2018



16,079
TOTAL NO. OF SUPPLIERS



Las características propias del negocio de infraestructuras e ingeniería industrial hacen de la gestión de compras un área estratégica de la empresa, en la que focalizar esfuerzos para la mejora de procesos, procedimientos y objetivos que inciden en los principales indicadores globales de la compañía. En este sentido, la centralización de la información de las compras, sobre la que COMSA Corporación ha trabajado en los últimos años, permite una gestión homogénea en la que, adicionalmente, se garantiza la transmisión de los principios fundamentales de la empresa a la cadena de valor.

SELECTION AND EVALUATION OF SUPPLIERS

COMSA Corporación, in order to guarantee compliance with the standards set by the company, has a supplier selection and approval system.

The main criteria used for the approval of suppliers are:



By formalising the contract, the supplier undertakes to respect the country's regulations and to adopt COMSA Corporación's Code of Ethics in the performance of its activity. In this sense, in order to facilitate two-way communication, COMSA Corporación's Ethical Channel is made available to the supplier, through which in 2018 no complaint has been received.

EXTERNAL COLLABORATORS

Throughout the contractual relationship with the supplier, COMSA Corporación carries out a continuous evaluation based on 7 criteria:



In 2018, more than 1,500 suppliers were evaluated in Spain, considered critical due to the type of supply or the volume of billing.

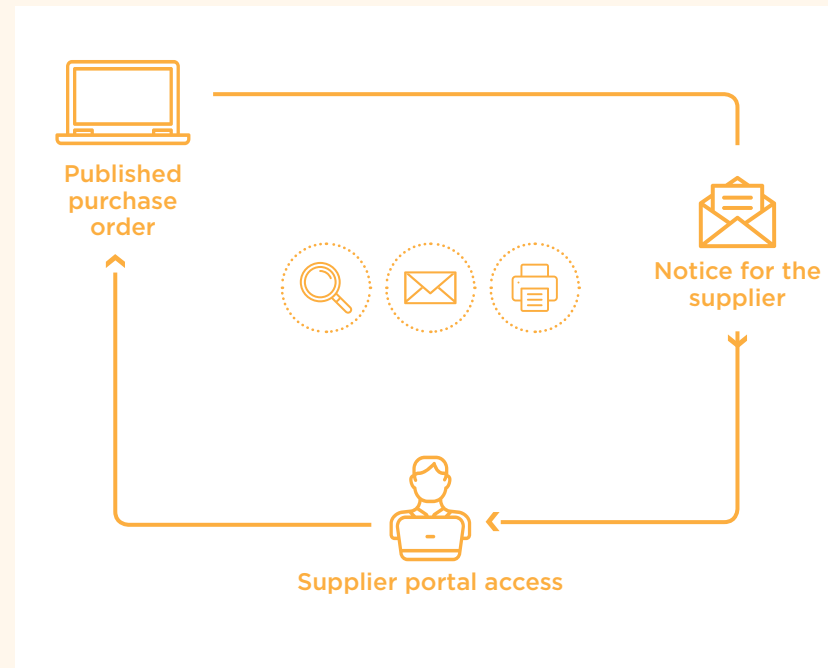
As a result of the evaluations, suppliers are classified as advisable, who can be ordered from, and as suppliers not to be recommended. Among the latter, there are 3 categories: incidents, which means that orders can be placed, but their evolution must be analysed; undesirable, for which orders can only be placed that were previously approved by management; and blocked, for which it is not possible to work.

In the event of negative performance by a supplier, a specific action plan is developed.

SUPPLIER DETAILS

The Supplier Portal is scheduled to be launched in 2019.

The main objective is to improve the relationship and communication with suppliers, as well as to speed up the documentary management of orders, delivery notes and invoices, allowing the supplier to consult in real time the status of each order, as well as the digital exchange of documentation.



EXTERNAL COLLABORATORS

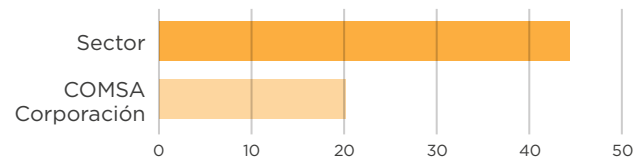
PREVENTIVE CULTURE IN THE VALUE CHAIN

COMSA Corporación works to ensure and promote a preventive culture throughout the entire value chain, establishing transverse measures that are applied to all the workers in its work centres, whether they are its own or those of collaborating companies.

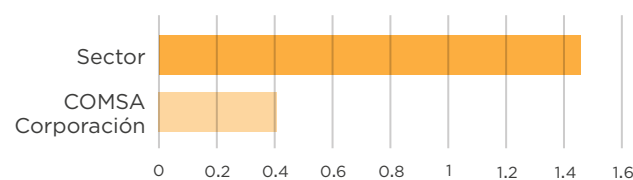
Despite this effort and commitment, in 2018 the accident rates that include companies collaborating with COMSA Corporación experienced a slight upturn, reflecting the trend observed in the construction sector in Spain from 2013 onwards.

