



2019 CORPORATE SOCIAL RESPONSIBILITY REPORT



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ABOUT
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CORPORACIÓN





MAIN MILESTONES IN 2019

International Presence

- » Commissioning of a new railway section between Gradec and Sveti Ivan Zabno, in Croatia.
- » Track rehabilitation of the La Mata - Colonia Jordán section (33.5 km) of the Istmo de Tehuantepec Railway in Mexico.

Economic area

- » Turnover of 777 million euros.
- » Portfolio of 1,167 million euros.

Transparency, Ethics and Integrity

- » Review of the group's compliance model, with the updating of the map of criminal risks, including those associated with corruption.
- » Review of the Conflict of Interest and Harassment Protocols, derived from the Code of Ethics.

Innovation Management

- » Investment of more than 7 million euros in a total of 35 innovation projects.
- » Appointment of COMSA as a member of the Steering Committee of the European Construction Technology Platform (ECTP).



New railway line between Gradec and Sveti Ivan Zabno, Croatia

Human Team

- » Launch of the "COMStruimos Liderazgo" project, focused on improving the culture of leadership.
- » Inclusion in the Top 25 companies of the MEPS2, a model of business excellence in occupational risk prevention.

Environmental Impact and Contribution

- » Signatories of the Spanish Government's Circular Economy Pact
- » Membership of the #PorElClima Community initiative to reduce greenhouse gas emissions.

Social Impact and Contribution

- » COMSA-UNHCR partnership, through the Salary Solidarity Programme, with the aim of helping improve coverage of the basic needs of refugees.
- » Creation of value at the local level, voluntary participation of professionals in social projects and promotion of culture and healthy habits.



Istmo Railway, Tehuantepec (Mexico)



INTERVIEW WITH THE CHAIRMAN OF COMSA CORPORACIÓN



Jorge Miarnau,
Chairman of COMSA Corporación

Could you give an overall assessment of COMSA Corporación's 2019 fiscal year?

The year 2019 was marked by two events of special relevance for the group, such as the conclusion of the 2016-2020 Strategic Plan with the certainty of having achieved the established objectives and having consolidated a sustained growth in our core business, as well as the establishment of the bases for drawing up the new 2020-2024 Strategic Plan.

In 2019, we maintained sustained growth and closed the year with a global turnover of 777 million euros. The group has been consolidated under the equity method since January 2019, and therefore the results of the Trakcja Group, its subsidiary in Poland, are not included. However, the comparison with the same consolidation method shows an increase in turnover of almost 6%.

We have an order book of 1,167 million euros, concentrating activity around our core business, which accounts for 97% of total turnover. Thus, in 2019, the Infrastructure, Industrial Engineering, Maintenance and Services, and Infrastructure Development and Concession businesses totalled 752 million euros. Of note is the increase in the weight of the Engineering portfolio, which has gone from 14% to 22% of the group's total turnover, with 185 million euros.

I would like to highlight the positive evolution of the group in recent years following the serious economic situation experienced in the previous crisis and its

ability to overcome adverse scenarios.

How is sustainability understood at COMSA Corporación?

Sustainability is fully integrated into the group's vision and mission and is one of the pillars of its 2020-2024 Strategic Plan.

Therefore, I would like to highlight our adhesion as a group to the United Nations Global Compact in 2019, thus showing our commitment to the fulfilment of its 10 principles. To this end, we have worked to align our business model with the Sustainable Development Goals (SDG), paying special attention to the fight against climate change, gender equality and ending poverty.

In short, we believe that Corporate Social Responsibility is our way of showing how we integrate our values into all areas of the group, reflecting the spirit that we want to integrate into the culture of all those who together build COMSA Corporación day by day.

What actions would you highlight from this year 2019?

As you will see in the following pages, our Corporate Social Responsibility report for 2019 is a profound exercise in reflection and transparency on our economic, environmental and social performance,



INTERVIEW WITH THE CHAIRMAN OF COMSA CORPORACIÓN

including the contribution of our activities to the sustainable development of the environments in which we operate.

With regard to responsible management, the group has made progress in its commitment to the Sustainable Development Goals (SDG) by analysing the most relevant ones for its activity and integrating these key elements into its corporate strategy. Thus, for example, I would like to highlight the partnership with the UNHCR through the launch of the Salary Solidarity Programme, which aims to help improve coverage of the basic needs of refugees.

At the same time, aware that our human capital is our greatest asset, we have continued to make progress in the lines of action set out in the COMStruimos project, based on talent management, equal opportunities and non-discrimination, promoting diversity, fostering work-life balance, and promoting a safe and healthy working environment.

Also, and in the same line of caring for our employees, in 2019 we received new awards, among which I would like to highlight the Top 25 of the Monitor of Excellence in Occupational Health and Safety (MEPS2), which rewards and stimulates the culture of prevention in organisations.

Where are you going to focus in the future to make further progress in contributing to sustainability?

In these moments of uncertainty, resulting from the Covid-19 crisis, we are confident in our strengths, especially in the professional and human capacities of all the collaborators who are part of the group, as well as in the robustness of our financial structures. Needless to say, we maintain our commitment to growth based on

efficiency, differentiation, sustainability and innovative creativity, in which the implementation of digital tools will serve as a catalyst.

In this sense, the strategic priorities of sustainability are directly aimed at our employees, commitment to our stakeholders, sustainable performance, corporate governance and business ethics, as well as innovation.

In the context of the fight against climate change, one of our challenges is to contribute to the mitigation of the climate emergency and, to this end, we are drawing up a strategic plan against climate change with specific actions and rigorous indicators, with the aim of progressively reducing our CO2 emissions and achieving carbon neutrality by 2050. Finally, I would like to conclude by expressly

acknowledging all the stakeholders who have been involved in our project to become a socially responsible and committed company, and those who have given us their trust and support throughout the past year. We will continue working to be a company focused on economic, social and environmental growth, based on a commitment to sustainable development.

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 railway track works and station renovation. Knowledge of the infrastructures and the skills of its professionals quickly made COMSA one of the leading railway companies of the time.

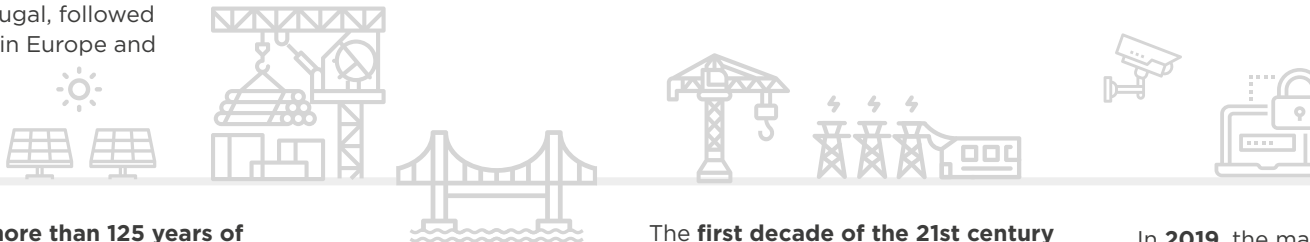


Already in the **1940's**, coinciding with the second generational change, it began to diversify its activities, with new areas of civil engineering, starting the construction of all types of works.

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



On the occasion of the **centenary of the group**, and coinciding with the arrival of the fourth family generation, COMSA started its internationalisation with its establishment in Portugal, followed by a rapid expansion in Europe and Latin America.



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

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

In **2019**, the maintenance and services area will celebrate its 25th anniversary with COMSA Service consolidated in the maintenance and energy efficiency sector. This area is completed by COMSA Solutions, specialised in auxiliary services, and COMSA Security, focused on the installation and maintenance of security systems.

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 in accordance with the principles of sustainability, integrity and responsibility.



MISSION, VISION AND VALUES

“ COMSA Corporación’s culture is based on the 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.



New Natura Bissé corporate headquarters, Cerdanyola del Vallès (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.



Design, supply and installation of Intelligent Traffic Systems (ITS) in the Villavicencio Corridor, Bogotá (Colombia)



MISSION, VISION AND VALUES

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 SDG

COMSA Corporación integrates the key elements of sustainability into the group's strategy, together with the leadership and involvement of senior management.

This year, marked by the Agenda 2030 and especially by the Sustainable Development Goals (SDG), COMSA Corporación has advanced in its commitment, analysing those that are most relevant for the group and its stakeholders, so that it focuses its actions where it can contribute significantly.

In line with the group's commitments, COMSA Corporación is working on defining specific goals for the identified objectives with the greatest impact, as well as on determining the appropriate indicators to be able to measure their progress. This integration process is part of its commitment to sustainability, understood as the balance between economic growth, reduction of environmental impact and social progress in its environment.



FOUR GREAT PRIORITIES FOR COMSA CORPORACIÓN



Industry, innovation and infrastructure: Investment in sustainable infrastructure and innovation are key drivers of growth and economic development.

COMSA Corporación's own activity involves the construction of modern and efficient infrastructures, which facilitate access to basic services such as electricity, water and transport, and thus contribute to the development of the communities where it is present.

In 2019, the group managed innovation projects linked to energy efficiency and the improvement of production and digitalisation processes worth more than **7 million euros**.



Sustainable cities and communities: Urban spaces must become more inclusive, safe, resilient and sustainable.

In 2019, **12** LEED or BREEAM certified sustainable building projects were executed, which, together with measures that increase the energy efficiency of the projects, mean that the group contributes to reducing the environmental impact generated by urban centres.



Responsible production and consumption: The group is committed to the circular economy by working on the efficient use of resources, extending the useful life of infrastructures, adding value to by-products by reintroducing them into the system as raw materials (thus contributing to the reduction of waste) and developing new, more sustainable products.

In this regard, in 2019 the group formalised its commitment to this SDG by joining the Pact for a Circular Economy.



Climate action: The fight against climate change is a global emergency whose consequences may be irreversible.

The group is committed to sustainable construction, energy efficiency and renewable energies and in 2019 joined the Catalan Climate Action Summit. Along these lines, **75% of the corporate offices in Spain have energy efficiency certification.**



COMMITMENT TO THE SDG

Likewise, COMSA Corporación incorporates other specific actions that develop specific aspects of the SDG, among which it is worth highlighting:



SDG 3 - Good Health and Well-being: COMSA Corporación is fully committed to health and safety and this commitment extends to all its collaborators.

To this end, in 2019 a campaign was carried out to reduce the number of traffic accidents at work, through training activities to raise awareness and improve ergonomics in vehicles. Likewise, on the occasion of World Health Day, the campaign “Don’t turn your back on overexertion” was carried out, as part of the project “Detection and Prevention of Overexertion” to reduce the number of accidents at work.



SDG 5 - Gender Equality: COMSA Corporación works to promote equal opportunities.

To this end, meritocracy and diversity are valued in the selection and promotion of talent. Furthermore, despite the traditional masculinisation of the sector, the group has decided to introduce a new selection criterion, whereby, with equal conditions between candidates in mind, priority is given to the recruitment or promotion of women.

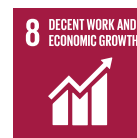


SDG 6 - Clean Water and Sanitation: Throughout its more than 125 years of history, the group has participated in drinking water, purification and desalination projects on four continents, collaborating in the comprehensive management of water.

In this area, the Amagá Tunnel project (Colombia), carried out in 2019, stands out. More than 700,000 m³ of water have been reused both for cooling the machinery and for sanitary use of the work thanks to the osmosis water treatment carried out on site. Internally, the group also promotes the efficient use of water at its facilities, most notably the GMN production plant located in Maials (Spain), a water deficit area, which has a water reuse and recirculation system for cooling the primary crushing machinery.



SDG 7 - Affordable and clean energy: The development of the renewable energy sector is part of the group’s business strategy. In this regard, in 2019, through the management of photovoltaic and wind power facilities, COMSA Corporación contributed to the production of 263,868 MWh of renewable energy.



SDG 8 - Decent Work and Economic Growth: The group’s commitment to its professionals lies in promoting safe and risk-free working environments.

Likewise, the group promotes the integration of groups at risk of social exclusion in its hiring policy, also encouraging the access of young people to the labour market, facilitating their training and incorporation into COMSA Corporación as apprentices. In 2019, the group contributed to the training and specialisation of different groups, teaching subjects in different training centres.



SDG 17 - Partnerships for the Goals: COMSA Corporación establishes partnerships with different entities to maximise results in areas such as innovation, environment and social action.

Examples include participation in the salary solidarity programme in collaboration with UNHCR and membership of the #Porelclima initiative. The group also promotes cross-cutting sustainability partnerships such as joining the Global Compact.



COMMITMENT TO THE SDG



Construction of a Student Residence near Sants Station, Barcelona (Spain)

ACCESSION TO THE 10 PRINCIPLES OF THE UNITED NATIONS GLOBAL COMPACT

At the beginning of 2019, COMSA Corporación strengthened its commitment to the 10 Global Compact Principles in the areas of Human Rights, Labour Standards, Environment and Anti-Corruption by joining the Global Compact as a business group.

The group integrates these principles both in its day-to-day work, with the awareness of its employees and collaborators through specific training and its Code of Ethics, as well as in international days such as World Health Day, World Water Day or the 4th Anniversary of the SDG, in which COMSA Corporación has helped disseminate some of its good practices, thus committing itself to continuous improvement in the sector.





CORPORATE GOVERNANCE

COMSA Corporación was born as a result of the integration, in 2009, of two family business groups. Both groups had historically maintained a close collaborative relationship that allowed them to offer clients comprehensive solutions for their projects. This vision has allowed COMSA Corporación to become a reference in the infrastructure and industrial engineering sector.

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

This **condition of family business** determines, to a large extent, the model of operation and corporate governance, as well as the decision-making process.

Managing bodies and structures of COMSA Corporación:

- » Board of Directors.
- » Executive Committee.
- » Operating and Operations Committees.

BOARD OF DIRECTORS

COMSA Corporación's highest governing body is the **Board of Directors**, appointed by the General Shareholders' Meeting and consisting entirely of proprietary directors, who are elected by the General Meeting from among the shareholders for their knowledge of the business, management experience and expertise.

The Chairman of the Board of Directors, Mr. Jorge Miarnau Montserrat, is appointed by the other members of the Board and discharges executive functions. Among these, he chairs the Executive Committee and has direct responsibility for supervising the Corporate Economic-Financial, Legal and Human Resources Areas.



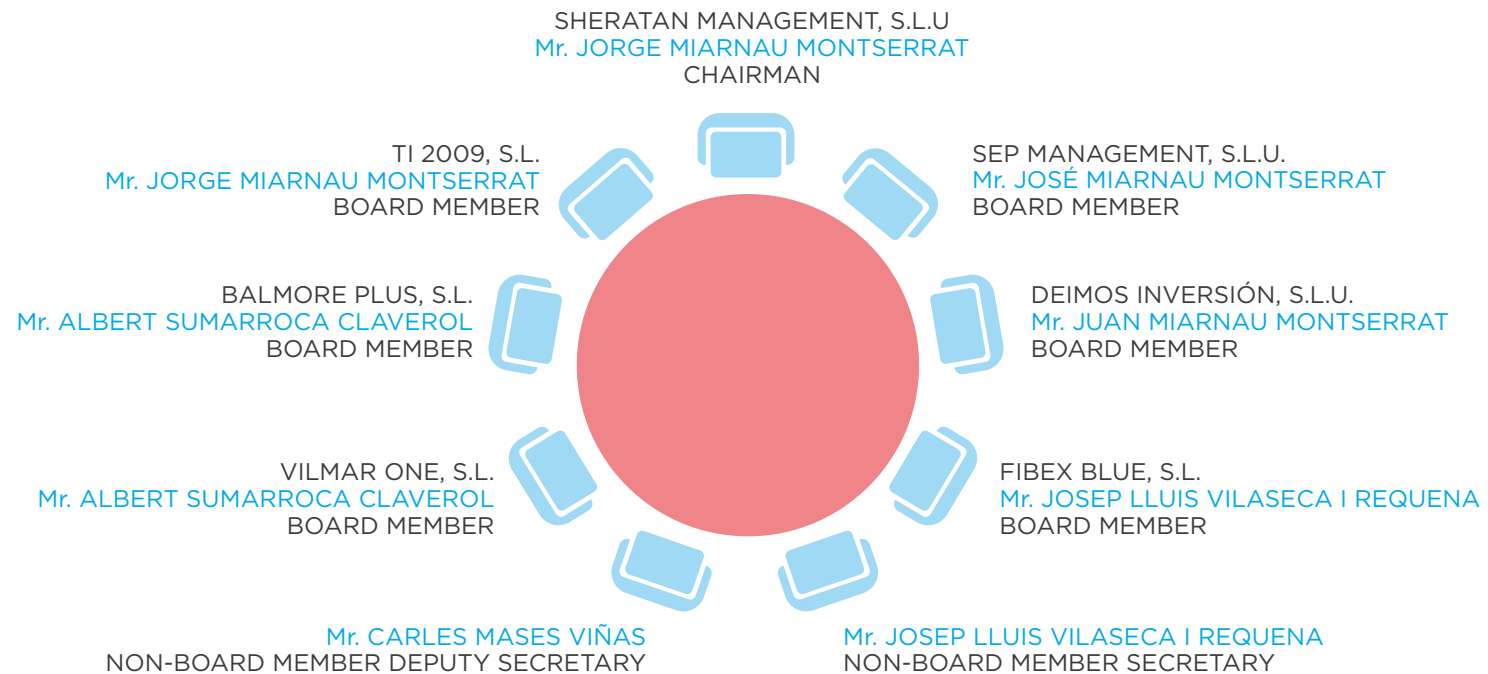
COMSA Corporation headquarters, Barcelona (Spain)



CORPORATE GOVERNANCE

The Board of Directors is made up of seven members, all of whom are legal persons represented by natural persons. Three of the directors discharge executive functions in COMSA Corporación. As it is a limited liability company, the position of the directors is indefinite and the seniority of all of them dates back to 2014.

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 managing body, the development of objectives, strategy, values, principles and the definition of the mission of COMSA Corporación and its member companies. In this regard, for the purpose of updating the group's compliance model, the Board of Directors has also reviewed the definition of the mission, vision and corporate values.

When taking decisions that may affect stakeholders, the Board of Directors requests relevant reports, both externally, through independent consultants and sectoral bodies, and internally, through experts in environmental, social and economic matters from the group itself. Likewise, the top executives of the group in the Corporate function,

Mr. Ferran Perea Samarra, and in the Business function, Mr. Guillermo Lorenzo Rodrigo, attend the meetings of the Board of Directors as guests. They respond to any clarifications required by the Board and inform it of the decisions taken by the Executive Committee and the Operating and Operations Committees.

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

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

With regard to the evaluation of the performance of the Board of Directors, at the end of 2019, the Board approved a self-evaluation of the Board, which was led by the Deputy Secretary of the Board. The conclusions of this self-evaluation are expected to be discussed and analysed internally by the Board of Directors at its meeting in the last quarter of 2020.



CORPORATE GOVERNANCE

EXECUTIVE COMMITTEE

The Executive Committee has been delegated to take decisions, within certain limits, on matters entrusted to it by the Board of Directors. The Executive Committee in turn delegates to executive bodies, as described below:



Economic area

Through the Economic and Financial Affairs Department and the Business Department.



Environmental and health and safety area

Through the Business Department and the Technical and Innovation Department.



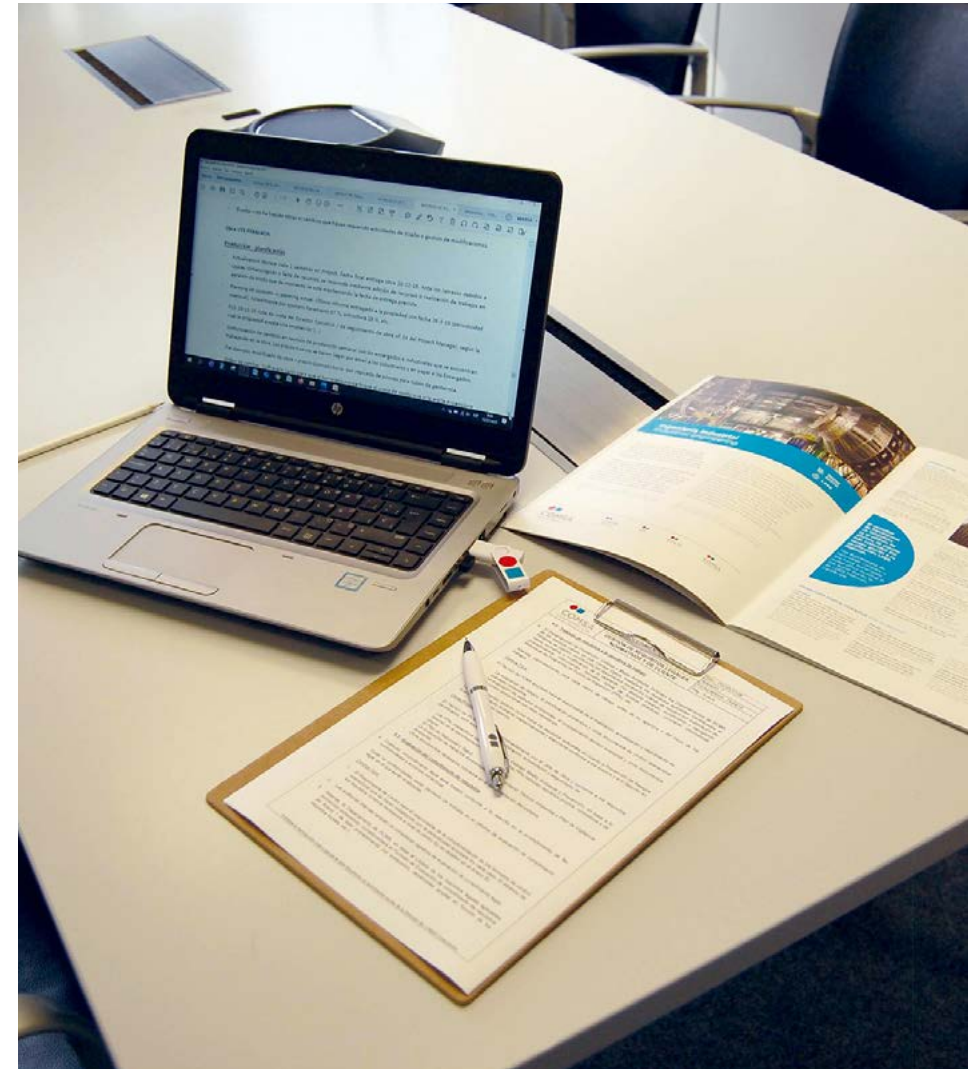
Social area

Through the Business Department and the Corporate and Operational Human Resources Department.

To bring these three areas together, the Board of Directors entrusted the Technical and Innovation Area Management with the preparation of the Corporate Social Responsibility Report which, once approved by the Board, serves as the basis for the analysis, determination and implementation of improvement measures.

The Executive Committee meets on a monthly basis to follow up the evolution of the main business indicators and objectives, as well as the main operations in progress of COMSA Corporación. The directors of the Corporate Areas may attend these meetings as guests.

The Executive Committee is composed of Mr Jorge Miarnau Montserrat, Mr Juan Miarnau Montserrat, Mr José Miarnau Montserrat, Mr Guillermo Lorenzo Rodrigo and Mr Ferran Perea Samarra.





CORPORATE GOVERNANCE

OPERATING AND OPERATIONS COMMITTEES

Likewise, there are Operating and Operations Committees that report to the Board of Directors through the group's top executives, who attend the Board meetings as guests.

Four-monthly committee meetings are held for each of the business areas, except for the Infrastructure and Industrial Engineering Business area, which is held monthly.

These committees analyse and control the main management and operational indicators that guarantee the fulfilment of the established objectives, and they can be attended by the directors and controllers of the respective business areas as guests.