The global accident rates for the year 2018 are:

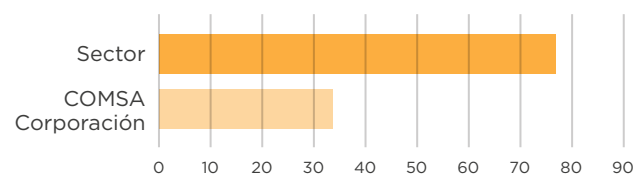
Frequency rate



Severity rate



Incident rate



Data on the Construction Sector in Spain for the year 2017 (latest available at the date of preparation of this report). Source: Ministry of Employment, Migration and Social Security.



Works for the construction of the A21 Santa Cilia - Puente la Reina de Jaca Motorway, Huesca (Spain)



CLIENTS

The recognition of COMSA Corporación as a reference company in the sector for more than 125 years is the result of its focus on the client, with the aim of permanently satisfying their expectations and needs, both current and future, and involving them from the beginning of their projects.

86% of sales are made under the application of a Quality Management System that guarantees compliance and control of the parameters established by ISO 9001 certification, systematically verified through internal and external audits. Thanks to this quality management system based on ISO 9001:2015, the company guarantees its clients that the projects carried out comply with the quality standards and regulations in force at all times.

To achieve this, the company enhances the following aspects:

- **Professionalism of the human team** to offer agile solutions to increasingly demanding challenges, in a climate of mutual trust that guarantees communication and fluid treatment with the client.
- **It is committed to innovation and technological development** to improve project efficiency and even the client's own expectations.
- **Fostering the global vision** within the company, taking advantage of the resources and diversity of the group to offer integral solutions, through synergies that enhance the added value for the client.
- **Commitment to quality** as a sign of identity, planning rigorously and fulfilling the commitments made.
- **Promoting organisational learning**, sharing information and detecting aspects of the organisation's performance that allow new opportunities thanks to the cycle of continuous improvement.

To this end, in all projects a Quality Plan is developed that includes both the requirements of the applicable regulations and the specific requirements of clients through the so-called Inspection Point Programmes (I.P.P.). The I.P.P. describe the sequence and scope of the verifications on the work units and processes previously listed in the Quality Plan. Checking the rigorous compliance of the I.P.P. and of the Test Plans ensures that the execution of the processes is carried out in accordance with the regulations and legislation in force. As a result of this effort to integrate sustainability throughout the corporation, the company's actions were aligned for the first time on the basis of the Sustainable Development Goals (SDGs), promoted by the United Nations.



COMSA Corporación
Quality Policy



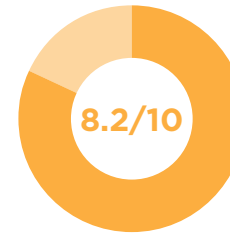
CLIENTS

CLIENT SATISFACTION

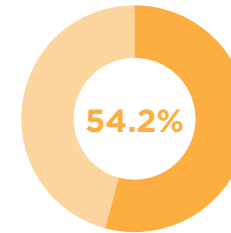
COMSA Corporación evaluates the degree of satisfaction of its clients, either at the end of the project or during the provision of the service, establishing specific action plans when considered necessary.

Satisfaction surveys include assessments on aspects such as the technical capacity of the teams, compliance with deadlines and commitments, the capacity to respond to unforeseen events, contributions for improvement, the fluidity of communication, the final quality of the project, the safety of execution, and environmental management. In addition, clients are periodically asked to weigh up the importance of these criteria for them, so that new criteria can be introduced into the evaluation.

“More than 563 satisfaction surveys sent out in 2018”



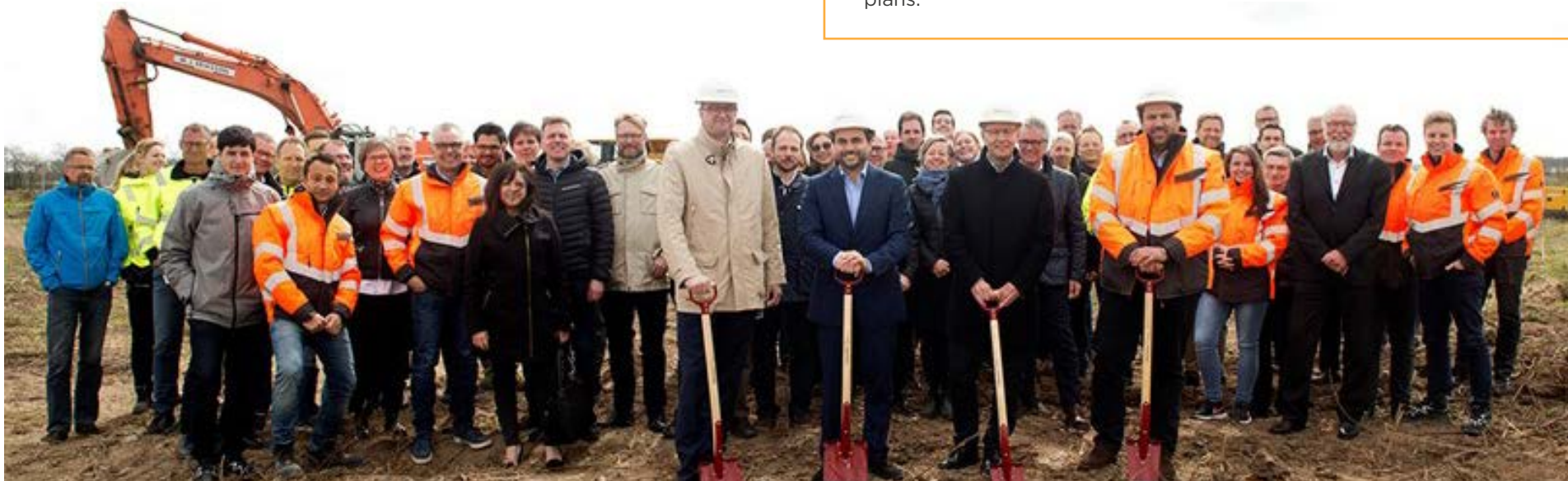
AVERAGE
CLIENT SATISFACTION



PERCENTAGE OF
RESPONSES

OBJECTIVE

Increase the percentage of client response to satisfaction surveys in order to optimise and objectify the implementation of improvement plans.



Laying of the first stone of the Odense Tramway (Denmark)

SOCIAL CONTRIBUTION

ACTIONS 2018

The family nature of COMSA Corporación gives it a special sensibility for the environment in which it operates and for the people who make it up. This singularity is palpable in the company's philosophy **"We take care of people just as we take care of our projects"** and is materialised through different actions, both internal and external, in all the group's companies and subsidiaries located in all the countries where it operates.

The company's main objective is to maintain active relations with the community in which it operates, contributing to local development and meeting the needs of each country in which it is present.

The local contribution is produced thanks to the creation of alliances with local foundations and NGOs, such as BCN+Sostenible, the voluntary collaboration of employees in social projects and the promotion of culture and healthy habits. For example, in the case of MIESES, the company manifests its commitment to Excellence, Integrated Health and Sustainability, giving support and help to small and medium enterprises.



"In 2018 €244,200 were earmarked
for Social Action"



Volunteers from EOLIS collaborating in the food classification of the Food Bank of Puebla (Mexico)

SOCIAL CONTRIBUTION

ACTIONS 2018

SPAIN

Education: COMSA Corporación has collaborated by providing training for the railway module of the occupational workshops promoted by the Construction Labour Foundation, with the aim of contributing to the employability of the sector.

Another initiative carried out by the company to promote the development of young talent, in this case in the engineering sector, was the sponsorship of the URV Voltage Racing team, made up of students from the Higher Technical School of Engineering (ETSE) of Rovira i Virgili University who designed and built an electric motorcycle to compete a posteriori in the MotoStudent worldwide competition.

Sports: With the aim of promoting values and benefits for the health of sport, the Mediterranean Games 2018, held in Tarragona, were sponsored. The participation of the corporation's employees in various charitable careers has also been promoted.

Culture: As an instrument for promoting culture and making it accessible to different groups, it has sponsored the 2018-2019 season of the Teatre Nacional de Catalunya and the Fundació Gran Teatre del Liceu.

Social sphere: The company monitors society's awareness of different social causes such as the right to health, human rights and sustainable development. For this reason, the company has collaborated with the Olof Palme International Foundation by carrying out engineering work for the campaign to raise funds against cancer at the TV3 Marathon.



COMSA Corporación Team at the Mercè (patron saint) of Barcelona race (Spain)



Advertising marquee for the 2018 Mediterranean Games, Tarragona (Spain)

SOCIAL CONTRIBUTION

ACTIONS 2018

COLOMBIA

Actions in the country have focused on the socio-cultural dynamisation of different groups such as children and young people, through recreational days in the community; the elderly, through environmental recruitment in a residence; or the carrying out of various actions by employees and their families on days that are significant for the community. In addition, within the framework of the Amagá Tunnel project, the pavement and the water canalisation of the school sector of one of the villages close to the infrastructure has been refurbished.



Accompanying of the community in the celebration of the 90th anniversary of the Corregimiento de Camilo (Amagá Tunnel Consortium)

PERU

The initiatives focused on improving the day-to-day running of the community. One of COMSA Corporación's contributions was the construction of two bridges over the canal that crosses the town of El Rosario (Peru) to facilitate the movement of people and vehicles. In parallel, the country's personnel collaborates with the collection of earplugs in the *Angelitos de Cristal* (Glass Angels) programme of the National Institute of Child Health, which contributes to improving the quality of life of children with epidermolysis bullosa (butterfly skin).



Construction of a bridge to improve mobility in the municipality of El Rosario (Peru)

SOCIAL CONTRIBUTION

ACTIONS 2018

BRAZIL

The actions carried out are concentrated around the BR101 motorway project in Alagoas and the second phase of Line 4 of the Sao Paulo Metro. In the case of the motorway, the hiring of different groups has been encouraged, specifically, the training of 14 young apprentices has been undertaken, who have subsequently been hired within the project; four women at risk of exclusion have been hired as signposters, and solid waste management has been carried out through the Municipal Association of Waste Collectors, helping to generate income in this group.