In addition, other Operational Committees are formed, whose main responsibilities are to control and monitor the areas with the greatest impact on the good governance of the group. These Operational Committees include most notably those of:



Contracting



Communication



Legal



Human Resources



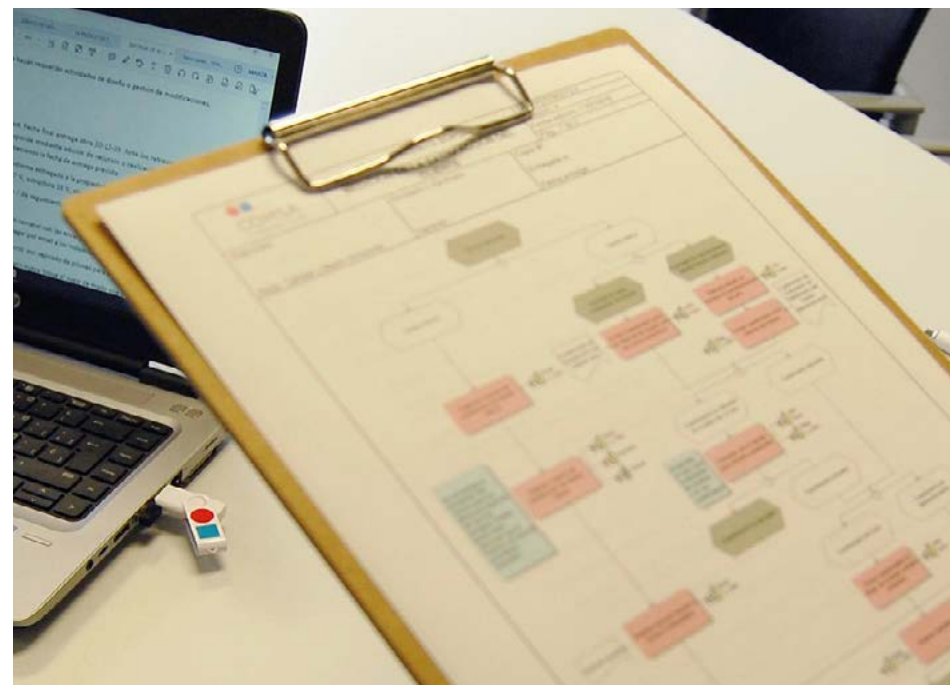
Innovation



Finance

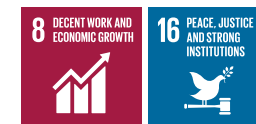
The Corporate Economic and Financial Services Department and the Infrastructure and Engineering Business Department, which includes the Technical R&D Department responsible for environmental matters, report directly to the Board of Directors. Likewise, the Legal Department and the Corporate Human Resources Department, which are responsible for the group's social affairs, report directly to the Chairman of the Board of Directors.

The analysis of the information and critical concerns of the Organisation are channelled upwards, from the Operating and Operations Committees, to the Executive Committee and, finally, to the Board of Directors, through the group's top executives.





TRANSPARENCY, ETHICS AND INTEGRITY



The COMSA Corporación de Infraestructuras, S.L. group and its subsidiaries are firmly committed to the **ethical management** of all their activities.

These principles of behaviour are reflected in the **Code of Ethics**, in the **Compliance** model and in the specific **policies** derived from them, which indicate the guidelines for behaviour and conduct of all those who make up COMSA Corporación, with a criterion of zero tolerance with respect to strict compliance with current regulations on matters of corruption and bribery, and in favour of respect for human rights and the social and environmental setting in which their activities are carried out.

CODE OF ETHICS

COMSA Corporación's **Code of Ethics**, available on the corporate website, is intended to establish the guidelines of behaviour that should guide the daily work of its professionals, whatever their responsibility, their position in the organisation or the geographical environment in which they carry out their activities. In this way, the Code of Ethics determines the expected behaviour of the professionals who form part of the group in those questions of an ethical nature related to the commitments of the organisation in this area or to the applicable regulations.

COMSA Corporación
Code of Ethics



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

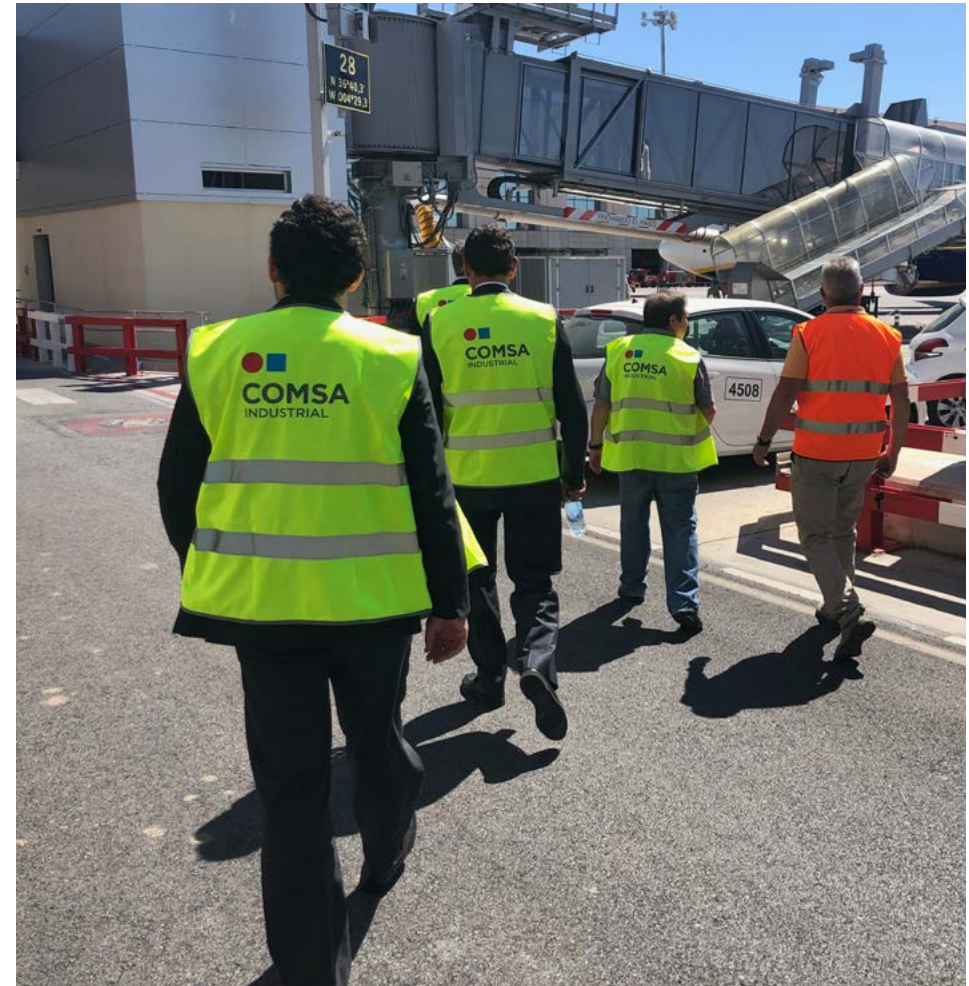
COMPLIANCE MODEL

In 2011, COMSA Corporación adopted a **Compliance Model** for all the companies in the group headed by COMSA Corporación, which constitutes a management system for ethical and regulatory non-compliance risks. Among others, the **Code of Ethics**, the **Criminal Compliance Policy**, and the **Crime Prevention and Response Manual** form part of the group's compliance documents. The Legal Compliance Policy details, among other elements, matters related to the fight against corruption and money laundering.

Although the criminal prevention system implemented to date is fully operational, taking into account the time that has elapsed since its adoption and the latest revisions made, as well as the new criminal regulations that have introduced some changes affecting the criminal liability of legal persons and, in accordance with the commitment to continuous improvement assumed by the organisation, the group's Compliance Model has been reviewed and updated.

As part of this review, carried out in 2019, the following actions have been carried out:

- » Updating the criminal risk map, including those risks associated with corruption.
- » Appointment of a compliance technician as a support resource for the Ethics Committee.
- » Appointment of a liaison officer for corporate vehicles in Peru.
- » Drafting of a Conflict of Interest Protocol and inclusion of the declaration of conflict of interest in employment contracts for new hires.
- » Drawing up of a Protocol for the Prevention of Harassment and other Discriminatory Behaviour.



Terminal 2 of the Malaga-Costa del Sol Airport site visit, Malaga (Spain)



TRANSPARENCY, ETHICS AND INTEGRITY

COMPLIANCE MODEL

In order to continue advancing the group's compliance model, a series of challenges are posed as of 2019, among which the following stand out:

- » Appointment of liaison officers in Latin America.
- » Approval and, if applicable, publication of the updating of the current documents of the Code of Ethics, Criminal Compliance Policy, Protocol for the Control of Critical Suppliers and Partners, compliance questionnaire and Information Security Policy.
- » Approval and publication of new protocols: Protocols for the Prevention of Corruption Risks (public and private sector), Gifts and Hospitality Policy, Protocol for General Risk Management Measures in Group Structures, Protocol for the Prevention of Crimes against the Public Treasury and Protocol for the Prevention of Harassment and other Discriminatory Behaviour (this was already prepared in the last quarter of 2019).
- » Approval and publication of a new Compliance Body protocol, Protocol for the Management of the Ethics Channel and Internal Investigations and Protocol for the Rights and Duties of Employees vis-à-vis the Compliance Model.
- » Publication of the Conflict of Interest Management Protocol, approved in December 2019.
- » In Peru, completion of the project to adapt the compliance model to local regulations, implement an ethical channel and obtain ISO 37001 certification.

With respect to questions related to corruption issues that could eventually pose a risk to COMSA Corporación or any of its group companies, the Ethics Committee has evaluated five issues that correspond to the following companies: four issues related to COMSA, S.A.U. (of which two are international) and one issue related to ADASA Sistemas, S.A.U. which, at the date of issue of this report, is not part of the group. Of the five issues assessed, only in two cases is there a judicial investigation involving persons who are or have been associated with COMSA Corporación in the past. The Ethics Committee has dealt with these cases and has decided, for the time being, not to commence any internal procedure. In the other three cases, the Committee has ruled out any link between the alleged events and COMSA Corporación and/or its group companies.



TRANSPARENCY, ETHICS AND INTEGRITY

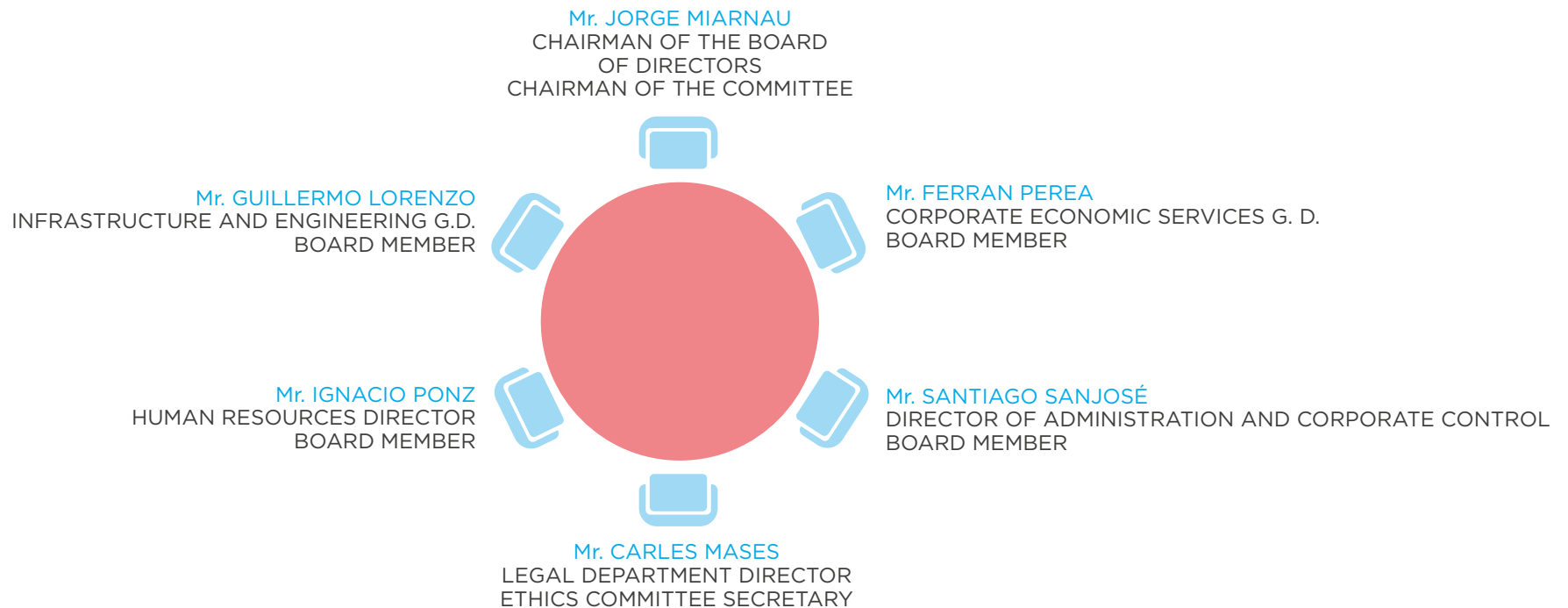
THE ETHICS COMMITTEE

Additionally, and in order to guarantee compliance with the principles included in the Code of Ethics, COMSA Corporación has established follow-up and control mechanisms in the event of potential non-compliance.

In this regard, the analysis, research, evaluation and resolution of behaviours not in line with COMSA Corporación's Code of Ethics is carried out by the **Ethics Committee**, within the framework of the group's Compliance Model. The Ethics Committee is endowed with autonomous powers of initiative and control under the terms of the legislation.

Composition of the Ethics Committee :

In addition, the national subsidiaries of COMSA Corporación all have their respective criminal prevention bodies, made up of the Ethics Committee and a liaison officer. The appointment of the criminal prevention body of each company and consequently of the different liaison officers is made by agreement of the managing body of that company.





TRANSPARENCY, ETHICS AND INTEGRITY

THE ETHICAL CHANNEL

COMSA Corporación has an **Ethics Channel**, through which all employees of the group can communicate in good faith about behaviours and practices potentially not in line with the provisions of the Code of Ethics in any of its matters 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.

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

Information on the complaint channels is detailed in the Code of Ethics, available on the intranet and also on COMSA Corporación's corporate website.

As part of the review of the group's compliance model, work has been done on an **Ethics Channel Protocol** that will be approved during the financial year 2020. An Ethics Channel will also be implemented in Peru.

During 2019, only one complaint was received through the Ethics Channel, regarding facts that could not be confirmed due to a lack of information and sufficient data, and therefore the Ethics Committee decided not to initiate investigation proceedings, according to the procedure provided in the Crime Prevention and Response Manual.

The Code of Ethics, the Criminal Compliance Policy, as well as the Crime Prevention and Response Manual, are available in Spanish, English and Portuguese. The training courses are also delivered in the above-mentioned languages.

With regard to stakeholders outside the group, COMSA Corporación's Code of Ethics is accessible to all of them and can be consulted on the corporate website.



Construction of the AVE station in La Sagrera, Barcelona (Spain)



TRANSPARENCY, ETHICS AND INTEGRITY

TRAINING AND COMMUNICATION

The commitment to ethical and responsible management implies continuous training in these matters for all employees and managers of COMSA Corporación and the group, who must know and apply the instruments, principles and standards that make up the culture of compliance in the organisation, which implicitly includes issues relating to respect for human rights. In addition to promoting and implementing training among professionals, COMSA Corporación has introduced these principles into its value chain, making its collaborators participants in this business culture.

In 2017, communication and training on this subject were provided to COMSA Corporación's managing body, as well as to the group's executives and employees, and this continued in 2018 and later in 2019. In particular, in 2019, the training cycle was continued for personnel from Spain, Portugal, Sweden, Argentina, Peru, Brazil, Colombia, Chile and Mexico, and training was also provided to new recruits, so that 80 people were trained in this area during the year.

People trained in the Code of Ethics in 2019

| Professional category ¹ | Women | Men | Total |
|------------------------------------|-----------|-----------|-----------|
| Category 1 | 1 | - | 1 |
| Category 2 | 1 | 9 | 10 |
| Category 3 | 15 | 38 | 53 |
| Category 4 | 1 | 6 | 7 |
| Category 5 | - | 9 | 9 |
| Total | 18 | 62 | 80 |



Office training day, Barcelona (Spain)

¹ Categories include: 1 Directors; 2 Delegates, Managers, Area Heads and Department Heads; 3 Site Managers and Unit Heads; 4 Technical and Administrative staff, and 5 Operatives.



TRANSPARENCY, ETHICS AND INTEGRITY

RESPECT FOR HUMAN RIGHTS

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

In this respect, the Code of Ethics states that COMSA Corporación provides the means to ensure compliance with the labour provisions contained in the basic ILO conventions, not admitting practices contrary to these either among the companies that make up the group or among those that collaborate with them.

The Code of Ethics establishes the framework for COMSA Corporación's relationship with suppliers and partners. Along these lines, clauses referring to the principles and values of the Code of Ethics, to its existence and to the commitment to comply with it are included in contracts with suppliers and partners, whenever the negotiation so allows.

On the other hand, the **Protocol for the Prevention of Harassment and Other Discriminatory Behaviour** aims to establish the procedural guidelines that must govern COMSA Corporación to prevent, avoid and eradicate any harassment and/or discriminatory behaviour within the group's organisation. In general terms, discrimination means any distinction, exclusion, restriction or preference which has the purpose or effect of nullifying or impairing the recognition, enjoyment or exercise, on an equal footing, of human rights and fundamental freedoms by all persons.

COMSA Corporación declares its total rejection of **child labour, forced labour**, and any type of work that involves painful, extreme, inhuman or degrading conditions, as well as its total defence of the **rights of minorities and indigenous peoples** in any geographical area where 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, namely, job creation, social protection, rights at work and social dialogue, which are central elements of the United Nations Sustainable Development Goal number 8.

In order to guarantee compliance with the guidelines established in relation to respect for human rights, these contents have been included in the training courses held since 2017 on the Code of Ethics.

In line with the group's commitment to respect human rights, in 2019 COMSA Corporación adhered to the **10 Principles of the United Nations Global Compact**.

Any situation of possible violation of human rights can be notified through the Ethics Channel. On the other hand, COMSA Corporación has not identified situations where there is a risk of human rights violations.

ECONOMIC SPHERE





BUSINESS MODEL

COMSA Corporación's business model is structured in **four main areas**, which contribute to 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, integrating the highest quality standards and sustainability principles in order to offer high added value solutions to its clients.

- » Infrastructures
- » Industrial Engineering
- » Maintenance and Services
- » Infrastructure Development and Concession
- » Other activities

COMSA Corporación exports its knowledge and more than 125 years of experience in the construction and maintenance of infrastructures all over the world. It is currently present in Andorra, Algeria, Brazil, Chile, Colombia, Croatia, Denmark, Spain, France, Mexico, Morocco, Paraguay, Peru, Poland, Portugal, Romania, Sweden, Switzerland and Uruguay.

In 2019, the COMSA Corporación de Infraestructuras group managed a workforce of more than 5,000 employees, allowing it to achieve a turnover of 777 million euros. In line with its strategic plan, 38% of this turnover corresponds to its international activity.

INFRASTRUCTURES

COMSA has been involved in the development of railway infrastructure for more than 125 years, offering a comprehensive service covering the construction and maintenance of high-speed lines, trams, as well as metropolitan and regional railways.

In the field of civil works, COMSA carries out comprehensive works on roads, airports, housing developments, maritime and port works, as well as hydraulic, sanitary works, etc. In building, the group stands out as an experienced builder of singular works of great architectural complexity.



Tram construction, Odense (Denmark)

COMSA is one of the main unlisted construction companies in Spain and has a solid international presence in markets such as Brazil, Chile, Croatia, Colombia, Denmark, Mexico, Peru, Poland, Portugal, Romania, Sweden and Uruguay.





BUSINESS MODEL

INDUSTRIAL ENGINEERING

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

In the field of engineering, COMSA Corporación focuses its offer on installations and systems, electrification and railway systems, ITS (Intelligent Traffic Systems), fire protection, solutions for Bio&Pharma, telecommunications, airports and ports, as well as electrical transport and distribution.



Installation of boarding bridges and auxiliary equipment, Malaga airport (Spain)

MAINTENANCE AND SERVICES

COMSA Service, which celebrated its 25th anniversary in 2019, is a multidisciplinary service company operating in the maintenance and energy efficiency sector, specialising in the comprehensive maintenance of buildings and facilities, in order to ensure their optimal operation and extend their useful life, as well as property management, technical assistance, energy optimisation and carbon neutrality, also developing the design, construction and preservation of ornamental fountains, including the decorative treatment of water, light, image, fire and sound.

Likewise, and with the vocation of comprehensive service, the companies COMSA Auxiliary Solutions, specialised in auxiliary cleaning, janitorial and gardening services, among others, and COMSA Security, focused on the installation and maintenance of security systems, are part of this area.



Renovation of the ornamental fountains on the Salou promenade, Tarragona (Spain)



BUSINESS MODEL

INFRASTRUCTURE DEVELOPMENT AND CONCESSION

Concessions

Under this activity, investments in transport infrastructure and real estate concession companies are grouped together, offering additional business opportunities.



Renewable Energies

This area groups together companies that manage renewable energy projects and assets, such as wind, photovoltaic, solar thermal and biomass.



OTHER ACTIVITIES

This area groups together the group's supplementary activities, such as radiofrequency diffusion systems, water technology, management, treatment and recovery of end-of-life tyres, and consultancy and development of IT projects.



Tramway Concession, Murcia (Spain)



Telecommunications transmitter from Egatel (Colombia)



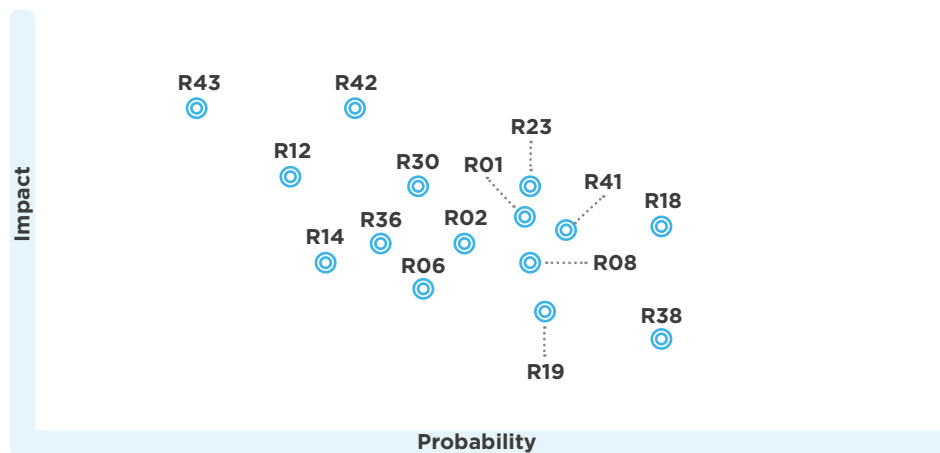
RISK MANAGEMENT

COMSA Corporación has established a proactive process in relation to risk management that is based on the early identification, evaluation and mitigation of risks as a key factor for risk management, as well as for the detection of new improvement opportunities.

The group is exposed to risks that are directly related to the carrying on of its activity, whether they are related to the geography and countries in which it operates and/or to the socio-economic, environmental and legal environment, among other key aspects.


- » With regard to the activity, Infrastructure and Industrial Engineering projects have a high variability in terms of volume, which is determined to a large extent by the type of activity, which is very diversified in the case of industrial engineering.
- » As for the geographical scope, this will be a determining factor in establishing the resources needed and available for each project, which, together with the tight margins within which the sector operates, make proper project selection and optimum risk management essential, both at the tender stage and later on in the implementation phase.

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



| | |
|--|--|
| 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 |

The risk map will be revised during the 2020, to adapt it to the new realities of a substantially changing and complex environment.



To review the group's key risk map during 2020.

OBJECTIVE



RISK MANAGEMENT

COMSA Corporación also has other systems to identify, evaluate, manage and minimise possible risks that may affect the group in other areas, as described below.

- » **Criminal risks.** The group has implemented a Compliance Model which, taking the Code of Ethics, the Criminal Compliance Policy and the Crime Prevention and Response Manual as a reference framework, develops a whole series of policies and procedures that ensure ethical and responsible behaviour in the group, meeting the regulatory requirements related to the organisation's activity. For more information on this area, please refer to the section on [Transparency, ethics and integrity](#) in this report.
- » **Aspects related to environmental management.** Within the framework of COMSA Corporación's environmental management system, the group has identified the internal and external factors that may represent a risk and/or an opportunity for it.