In the case of the Sao Paulo Metro, 37 minors have been sponsored through the Ana Rosa Institute for Social Protection in the vicinity. It has also collaborated in the publication of the book commemorating the 50th anniversary of the underground as a reminder of the revolution its construction entailed.



Recruitment of women signposters on the BR101 motorway, Alagoas (Brazil)

MEXICO

Following the damage caused in September 2017 by the earthquake in Puebla, the actions undertaken have focused mainly on providing support to different affected groups. In this regard, several donations have been made to the Puebla Food Bank and the Mexican Red Cross for the assistance and maintenance of those affected, employees have volunteered in various campaigns, and 50 trees have been donated to contribute to the repopulation of the devastated areas.



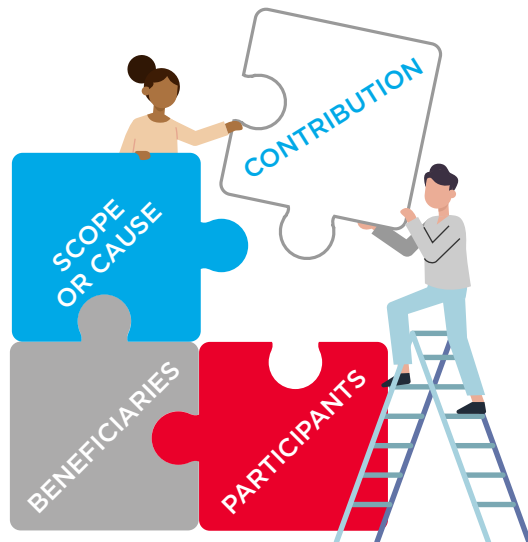
Red Cross recognition of EOLIS for support in 2018, Puebla (Mexico)

SOCIAL CONTRIBUTION

MANAGEMENT OF SOCIAL ACTION

From 2018, the company has decided to focus its social action on activities related to the core of the business, prioritising actions in which employees have a leading role. An internal survey is planned for 2019 to ascertain the concerns and main interests of the workforce in this area.

COMSA Corporación is also working on the establishment of a standardised method to help quantify the positive impact of social action on the environment, regardless of the location and type of action taken, with the aim of disseminating these criteria in the different countries and businesses of the company.



Campaign to collect caps for the *Angelitos de Cristal* programme of the National Institute of Child Health, Huacho (Peru)



**ABOUT
THE REPORT**







ABOUT THE REPORT

SCOPE AND COVERAGE

This report, the second to be prepared in accordance with GRI standards, focuses on the activities of the business area of COMSA, COMSA Industrial, COMSA Service, COMSA Renovables, GMN and EOLIS, including its subsidiaries and branches in Argentina, Brazil, Colombia, Denmark, France, Mexico, Peru, Poland, Portugal and Sweden, as well as the corporate activities integrated into COMSA Corporación.

MATERIAL ISSUES

This report has been prepared in response to the main material issues identified in the materiality analysis carried out for the first CSR Report of COMSA Corporación. The aim of this selection is to respond to the expectations and concerns of the company's main stakeholders.

CORPORATE GOVERNANCE	ECONOMY	ENVIRONMENT	LABOUR	SUPPLY CHAIN	SOCIAL
					
<ul style="list-style-type: none">* Integrity* Compliance* Risk management* Prevention of bribery and corruption	<ul style="list-style-type: none">* Competitiveness* Fiscal responsibility	<ul style="list-style-type: none">* Circular economy* Water management* Climate change<ul style="list-style-type: none">* Impact on biodiversity* Acoustic impact	<ul style="list-style-type: none">* Equality and diversity* Attraction and retention of talent* Health and safety	<ul style="list-style-type: none">* Supply chain risks* Human Rights* Quality of service* Client satisfaction	<ul style="list-style-type: none">* Relationship with the community* Institutional relations<ul style="list-style-type: none">* Social impact* Social commitment<ul style="list-style-type: none">* Volunteer programmes

ABOUT THE REPORT

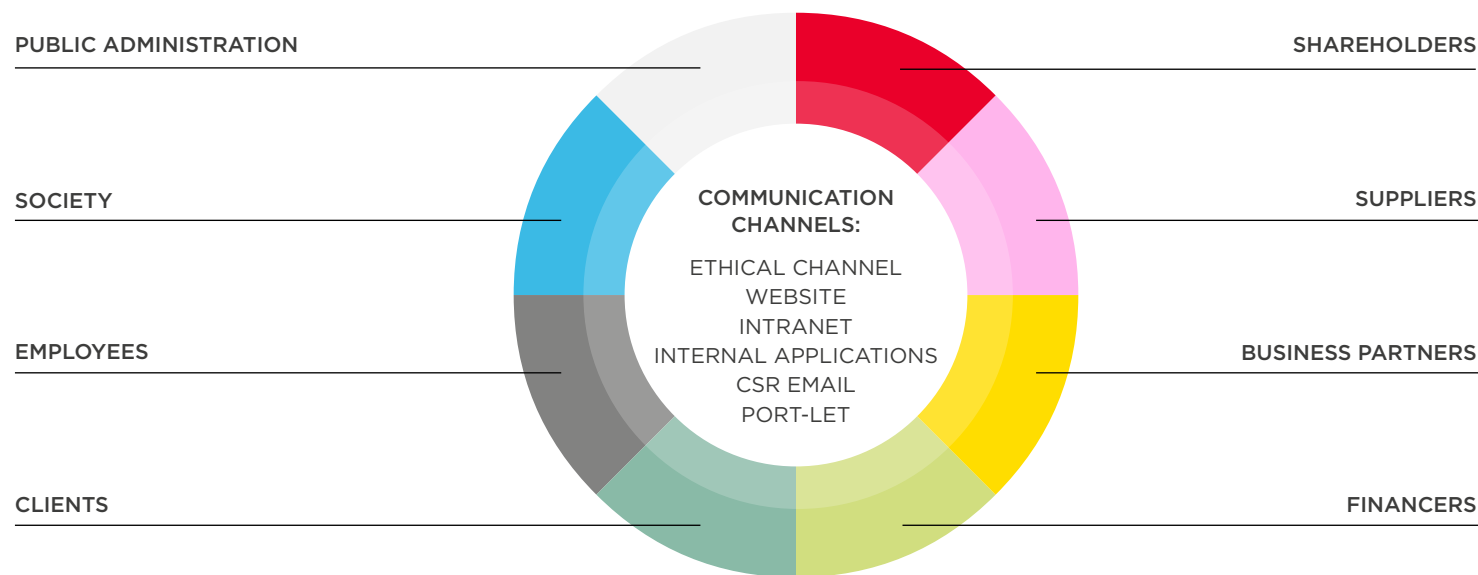
COMMUNICATION WITH STAKEHOLDERS

As a key aspect of the business model, the company is committed to establishing stable and transparent relationships with its stakeholders. In this regard, it offers the same different channels of communication, both internal and external, which enable the communication of concerns and expectations. These include the creation in 2018 of Port-Let, a new internal news and communications portal that publishes specific content and information for employees.

CONCORDANCE WITH OTHER DOCUMENTS

This document has been prepared in an exhaustive manner, taking into account the context of COMSA Corporación's sustainability, its material issues and their repercussions on the main interest groups. Much of the data presented here supplements and expands on the [Annual Summary 2018](#) published in April 2019 and available on the company's website. In case of divergence of information between the two documents, the information in this report prevails as most of which has been audited by an independent verification service provider.

COMSA Corporación stakeholders and communication channels established



For inquiries about this report, please contact responsabilidad.social@comsa.com



GRI TABLE OF CONTENTS

This report has been prepared in accordance with the Global Reporting Initiative (GRI) Standards in its essential version. Below is a summary table with all the GRI indicators discussed throughout this report to facilitate their identification.

RI Standard	Name of the indicator	Page number or explanation
GRI 101	FOUNDATION	
GRI 101	Principles	
GRI 102-00	GENERAL DISCLOSURES	
	Organizational profile	
GRI 102-01	Name of the organization	COMSA Corporación de Infraestructuras S.L.
GRI 102-02	Activities, brands, products and services	23 , 24 , 25
GRI 102-03	Location of headquarters	47 Viriato Street, Barcelona, Spain 08014
GRI 102-04	Locations of operations	22 , 29
GRI 102-05	Ownership and legal form	Limited Society
GRI 102-06	Markets served	23
GRI 102-07	Scale of the organization	30 , 31
GRI 102-08	Information on employees and other workers	30 , 32 , 54 , 55 ,
GRI 102-09	Supply chain	67 , 71 , 79
GRI 102-10	Significant changes to the organization and its supply chain	28
GRI 102-11	Precautionary principle or approach	17 , 18 , 19 , 26 , 27 , 34
GRI 102-12	External initiatives	9 , 10 , 11 , 46 , 50 , 73 , 74 , 75 , 76
GRI 102-13	Memberships of associations	46 , 73 , 74 , 75 , 76
	Strategy	
GRI 102-14	Statement from senior decision-maker	5
GRI 102-15	Key impacts, risks and opportunities	26 , 27



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GRI Standard	Name of the indicator	Page number or explanation
Ethics and integrity		
GRI 102-16	Values, principles, standards and norms of behaviour	7 , 8
GRI 102-17	Mechanisms for advice and concerns about ethics and integrity	17 , 18 , 19 , 20 , 21
Governance		
GRI 102-18	Governance structure	13 , 15 , 16
GRI 102-19	Delegating authority	13
GRI 102-20	Executive level responsibility for economic, environmental and social topics	13 , 14
GRI 102-21	Consulting stakeholders on economic, environmental and social topics	14
GRI 102-22	Composition of the highest governance body and its committees	13 , 14 , 15 , 16
GRI 102-23	Chair of the highest governance body	13
GRI 102-24	Nominating and selecting the highest governance body	13
GRI 102-25	Conflicts of interest	17 , 18
GRI 102-26	Role of the highest governance body in setting purpose, values and strategy	14
GRI 102-27	Collective knowledge of the highest governance body	14
GRI 102-28	Evaluating the highest governance body's performance	Not reported
GRI 102-29	Identifying and managing economic, environmental and social impacts	26
GRI 102-30	Effectiveness of risk management processes	27
GRI 102-31	Review of economic, environmental and social topics	14
GRI 102-32	Highest governance body's role in sustainability reporting	13
GRI 102-33	Communication of critical concerns	14 , 15
GRI 102-34	Number and nature of critical concerns	Not reported