These factors include the following:

| External factors | Internal factors |
|---|---|
| <ul style="list-style-type: none"> » Legislative changes in the environmental field. » Weather conditions (natural disasters). » Potential effects on cultural heritage. » Client requirements. » New market needs, related to client and investor expectations. » Technical aspects. » Social demands. » Aspects related to purchases and management of suppliers and subcontractors | <ul style="list-style-type: none"> » Strategic management and leadership. » Environmental conditions and operational control. » Performance of the organisation. Monitoring, measurement, analysis and evaluation of environmental aspects. » Significant environmental aspects during the execution of the works. » Training and awareness on environmental issues. |



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

For each factor, threats and opportunities are identified, and the actions contemplated to respond to them are detailed.

- » **Health and safety aspects.** Similarly, the group has also identified internal and external factors that may pose a risk and/or opportunity within the framework of the occupational health and safety management system.

| External factors | Internal factors |
|---|---|
| <ul style="list-style-type: none"> » Value chain: clients, suppliers, partners and competitors. » Technical aspects and those aspects related to the production process itself. » Related to economic investment. » Socio-economic situation and legal and social security of the environment. » Geographical accessibility. | <ul style="list-style-type: none"> » Employees competence in terms of qualifications and use of equipment. » Operational control systems. » Project types and geographical distribution. |



CORPORATE STRATEGY

In recent years, COMSA Corporación has developed its 2016-2020 Strategic Plan, structured around four fundamental objectives:

- » **To focus the group's activity on the activities of the Infrastructures and Industrial Engineering business area**, integrating the support and production assistance functions, with the aim of ensuring maximum organisational efficiency.

During 2019, the integration of cross-cutting and business areas linked to the core business continued.

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

The divestment objectives for the period of the Strategic Plan were already achieved in the previous year. However, the process of divestment of some Business Units that are not strategic for the group has continued.

- » **Internationalisation of activities**, using the specialities in which COMSA Corporación makes use of its competitive advantages, both technical and managerial, acting as a spearhead to capture new opportunities.

During 2019 the group worked to consolidate and expand its activity in Latin American markets, such as Peru, Colombia and Mexico, as well as in the strengthening of European markets such as Sweden and Portugal, or which represent new business opportunities, such as the Balkan Peninsula.

- » To promote **Innovation** as a differential factor, developing an open innovation model, based on Corporate Venturing. During 2019 COMSA Corporación launched the programme "The InnCom Challenge" to encourage collaboration with startups, receiving 120 applications from 34 different nationalities. After analysing the applications of the different candidates, three finalists were selected with solutions based on Artificial Intelligence (AI) and Big Data focused on improving efficiency and decision making in the execution of large infrastructure works, thus promoting the digitalisation of the construction sector. COMSA Corporación is collaborating with them in the process of validation, scaling and commercialisation of their products/services at national and international level.

Additionally, during 2019, COMSA Corporación consolidated its upward trend in the innovation project portfolio. Currently, 32 initiatives are being developed with a budget of more than 7 million euros.



Tram section under construction, Odense Tram (Denmark)



CORPORATE STRATEGY

Furthermore, COMSA Corporación, during 2019, established the basis for the drafting of the new 2020-2025 Strategic Plan. The strategic lines of this new plan are as follows:

- 1 Prepare and develop **commercial plans** based on specific guidelines for each of the businesses and activities with the support of the Contracting area.
The group's strategy in this regard is to advance in the establishment of methodologies for the identification, evaluation and mitigation of commercial and operational risks.
- 2 **Develop a unified project planning system** to anticipate risks and opportunities and make decisions more quickly.
- 3 Continue with the **digitalisation of the group** both in the support in the execution of projects and in the improvement of the internal processes.
- 4 Maintain **specialisation and comprehensive service** to our clients, with **innovation** as the backbone to enhance our competitive advantages.
- 5 Continue **promoting collaboration between the group investees** in international projects.
- 6 Review the **organisational model** in the Infrastructure and Industrial Engineering perimeter during 2020 and place the work at the centre of the model.

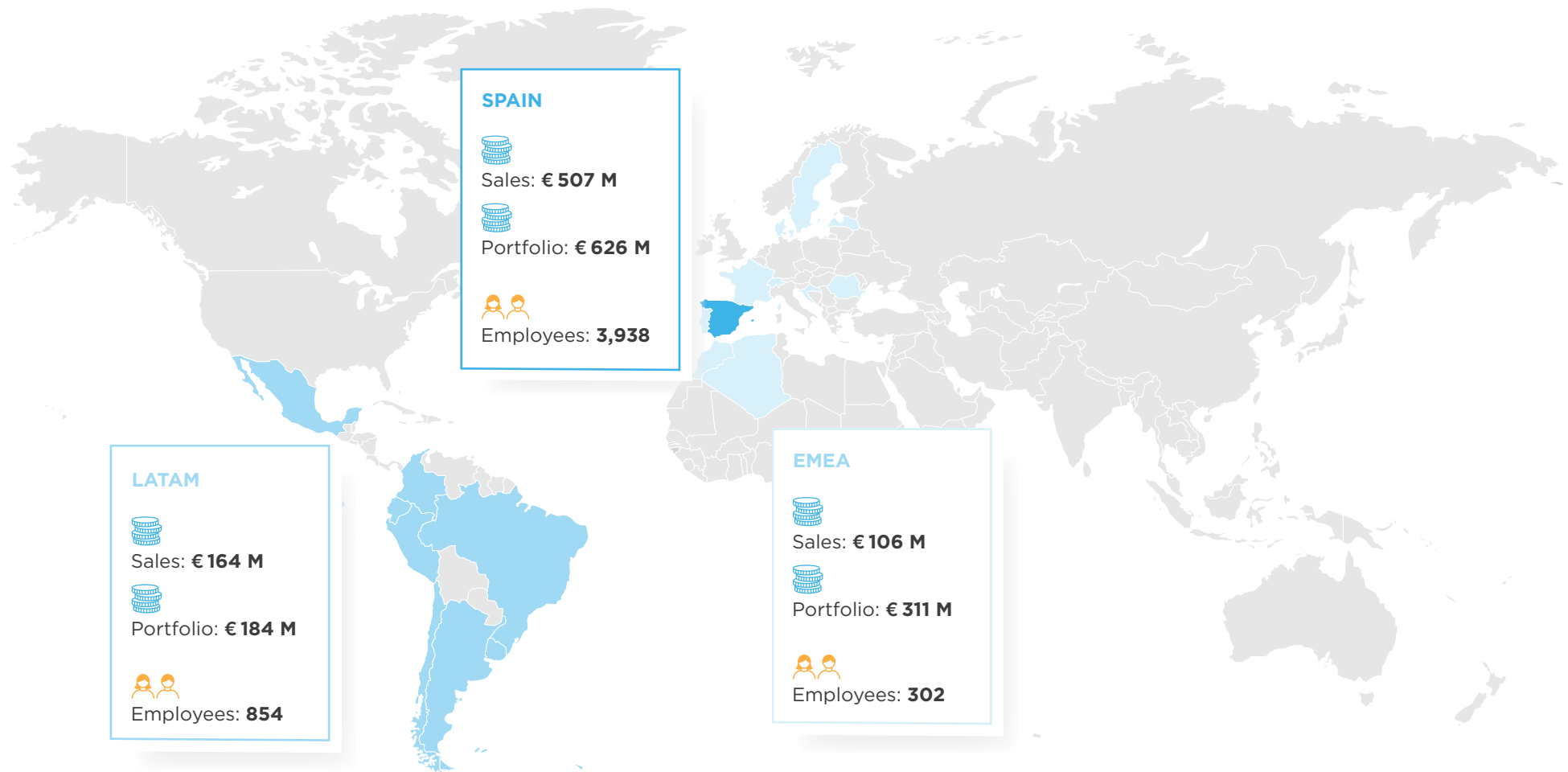
Based on these guidelines, the 2020-2025 Strategic Plan is expected to be implemented and deployed during the year 2020.



Track rehabilitation of a 327 kilometer section between Piedra Sola and Salto Grande (Uruguay)



MAIN FIGURES IN 2019¹



¹ Group consolidated figures.



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 the sustainability of the business, the group maintains a stable, sustainable and integrating commitment, in which the participation of all the stakeholders in the value chain, the motivation and promotion of the talent and creativity of its professionals, as well as the commitment to continuous improvement, are its backbone.

Among the main initiatives that have been launched, COMSA Corporación consolidates measures of shared prosperity and that promote common benefit. Examples of this type of initiative are those carried out in the area of personal and professional development of the group's employees, which include policies on work-life balance and the right to disconnect, or the participation of clients in the development of products and services that cover both explicit needs and present and future expectations.

These same principles are the basis of the commercial relationship with suppliers and collaborators, in which trust and the promotion of initiatives for the common benefit are aimed at producing stable and lasting relationships, creating value by generating quality employment and wealth in the countries where COMSA Corporación carries out its activities.

During 2019, COMSA Corporación contributed to the productive growth of society, generating stable and quality employment, with an average employees of 4,205 people, and almost 20,000 collaborating companies, 97.24% of which are companies located in the countries where the activities are carried on. All in all, the activity generated by the group in 2019 involved 14,795 direct jobs in its work centres, including its own workers and collaborators.

In addition to its own business activity, COMSA Corporación contributes to social causes in the areas where it is present, either by supporting cultural, sports and environmental institutions or by training and integrating groups at risk of exclusion, with a view to contributing, directly and indirectly, to the achievement of the United Nations Sustainable Development Goals.



Widening of the BR-101 highway, São Miguel dos Campos (Brazil)



VALUE CREATION

MAIN BUSINESS FIGURES IN 2019

SALES (€M)



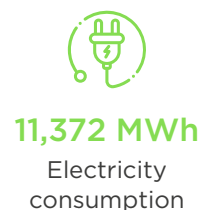
PORTFOLIO (€M)

Infrastructure and
Industrial Engineering
€ 1,140 M
Other Businesses
€ 15 M

INNOVATION

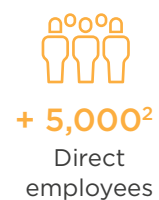
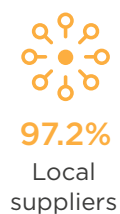


ENVIRONMENTAL CONTRIBUTION



SUSTAINABLE BUILDING

SOCIAL AREA



1 Data homogenised according to 2019 consolidation criteria (Trakcja Group in Global Integration).

2 Figure referring to the COMSA Corporación group (not including the Trakcja Group).

ENVIRONMENTAL SPHERE





ENVIRONMENTAL CONTRIBUTION

COMSA Corporación, aware of the potential impact its activities may have on the environment, assumes a commitment with the communities where it is present and works to minimise their effect on climate change, reducing their carbon footprint, increasing the efficiency of the resources used, making a responsible use of them and carrying out projects that integrate sustainability throughout their life cycle.

“ COMSA Corporación integrates, as an organisational value, respect for the environment in which its operations are carried out

The group carries out an analysis of risks and opportunities in relation to its environmental performance, taking into account the context of the organisation, as well as the needs and expectations of the stakeholders. To this end, COMSA Corporación identifies these risks and opportunities through the analysis of the processes and activities carried out in the different business areas, and establishes actions to be implemented in this respect.

Among the main environmental risks identified by COMSA Corporación in the carrying on of the activity, the following stand out:

- » Contamination of soil, aquifers, watercourses and sea beds by accidental spillage of hazardous products and waste.
- » Negative impacts on biodiversity.
- » Noise and vibration.
- » Effects on historical and artistic heritage.
- » Uncontrolled dumping of waste.
- » Atmospheric pollution by combustion gases from machinery and equipment and by particle emissions.
- » Fires.

Environmental Policy of
COMSA Corporación



For each project, the group also designs and implements Environmental Monitoring programmes, based on a procedure for evaluating the normal environmental aspects, as well as the potential ones and emergency situations in each case, taking into account the entire life cycle of the project to ensure that these points are known and adequately controlled. In this way, the group implements measures that minimise the environmental impact derived from the execution of the project and improves the environmental conditions of the surroundings by providing added value.

The **Environmental Policy** of COMSA Corporación defines the principles of action of the group, acquiring commitments in different areas to:

- » Promote the circular economy.
- » Combat climate change and reduce the carbon footprint.
- » Reduce water consumption.
- » Improve energy efficiency.
- » Reduce waste generation.
- » Respect biodiversity.

“ 78% of COMSA Corporación’s sales are executed under the guidelines and directives of the international environmental management standard ISO 14001:2015.



ENVIRONMENTAL CONTRIBUTION

These commitments are specified in the **Environmental Management System**, certified based on the ISO 14001:2015 standard, which is integrated with the Quality and Health and Safety Management System, with which it is interrelated. Within the framework of the management system, COMSA Corporación promotes continuous improvement, establishes the objectives to be achieved, monitors their attainment and evaluates their performance by means of periodic audits at its work centres. The management of the various companies also reviews the entire system periodically.



OBJECTIVES

As a tool for continuous improvement, starting in 2020, semi-annual reports of good environmental practices have been planned, which will be available to all the organization's personnel.

Along these lines, and as a supplementary measure, the group has taken out voluntary environmental responsibility insurance, both at national and international level, which provides coverage in the event of the risks described above materialising.

With respect to the disclosure of COMSA Corporación's environmental commitment in the supply chain, the group transfers the required environmental criteria through contractual requirements. These criteria are systematically evaluated and serve as an indicator in the selection of suppliers.

In addition, COMSA Corporación has a Procedure for the Identification and Evaluation of Legal Requirements both in the projects it executes and in its own workplaces. In 2019, thanks to the implementation of the Wordlex platform, the group was able to centralise and automate the document management of legal requirements on construction sites, thus optimising time and resources.

Furthermore, it should be noted that in 2019 COMSA Corporación carried out an internal environmental awareness campaign, which included, among others, the following actions:

- » In offices, the sustainability course "Good environmental practices in offices and energy efficiency" has been launched, an online training course taught through the virtual campus that aims to provide new information on fundamental practices in environmental management to raise awareness and improve aspects such as resource scarcity and pollution. More than 420 employees have received this training in Spain.
- » On construction sites, the group gives informative talks to all the personnel involved at the beginning of each project and also during the course of the project at the coordination meetings.



Castilla A-62 motorway. Section: Fuentes de Oñoro, Border between Portugal and Salamanca (Spain)



ENVIRONMENTAL CONTRIBUTION

WASTE MANAGEMENT AND CIRCULAR ECONOMY

Generation of waste

The efficient management of the waste produced in the projects is focused on minimising its generation, promoting segregation at source, recycling, reuse and recovery as opposed to disposal by controlled deposit.

Waste produced by type:

| | Hazardous Waste | | Non-Hazardous Waste | |
|------------------------|-----------------|------|----------------------------|---------------------------------------|
| | 2019 | 2018 | 2019 | 2018 |
| Total waste (t) | 335 | 217 | 1,384,084 (86.69% land) | 826,691 ¹ (71.37% land) |

As is the case with most of the resources used by the organisation, waste production is strongly linked to the types of projects executed, with infrastructure projects being the ones that generate the greatest volume due to the large amount of land that must be mobilised in the case of road or tunnel construction, among others.



OBJECTIVES

- » **Corporate:** eliminate plastic cups and replace them with ceramic cups and reusable bottles for the group's professionals, as well as compostable cups for the visits.
- » **Works:** optimise the methodology for quantifying the materials revalued internally or through waste managers.



GMN processes out-of-use tires for recovery, separating their components and recycling the rubber for reuse in Maials plant, Lleida (Spain)

¹ Variation from 2018 publication: An error occurred in the unit of measurement used for land in Denmark, where the mass was reported in kg and counted as t.



ENVIRONMENTAL CONTRIBUTION

Circular economy

The circular economy is one of the strategic axes of COMSA Corporación's activity, in which it integrates the life cycle approach in its management.

The group considers that the implementation of the circular economy is key to the transformation of the construction sector, which has a considerable impact on the environment due to the amount of natural resources it mobilises and the high percentage of waste it generates.

For this reason, in 2019, COMSA Corporación adhered to the Covenant for the Circular Economy of the Spanish Government Ministries of Agriculture and Fisheries, Food and Environment and Economy, Industry and Competitiveness, which mainly promote the reduction of the use of non-renewable natural resources, the reuse of waste as raw materials, recycling, the analysis of the life cycle of products and services, the incorporation of eco-design criteria and the awareness of the public.

The Group also specifically promotes the use of recycled and/or certified construction materials, offering these types of more environmentally friendly alternatives to the client when selecting the materials to be used.

With regard to earth, which accounts for approximately 87% of the materials considered as waste in the projects, the group prioritises the use of these both within the same work from which they are extracted or moved, and in nearby projects, thus avoiding their consideration as waste, and at the same time reducing the amount of materials needed in new projects.

Additionally, as described below, COMSA Corporación considers innovation as an internal ally with which to make possible the true transition to a circular economy. Through innovation, the group 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 on its activity.

In this area, and within the framework of the State R&D&I Programme Oriented to the Challenges of Society, the **NOVOFUEL** project stands out. Through the treatment of plastic and biomass waste synthesis, the group is developing different types of fuels, whose use is ideal for industries with high energy consumption, such as cement, steel and ceramics, as well as for thermal coal plants, cogeneration or gasification of biomass or urban waste.



Construction of the Amagá Tunnel of the Pacific Connection Highway 1, Antioquia (Colombia)



Development of new high energy content CSR from urban and industrial waste



ENVIRONMENTAL CONTRIBUTION

Initiatives undertaken in 2019 to promote the circular economy and recycling:



Awareness

In **Mexico**, internal awareness campaigns have been carried out to make people aware of the correct separation and disposal of waste and the prevention of its generation at work sites.



Revaluation of materials

In **Colombia**, 33,066 kg of non-hazardous waste was managed for reuse, largely made up of wood and metal, which accounts for 31.94% of the non-hazardous waste from the project¹.



Revaluation of materials

In **Spain** and **Mexico**, 3,540 purchased pallets were returned to the supplier to be put back into circulation.



Revaluation of materials

In **Peru**, 1,715 kg of materials (including waste from clearing, paper, land and toner) have been separated and donated to the community for reuse and revaluation.



Awareness

In **Spain**, a campaign was carried out to reduce the use of plastics in the office.



Revaluation of materials

In **Spain**, at GMN Maials plant, 31,273 t of end-of-life tyres were reused, representing a 32% increase on the previous year.



Revaluation of materials

In **Brazil**, improvements to the waste management system have led to an increase in the volume of segregated waste going to a cooperative in the region.

¹ Non-hazardous waste from the Amagá Tunnel Project not including earth and debris.



ENVIRONMENTAL CONTRIBUTION

SUSTAINABLE USE OF RESOURCES

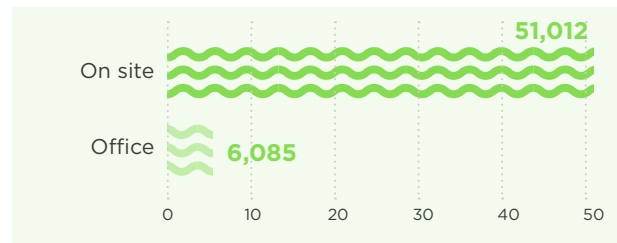
Water consumption¹

The activities carried out by COMSA Corporación have a considerable consumption of water associated to them, especially relevant in infrastructure works.

Water consumption in the organisation and its projects² by type:

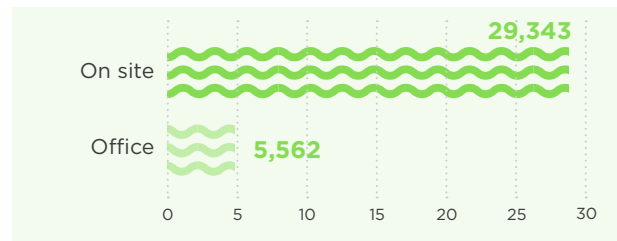
Mains Water (m³)

2019



Total Consumption (m³)
57,096

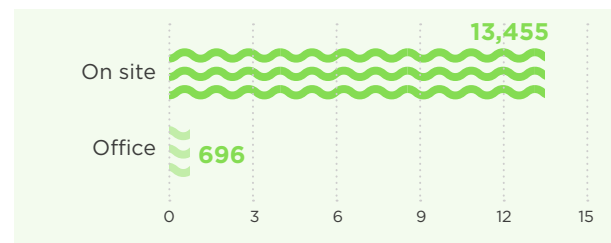
2018



Total Consumption (m³)
34,905

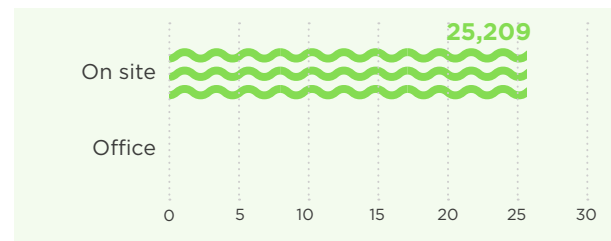
Purchased Water (m³)

2019



Total Consumption (m³)
14,151

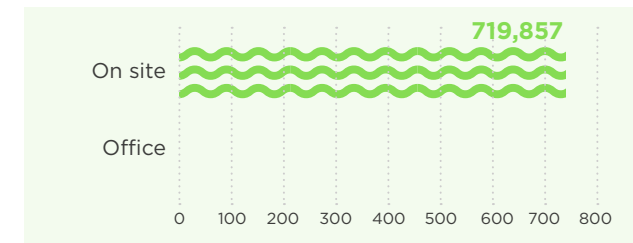
2018



Total Consumption (m³)
25,209

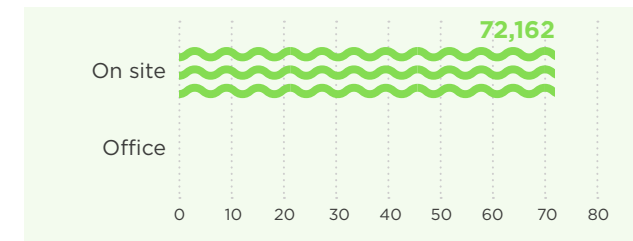
Harvested Water (m³)

2019



Total Consumption (m³)
719,857

2018



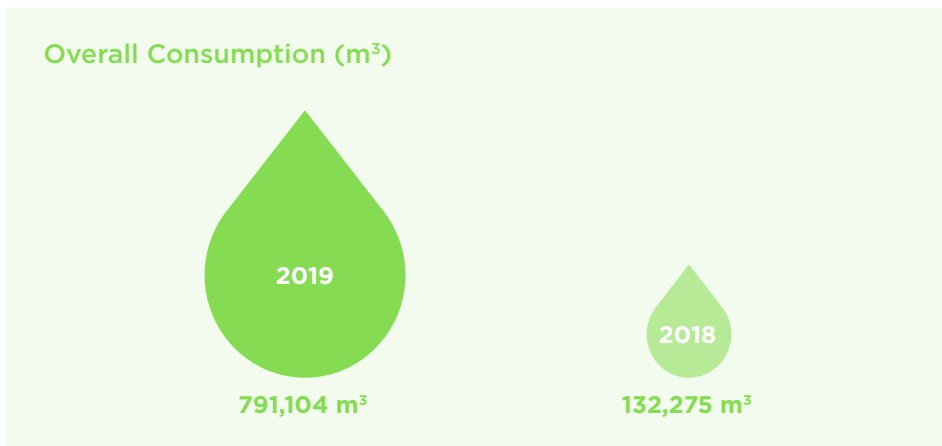
Total Consumption (m³)
72,162

¹ Water consumption data for 2018 have been modified with respect to those reported in the 2018 Report.

² The water consumption in projects and works includes the consumption of logistics centres and all those non-corporate offices, and which are associated with projects.



ENVIRONMENTAL CONTRIBUTION



As with the rest of the group's resources, water consumption is closely linked to the number, type and progress phase of each project. The use of this particular resource and its variation with respect to 2018 is conditioned by the reuse of water collected during the excavation process of the Amagá Tunnel in Colombia. Specifically, a total of 700,061 m³ of water has been reused for industrial processes. For this reason, and to facilitate comparison with respect to 2018 and future reports, it has been considered more appropriate to provide this data broken down between water consumed in corporate offices, where effective saving measures can be taken, and water consumption at construction sites, where there is great variability from year to year.