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GRI Standard	Name of the indicator	Page number or explanation
GRI 102-35	Remuneration policies	57
GRI 102-36	Process for the determination of the remuneration	57
GRI 102-37	Stakeholders' involvement in remuneration	Stakeholders are not involved in the retribution
GRI 102-38	Annual total compensation ratio	Not reported
GRI 102-39	Percentage increase in annual total compensation ratio	Not reported
Stakeholder engagement		
GRI 102-40	List of stakeholder groups	80
GRI 102-41	Collective bargaining agreements	19
GRI 102-42	Identifying and selecting stakeholders	80
GRI 102-43	Approach to stakeholder engagement	80
GRI 102-44	Key topics and concerns raised	79
Reporting practices		
GRI 102-45	Entities included in the consolidated financial statements	79
GRI 102-46	Defining report content and topic boundaries	79
GRI 102-47	List of material topics	79
GRI 102-48	Restatements of information	No restatements in 2018
GRI 102-49	Changes in reporting	The data reported in this report are not directly comparable to those in report 2017, as it did not include Colombia or Denmark, or the companies COMSA Renovables, GMN and EOLIS.
GRI 102-50	Reporting period	From January 1 to December 31, 2018.
GRI 102-51	Date of most recent report	July 2018
GRI 102-52	Reporting cycle	Annual
GRI 102-53	Contact point for questions regarding the report	responsabilidad.social@comsa.com



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GRI Standard	Name of the indicator	Page number or explanation
GRI 102-54	Claims of reporting in accordance with the GRI Standards	This report has been prepared in accordance with the GRI standards: Essential option
GRI 102-55	GRI content index	81
GRI 102-56	Review external	<p>This report is based on COMSA Corporación's 2018 Non-financial Information Report required by Law 11/2018, which has been verified by the independent verification service provider Deloitte.</p> <p>However, this report includes additional information that is not subject to verification.</p>
GRI 103	MANAGEMENT APPROACH	
GRI 103-01	Explanation of the material topic and its boundaries	12 , 17 , 23 , 26 , 31 , 34 , 46 , 54 , 67 , 71 , 73 , 79
GRI 103-02	Management approach and its components	12 , 17 , 23 , 26 , 31 , 34 , 46 , 54 , 67 , 71 , 73 , 79
GRI 103-03	Evaluation of management approach	12 , 17 , 23 , 26 , 31 , 34 , 46 , 54 , 67 , 71 , 73 , 79



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ECONOMIC MATERIAL TOPIC

GRI Standard	Name of the indicator	Page number or explanation
GRI 201	ECONOMIC PERFORMANCE	
GRI 201-1	Direct economic value generated and distributed	30, 31
GRI 201-2	Financial implications and other risks and opportunities due to climate change	Not reported
GRI 201-3	Defined benefit plan obligations and other retirement plans	Does not apply
GRI 201-4	Financial assistance received from government	€ 10,853,000
GRI 202	MARKET PRESENCE	
GRI 202-1	Ratio of standard entry level wage by gender compared with local minimum wage	57
GRI 202-2	Proportion of senior management hired from the local community	57
GRI 203	INDIRECT ECONOMIC IMPACTS	
GRI 203-1	Investment in infrastructure and services of support	75
GRI 203-2	Significant indirect economic impacts	31
GRI 204	PROCUREMENT PRACTICES	
GRI 204-1	Proportion of spending on local suppliers	31, 68
GRI 205	ANTI-CORRUPTION	
GRI 205-1	Proportion of spending on local suppliers	Not reported
GRI 205-2	Communication and training on anti-corruption policies and procedures	11, 17, 19
GRI 205-3	Confirmed cases of corruption and actions taken	In 2018, no complaints were received through the Ethical Channel.
GRI 206	ANTI-COMPETITIVE BEHAVIOUR	
GRI 206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	In 2018, no complaints were received through the Ethical Channel.



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ENVIRONMENTAL MATERIAL TOPIC

GRI Standard	Name of the indicator	Page number or explanation
GRI 301	MATERIALS	
GRI 301-1	Materials used by weight or volume	The materials with the most representative consumptions for COMSA Corporación in 2018: - Works: concrete (176,989.67 m ³) - Offices: paper (4,093.63 kg)
GRI 301-2	Recycled input materials used	Of the 4,093.63 kg of paper used, 19.44% was recycled.
GRI 301-3	Reclaimed products and their packaging materials	36. In 2019, the company will launch a project to register and quantify materials of recycled origin, as well as materials reused in its own projects or those of third parties, related to the sectors in which it operates.
GRI 302	ENERGY	
GRI 302-1	Energy consumption within the organization	39
GRI 302-2	Energy consumption outside the organization	39
GRI 302-3	Energy intensity	Not reported
GRI 302-4	Reduction of energy consumption	39 , 40 , 41 , 42
GRI 302-5	Reductions in energy requirements of products and services	9 , 32 , 42
GRI 303	WATER AND EFFLUENTS	
GRI 303-1	Interactions with water as a shared resource	38
GRI 303-2	Management of water discharge related impacts	34 , 35 , 38
GRI 303-3	Water withdrawal	38



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GRI Standard	Name of the indicator	Page number or explanation
GRI 303-4	Water discharge	38
GRI 303-5	Water consumption	38
GRI 304	BIODIVERSITY	
GRI 304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Not reported
GRI 304-2	Significant impacts of activities, products, and services on biodiversity	34 , 35 , 43 , 44
GRI 304-3	Protected or restored habitats	43 , 44
GRI 304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	Not reported
GRI 305	EMISSIONS	
GRI 305-1	Direct (Scope 1) GHG emissions	41
GRI 305-2	Energy indirect (Scope 2) GHG emissions	41
GRI 305-3	Other indirect (Scope 3) GHG emissions	41
GRI 305-4	GHG emissions intensity	Not reported
GRI 305-5	Reduction of GHG emissions	41
GRI 305-6	Emissions of ozone-depleting substances (ODS)	Not reported
GRI 305-7	Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions	Not reported



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GRI Standard	Name of the indicator	Page number or explanation
GRI 306	EFFLUENTS AND WASTE	
GRI 306-1	Water discharge by quality and destination	Not reported
GRI 306-2	Waste by type and disposal method	37
GRI 306-3	Significant spills	No significant discharges were identified in 2018.
GRI 306-4	Transport of hazardous wastes	Not reported
GRI 306-5	Water bodies affected by water discharge and/or runoff	No significant discharges were identified in 2018.
GRI 307	ENVIRONMENTAL COMPLIANCE	
GRI 307-1	Non-compliance with environmental laws and regulations	45 . The company received an environmental penalty of €100 in 2018.
GRI 308	SUPPLIER ENVIRONMENTAL ASSESSMENT	
GRI 308-1	New suppliers that were screened using environmental criteria	68 , 69
GRI 308-2	Negative environmental impacts in the supply chain and actions taken	69



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SOCIAL MATERIAL TOPIC

GRI Standard	Name of the indicator	Page number or explanation
GRI 401	EMPLOYMENT	
GRI 401-1	New employee hires and employee turnover	56
GRI 401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	57
GRI 401-3	Parental leave	59
GRI 402	LABOUR RELATIONS	
GRI 402-1	Minimum notice periods regarding operational changes	Established by collective agreement
GRI 403	OCCUPATIONAL HEALTH AND SAFETY 2018	
GRI 403-01	ORP management system	61
GRI 403-02	Risk identification and incident investigation	54 , 62
GRI 403-03	Occupational health services: description and mechanisms to ensure quality of the service	62
GRI 403-04	Employee participation in ORP	63
GRI 403-05	Employee training in ORP	58
GRI 403-06	Occupational health promotion	63
GRI 403-07	Prevention and mitigation of health impacts related to labour relations	62 , 63 , 65
GRI 403-08	Employees covered by ORP management systems	63
GRI 403-09	Work-related accidents	64
GRI 403-10	Occupational illnesses	64
GRI 403-9	Injuries caused by accidents at work	64



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GRI Standard	Name of the indicator	Page number or explanation																									
GRI 404	TRAINING AND EDUCATION																										
GRI 404-1	Average hours of training per year per employee	58																									
GRI 404-2	Programmes for upgrading employee skills and transition assistance programmes	54, 58																									
GRI 404-3	Percentage of employees receiving regular performance and career development reviews	57																									
GRI 405	DIVERSITY AND EQUAL OPPORTUNITY																										
GRI 405-1	Diversity of governance bodies and employees	31, 54, 55																									
GRI 405-2	Ratio of basic salary and remuneration of women to men	57 <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th colspan="4">Categories</th> </tr> <tr> <th></th> <th>1 y 2</th> <th>3</th> <th>4</th> <th>5</th> </tr> </thead> <tbody> <tr> <td>< 30</td> <td>N/A</td> <td>16.26%</td> <td>-0.01%</td> <td>- 15.18%</td> </tr> <tr> <td>30 - 50</td> <td>11.62%</td> <td>12.75%</td> <td>19.13%</td> <td>- 15.61%</td> </tr> <tr> <td>> 50</td> <td>-11.61%</td> <td>N/A</td> <td>23.98%</td> <td>N/A</td> </tr> </tbody> </table> <p>Categories 1 and 2: Managers, Delegates, Managers, Area Heads, Department Heads. Category 3: Construction Managers and Unit Managers. Category 4: Technical and Administrative staff. Category 5: Side workers.</p>		Categories					1 y 2	3	4	5	< 30	N/A	16.26%	-0.01%	- 15.18%	30 - 50	11.62%	12.75%	19.13%	- 15.61%	> 50	-11.61%	N/A	23.98%	N/A
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> 50	-11.61%	N/A	23.98%	N/A																							
GRI 406	NON-DISCRIMINATION																										
GRI 406-1	Incidents of discrimination and corrective actions taken	17, 54, 59, 60 No significant discharges were identified in 2018.																									
GRI 407	FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING																										
GRI 407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	19, 67, 68																									