From the moment it is extracted until the moment it reaches the user, mains water has associated with it, among others, processes for harvesting, potabilisation and distribution, whose treatment results in the emission of CO₂ into the atmosphere. The water footprint allows us to know the emissions associated with this process.

| | 2019 | 2018 |
|---|--------------|--------------|
| On Site Water Footprint (t CO ₂) | 20.15 | 11.59 |
| Office Water Footprint (t CO ₂) | 2.40 | 2.20 |
| Overall Water Footprint (t CO₂) | 22.55 | 13.79 |

Lines of action to reduce water consumption:

- » Awareness: in addition to the usual on-site training on the efficient use of resources and the internal campaigns carried out in Spain and Mexico, in Colombia an awareness session was also held at a school in the area on the efficient use of water and the operation of the water treatment system linked to the Amagá Tunnel Consortium project (Colombia).
- » Reuse of water: as indicated above, the Amagá Tunnel Consortium project in Colombia has a system for harvesting infiltration water that is subsequently reused in the tunnel excavation process, which has resulted in a total of 700,061 m³ of water being reused for industrial purposes. Another example can be found at the GMN plant in Maials (Lleida) where rainwater and reused irrigation water have been used for the cooling system of the crushing machine.
- » Contamination prevention: Procedures to prevent contamination of groundwater are usually carried out during the development of projects, such as settling basins to prevent the deposition of solids in the water or covering the ground to prevent the infiltration of materials into the subsoil, thus preventing them from reaching groundwater.



ENVIRONMENTAL CONTRIBUTION

Consumption of materials

The characteristics of the construction and industrial engineering sector imply a significant consumption of materials. However, the heterogeneity of each project, the fact that semi-finished materials are acquired, the different types of acquisition of the same material and the great variability that can be found within the same material make it difficult to account for them homogeneously.

Even so, the materials that represent a greater volume of consumption for COMSA Corporación are concrete, in works, and paper, in offices. The consumption of these materials has been:

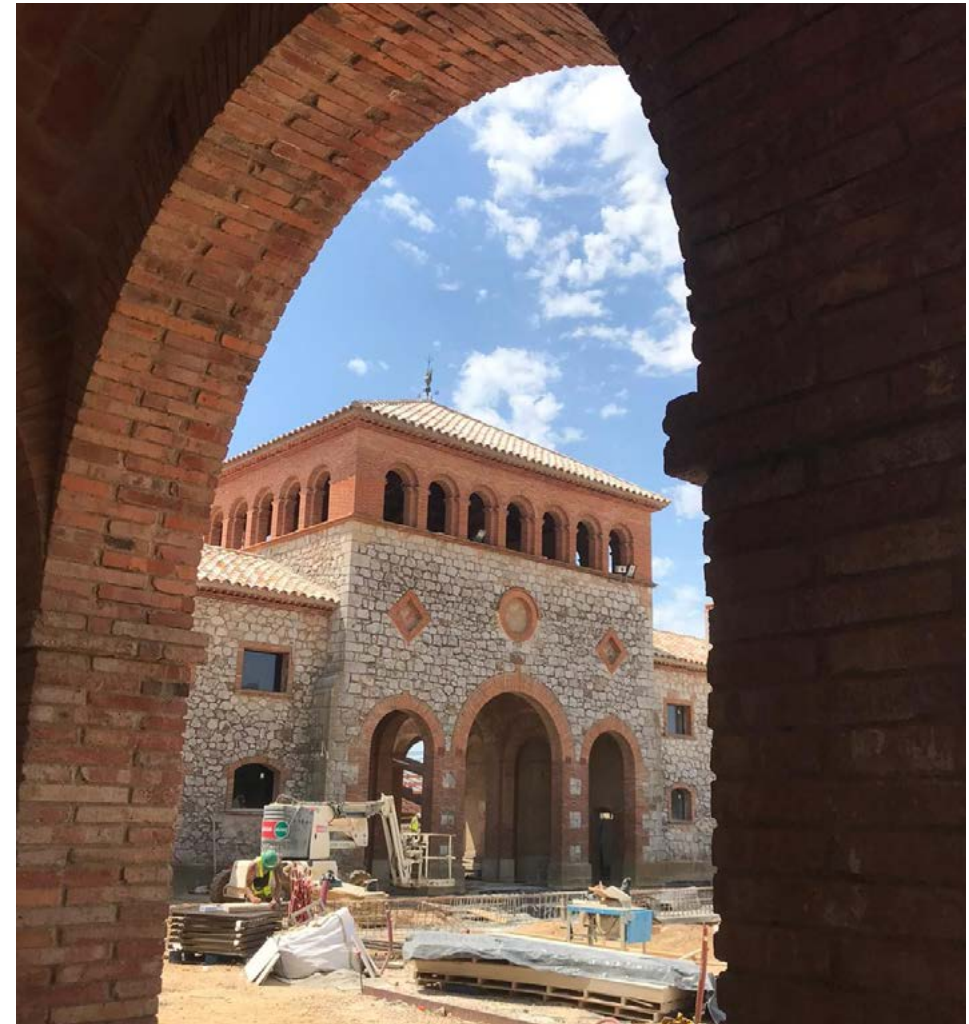
| | 2019 | 2018 |
|----------------------------|--|--|
| Concrete (m ³) | 164,337.97 ¹ | 176,989.67 ² |
| Paper (t) | Overall: 27.58 (10.93% recycled) Spain: 19.42 (15.52% recycled paper: 3.0 t) ³ | Overall: Data not available Spain: 12.52 (24.80% recycled paper: 3.1 t) |

As far as paper consumption is concerned, the group is working to reduce its use through awareness campaigns such as those carried out in Spain and Mexico, as well as projects to digitalise documents in the Supplier Portal, among others.



OBJECTIVES

- » To 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.
- » Where the use of paper is essential, the aim is to encourage the use of recycled or sustainably sourced paper.



Construction of a new wine cellar for the Peralada Group, Girona (Spain)

1 This figure includes the volume of concrete used in Spain.
 2 This figure includes the volume of concrete used in Spain, Argentina, Brazil and Portugal.
 3 The role of COMSA Auxiliary Solutions and COMSA Security is also included.



ENVIRONMENTAL CONTRIBUTION

Energy consumption¹

Energy is one of the main resources used by the group and is a key element for the implementation and execution of its activities.

Consumption of fuel:

| | Petrol | | Diesel | |
|-----------|--------|--------|---------|---------|
| | 2019 | 2018 | 2019 | 2018 |
| Fuel (GJ) | 16,046 | 16,565 | 280,381 | 250,285 |

Consumption of electrical energy:

| | Offices | | Works | |
|------------------|---------|--------|--------|--------|
| | 2019 | 2018 | 2019 | 2018 |
| Electricity (GJ) | 20,669 | 18,203 | 20,269 | 16,013 |

Overall energy consumption within the organisation:

| | Global Country | |
|----------------------------|----------------|----------------|
| | 2019 | 2018 |
| Fuel (GJ) | 296,427 | 266,850 |
| Electricity (GJ) | 40,938 | 34,216 |
| Overall Energy (GJ) | 337,365 | 301,066 |

As can be seen in the table, fuel consumption, mainly linked to travel, continues to play a leading role in the group's energy use. This consumption is strongly linked to the type of project and its location.

With regard to external² energy consumption, the data come from sources outside COMSA Corporación that do not provide kWh or litres of fuel, but rather Km/mile travelled or directly associated CO₂ emissions, which is why they are shown in the following section.



OBJECTIVE

Promote the contracting of renewable energy for corporate centres.

¹ Fuel consumption data for 2018 have changed from the 2018 SNFI Report. See details in Annex I.

² External energy consumption refers to that associated with business travel.



ENVIRONMENTAL CONTRIBUTION

Some of the measures implemented in the group to reduce energy consumption are:

- » Energy efficiency certifications in 75% of the corporate offices in Spain.
- » Campaigns to raise staff awareness, such as the course on good environmental practices held in offices, which has a specific section on energy efficiency.
- » Within the framework of the Mobility Plan, and with the aim of minimising fuel consumption, which is the main consumption of the organisation, the group promotes the rental and leasing of vehicles, prioritising those with lower consumption and greenhouse gas emissions. Thus in 2019 the electric and LPG fleet has increased to a total of 25 vehicles, compared to 12 in 2018.
- » Use of drones in some phases of the projects, thus optimising the movement of the technicians and reducing the associated emissions, while increasing productivity.
- » In works, the group applies geothermal systems that allow taking advantage of the temperature of the subsoil in the cooling systems. An example of application of this technology is the one carried out in the new Warehouse of the Perelada Group (Spain). In this way, the building is more energy efficient in its operating phase, which means significant energy savings.

COMSA Corporación offers within its service portfolio solutions for the improvement of energy efficiency of its clients, thus promoting a more efficient use of energy. In addition to the hand of the **Renewable Energy Business Area**, it contributes to the development of the renewable sector, both in the design and construction phases, as well as in the management of various energy infrastructures, thus helping to guarantee universal access to sustainable energy.

“ In 2019, COMSA Renovables managed 263,868 MWh of energy from renewable sources, the equivalent of a municipality with 204,000 inhabitants.



LPG vehicles used in road maintenance contracts



ENVIRONMENTAL CONTRIBUTION

CLIMATE CHANGE

COMSA Corporación is firmly committed to the fight against climate change and, to this end, works to reduce the greenhouse gas emissions generated by its activity. The group's strategy is based on proper management of direct emissions and fossil fuels, prioritising the use of renewable resources, energy saving and efficiency, as well as sustainable mobility.



OBJECTIVE

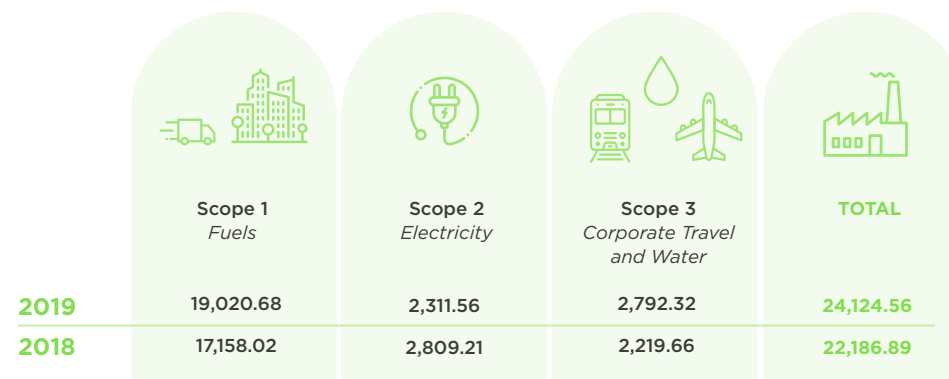
Development of the group's Strategic Plan to face climate change 2030-2050, establishing reduction percentages for each of the Scopes.

Greenhouse gases

As part of COMSA Corporación's commitment to reduce greenhouse gas emissions, in 2019, the group joined the **#PorElClima Community**, a pioneering multi-player initiative for action against climate change, in accordance with the guidelines set out in the Paris Agreement. In this line, since 2018 the group has published its emissions annually in the CDP Disclosure Insight Action.

COMSA Corporación performs the calculation of greenhouse gas emissions and reports scope 1, 2 and 3 of such emissions. Scope 3 includes emissions associated with corporate travel as well as emissions associated with mains water treatment (water footprint).

Group emissions (t CO₂ eq)



Emission intensity in relation to turnover¹:

| | Scope 1 | Scope 2 | Scope 3 | Total |
|------|---------|---------|---------|-------|
| 2019 | 24.48 | 2.97 | 3.59 | 31.05 |
| 2018 | 23.38 | 3.83 | 3.02 | 30.23 |

¹ A turnover of 734 million euros in 2018 and 777 million euros in 2019 are considered for the calculation of the intensity.



ENVIRONMENTAL CONTRIBUTION

To help achieve **SDG 13 – Climate Action**, the group is working on the implementation of measures throughout its value chain, thus promoting the development of its collaborators in this field:

- » Mechanisms to offset emissions associated with business travel (Scope 3) through reforestation projects have begun to be explored with travel suppliers.
- » Suppliers that incorporate green energy into their facilities, as well as those who have energy efficiency certifications for their facilities or services, are given higher scores in tenders.
- » With some suppliers, the group provides support so that they can make improvements that will reduce their emissions.



OBJECTIVE

Obtain certification of the carbon footprint of scope 1 and 2 for Spain.



Maintenance of photovoltaic panels, Tarragona (Spain)



ENVIRONMENTAL CONTRIBUTION

APPLICATION OF SUSTAINABLE CONSTRUCTION STANDARDS

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

“ In 2019, 12 projects were implemented with energy efficiency certifications: LEED and BREEAM.

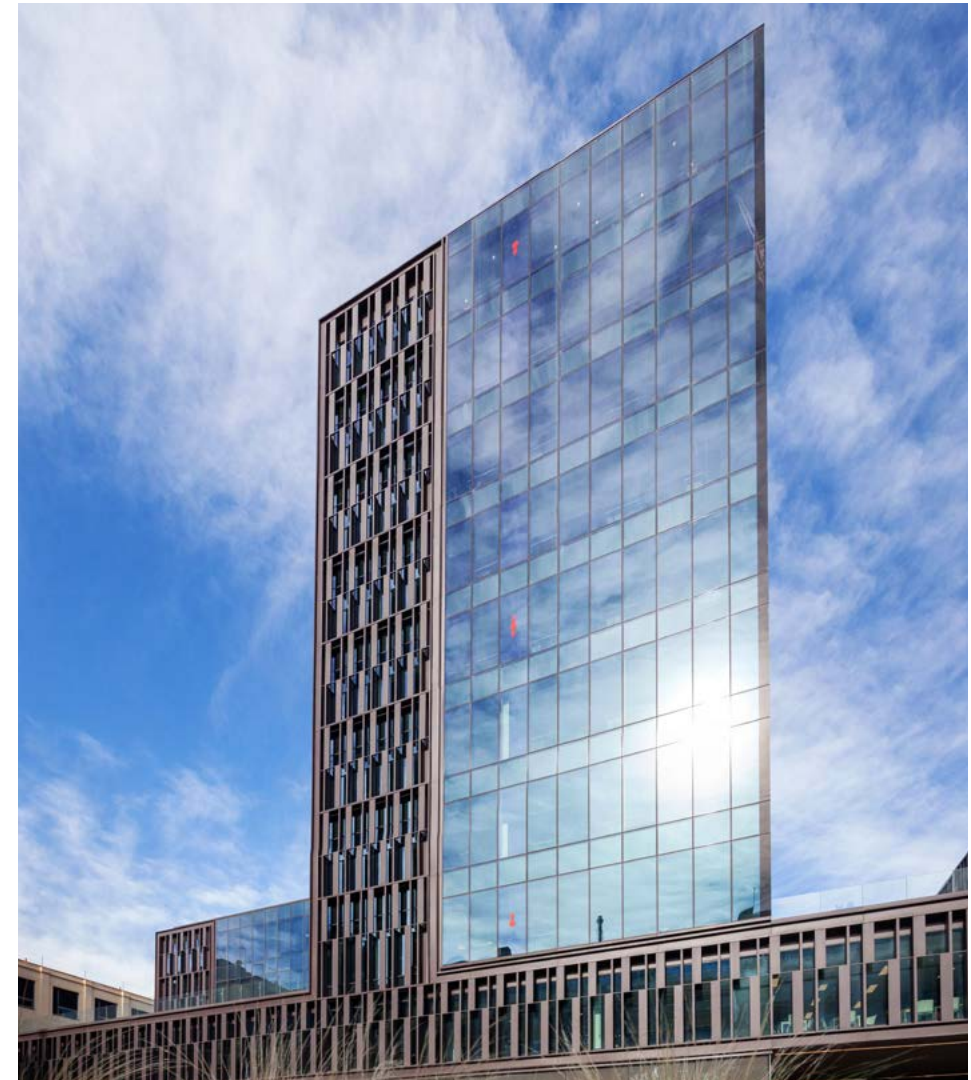
These certifications provide a complete framework for evaluating water, energy and material selection efficiency, which ensures better indoor air quality, as well as more comfortable and safe lighting and noise levels for users. As a result, these buildings use fewer resources, have lower maintenance costs, show a greater commitment to sustainability and offer safer environments.

Some of the highlights in this area are:

- » In 2019, 12 energy-certified projects were executed, including the Barcelona Office Building Project in Barcelona's Barrio 22@, which achieved the highest LEED certification score in the world.
- » 75% of the corporate centres have ISO 50.001 or BREEAM energy certification.

“ 75% of corporate centres have energy certification.

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



Barcelonesa Real Estate headquarter in the 22 @ neighborhood, Barcelona (Spain)



ENVIRONMENTAL CONTRIBUTION

PROTECTION OF BIODIVERSITY

The activities carried out by COMSA Corporación may affect the natural environment where the work projects are executed. For that reason, the group works to minimise its impact on biodiversity, especially when its activity takes place in protected areas or areas of high ecological value.

During the execution of the work in the field, if new significant impacts on the environment are identified, the group proceeds to modify the project, as far as possible, implementing the best available techniques and relevant measures to reduce or minimise such impact.

In the event that this impact cannot be avoided or mitigated completely, as a fundamental part of the project planning phase, compensatory measures for the conservation of flora and fauna are carried out. These measures are based on the physical protection, transplantation or transfer, as well as on the respect of the life cycles of the plant and animal species that may be affected by the execution of the work. Another of the measures carried out in areas of special landscape interest is training for personnel in the correct handling of wild flora and fauna, such as those that took place in the Pacific Highway project in Colombia.



Project for the rescue, transfer and relocation of endangered species (terrestrial and vascular epiphytes), Cordillera Central mountain range (Colombia).

Below are some of the actions highlighted in 2019 regarding the protection of biodiversity in the territory where the group operates:

Fauna:

- » Murcia (Spain): separation of native species from invasive ones, helping to re-establish the natural balance of the ecosystem when moving a raft, in the Reguerón joint venture.
- » Salamanca (Spain): landscape integration of the wildlife passage on the Castilla A-62 highway to make the passage more accessible to the fauna of the area.
- » Vizcaya (Spain): restoration and cleaning of slopes in the Cadagua River basin, thus facilitating access for the European mink (in danger of extinction) to food, shelter and communication between adjacent hydrographic areas, within the framework of the Emergency Works project of the Iberian Wide Conventional Network.
- » Huesca (Spain): installation of a mesh to avoid the risk of entry of small vertebrates, amphibians and micromammals in the A-21 Jaca highway work. In addition, a feeding trough for necrophagous birds has been built and anti-bird screens have been installed to reduce bird collisions with vehicles.
- » Spain, different locations: replacement of conventional insulation in electrical installations to avoid possible effects on birds, as well as the installation of nest boxes.

Flora:

- » *Cordillera* Central mountain range (Colombia): carrying out rescue, transfer and relocation activities for species the hunting of which is banned (terrestrial and vascular epiphytes) located in the project's intervention area.



ENVIRONMENTAL CONTRIBUTION

OTHER ENVIRONMENTAL IMPACTS

Noise pollution

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.

During the execution of construction works, the group maintains time limitations for work with noise-generating equipment. Work in urban areas is carried out at the times established by each region, and noise screens are installed along roads and railway lines to protect the immediate environment from noise generated by machinery and vehicles. In the case of transport infrastructure works, in many cases the work must be done at night to minimise the impact on the mobility of the population, especially in densely populated urban areas.

In order to minimise these impacts, various measures have been implemented, among which the following can be highlighted:

- » 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.

One of the initiatives highlighted in 2019 in this area was the installation of stands for the generators, especially in urban projects, to avoid noise pollution.

Light pollution

COMSA Corporación carries out Environmental Monitoring Plans in all its projects that determine the preventive measures to be adopted to mitigate the impacts of light pollution. The activities that generate a greater impact in this sense are those works carried out at night, as well as the exterior lighting of the workplaces.

In order to minimise these impacts, various measures have been implemented, among which the following can be highlighted:

- » Replacement of exterior lights with others of greater efficiency (LED).
- » Use of environmentally-friendly night-time lighting devices on sites with night-time opening hours.
- » Installation of presence detectors and timers to ensure minimum use of lighting.

Particle pollution

The group works to avoid environmental pollution, especially when working with materials that can be released into the atmosphere, such as soil, aggregates and rubble. Accordingly, the group has implemented different measures, such as:

- » Tarpaulin covering for lorries to prevent the spread of particles during transport.
- » Watering of surfaces to avoid the volatilisation of particles.

Additionally, in episodes of high particulate matter pollution, some activities are temporarily stopped to avoid increasing the levels of suspended solids pollution.



INNOVATION MANAGEMENT



THE COMMITMENT TO INNOVATION AT COMSA CORPORACIÓN

“ COMSA Corporación has had a certified Management System in R+D+i in place according to the UNE 16602 standard since 2007.

COMSA Corporación considers 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 since its foundation, more than 125 years ago.

In line with this commitment, 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.

Thanks to this approach, COMSA Corporación manages to incorporate all business units to the innovative process, which ensures a successful exploitation of results, both internally and in direct marketing.

Currently, COMSA Corporación has **35 innovation projects** in progress, of which five started in 2019. In total, R&D&I activities and projects worth over 7 million euros were carried out in 2019.



Application of the BIM methodology in the Generalitat de Catalunya Campus, Barcelona (Spain)

INNOVATION MANAGEMENT

Most notable projects in progress

| | National level | European level |
|--|---|---|
| Railway | <ul style="list-style-type: none"> » RESILTRACK: Railway infrastructures resilient to the effects of climate change. » SWITCHES: Optimisation of maintenance of structures for track switches. » RECOVER: Comprehensive sustainable anti-pollution treatments and creation of green railway corridors. » BIRBALAS: Development of ballast products from metallurgical slag. | <ul style="list-style-type: none"> » S-CODE: Design to reduce the composition of the structures that allow changing track. » BALLAXT: New artificial ballast from 3D printing. » NEOBALLAST: The ballast is lined with recycled rubber to extend the life of the railways. |
| Air navigation and communications | <ul style="list-style-type: none"> » INMA: Remote management system for air navigation assistance systems. | <ul style="list-style-type: none"> » 5G-PICTURE: Converged infrastructures that integrate advanced wireless solutions and innovative network solutions. |
| PRL | <ul style="list-style-type: none"> » BIMIÓTICA: Control of protection devices through image detection. | |
| Digitalisation | <ul style="list-style-type: none"> » BIMTable: Virtual construction before the execution of the work. | <ul style="list-style-type: none"> » SPHERE: Digital Twin for building construction and maintenance. |
| Civil Works | <ul style="list-style-type: none"> » PAVIRE: Analysis of data generated by users during driving, for improvements in maintenance, sustainability and safety of the infrastructure. » ROADZ: System for the illumination of road signs from the energy generated by the passage of vehicles.. » ALBEPAV: Creation of high performance asphalt from the reuse of recycled glass aggregate. | <ul style="list-style-type: none"> » GEOFIT: Integration of geothermal energy generation in building rehabilitation. |
| Building and Smart Buildings | <ul style="list-style-type: none"> » REFER: Energy reduction and flexibility in building rehabilitation. » BIMTable: Virtual construction before the execution of the work. » INSPECTOR: Maintenance of installations by means of drones. | <ul style="list-style-type: none"> » LIFE BIPV: Building Integrated Photovoltaic. » BIPVBOOST: Cost reduction of BIPV solutions. » DRIVE: Improving the energy efficiency of buildings. » GEOTECH: Renewable heating and cooling system that, through an innovative system of perforation and heat exchange with the floor, allows application in the housing sector. » HYBUILD: Hybrid electric and thermal storage systems that guarantee thermal comfort for buildings in both Mediterranean and continental climates. |



INNOVATION MANAGEMENT

Below are some of these projects executed during 2019.

INNOVATION IN INFRASTRUCTURE MAINTENANCE

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 determined commitment to intelligent and effective maintenance that eliminates the over-exploitation of natural resources related to the reinforcement of their durability.

It is also essential to ensure that infrastructures are resilient to the effects of climate change, an area in which COMSA Corporación contributes by making infrastructures resilient, as one of the main objectives of its portfolio of innovation projects dedicated to predictive maintenance.

In this regard, the **RESILTRACK** project stands out. Its objective is to design a system that allows knowing the state of the railway infrastructure and its effect with respect to adverse climatic phenomena in real time, as well as to foresee its behaviour in order to act where it is necessary, thus obtaining resilient railway infrastructures in the face of the effects of climate change.

This project, promoted by a group of companies led by COMSA Corporación, was executed thanks to the financing of the Centre for the Development of Industrial Technology as an organisation attached to the Ministry of Science and Innovation.



Rail yard expansion of high-speed train at the base of Santa Catalina, Madrid (Spain)

NEW MATERIALS

Within the framework of COMSA Corporación's commitment to the environment, the development of new sustainable products is another of the fundamental pillars of the group's commitment to innovation. These new product developments must always meet a double requirement: use recycled materials and provide advanced performance.

Currently, the contamination associated with trains on external and underground railways is very important and its effects are very worrying, since during the circulation of these trains, heavy metals and hydrocarbons are released, which represents a toxic risk for health and the environment. Although this is a significant problem identified by the Member States of the European Union, very little has been studied to date.

In this sense, the **RECOVER** project, in which COMSA Corporación is participating, aims to create Green Railway Corridors by eliminating or mitigating the pollution associated with the operation of these infrastructures. The aim is to generate a zone free of the pollution associated with the movement of trains on railways and their surroundings that will allow an environmental improvement of the tracks themselves and their surrounding area.

The RECOVER Project is financed by the European Regional Development Fund (ERDF) through the Ministry of Economic Affairs and Digital Transformation.

INNOVATION MANAGEMENT

INNOVATION AND ENERGY EFFICIENCY

Another priority area for innovation in COMSA Corporación is energy efficiency. The group is aware that, in order to reduce polluting emissions and energy expenditure, one must start by exploiting resources and adapting facilities. Information and communication technologies, as well as the implementation of intelligent networks, are key to achieving this scenario. The “Demand-Response” aspect is decisive for energy automation, with flexible and distributed generation being a necessary tool for sustainable development and efficient energy management in buildings.

The **REFER** project aims to improve the energy alternatives available for buildings, providing them with flexibility with various options for energy generation. Taking into account the great challenge of improving the energy efficiency of existing buildings -not so much in new buildings where it is easier to incorporate new technologies and knowledge-, the REFER project takes both points of view and focuses on the energy and flexible rehabilitation of residential and tertiary buildings separately.

REFER is financed by the European Regional Development Fund through ACCIÓ, the Catalan Government’s agency for business competitiveness, attached to the Department of Enterprise and Knowledge.

DIGITALISATION

Undoubtedly, digitalisation is one of the fundamental areas for boosting innovation projects and accompanies most of them during their development.

Likewise, the exponential growth of mobile Internet traffic introduces the need to transform traditional closed, static and inelastic network infrastructures into open, scalable and flexible ecosystems that support new types of connectivity, high mobility and new services. Responding to this new need, the **5G-PICTURE** project will develop and demonstrate a converged infrastructure that integrates advanced wireless solutions and novel network solutions. This will enable the provisioning of any service across the infrastructure through the flexible and efficient combination of network, computing and storage resources.

The results of the project will provide operational services on mobile telecommunications networks and will be applicable, inter alia, to the management of railway infrastructures. The 5G-PICTURE project is part of the European Union’s Horizon 2020 programme for research and innovation.





INNOVATION MANAGEMENT

CORPORATE VENTURING

During 2018, COMSA Corporación presented **The InnCom Challenge**, an initiative that aims to support the development of companies with solutions based on emerging technologies applied to the fields of digitalisation of construction and maintenance of infrastructure, or specialised in improving services related to energy efficiency in the management of facilities.

- » Within the framework of this initiative, it is worth highlighting the promotion of the **FINALCAD** project, which has developed an application that allows for the efficient management of infrastructure and construction projects. It consists of a digital platform for collaborative work that integrates all the components of the project in real time.
- » Likewise, it is worth mentioning the collaboration with **SAALG Geomechanics**, a Spanish startup specialised in the analysis of geotechnical instrumentation data in real time to minimise risk, save time and maximise the profitability of the work.

Other selected projects were:

- » **Allread (Spain)**: development of computer vision software that detects, reads and processes any type of text or symbol that appears in industrial processes.
- » **Constru (Israel)**: platform that uses AI to optimise the inspection and analysis of the construction process.
- » **Infrakit (Finland)**: platform for real-time monitoring of construction sites.

In this same area, COMSA Corporación reinforces its commitment to digital transformation and open innovation through a collaboration agreement with the **Mobile World Capital Foundation's The Collider** programme. Within the framework of this agreement, the **Smart Tower** startup has been set up to market remote monitoring services for electric towers and other infrastructures.

NEW CONSTRUCTION METHODS

COMSA Corporación innovates in the design of projects by integrating the use of **BIM technology**, which allows “building before you build”, i.e., to build virtually before the work is executed.

To this end, the group created its own BIM Unit years ago and has designed the **BIMTable**, a tool that allows projects to be monitored in situ in a collaborative environment and which was presented in 2018 at the BIMExpo fair in Madrid, generating great expectation.

In 2019, 20 projects were implemented using BIM methodology, including the rehabilitation of the Garraf Tunnel for Adif and the Johan Cruyff Stadium for FC Barcelona.

On the other hand, and within the framework of the commitment to environmental sustainability in the application of construction methodologies, **BIGEO** (Building-Integrated Geothermal System) technology has been integrated as an innovative solution for the generation of renewable geothermal energy installed in buildings, whose geothermal exchangers are embedded in elements of the foundations themselves.



INNOVATION MANAGEMENT

COLLABORATION AND PARTICIPATION IN SECTORAL ASSOCIATIONS AND FORUMS

The group collaborates with sectoral and other more specialised entities to promote the development of the sector, among which the following stand out:

Construction field:

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

Railway field:

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

Energy efficiency:

- » Catalonia Energy Efficiency Cluster (CEEC)
- » Agency for Enterprise Competitiveness, RIS3CAT energy project
- » Energy Efficient Buildings (E2B)

Likewise, COMSA Corporación encourages participation in forums and meeting spaces with other companies, in order to jointly advance in the promotion of innovation.

- » UIC Workshop on Noise and Vibration (Paris). COMSA Corporación attended to present Neoballast as an effective technology against noise and vibration in the railway.
- » Expo Rail Mexico 19 (Mexico City). The group was present at Expo Rail Mexico 19, the main fair of the Mexican railway industry, organised by the Association of Mexican Railways, where information about Neoballast technology was also shared.
- » IABSE Symposium 2019 (Guimarães). The symposium aimed to provide an international forum for the discussion of issues related to sustainability in the construction sector, risk assessment and asset management in infrastructure, among other topics. Within this framework, COMSA presented the RESIL-TRACK project, an intelligent and resilient system for the predictive maintenance of railway infrastructures.



Neoballast field test section between Maçanet-Massanes and Caldes de Malavella section, Girona (Spain)

SOCIAL SPHERE





COMSA CORPORACIÓN TEAM



For COMSA Corporación, human capital is the greatest asset for the creation of value and implies the guarantee of success in all the projects in which it contributes. In this regard, the group has a strong commitment to **SDG 8 - Decent Work and Economic Growth, as well as SDG 3 - Good Health and Well-being, SDG 4 - Quality Education, SDG 5 - Gender Equality and SDG 10 - Reduced Inequalities.**

On this basis, the group offers inclusive, safe, healthy and non-discriminatory working environments where everyone can grow and develop their career, and where talent, professionalism and performance are the success factors.

COMSA Corporación expresses its commitment to its professionals in the **Human Resources Policy**. In 2018, the group also launched the **COMStruimos Plan**. This is part of the Human Resources Strategic Plan, which incorporates the lines of comprehensive management of human capital and has a three-year horizon.

Within the framework of the COMStruimos Plan, in 2019 the **basic competence map** and the **description of all the job positions** were reviewed, and the **performance evaluation model** was reviewed and defined, which at the same time was systematised and digitalised, with the aim of professionalising and improving the efficiency of talent management. The group has also planned a review of the remuneration policy for this year and has set the long-term objective of drawing up succession plans for strategic positions.

In the field of risk management, COMSA Corporación's risk map identifies and evaluates significant risks in the area of people management. In this respect, the materialisation of labour accidents and the lack of talent retention were identified as significant risks. Both risks have been prioritised historically and have independent structures, which analyse, establish and implement specific policies and procedures in this regard to create interdependent teams as a model of leadership.

COMStruimos PLAN LINES OF ACTION:

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



Project meeting at the corporate headquarters (Spain)



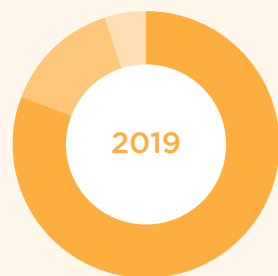
COMSA CORPORACIÓN TEAM

HUMAN CAPITAL¹

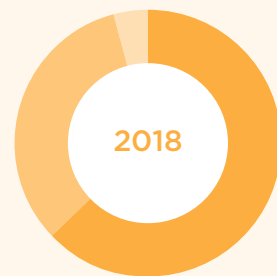
The COMSA Corporación team is structured around the principles of business culture. Thus, based on the mission and vision of the group, the shared value of offering integrated infrastructure projects, industrial engineering, maintenance and services, and development and concession of environmental infrastructures, always under the principles of professionalism, quality and innovation, driving international growth, and thus supporting the economic, technological and social progress of the countries where it carries on its activity.

The cross-cutting and global strategy of the group requires a diverse team integrated by different professional profiles that generate wealth and prosperity in all geographical areas where COMSA Corporación operates. An example of this commitment is that almost all senior positions² are covered by local staff, and in 92.7% of cases (95.8% in 2018).

Distribution of employees by geographical area

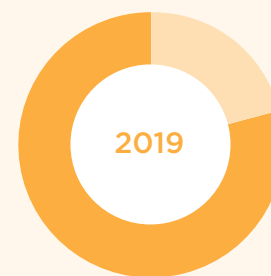


| | | | |
|---|-------|-----|---------------|
| ● | 3,393 | 81% | Spain |
| ● | 603 | 14% | LATAM |
| ● | 209 | 5% | Rest and EMEA |

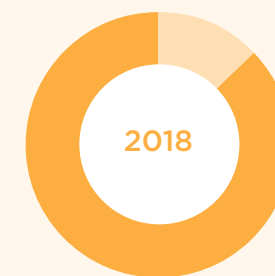


| | | | |
|---|-------|-----|---------------|
| ● | 3.013 | 63% | Spain |
| ● | 1,594 | 33% | LATAM |
| ● | 192 | 4% | Rest and EMEA |

Distribution of employees by gender



| | | | |
|--------------------|-------|-----|-------|
| ● | 893 | 21% | Women |
| ● | 3,312 | 79% | Men |
| ----- | | | |
| 4,205 TOTAL | | | |



| | | | |
|--------------------|-------|-----|-------|
| ● | 634 | 13% | Women |
| ● | 4,165 | 87% | Men |
| ----- | | | |
| 4,799 TOTAL | | | |

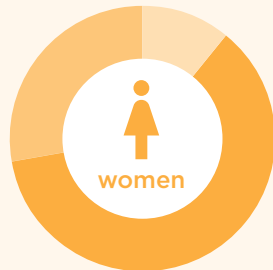
¹ Unless otherwise specified, all figures, tables and comparisons in this section refer to the countries and businesses included in the scope of this report.

² The senior positions include: Directors, Delegates, Managers, Area Heads and Department Heads.



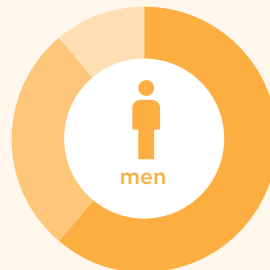
COMSA CORPORACIÓN TEAM

Distribution of the workforce by age

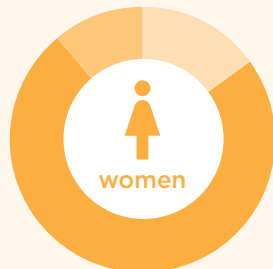


| | | |
|------------------|-----|-------|
| 74 | 8% | <30 |
| 564 | 63% | 30-50 |
| 255 | 29% | >50 |
| 893 TOTAL | | |

2019

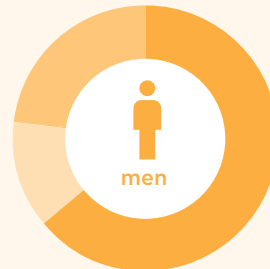


| | | |
|--------------------|-----|-------|
| 348 | 11% | <30 |
| 2,039 | 62% | 30-50 |
| 925 | 28% | >50 |
| 3,312 TOTAL | | |



| | | |
|------------------|-----|-------|
| 95 | 15% | <30 |
| 466 | 74% | 30-50 |
| 73 | 11% | >50 |
| 634 TOTAL | | |

2018



| | | |
|--------------------|-----|-------|
| 540 | 13% | <30 |
| 2,662 | 64% | 30-50 |
| 963 | 23% | >50 |
| 4,165 TOTAL | | |

People management indicators reflect some of the characteristics of the construction and industrial engineering sector. One of them is the temporary nature 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 the hiring modality and its temporary duration. However, COMSA Corporación is committed to the creation of quality employment that contributes to the development of the communities in which it operates, which is why, globally, in 2019, 76% of the contracts were permanent, and 89% of them were full-time.

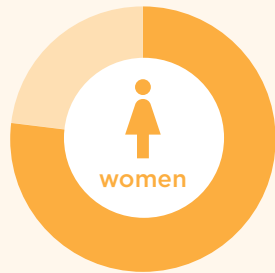


Construction of two access tunnels to the E4 motorway, Stockholm (Sweden)



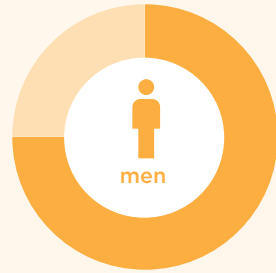
COMSA CORPORACIÓN TEAM

Type of contract by gender



● 688 77% Indefinite
● 205 23% Temporary

893 TOTAL



● 2,492 75% Indefinite
● 820 25% Temporary

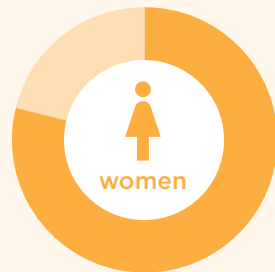
3,312 TOTAL

2019



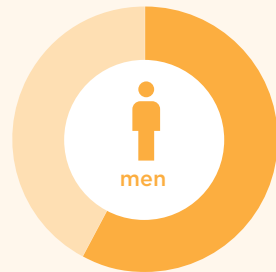
● 3,180 76% Indefinite
● 1,025 24% Temporary

4,205 TOTAL



● 501 79% Indefinite
● 133 21% Temporary

634 TOTAL



● 2,414 58% Indefinite
● 1,751 42% Temporary

4,165 TOTAL

2018



● 2,915 61% Indefinite
● 1,884 39% Temporary

4,799 TOTAL



Intelligent Traffic Systems (ITS) in the Bogotá - Villavicencio Corridor (Colombia)

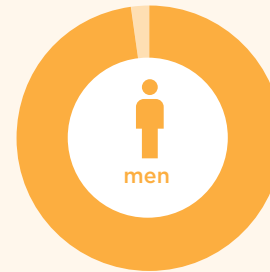
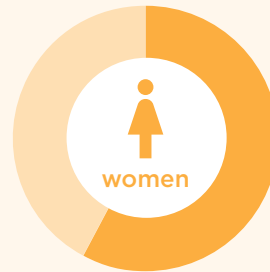


COMSA CORPORACIÓN TEAM

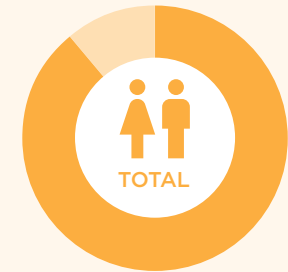


Cleaning work carried out by COMSA Solutions

Type of contract by type of workday and gender



2019



● 514 58% full time
● 379 42% part time

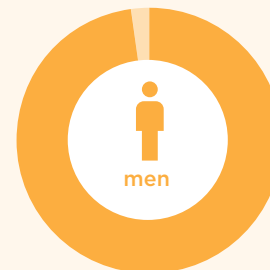
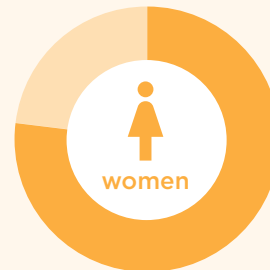
893 TOTAL

● 3,228 97% full time
● 84 3% part time

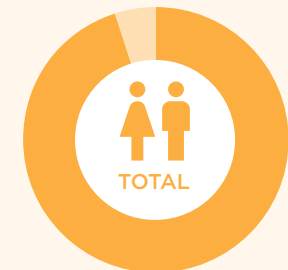
3,312 TOTAL

● 3,742 89% full time
● 463 11% part time

4,205 TOTAL



2018



● 489 77% full time
● 145 23% part time

634 TOTAL

● 4,083 98% full time
● 82 2% part time

4,165 TOTAL

● 4,572 95% full time
● 227 5% part time

4,799 TOTAL



COMSA CORPORACIÓN TEAM

TURNOVER

The seasonality of operations in a given region also affects the need to adjust contracts, with the aim of adapting to the productive and organisational reality of different businesses and projects.

Thus, employees turnover is highly conditioned by two fundamental factors:

- » Firstly, many of the projects are carried out in dispersed geographical areas, which means that at the end of these projects the continuity of a large number of the employees assigned to the contract is highly conditioned by contracts ending. The impact of this type of leave on the workforce, for the group as a whole, translated into 1,261 people leaving the group, 55.3% of the total number of employees who left in 2019.
- » Secondly, some types of service contracts mean that, in order to guarantee clients the best conditions and continuity of the service, the group subrogates personnel with extensive experience and knowledge of the type of work to be carried out. This same process, in the opposite direction, occurs in cases where one of the group companies ceases to provide a contract of this type, and the personnel assigned to it is subrogated by COMSA Corporación which takes over the service. The impact of this type of leave on COMSA Corporación's employees can be seen in the example of Peru for 2019, with a total of 1,143 employees leaving by their own free will or because their contracts ended (more than 50% of the group's total in 2019), due to these types of circumstances.

In this sense, and taking into account the factors mentioned above, the ratio of personnel turnover, without considering contract terminations and without including the case of Peru, due to the above-mentioned cases, is 12.79%. In the case of Spain, the rotation due to voluntary leave of personnel is 7.25%.

In turn, the termination of employees contracts for non-voluntary reasons has been the result of specific needs for adjustments to the reality of production and organisational conditions in the various group companies.

Notwithstanding the above, COMSA Corporación maintains a clear commitment to job creation in all the areas in which it carries on its activities. As a result of this commitment, the group has made 1,504 additions to its workforce, the distribution of which can be seen in the table below:

Number of new hires

| Age | under 30 | | 30 - 50 | | over 50 | | Total |
|------|----------|-----|---------|-------|---------|-----|--------------|
| | Women | Men | Women | Men | Women | Men | |
| 2019 | 81 | 293 | 168 | 723 | 61 | 178 | 1,504 |
| 2018 | 89 | 612 | 122 | 1.068 | 9 | 236 | 2,136 |

In order to analyse and improve the conditions of employment, the **project of follow-up interviews for new recruits was launched** in 2019. This practice has been fully implemented in COMSA Corporación and partially in the rest of the group. The interviews are carried out three months after hiring and consist of personal interviews with the new hire and their manager to obtain a general assessment of these three months, their perceptions, fulfilment of initial expectations and proposals for improvement.

Likewise, in 2019 **the process of leave interviews began**, which consists of a questionnaire and a subsequent interview with Human Resources by the person who leaves the group voluntarily.



OBJECTIVE

To publicise job vacancies internally and to implement the On Boarding project, the welcome programme for new recruits.



COMSA CORPORACIÓN TEAM

REMUNERATION

COMSA Corporación publishes the remuneration of the Board of Directors annually in the management report, in accordance with the group's commitment to transparency and equality.

The amount accrued in 2019 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 796 thousand euros.

The group determines the remuneration on the basis of the salary structure laid down in the applicable collective agreements, which are generally composed of basic salary, seniority and additional bonuses related to specific conditions, quality and/or quantity of work.

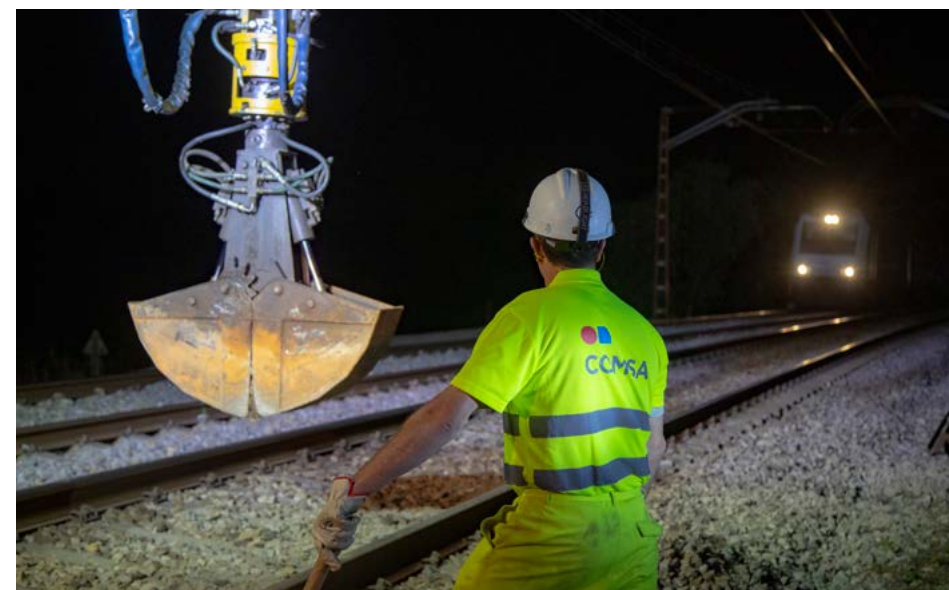
COMSA Corporación's remuneration model is made up of:

- » Fixed salary: Corresponding to the professional category, the collective agreement and the country.
- » Variable remuneration: In some countries, depending on the responsibilities of the employees, and their category¹, in addition to the fixed salary, they receive 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.

In 2018, 83% of the workforce in Spain received this type of remuneration, while in 2019, 74% of the workforce in Spain, Argentina, Brazil, France, Mexico and Peru had access to this type of remuneration and their performance was formally evaluated and reported.

- » Flexible remuneration: Depending on the country, the group offers its employees the possibility of modifying their remuneration package, on a voluntary basis, replacing part of it with products or services, so that the employees have a remuneration that is optimised to their needs. Through this option it is possible to acquire transport passes, subsistence allowances, medical or life insurance, as well as pay for nurseries and training programmes.

As mentioned 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 regard, in 2019, the ratio between the salary that COMSA Corporación's workers initially receive and the minimum salary in each of the countries in which the group operates is 1.43 on average, compared with 1.28 in 2018. It should be noted that there are countries where this ratio is not comparable.



Night works on the railway track, Caldes de Malavella (Spain)

¹ Employees from the administrative category.



COMSA CORPORACIÓN TEAM

Gender Pay gap by category 2019

| Age | 2019 | | | |
|----------|-----------------|------------|------------|------------|
| | Category 1 y 2 | Category 3 | Category 4 | Category 5 |
| under 30 | NA ¹ | 5.58 % | -8.31 % | -18.97 % |
| 30-50 | 10.38 % | 13.62 % | 14.47 % | 18.08 % |
| over 50 | -9.88 % | 30.31 % | 20.01 % | 24.17 % |

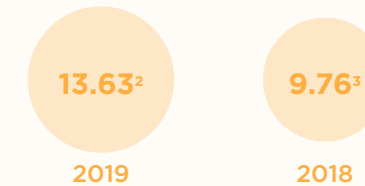
The calculation of the gender pay gap presents a similar problem to that of average salaries, since the presence of the group in highly differentiated geographical areas makes the results obtained unrepresentative. As an example of this diversity, for category 3 corresponding to Site Managers and Unit Managers, very different realities are compared both in terms of geographical areas and areas of responsibility, and even labour market and activity situations. In this sense, the pay gap for this category in the 50+ age group in Spain is 12.13%.



OBJECTIVE

To review the remuneration policy, working on the definition of salary bands by function, internal equity and with respect to the market of the 25 key positions of the group.

Annual compensation ratio



The annual compensation ratio for 2019 is obtained from the fixed gross annual salary plus the variable compensation, while in 2018 it was obtained only from the gross annual salary, the main reason for the difference between the values obtained.

DEVELOPMENT OF THE SKILLS MAP

In 2019, the **Success Factors** project was launched, with training and implementation in early 2020. Success Factors is a tool that allows an evaluation of the employee's performance, taking into consideration group and specific objectives, as well as the person's competence. This tool will facilitate the development of a competence map in the organisation.