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GRI Standard	Name of the indicator	Page number or explanation
GRI 408	CHILD LABOUR	
GRI 408-1	Operations and suppliers at significant risk for incidents of child labour	19 , 67 , 68
GRI 409	FORCED OR COMPULSORY LABOUR	
GRI 409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	19 , 67 , 68
GRI 410	SECURITY PRACTICES	
GRI 410-1	Security personnel trained in human rights policies or procedures	Not reported
GRI 411	RIGHTS OF INDIGENOUS PEOPLES	
GRI 411	Cases of violations of the rights of indigenous peoples	No cases recorded in 2018
GRI 412	HUMAN RIGHTS ASSESSMENT	
GRI 412-1	Operations that have been subject to human rights reviews or impact assessments	The company has not identified situations in which there is a risk of human rights violations
GRI 412-2	Employee training on human rights policies or procedures	19 , 58
GRI 412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	17 , 18 , 19 , 67 , 68
GRI 413	LOCAL COMMUNITIES	
GRI 414-1	Operations with local community engagement, impact assessments, and development programmes	68 , 69
GRI 414-2	Operations with significant actual and potential negative impacts on local communities	69



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GRI Standard	Name of the indicator	Page number or explanation
GRI 414	SOCIAL EVALUATION OF PROVIDERS	
GRI 414-1	New suppliers that have passed selection filters according to social criteria	68
GRI 414-2	Negative social impacts in the supply chain and actions taken	69
GRI 415	PUBLIC POLICY	
GRI 415-1	Political contributions	No political contributions were made in 2018
GRI 416	CUSTOMER HEALTH AND SAFETY	
GRI 416-1	Evaluation of the impacts on health and safety of the products and services	71
GRI 416-2	Assessment of the health and safety impacts of product and service categories	No cases recorded in 2018
GRI 417	MARKETING AND LABELLING	
GRI 417-1	Requirements for product and service information and labelling	Does not apply
GRI 417-2	Incidents of non-compliance concerning product and service information and labelling	Does not apply
GRI 417-3	Incidents of non-compliance concerning marketing communications	Does not apply
GRI 418	CUSTOMER PRIVACY	
GRI 418-1	Substantiated complaints regarding concerning breaches of customer privacy and losses of customer data	No cases recorded in 2018
GRI 419	SOCIOECONOMIC COMPLIANCE	
GRI 419-1	Non-compliance with laws and regulations in the social and economic area	17 , 18 , 19

SDGs TABLE OF CONTENTS

Below are the sections in which you can find more information on COMSA Corporación’s contribution to each of the objectives introduced in the “Commitment to the United Nations SDGs” section of this report, as well as some SDGs to which it contributes indirectly:

SDG	Implication	Page
1 NO POVERTY	End poverty in all its forms everywhere	31 , 68 , 73
2 ZERO HUNGER	End hunger, achieve food security and improved nutrition and promote sustainable agriculture	76
3 GOOD HEALTH AND WELL-BEING	Ensure healthy lives and promote well-being for all at all ages	10 , 61 , 65 , 70 , 74 , 75
4 QUALITY EDUCATION	Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all	58 , 74 , 75 , 76
5 GENDER EQUALITY	Achieve gender equality and empower all women and girls	10 , 59 , 60 , 76
6 CLEAN WATER AND SANITATION	Ensure availability and sustainable management of water and sanitation for all	10 , 38 , 42
7 AFFORDABLE AND CLEAN ENERGY	Ensure access to affordable, reliable, sustainable and modern energy for all	10 , 39 , 41 , 42
8 DECENT WORK AND ECONOMIC GROWTH	Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all	10 , 19 , 31 , 50 , 54 , 55 , 56 , 59 , 60 , 68 , 76
9 INDUSTRY INNOVATION AND INFRASTRUCTURE	Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation	9 , 29 , 39 , 42 , 47 , 49 , 51

SDG	Implication	Page
10 REDUCED INEQUALITIES	Reduce inequality within and among countries	57 , 73 , 75 , 76
11 SUSTAINABLE CITIES AND COMMUNITIES	Make cities and human settlements inclusive, safe, resilient and sustainable	9 , 34 , 35 , 42 , 49 , 47
12 RESPONSIBLE CONSUMPTION AND PRODUCTION	Ensure sustainable consumption and production patterns	9 , 36 , 37 , 47 , 48 , 49 , 68
13 CLIMATE ACTION	Take urgent action to combat climate change and its impacts by regulating emissions and promoting developments in renewable energy	9 , 39 , 40 , 41 , 42
14 LIFE BELOW WATER	Conserve and sustainably use the oceans, seas and marine resources for sustainable development	Out of reach according to the company activity
15 LIFE ON LAND	Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss	43 , 44 , 45 , 76
16 PEACE, JUSTICE AND STRONG INSTITUTIONS	Promote peaceful and inclusive societies for sustainable development	17 , 18 , 19 , 68
17 PARTNERSHIPS FOR THE GOALS	Strengthen the means of implementation and revitalize the global partnership for sustainable	10 , 11 , 46 , 50 , 73 , 74 , 75 , 76



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