¹ It is not possible to indicate the Gender Pay gap for this category and age range due to personal data protection policy.

² The calculation includes the fixed salary and the variable remuneration.

³ The calculation only includes the fixed salary.



COMSA CORPORACIÓN TEAM

TRAINING

Talent is an indisputable value within COMSA Corporación, and this has been highlighted in the COMStruimos Strategic Plan. In this sense, not only is it necessary to identify talent in the selection of new hires, but it is also fundamental to promote the growth and professional development of all the people who form part of the group. This aspect is one of the most relevant elements to attract and retain talent within the organisation.

In this line, in 2019 a total of **62,175 hours of training** were given, both in person and through the online or “e-learning” platform, which favours the implementation and organisation of training courses.

The “e-learning” platform operates on an intuitive and visual basis, which has made it possible to increase the number of training courses per worker. Moreover, thanks to the flexibility provided by distance learning, professionals are free to organise themselves to complete the training when it least interferes with their work tasks and personal life.

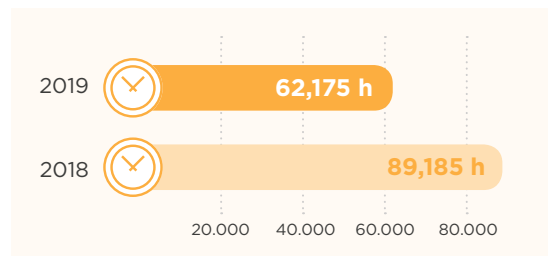
Total investment

2019
590,391 €

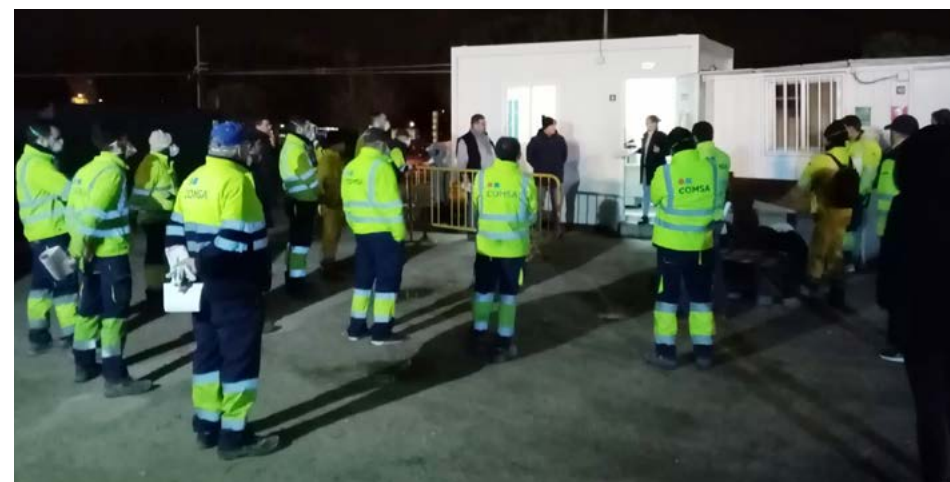
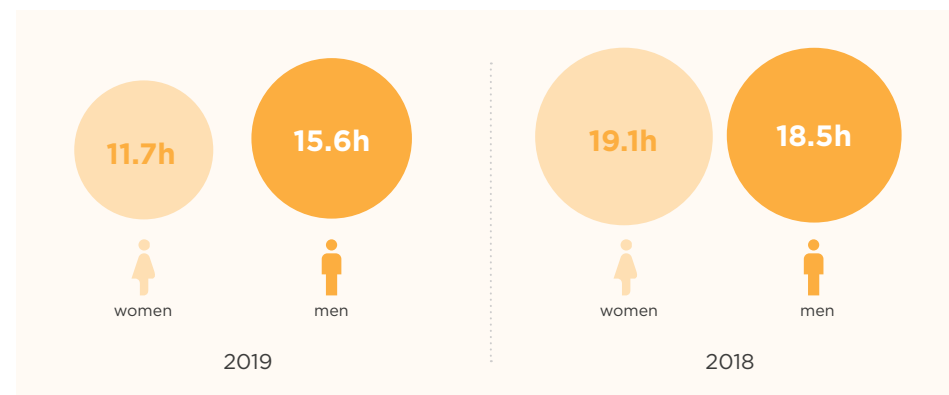
2018
575,619 €



Total training hours



Average training hours per gender



Training of workers in the Maintenance of Metro Madrid (Spain)



COMSA CORPORACIÓN TEAM

Most of the training courses held in 2019 were specific to the knowledge and skills required for each job, training in occupational risk prevention and safety, languages, certifications and their requirements, personnel management and updates of regulations and procedures.

In 2019 the group **collaborated with external training centres** to carry out the following training:

- » Training for Health and Safety inspectors in Construction Works, in collaboration with the Construction Labour Foundation.
- » **Collaboration in the Training of Internal Auditors in Occupational Risk Prevention carried out by the INSST (National Institute for Safety and Health at Work).**
- » Training in technical and legal solutions for prevention technicians, in collaboration with AJP Asesoría Jurídica Y Prevención.
- » Conference on Innovation in Construction, Màster d'Enginyeria de la Construcció de l'Universitat Politècnica de Catalunya.

In addition, COMSA Corporación has launched the **2019-2020 Leadership Programme** to work on the **collective leadership of the organisation**, which has begun with the completion of a Collective Leadership Survey of managers based on the international standard called 'The Leadership Circle'.

In addition, at EOLIS, due to the generational change it is facing, the "Eolis University" has been implemented to encourage the transmission of knowledge from experienced personnel in COMSA Corporación to new personnel, thus contributing to their training.

Presence in Human Resources Forums

In 2019 COMSA Corporación participated in the **4th edition of the Human Factor Congress in Barcelona** organised by *International Faculty for Executives*. During the congress, business strategy, training in emotional and relational skills, and support for employees on a personal and professional level, among other topics, were discussed. During the congress, the group participated in a round table discussion on how emotions and the integral well-being of teams are key to achieving business success.



OBJETIVO

- » Carry out plans to develop basic skills by area based on the competence map resulting from the performance evaluation (Success Factors).
- » Share the job description with the competence associated with all positions within the organisation to identify the skills needed to access the various positions.



Training to prevent musculoskeletal disorders in the framework of the campaign "Don't turn your back on overexertion" (Spain)



COMSA CORPORACIÓN TEAM

EQUALITY

Equal opportunities, non-discrimination, decent work and respect for human rights are fundamental principles in the promotion and professional development of COMSA Corporación, as established in the group's Code of Ethics. These principles are shared through the specific training and information processes that are systematically carried out on the employees.

However, the gender distribution in most professional categories is strongly masculinised due to the strong link to physical strength that has historically prevailed in the sector. The incorporation of women into the construction and engineering sector has taken place, above all, in recent years.

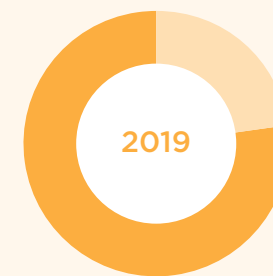
The **2019-2023 Equality Plan** is the instrument used by the group to guarantee equality between women and men, including enforceable and applicable measures, in line with **SDG 5 - Gender Equality**. This document sets out the measures carried out to promote the progressive increase of the number of women in the group. Among them, one measure stands out, which establishes that, in the face of equal conditions between candidates, priority should be given to the recruitment or promotion of women.

The commitment to equal opportunities goes beyond the labour level, since the group understands that the organisation of employment must also favour this equality on a personal and family level, enhancing, in addition, the well-being of the employees.

In this sense, COMSA Corporación 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. Some examples of these measures adopted in Spain are:

- » Flexible office entry and departure times.
- » Intensive working day on Fridays all year round.
- » Continuous working day in summer periods.
- » Flexibility in the choice of holiday periods, as well as extension of the period beyond the calendar year.

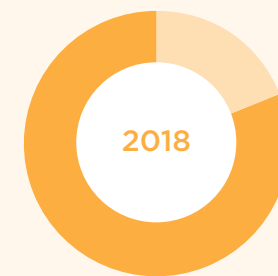
Paternity or maternity leave requested



2019

120
Approved permits

23% Women
77% Men



2018

176
Approved permits

19% Women
81% Men

With regard to paternity or maternity leave, the group, as provided for in the regulations, accepts all applications received.



COMSA CORPORACIÓN TEAM

In addition, as mentioned above, employees have other advantages in this regard such as the **option of childcare as part of the flexible compensation plan**.

In addition, COMSA Corporación has been working on updating the Protocol for the Prevention of Psychological, Sexual and Gender-based Harassment, which was revised at the beginning of 2020. The objective of this protocol is to prevent and, where appropriate, punish all conduct that violates the dignity, equality and moral and sexual freedom of any person who is a member of the group. This protocol establishes the complaint channels, guaranteeing confidentiality throughout the process. In 2019, there were no complaints in this area.

During this year, the organisation of the **Workshop on Induction, Prevention and Response to Sexual and Gender-based Violence, held by the Office in Peru of the United Nations High Commissioner for Refugees (UNHCR) in Lima**, and attended by 12 employees members, is noteworthy.

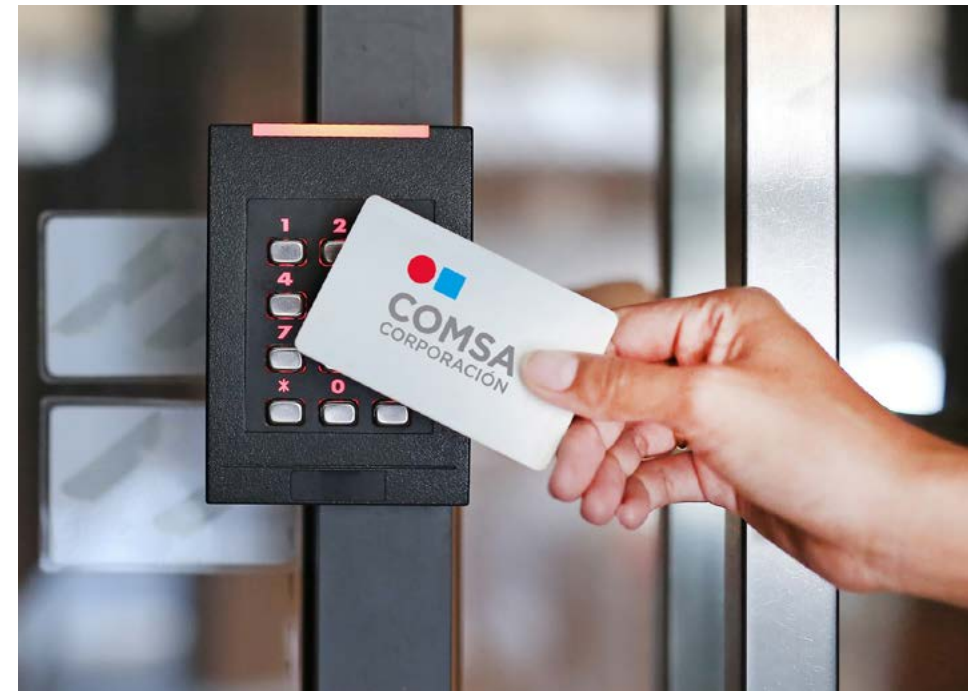


OBJECTIVE

To increase business commitment to gender diversity through partnerships and training and awareness campaigns in this area.

Disconnection Policy

On the other hand, regarding the right to digital disconnection, COMSA Corporación recognises it as a key factor in respecting personal and family life. In this regard, in 2019 the group approved a **Disconnection Policy** which aims to establish the general guidelines that regulate the right of employees to be digitally disconnected, 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.



Transfer terminal in offices (Spain)



COMSA CORPORACIÓN TEAM

INCLUSION AND DIVERSITY

COMSA Corporación promotes the inclusion and diversity of its employees from the certainty 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.

Beyond compliance with the guiding principles of the Code of Ethics regarding non-discrimination and equal opportunities, COMSA Corporación is firmly committed to incorporating local personnel in the projects it executes, thus contributing to the economic development of the communities where it operates. In 2019, local employees accounted for 93% of COMSA Corporación's total, compared with 84% in 2018.

Within this framework, in 2019 **the group's participation in university forums to attract young talent** stands out, where, in parallel, 15 interns were hired in Spain.

Likewise, the group has implemented policies and procedures for the incorporation of people with difficulties in accessing employment, materialised in different projects. Chief among these initiatives is the hiring of women at risk of exclusion for the BR-101 road Duplication project in Alagoas, Brazil.

With regard to groups with functional diversity, the group prioritises internal hiring, except in cases where this is not possible due to the types of tasks to be performed, and such hiring is done indirectly through special employment centres or donations to them, in order to promote the labour integration of these workers.



Construction team made up of more than 11 different nationalities, Odense Tramway (Denmark)

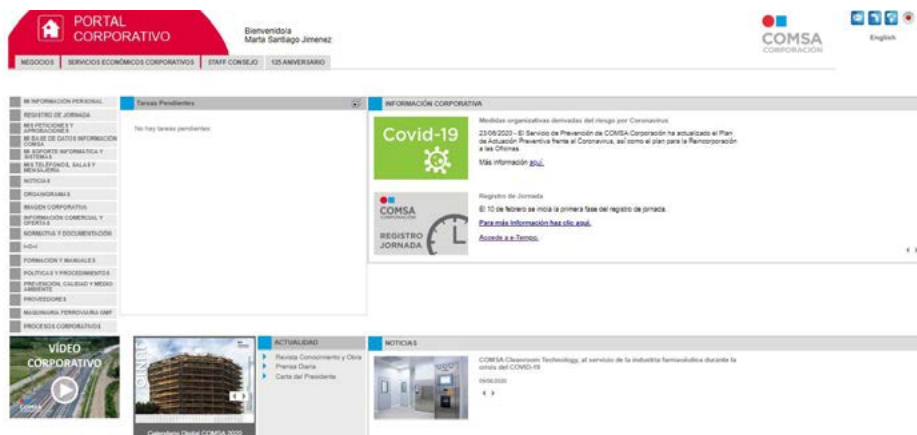


COMSA CORPORACIÓN TEAM

CORPORATE DIALOGUE

Stable and transparent communication with workers is essential for the proper performance of the group.

To guarantee this aspect, there are various channels, such as formal and informal meetings, works councils, e-mail, the website, intranet and the corporate port-let (portal), which is an internal news and communications portal where specific content and information is published for the employees. Some of these channels have established periodicity and others are used when events considered relevant for the knowledge of the employees occur. The group holds Works Councils by business and by area, with worker and company representation, where different topics are dealt with. In this line, specific meetings are also held by subject, such as the meetings of the Health and Safety Committee.



Intranet Home and news in the corporate port-let.

Due to the nature and location of the group's activities, different collective agreements apply in COMSA Corporación. In all countries where the group is present, it complies with the respective collective agreements that establish specific regulations in the field of occupational health and safety.



Meeting to start the pit with different subcontractors on the Reguerón Highway, Murcia (Spain)



COMSA CORPORACIÓN TEAM

HEALTH AND SAFETY

COMSA Corporación has been aware from the beginning that people are the most significant value and the greatest guarantee of future for the group. Therefore, it maintains a continuous commitment to offer optimal health and safety conditions to all workers and collaborators, in line also with SDG 8 - Decent Work and Economic Growth and SDG 3 - Good Health and Well-being.

Within this framework, the group has implemented an **Occupational Health and Safety Management System** based on the OHSAS 18001 standard, which goes beyond the legal and regulatory requirements and incorporates strategic precepts aligned with the principles of decent work of the International Labour Organization, and with the goals of the SDG 3 - Good Health and Well-being, of the Sustainable Development Goals promoted by the United Nations. The group is currently in the process of adapting to the ISO 45001 standard, and COMSA Service Facility Management will be the first business to have this certification by 2019.

“ 77% of COMSA Corporación's sales are executed under the guidelines of the international OHSAS 18001 or ISO 45001 occupational health and safety standard.

The main purpose of the lines of work determined in COMSA Corporación is to make possible its vision of a zero-harm scenario, promoting a culture in which prevention is prioritised over correction, and which is based on five essential principles that make up the Health and Safety Policy.

Health and Safety Policy
of COMSA Corporación



- 1 Planning and innovation, avoiding routine and false trust, and innovating to eliminate or reduce risks.
- 2 Coordination and participation of all employees.
- 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.

It is also worth noting the cross-cutting nature of the Health and Safety Policy and the Environmental Policy, which are strongly related and the group works in an integrated manner from the Prevention, Quality and Environment Area, which is made up of three divisions:



Joint Prevention
Service



Prevention, Quality
and Environment
at National and
International level



Internal audit



COMSA CORPORACIÓN TEAM

Prevention planning

As it cannot be otherwise, the management of Safety and Health in COMSA Corporación hinges on the fundamental axis of preventive planning. The group has technicians who are specialists in this field, who make up its preventive organisation, and who rely on specialised services, such as Occupational Medicine, to provide coverage and a global vision of the occupational risks to which the productive and cross-cutting processes that are integrated within the organisation are subjected.

The group carries out an identification of the hazards in the field of health and safety, both at a general level for recurrent activities, and at a particular level for each project.

The risks identified are evaluated by competent technicians belonging to the preventive organisation, based on proven and documented procedures, which use criteria of probability of occurrence and severity of damage in the event of materialisation. On the basis of this information, prevention measures are planned and implemented at source to eliminate the risks or, if this is not possible, to reduce them to a level that makes the degree of risk moderate. Professionals with preventive resource functions have a form with which they can notify new risk situations identified in the field of occupational health and safety. COMSA Corporación's Health and Safety Policy does not allow, in any case, processes involving high or very high levels of risk.

On the other hand, in order to promote the health and well-being of the group's professionals, among other measures implemented, it is worth highlighting the possibility of contracting private health insurance companies with a discount through the Flexible Compensation Plan, collaboration agreements with gyms near the offices and the promotion of participation in races, paying for the registration to encourage healthy living habits. The group also carries out specific international health prevention campaigns, including the breast cancer awareness campaign in Brazil and the awareness campaign in Mexico on the health effects of alcohol, drugs and tobacco.

Implementation and control of working conditions

COMSA Corporación has an external Prevention Service responsible for Health Surveillance, which, among other functions assigned to it, is responsible for carrying out periodic examinations on the employees, always respecting the confidentiality of all information. The results of the health surveillance are sent only to the professional examined.

In addition, the group documents the planning for the implementation of preventive measures, both at a general level and at a particular project level, following criteria of the highest worldwide standards.

These preventive measures can be:

- » Techniques.
- » Collective or individual protection.
- » Organisational.
- » Related to human factors.

In order to verify the effectiveness of the actions implemented, the group carries out systematic controls of the conditions of the organisation and the methods of work, as well as the health of the workers, supplemented by voluntary internal and external audits, throughout the geographical area in which COMSA Corporación carries out its activity.



COMSA CORPORACIÓN TEAM

Training as a basis for prevention

The group has its own **annual Health and Safety training plan**, which includes preventive training for each job position, both for the different trades and in offices. Along these lines, in the case of construction work, the group also holds talks at the beginning of the work (both for its own personnel and for subcontractors) where the risks and preventive measures specific to each project are explained. For the coming year, the group has worked on the implementation of an online platform where training in this area will be centralised.

Another relevant factor is the certification according to AENOR's TELCO standard of its own electrical risk training centres in Madrid and Seville.

Given the importance of training, information and awareness of society and future professionals in the sector, the group has collaborated by teaching subjects related to prevention at the University of Las Palmas de Gran Canaria, Vocational Training Institutes in Girona and other training entities of recognised prestige in the field of prevention such as the National Institute of Safety and Health at Work.



Metro Maintenance Line A (México)

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 COMSA Corporación's own workers, Health and Safety Committees are established, under different terminologies specific to each geography, which are joint company-worker bodies that periodically analyse management actions and indicators, and where the workers' representation proposes measures or lines of action that can supplement and improve those already implemented or proposed by COMSA Corporación's representatives, which are recorded in the corresponding minutes. Since 2018, 100% of COMSA Corporación's employees have been provided with tools for consultation and participation in Occupational Health and Safety matters.

Likewise, COMSA Corporación's management system makes it compulsory to hold periodic coordination meetings for the different projects, in which representatives of the employees of the collaborating companies participate, and at which actions are planned and established as a consequence of the pooling of risk management.

All personnel are covered by the Group's Health and Safety System, which is implemented in all projects. In addition, 77% of the employees are OHSAS 18001 certified.



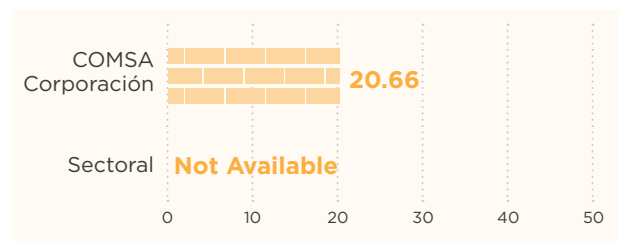
COMSA CORPORACIÓN TEAM

Evolution of the accident rate

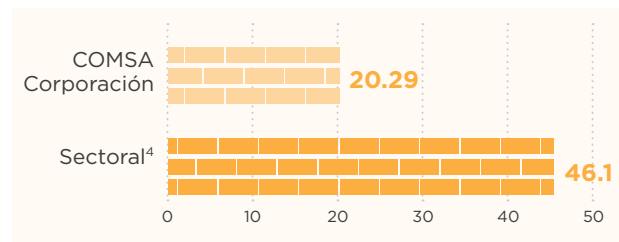
The result of this cycle of continuous improvement is the progressive reduction of occupational accident indicators. For the year 2019, these indicators for own employees produce the following results:

Frequency rate (%)¹

2019

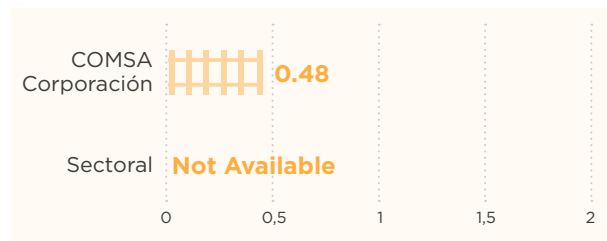


2018

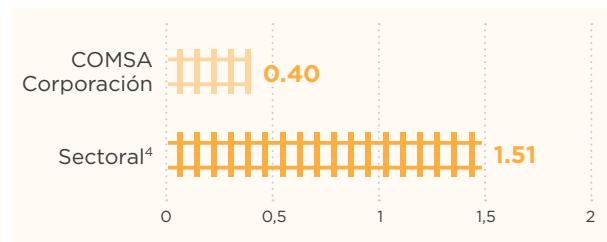


Severity rate (%)²

2019

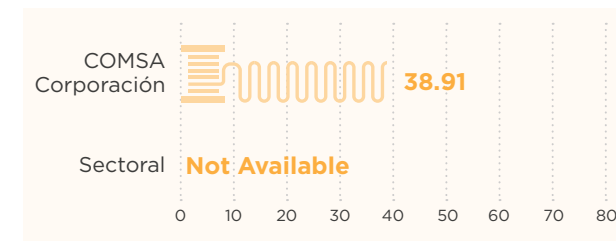


2018

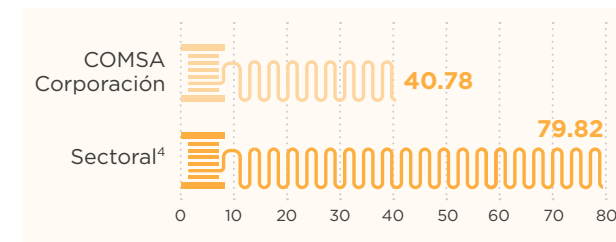


Incidence rate (%)³

2019



2018



Despite the fact that accident rates are still much lower than those prevalent in the sector, in 2019 indicators related to the number of hours worked (frequency rate and severity rate) have risen slightly. This is due to the expansion of the scope of that report with activities with a higher occupational accident rate.

¹ Data on the Construction Sector in Spain for 2018 (latest available at the date of preparation of this report). Source: Ministry of Labour and Social Economy.

² Severity rate: Days lost per every thousand hours worked.

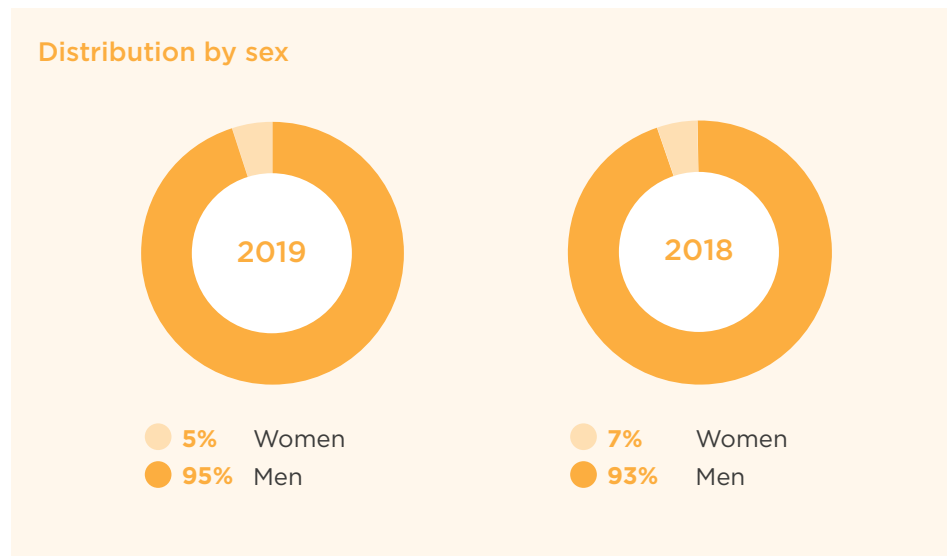
³ Incidence rate: Number of accidents per thousand workers.

⁴ Data on the Construction Sector in Spain for 2018 (latest available at the date of preparation of this report). Source: Ministry of Labour and Social Economy.



COMSA CORPORACIÓN TEAM

In relation to the accidents presented, the percentage distribution of own employees by gender is as follows:



The distribution of accidents by gender shows a greater incidence in men than in women, a logical distribution if we take into account both the distribution of the composition of the workforce and, additionally, the factors of exposure to risk.

As far as occupational illnesses are concerned, in 2019, there was one case of sick leave, while in 2018 no cases were detected. On the other hand, in 2019, there were no fatal accidents, while, unfortunately, there was one in 2018.

The analysis of the causes of accidents for own employees in 2019 shows the following results:

| Accident types | 2019 | 2018 |
|-------------------------------------|-------|-------|
| Falls to the same level / Sprains | 16.0% | 7.1% |
| Hitting or colliding with an object | 15.9% | 32% |
| Electrical contact | 1.5% | 4.1% |
| Projections / Splashes | 1.5% | 5.6% |
| Cutting agent contact | 5.3% | 5.1% |
| Falls from heights | 0.0% | 0.5% |
| Falls to different levels | 0.0% | 5.1% |
| Crushing /Trapping | 1.5% | 7.1% |
| Insect bite | 1.5% | 0.5% |
| Overexertion (MSD) | 37.1% | 32.5% |
| Other | 19.7% | 0.4% |

In this regard, the actions derived from the investigations of accidents and incidents are indispensable, which is why an investigation is carried out into each of the accidents that have occurred, whether or not they have caused leave of absence, both for our own workers and for subcontracted workers.



COMSA CORPORACIÓN TEAM

COMMITMENT TO CONTINUOUS IMPROVEMENT

COMSA Corporación carries out different initiatives aimed at reducing both the number and severity of the main types of accidents. Among these actions, it is worth highlighting long-term projects, such as those on mobility at work and on musculoskeletal disorders. Both plans are multi-year plans aimed at reaching the entire workforce, but focused on risk groups.

In addition, by consensus with the workers' representatives, and in line with the **SDG3 - Good Health and Well-being**, the group has launched different initiatives, such as the Mobility Plan to reduce commuting accidents, the prevention of alcohol and drug consumption and the systematic review of psychosocial risk management, among whose actions we can highlight the implementation of the Protocol for the Prevention and Detection of Stress, and the implementation of defibrillators at corporate headquarters and main logistics centres in Spain, turning them into protected cardio centres.

These actions support COMSA Corporación's commitment to promoting healthy living habits and personal well-being.



Road safety course with driving simulator, Barcelona (Spain)

MOBILITY PLAN

In 2018, COMSA Corporación launched the group's Mobility Plan with a twofold objective: on the one hand, to improve health and safety conditions at the wheel and, on the other, to reduce the associated environmental pollution.

The first phase of this Plan focused on ascertaining the mobility habits of employees, while during the second phase, in 2019, different initiatives were undertaken to reduce the number of road accidents, the most notable of which were:

- » Study on real mobility habits, as well as associated risk and environmental factors.
- » Improving driving skills and raising awareness of preventive and environmental issues.
- » Implementation of safety and environmental improvements in the group's means of transport.



COMSA CORPORACIÓN TEAM

ABSENTISM

Absenteeism data for 2019 for COMSA Corporación in Spain as a whole are very similar to those of the previous year and show 53,150 lost working days, with the following absenteeism rates:

| | 2019 | 2018 |
|--------------------------------------|-------|-------|
| Absence due to common contingencies | 3.72% | 3.72% |
| Absenteeism due to accidents at work | 0.61% | 0.54% |

ACKNOWLEDGEMENTS

At Comsa Corporación, health and safety management is considered a key factor, being a cornerstone within the group's strategy. It has therefore been rewarded with recognition through various relevant initiatives and awards.

In 2019, COMSA Corporación has again been included in the **Top 25 of the MEPS2 model**, a model of business excellence in occupational risk prevention, in recognition of its Health and Safety management.



Construction of the Reguerón Highway, Murcia (Spain)



EXTERNAL COLLABORATORS

COMSA Corporación considers the management of the value chain as one of the fundamental pillars in decision making and, therefore, has a purchasing model established at a corporate level to ensure transparency in contracting processes, fostering free competition and detecting risk situations, thus reinforcing its commitment to ethical behaviour.

For such purpose, COMSA Corporación requires its suppliers to assume its ethical, social and environmental principles, and therefore includes clauses in the contracts where they express their knowledge and commitment.

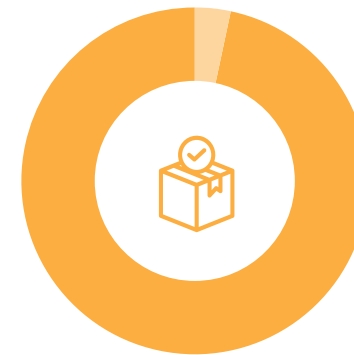
In this way, the group works to ensure compliance with human rights in its business relations, applying a policy of zero tolerance towards potential situations of child labour, forced labour, serious risk to the health of workers, and behaviour contrary to its Code of Ethics.

With regard to security service providers, in 2019 the group began working with them to include training on respect for human rights in the performance of their work, as well as in their action manuals and protocols.

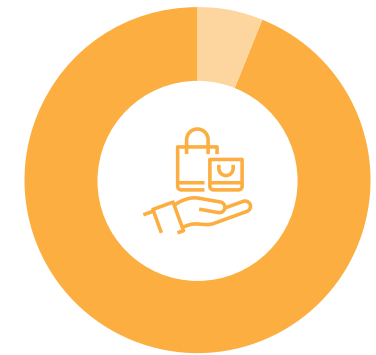
Likewise, **supplier companies** are periodically **monitored and evaluated** to ensure compliance with, among other things, principles related to quality management, respect for the environment and occupational risk prevention during the contractual relationship.

Its supply chain is made up of nearly 20,000 suppliers¹, encouraging the contracting of local suppliers and supporting the generation of positive social impact through the creation of wealth and investment in the countries where it is present.

Suppliers of COMSA Corporación in 2019



97.24%
local suppliers²



93.72%
of purchases from
local suppliers



More than
592 million euros
in turnover to suppliers.

¹ Total number of suppliers, including group businesses.

² A local supplier is one that is based in the country in which the project is carried out.



EXTERNAL COLLABORATORS

SUPPLIER SELECTION AND EVALUATION

COMSA Corporación selects its suppliers based on quality, services offered, rates, health and safety conditions, supply conditions, and environmental and ethical criteria, in order to guarantee that they comply with the group's standards.

The main criteria used for the approval of suppliers are:



By formalising the contract, the supplier companies undertake to respect the regulations of the country, as well as to adopt COMSA Corporación's Code of Ethics in the performance of their activity. In this sense, in order to facilitate two-way communication, COMSA Corporación's Ethics Channel is made available to the supplier, through which no complaints were received in 2019.



Transport of railway lanes (Uruguay)



EXTERNAL COLLABORATORS

MONITORING AND EVALUATION

The **monitoring and evaluation of the supplier companies** with which COMSA Corporación collaborates is a key aspect in the management of the value chain, and aims to ensure compliance with the following criteria throughout the contractual relationship.



In 2019, more than 1,000 suppliers were evaluated in Spain (1,500 in 2018), considered critical due to the type of supply or volume of turnover. As a result of these assessments, no significant negative environmental impacts, actual or potential, were identified in the supply chain in 2019. With regard to social aspects, only the requirements for occupational risk prevention are included in the supplier evaluations, since issues relating to human rights are established in the group's Code of Ethics, compliance with which and acceptance of which is indispensable for working together.

The result of the evaluation process allows classifying the vendors as advisable, those with which orders can be placed, and inadvisable. Among the latter, there are three categories: with incidents, which means that orders can be placed, but their evolution must be analysed; undesirable, for which only orders previously approved by management can be placed; and blocked, with which no contractual relationship can be established. In the event of negative performance by a supplier, a specific action plan is devised. The supplier evaluation process does not generally provide for on-site audits.



OBJECTIVE

To review the supplier evaluation criteria to increase the weight of social and environmental criteria



Corrective maintenance on FM radio broadcast antennas, Pic de Carroi (Andorra)



EXTERNAL COLLABORATORS

INTERNAL DIGITALISATION

Since 2017, the Purchasing area has been immersed in a digitalisation process with the aim of optimising internal processes and working in a more agile and effective way with the different collaborators in today's globalised world. Under this premise, in 2019 work began on updating the **Purchasing Procedure**, which will be linked to different tools under development:



Supplier Portal: It will allow more agile management of orders and invoices, both internally and externally, while providing greater traceability to different transactions.



Approval Portal: It will allow the pre-registration of new suppliers with which to collaborate. Each interested supplier will be able to upload to the platform business information and specific requirements according to their type of supply, and based on this information, they will be given a score.

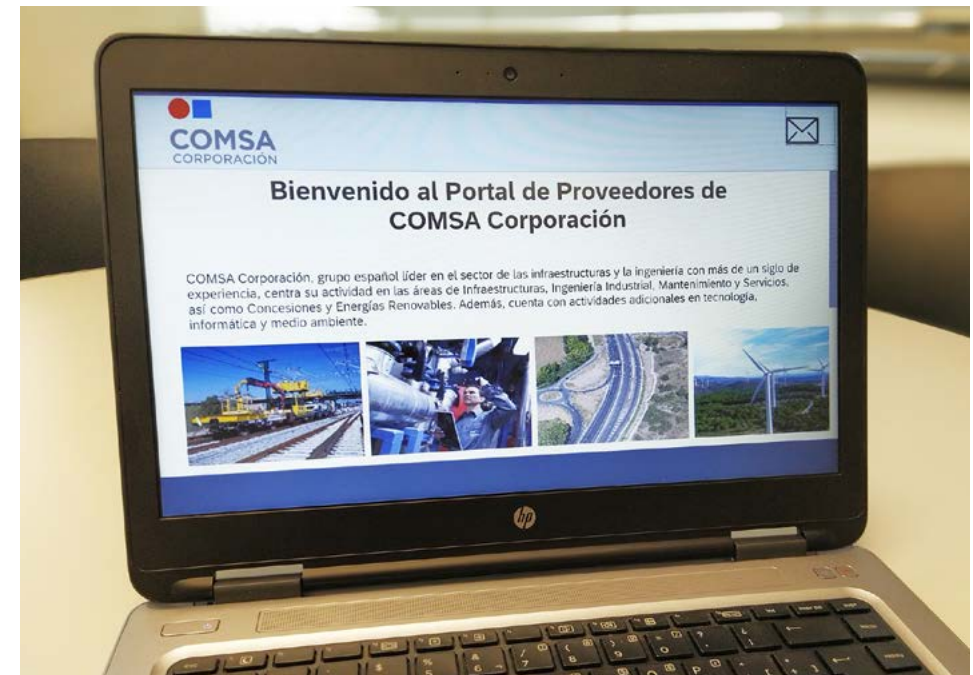


Tender Portal: This tool will be fed by the database of existing and new suppliers invited to participate in tenders. It will allow a greater number of suppliers to participate in the group's tenders, as well as much more agile and transparent management of the information collected.



Purchasing Planning: This tool will allow optimising and forecasting purchases for projects for a better search of the most suitable materials and services.

Along the same lines of internal optimisation of the different operations, throughout 2019 the **materials database was optimised**, on the one hand, in the case of strategic materials, defining specific parameters on which to base purchasing decisions, and on the other, establishing broader categories of materials that encompass products of similar types.



COMSA Corporación Supplier Portal Homepage



EXTERNAL COLLABORATORS

PREVENTIVE CULTURE IN THE VALUE CHAIN

COMSA Corporación works to ensure and promote a preventive culture throughout the entire value chain, establishing cross-cutting measures that apply to all workers in its workplaces, whether they are its own or those of collaborating companies.

Overall accident rates¹:

| | year | accident rate |
|---|-----------------------------|---------------|
| Frequency rate (number of accidents per million hours worked) | 2019 | 19.37 |
| | 2018 | 20.03 |
| | 2018 sectorial ² | 46.1 |
| Severity rate (number of accidents per million hours worked) | 2019 | 0.40 |
| | 2018 | 0.41 |
| | 2018 sectorial ² | 1.51 |
| Incidence rate (number of accidents per million hours worked) | 2019 | 30.01 |
| | 2018 | 30.29 |
| | 2018 sectorial ² | 79.82 |

The above figures show the correct performance in terms of occupational risk prevention carried out by the group throughout 2019.



Substations and associated transmission lines of four ENEL Green Power Iberia wind farms (Spain)

¹ Both own and subcontracted personnel are included.

² Data on the Construction Sector in Spain for 2018 (latest available at the date of preparation of this report). Source: Ministry of Labour and Social Economy.

CLIENTS

COMSA Corporación has a history of more than 125 years as a reference company in the sector, in which its **client focus** stands out, aimed at permanently satisfying their expectations and needs, both current and future, and involving them from the very beginning of their projects.

To this end, the group promotes 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 group, taking advantage of the resources and diversity of the group to offer integrated 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.

COMSA Corporación has a Quality Policy and a **Quality Management System** in place based on the ISO 9001:2015 standard, thanks to which the group guarantees clients that the projects executed comply with the highest quality standards and with the regulations in force at any given time.

“ The Quality Management System is systematically verified by internal and external audits.

The quality management system aims to ensure compliance with and control of the parameters established by ISO 9001 certification. This procedure is closely linked to sales by business division. Thus, the percentage of sales governed by this system was 86% in 2018 and 80% in 2019.

In all projects a Quality Plan is developed, which includes both the requirements of the applicable regulations and the specific demands of the clients through the so-called Inspection Point Programmes (IPPs). The IPPs detail the sequence and scope of the checks on the work units and processes previously listed in the Quality Plan.

Checking for strict compliance with the IPPs. (Inspection Points Programme) and the Test Plans ensure that the execution of the processes is carried out in accordance with the regulations and legislation in force.

In addition, once the project is completed, the “as built” file is generated, which allows the client to know all the final characteristics of the project, facilitating its preservation and maintenance.

Quality politics
of COMSA Corporación



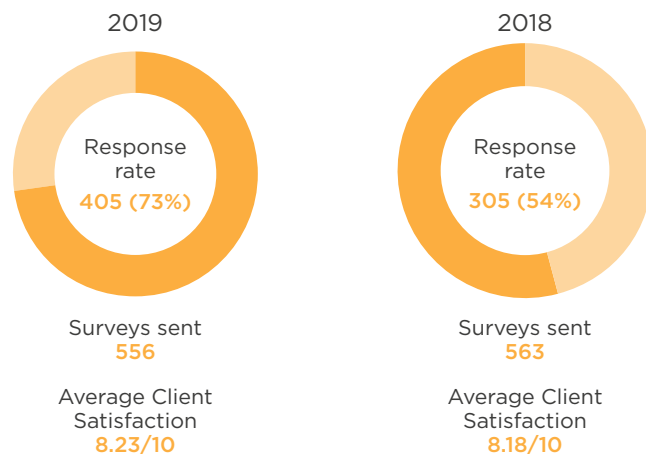


CUSTOMERS

CLIENT SATISFACTION

In order to guarantee client satisfaction, COMSA Corporación carries out evaluations systematically and continuously, either at the end of the project or during the provision of the service, establishing specific action plans when deemed necessary.

These evaluations are carried out by means of satisfaction surveys, which include assessments of 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.



In this regard, the group fulfilled the objective set the previous year of increasing the percentage of client response in satisfaction surveys, achieving a 32.8% increase.



OBJECTIVE

To increase the response rate of our clients in the satisfaction questionnaires in order to optimise and objectify the implementation of improvement plans.

Likewise, in order to guarantee the analysis of the most significant information, the Quality Management Systems implemented establish mechanisms that ensure the adequate handling of the claims and complaints received, following the stages detailed below:

- » Identification and communication of claims and complaints received.
- » Analysis of provisions to be adopted for their resolution.
- » Approval, depending on their significance, of the proposed provisions.
- » Adoption of the adopted provisions.
- » Verification of the effectiveness of the provisions and closure of the claim or complaint.

This system is designed to deal with any claim or complaint from the client or their representative, as well as from any other interested party, such as neighbours, associations, environmental organisations, etc. The process is systematically supervised by internal audits, carried out by both our own auditors and specialised companies, and by external audits.

All the above allows COMSA Corporación to identify and evaluate its strengths and weaknesses, as well as the risks and opportunities of the different projects. Once analysed, if it is considered that additional competences to those of COMSA Corporación are required, partnerships are established with partners and consultants of proven experience and with affinity in corporate principles and values, especially regarding ethical and honest behaviour.

SOCIAL CONTRIBUTION

“ In 2019 COMSA Corporación has made donations in various areas worth 423,600 euros.

COMSA Corporación’s family nature makes it especially sensitive to the environment in which it carries on its activity and to the people who are part of it. This particularity can be seen in the group’s philosophy, **“We take care of people in the same way that we take care of our projects”**, and it is materialised through different actions, both internal and external, in the companies and subsidiaries located in the different regions where the group operates.

COMSA Corporación’s fundamental objective is to create value in the territory, maintaining active relations with the community, supporting local development and meeting the needs of each region.

This contribution is materialised both on a global scale through partnerships that seek to achieve the main objectives of the Agenda 2030, such as the group’s adherence to the Global Compact, or the collaborations with the Olof Palme International Foundation, which strives to ensure that human rights are respected, or the MIESES Global in the area of business sustainability, as well as on a local scale with networks such as Barcelona+Sostenible.



Throughout 2019, different actions were carried out, adapted to the specific needs of each territory, for which an amount of **423,600 euros** has been allocated.



SOCIAL ACTION MANAGEMENT

COMSA Corporación has aligned the social action initiatives it undertakes with the activities related to the core business, prioritising, moreover, those actions where the group’s professionals can play a leading role. Therefore, in 2020 the group has planned to carry out an internal survey to ascertain the concerns and main interests of the group’s professionals in this field.

At the same time, it is working on a standardised methodology to help quantify the positive impact of the various social action initiatives on the environment, regardless of the location and type of action carried out, in order to disseminate it among the various countries and businesses of the group.



OBJECTIVE

To improve the overall management of social action, through the implementation of a Social Action Policy and setting indicators to measure the positive impact generated.



SOCIAL CONTRIBUTION

PARTNERSHIP WITH UNHCR - SOLIDARITY PAYROLL PROGRAM

COMSA Corporación and the Spanish Committee for UNHCR, the United Nations High Commissioner for Refugees, have signed a collaboration agreement with the aim of helping to improve the coverage of the basic needs of refugees.

This collaboration is materialised through the **“Solidarity Payroll Program”**, which consists of voluntary monthly contributions from the salary of the group’s professionals, which COMSA Corporación simultaneously matches. The funds are intended to support UNHCR in its mission of ensuring access to adequate housing in humanitarian emergencies, specifically in the provision of:

- » Emergency shelter kits.
- » Distribution of emergency tents for refugee families.
- » Complete rehabilitation of houses destroyed by violence for refugee families.
- » Rehabilitation of buildings with private rooms for families, with common facilities (kitchens, bathrooms).

This collaboration, which began in Spain, will be extended in the short term to the rest of the countries where the group is present, with the aim of generating awareness and sharing positive values both within and outside the group.





SOCIAL CONTRIBUTION

CULTURAL FIELD

The group makes various contributions to cultural institutions to make culture accessible to the population, including sponsorship of the 2019-2020 season of the Teatre Nacional de Catalunya and the Fundació Gran Teatre del Liceu.

At the same time, in some countries such as Brazil and Colombia, it carries out actions to raise awareness of the archaeological heritage linked to the projects, both for employees and for the communities surrounding the projects.



Awareness of archaeological heritage for high school students (Brazil)

SPORTS FIELD

COMSA Corporación promotes the values and health benefits of sport. Thus, in addition to supporting the participation of employees in some sporting events, such as the Company runs in Barcelona and Madrid (with the registration for which we contributed to the TV3 Fundació de la Marató and Arrels Fundació, as well as the Intheos Foundation, respectively), it has also sponsored other sporting events such as the Rovira i Virgili University Charity Run and the Port Aventura Foundation golf tournament, all of which were held for charity.

In the case of Brazil, the group has made a contribution in kind, through the provision of rehabilitation services, as well as the donation of materials for the restoration of a local Judo association, closely linked to the community in which the Line 4 metro works are being carried out.



Runners reaching the finish line in a Business Race (Barcelona)



SOCIAL CONTRIBUTION

CHILDREN AND EDUCATION FIELD

To promote equal opportunities, especially among the youngest, both the group and its employees participate in different local actions, such as sponsoring more than 100 children in Brazil during the Christmas campaign or collecting dance uniforms in the case of Colombia.

Another of the actions carried out within the framework of the schools in these two countries are the awareness campaigns for the promotion of recycling and efficient water use in which more than 300 schoolchildren have participated, with the aim of promoting respect for the environment among the very young.



Environmental themed games to raise awareness among schoolchildren, São Paulo (Brazil)

HEALTH FIELD

In the field of health, the group has made financial and material donations to support treatment and research into different pathologies. Among other entities, the group has collaborated with the Mexican Association of Aid to Children with Cancer (AMANC) and the Tamariz Oropeza Foundation in Mexico.

In the case of Spain, the contribution made has been in kind, providing its services free of charge for the second consecutive year in the telecommunications facility for the development of the *TV3 Marató* (marathon), whose mission is to raise funds for research into different diseases.



La Marató TV3 campaign on minority diseases in 2019 (Spain)



SOCIAL CONTRIBUTION

SOCIAL FIELD

The group works closely with local communities to understand their needs and contribute to their development.

Thus, in some territories, essential infrastructures have been rehabilitated, such as in the vicinity of the Amagá Tunnel in Colombia, where the group has contributed to the improvement of the sewage system.

Furthermore, the group also watches over the social rights of people, especially the most disadvantaged. In the case of Spain, COMSA Corporación has collaborated with the Prevent Private Foundation, whose aim is the social integration of people with functional diversity, while in Mexico it has continued to support the Puebla Foodbank and the Mexican Red Cross.



Volunteers sorting and distributing donated food to the Puebla Food Bank (Mexico)

ABOUT THE REPORT





ABOUT THE REPORT

SCOPE AND COVERAGE

In keeping with the commitment initiated in 2017 in relation to the reporting of non-financial information through the Corporate Social Responsibility Reports, COMSA Corporación de Infraestructuras, S.L., referred to throughout this report as “COMSA Corporación” or “the group”, is redoubling its efforts in the area of transparency with the publication of this second Statement of Non-Financial Information, with information relating to environmental and social issues and the group’s workforce, respect for human rights and the fight against corruption and bribery.

This Statement of Non-Financial Information, also referred to as a report, shows the information and data for the year ended 31 December 2019 of COMSA Corporación and its subsidiaries. In this regard, this report focuses on the business area activities of the following Spanish companies:

- » COMSA Corporación de Infraestructuras, S.L.
- » COMSA, S.A.U.
- » COMSA Instalaciones y Sistemas Industriales, S.A.U.
- » COMSA Service Facility Management, S.A.U.
- » COMSA Renovables, S.A.U.
- » Gestión Medioambiental de Neumáticos, S.L.
- » TFM Energía Solar Fotovoltaica, S.A.
- » Generación de Energías Sostenibles, S.L.

Also included are its subsidiaries and branches in Argentina, Brazil, Colombia, Denmark, France, Mexico, Peru, Portugal and Sweden.

In relation to the scope, in this past year, due to their turnover and volume of personnel, the following companies were included:

- » Comsa Auxiliary Solutions, S.L.
- » Comsa Security Service, S.L.U.

For this reason, the data are not strictly comparable with the information reported in the previous year.

In addition, the 2018 Non-Financial Information Report included data on the Trackja Group’s activity in Poland, although this information was not consolidated with the rest of the data included in the report. In 2019, due to the change in the scope of consolidation, the information relating to the Trakcja Group was not included.

This report forms part of the Consolidated Management Report of the COMSA Corporación de Infraestructuras, S.L. and Subsidiaries Group and has been prepared in compliance and in line with the requirements of Spanish Law 11/2018 of 29 December on Non-Financial Information and Diversity. For the preparation of the report, the guidelines and requirements included in the Global Reporting Initiative (GRI) standards have been considered, both for the definition of the content with regard to the inclusion of stakeholders, the context of sustainability, materiality and exhaustiveness, and with regard to the quality of the information, considering the principles of precision, balance, clarity, comparability, reliability and timeliness. However, in order to respond to the requirements of Spanish Law 11/2018, the information has been adapted where necessary.


In order to facilitate the traceability of the information, a table with the correspondences between the requirements of Spanish Law 11/2018 and the GRI standards is included in the Annex.



ABOUT THE REPORT







MATERIAL ISSUES RELATED TO SUSTAINABILITY

This report has been prepared to respond to the main material issues identified in the materiality analysis carried out as part of the preparation of the first CSR Report of COMSA Corporación, the results of which are shown below.



OBJECTIVE

In line with the group's commitment to ethical, responsible and sustainable management, a new process is planned for 2020 to update the identification of material issues for COMSA Corporación and its stakeholders.

| | | | | | |
|---|--|--|--|--|--|
|  <p>CORPORATE GOVERNANCE</p> <ul style="list-style-type: none"> * Integrity * Compliance * Risk management * Prevention of bribery and corruption |  <p>ECONOMY</p> <ul style="list-style-type: none"> * Competitiveness * Fiscal responsibility |  <p>ENVIRONMENT</p> <ul style="list-style-type: none"> * Circular economy * Water management * Climate change <li style="padding-left: 20px;">* Impact on biodiversity * Acoustic impact |  <p>LABOUR</p> <ul style="list-style-type: none"> * Equality and diversity <li style="padding-left: 20px;">* Attraction and retention of talent <li style="padding-left: 20px;">* Health and safety |  <p>SUPPLY CHAIN</p> <ul style="list-style-type: none"> * Supply chain risks <li style="padding-left: 20px;">* Human Rights <li style="padding-left: 20px;">* Quality of service <li style="padding-left: 20px;">* Client satisfaction |  <p>SOCIAL</p> <ul style="list-style-type: none"> * Relationship with the community * Institutional relations <li style="padding-left: 20px;">* Social impact <li style="padding-left: 20px;">* Social commitment <li style="padding-left: 20px;">* Volunteer program |
|---|--|--|--|--|--|



ABOUT THE REPORT

DIALOGUE WITH THE STAKEHOLDERS

As a key aspect of the business model, the group is committed to maintaining 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.

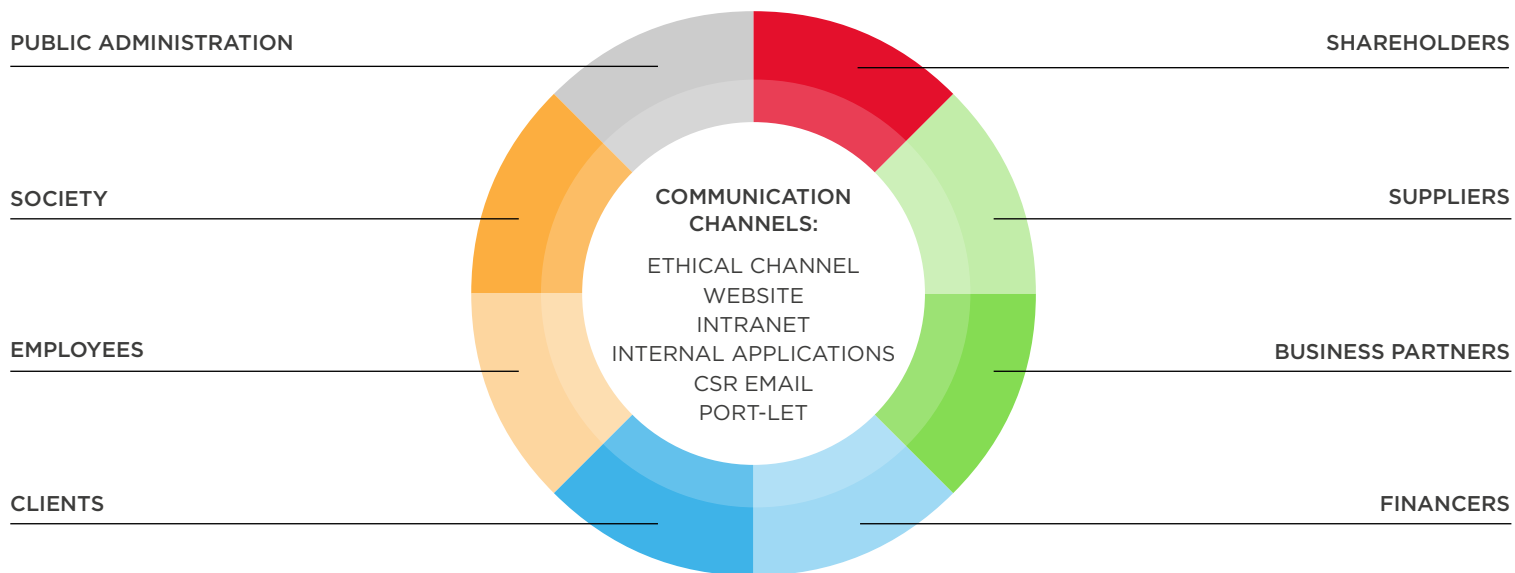
The new materiality study, which will be carried out in 2020, reaffirms COMSA Corporación's commitment to integrating the needs and expectations of stakeholders into its sustainability strategy.

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 stakeholders. Much of the data presented here supplements and expands on the Annual Summary 2019 published in April 2020 and available on the group's website. In the event of divergence of information between the two documents, the information in this report prevails as it has been verified by an independent verification service provider, in compliance with Spanish Law 22/2018.

For any questions regarding this report, please contact responsabilidad.social@comsa.com

COMSA Corporación stakeholders and communication channels established





ABOUT THE REPORT

SUBSEQUENT RELEVANT FACTS

The Covid-19 outbreak in China in January 2020, and its recent global expansion to a large number of countries, led to the virus being classified as a pandemic by the World Health Organization on 11 March.

Considering the complexity of the markets due to their globalisation and the absence, for the time being, of effective medical treatment against the virus, the consequences for the group's operations are uncertain and will depend to a large extent on the evolution and extension of the pandemic in the coming months, as well as the capacity to react, the decisions taken to contain it, and the adaptation of all the economic players affected.

Therefore, at the date of preparation of this Statement of Non-Financial Information, it is premature to carry out a detailed assessment or quantification of the possible impacts that Covid-19 will have on the group, due to the uncertainty surrounding its consequences in the short, medium and long term.

However, the Group's Directors and Management have made a preliminary assessment of the current situation on the basis of the best information available. Due to the above-mentioned considerations, such information may be incomplete. From the results of this evaluation, the following issues regarding non-financial information are highlighted:

- » Business model: the current circumstances may lead to a rethinking of some characteristics of the business model, mainly in terms of the location of operations and markets. In this regard, the group immediately set up a Committee for the evaluation, analysis and implementation of short- and medium-term measures to reduce the impact on the business and guarantee the continuity of operations.
- » Environmental issues: although the analysis of the impact of the Covid-19 crisis on environmental issues related to the group's activity is considered low, actions are planned for continuity in pollution prevention policies, as well as with respect to climate change.
- » Personnel issues: as a result of the Covid-19 crisis, the group has implemented innovative practices, such as facilitating remote working (teleworking), which have largely enabled the continuity of core business support operations. The group has also adopted practices for regulating employment, which will have an impact on the main indicators relating to the workforce for 2020.
- » Health and safety issues: since the beginning of the crisis, the group has adopted the necessary measures to ensure the health and safety of employees and clients, as well as reviewing the possible impacts that these actions may have on indicators related to occupational health and safety.
- » Supply chain issues: the group's main suppliers are suppliers whose activity has suffered similar slowdowns to those of the group and, consequently, the health crisis generated by Covid-19 is not having an impact on the group's supply service provision in any significant way.
- » Continuity of operations: the changing and unpredictable nature of events could lead to a risk of temporary interruption of production. Therefore, the Group has established specific working groups and procedures to monitor and manage the evolution of its operations at all times, in order to minimise their impact on its operations.



ABOUT THE REPORT

SUBSEQUENT RELEVANT FACTS

In this regard, there has recently been something of a slowdown in the activity planned by the group, without it being possible to objectively quantify the impact expected for 2020. In any case, the effects on results of the fall in activity, the slowdown and/or the halt in the implementation of some projects are expected to be partially offset by cost containment measures.

Taking into account all the factors mentioned above, the Group's Directors consider that the conclusion on the application of the going-concern principle, as indicated in the Consolidated Financial Statements, remains valid.

Finally, it should be noted that the Group's directors and Management are continuously and constantly monitoring the evolution of the situation in order to successfully address any possible impacts, both financial and non-financial, that may arise.



Delivery of personal protective equipment in the maintenance of Line A of the Metro (Mexico)



ADDITIONAL INFORMATION

COMSA CORPORACIÓN TEAM

Distribution of employees by professional category

| Professional category | 2019 | | 2018 | |
|-----------------------|-------------|---------------|--------------|---------------|
| | % Women | % Men | % Women | % Men |
| Category 1 | 3 (0.3%) | 15 (0,5%) | 3 (0.5 %) | 18 (0.4 %) |
| Category 2 | 16 (1.8%) | 102 (3.1%) | 14 (2.2 %) | 109 (2.6 %) |
| Category 3 | 73 (8.2%) | 291 (8.8%) | 66 (10.4 %) | 277 (6.7 %) |
| Category 4 | 495 (55.4%) | 660 (19.9%) | 518 (81.7 %) | 811 (19.5 %) |
| Category 5 | 306 (34.3%) | 2,244 (67.7%) | 33 (5.2 %) | 2,950 (70.8%) |
| Total | 893 | 3,312 | 634 | 4,165 |

Distribution of employees by country

| Country | Employees 2019 | Employees 2018 |
|--------------|----------------|----------------|
| Argentina | 7 (0.17%) | 182 (3.79%) |
| Brazil | 30 (0.71%) | 26 (0.54%) |
| Colombia | 39 (0.93%) | 32 (0.67%) |
| Denmark | 20 (0.48%) | 13 (0.27%) |
| Spain | 3.393 (80.69%) | 3.013 (62.76%) |
| France | 57 (1.36%) | 74 (1.54%) |
| Mexico | 451 (10.73%) | 362 (7.54%) |
| Peru | 76 (1.81%) | 992 (20.66%) |
| Portugal | 120 (2.85%) | 104 (2.17%) |
| Sweden | 12 (0.29%) | 1 (0.02%) |
| Total | 4,205 | 4,799 |

Distribution of employees by gender, age and professional category in Spain

| Age | under 30 | | 30 - 50 | | over 50 | | Total |
|--------------|-----------|------------|------------|--------------|------------|------------|--------------|
| | Women | Men | Women | Men | Women | Men | |
| Category 1 | 0 | 0 | 2 | 6 | 1 | 8 | 17 |
| Category 2 | 0 | 0 | 14 | 55 | 0 | 26 | 95 |
| Category 3 | 2 | 3 | 55 | 172 | 2 | 54 | 288 |
| Category 4 | 30 | 63 | 293 | 312 | 70 | 99 | 867 |
| Category 5 | 14 | 108 | 113 | 1,126 | 166 | 599 | 2,126 |
| Total | 46 | 174 | 477 | 1,671 | 239 | 786 | 3,393 |



ADDITIONAL INFORMATION

COMSA CORPORACIÓN TEAM

Number of departures by gender and age

| | | Dismissals | Voluntary departures | End of contracts | Retirements | Total | |
|----------------------|---------|-------------|----------------------|------------------|-------------|--------------|--------------|
| 2019 | <30 | Women | 4 | 36 | 59 | 0 | 96 |
| | | Men | 29 | 152 | 280 | 0 | 461 |
| | 30 - 50 | Women | 16 | 55 | 76 | 0 | 147 |
| | | Men | 81 | 474 | 665 | 1 | 1,221 |
| | >50 | Women | 6 | 10 | 23 | 4 | 43 |
| | | Men | 34 | 92 | 158 | 25 | 309 |
| Total by type | | 170 | 819 | 1,261 | 30 | 2,280 | |
| | | 7.5% | 35.9% | 55.3% | 1.3% | | |

| | | Dismissals | Voluntary departures | End of contracts | Retirements | Total | |
|----------------------|---------|-------------|----------------------|------------------|-------------|--------------|------------|
| 2018 | <30 | Women | 2 | 17 | 35 | 0 | 54 |
| | | Men | 23 | 147 | 197 | 0 | 367 |
| | 30 - 50 | Women | 16 | 32 | 24 | 0 | 72 |
| | | Men | 53 | 312 | 454 | 0 | 819 |
| | >50 | Women | 2 | 3 | 1 | 0 | 6 |
| | | Men | 16 | 42 | 87 | 24 | 169 |
| Total by type | | 112 | 553 | 798 | 24 | 1,487 | |
| | | 7.5% | 37.2% | 53.7% | 1.6% | | |



ADDITIONAL INFORMATION

COMSA CORPORACIÓN TEAM

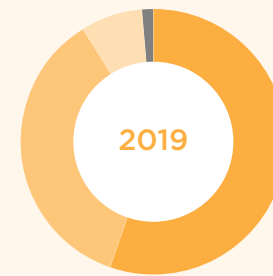
Number of departures by country

| Country | Dismissals | | Voluntary departures | | End of contracts | | Retirements | |
|-----------|------------|------|----------------------|------|------------------|------|-------------|------|
| | 2019 | 2018 | 2019 | 2018 | 2019 | 2018 | 2019 | 2018 |
| Argentina | 32 | 12 | 12 | 18 | 148 | 3 | 1 | 0 |
| Brazil | 2 | 0 | 1 | 1 | 0 | 97 | 0 | 1 |
| Colombia | 15 | 1 | 8 | 2 | 2 | 2 | 0 | 0 |
| Denmark | 0 | 0 | 5 | 1 | 0 | 0 | 0 | 0 |
| Spain | 76 | 78 | 246 | 220 | 353 | 307 | 22 | 18 |
| France | 0 | 6 | 0 | 4 | 0 | 13 | 0 | 1 |
| Mexico | 42 | 13 | 57 | 52 | 92 | 56 | 6 | 2 |
| Peru | 0 | 1 | 481 | 230 | 662 | 311 | 0 | 2 |
| Portugal | 3 | 1 | 8 | 23 | 4 | 9 | 1 | 0 |
| Sweden | 0 | 0 | 1 | 2 | 0 | 0 | 0 | 0 |

Number of new hires by gender, age and country

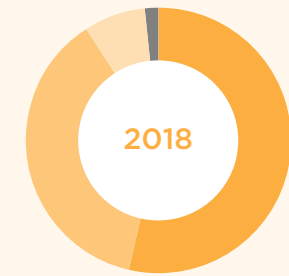
| Country | new hires 2019 | new hires 2019% | new hires 2018 | new hires 2018% |
|--------------|----------------|-----------------|----------------|-----------------|
| Argentina | 17 | 1.13% | 144 | 6.74% |
| Brazil | 7 | 0.47% | 30 | 1.40% |
| Colombia | 47 | 3.13% | 37 | 1.73% |
| Denmark | 13 | 0.86% | 10 | 0.47% |
| Spain | 912 | 60.64% | 935 | 43.77% |
| France | 7 | 0.47% | 24 | 1.12% |
| Mexico | 257 | 17.09% | 105 | 4.92% |
| Peru | 205 | 13.63% | 793 | 37.13% |
| Portugal | 29 | 1.93% | 57 | 2.67% |
| Sweden | 10 | 0.66% | 1 | 0.05% |
| Total | 1,504 | 100% | 2,136 | 100.00% |

Number of medical leave per year



- 1261 55.3% End of contract
- 819 35.9% Voluntary departure
- 170 7.5% Dismissal
- 30 1.3% Retirement

2,280 TOTAL



- 798 53.7% End of contract
- 553 37.2% Voluntary departure
- 112 7.5% Dismissal
- 24 1.6% Retirement

1,487 TOTAL



ADDITIONAL INFORMATION

COMSA CORPORACIÓN TEAM

Average remuneration by country and gender

| Country | Women | | Men | |
|-----------|-----------|-----------|-----------|-----------|
| | 2019 | 2018 | 2019 | 2018 |
| Argentina | --- | 10,418.29 | 17,680.52 | 9,954.95 |
| Brazil | 15,048.33 | 15,030.75 | 32,361.21 | 27,484.14 |
| Colombia | 12,026.95 | 10,942.90 | 13,560.39 | 9,426.21 |
| Denmark | 51,091.51 | 42,384.80 | 72,700.99 | 75,957.84 |
| Spain | 25,578.06 | 28,322.38 | 29,318.63 | 27,334.54 |
| France | 28,728.30 | 28,265.92 | 32,690.16 | 32,339.53 |
| Mexico | 10,039.36 | 8,759.97 | 9,381.54 | 8,858.63 |
| Peru | 7,583.47 | 7,930.89 | 14,507.42 | 7,532.75 |
| Portugal | 18,861.11 | 17,355.14 | 14,141.29 | 12,666.61 |
| Sweden | 40,892.91 | - | 47,423.95 | - |

Average remuneration by country and professional category: 2019

| Country | Cat. 1 | Cat. 2 | Cat. 3 | Cat. 4 | Cat. 5 |
|-----------|-----------|-----------|-----------|-----------|-----------|
| Argentina | N/A | N/A | 23,808.54 | 15,060.07 | |
| Brazil | N/A | N/A | 46,534.13 | 15,904.91 | |
| Colombia | N/A | N/A | 14,840.24 | | 9,349.28 |
| Denmark | N/A | 71,701.04 | | 58,279.02 | N/A |
| Spain | 87,806.10 | | 48,587.24 | 31,471.26 | 21,430.88 |
| France | N/A | 37,556.39 | | 28,172.22 | 26,809.67 |
| Mexico | N/A | 40,925.63 | | 9,073.58 | 6,107.20 |
| Peru | N/A | 44,775.54 | 31,405.93 | 12,523.21 | 7,811.32 |
| Portugal | N/A | 64,246 | 26,671.75 | 16,378.91 | 10,328.85 |
| Sweden | N/A | N/A | 44,702.68 | | |

Average remuneration by country and age

| Country/Age | <30 | | 30-50 | | >50 | |
|-------------|-----------|-----------|-----------|-----------|-----------|-----------|
| | 2019 | 2018 | 2019 | 2018 | 2019 | 2018 |
| Argentina | 12,043.55 | 7,964.23 | 21,893.88 | 10,524.10 | 16,574.33 | 12,783.05 |
| Brazil | 16,410.91 | 16,489.79 | 31,121.58 | 24,815.46 | 16,826.08 | 24,247.09 |
| Colombia | 7,169.72 | 4,982.02 | 14,410.65 | 11,434.29 | 13,622.25 | 9,620.10 |
| Denmark | 56,893.85 | 61,334.08 | 67,202.03 | 60,242.66 | 56,213.61 | 93,608.13 |
| Spain | 21,858.02 | 21,466.90 | 28,771.37 | 27,135.90 | 29,198.14 | 29,716.48 |
| France | 31,483.33 | 25,242.98 | 30,174.43 | 32,027.57 | 35,179.27 | 34,597.68 |
| Mexico | 5,464.38 | 5,386.88 | 10,107.14 | 9,411.15 | 14,553.39 | 13,939.97 |
| Peru | 8,876.36 | 6,521.11 | 12,175.57 | 7,802.83 | 24,601.64 | 8,266.13 |
| Portugal | 9,420.60 | 9,048.56 | 14,387.48 | 13,333.45 | 19,076.91 | 16,861.73 |
| Sweden | 40,778.04 | - | 47,351.02 | - | - | - |

Average remuneration by country and professional category: 2018

| Country | Cat. 1 y 2 | Cat. 3 | Cat. 4 | Cat. 5 |
|-----------|------------|-----------|-----------|-----------|
| Argentina | N/A | 16,008.68 | 11,703.99 | 8,825.17 |
| Brazil | N/A | 44,814.10 | 13,938.73 | 19,369.77 |
| Colombia | N/A | N/A | 14,085.16 | 6,956.93 |
| Denmark | N/A | 82,278.74 | 55,709.56 | N/A |
| Spain | 72,176.72 | 42,014.59 | 29,328.37 | 21,607.14 |
| France | N/A | 41,691.20 | 28,440.87 | 30,281.33 |
| Mexico | 56,642.55 | 18,393.86 | 8,124.26 | 5,237.73 |
| Peru | 29,089.41 | 20,713.73 | 9,444.27 | 6,375.15 |
| Portugal | 54,847.33 | 27,883.33 | 14,487.48 | 9,834.65 |

Categories 1: Directors; Category 2: Managers, Delegates, Area Heads, Department Heads; Category 3: Construction Managers and Unit Managers. Category 4: Technical and Administrative staff. Category 5: Side workers. In some countries, categories are grouped to guarantee the protection of personal data.



ADDITIONAL INFORMATION

COMSA CORPORACIÓN TEAM

Percentage of employees covered by collective agreement by country

| Country | 2019 | | 2018 | |
|-----------------------|-------|------|-------|------|
| | Women | Men | Women | Men |
| Spain | 99% | 99% | 98% | 99% |
| Argentina | 0% | 17% | 50% | 89% |
| Brazil | 100% | 100% | 100% | 74% |
| Colombia | - | - | - | - |
| Denmark | 100% | 100% | 100% | 100% |
| France | 100% | 100% | 100% | 100% |
| Mexico ¹ | 0% | 43% | 0% | 41% |
| Peru | - | - | - | - |
| Portugal ² | 100% | 100% | 100% | 100% |
| Sweden | 100% | 100% | 100% | 100% |

¹ Only the data of the EOLIS México company are included, the data of the other companies are not available.

² Only the data of Fergrupo, SA Portugal company are included, the data of the other companies are not available.



ANNEX I. 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 | 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 | 26-28 |
| GRI 102-03 | Location of headquarters | España C/ Viriato, 47, 08014, Barcelona. |
| GRI 102-04 | Locations of operations | 26 , 33 |
| GRI 102-05 | Ownership and legal form | Limited Society |
| GRI 102-06 | Markets served | 26 |
| GRI 102-07 | Scale of the organization | 33-35 |
| GRI 102-08 | Information on employees and other workers | 33-34 , 60-62 |
| GRI 102-09 | Supply chain | 80 |
| GRI 102-10 | Significant changes to the organization and its supply chain | 31 |
| GRI 102-11 | Precautionary principle or approach | 29 , 30 , 37-38 , 73 |
| GRI 102-12 | External initiatives | 40 , 47 , 68 , 88-91 |
| GRI 102-13 | Memberships of associations | 57 , 87 |
| | Strategy | |
| GRI 102-14 | Statement from senior decision-maker | 5-6 |
| GRI 102-15 | Key impacts, risks and opportunities | 29-30 |



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| RI Standard | Name of the indicator | Page number or explanation |
|-----------------------------|--|----------------------------|
| Ethics and integrity | | |
| GRI 102-16 | Values, principles, standards and norms of behaviour | 8, 9 |
| GRI 102-17 | Mechanisms for advice and concerns about ethics and integrity | 18, 21-22 |
| Governance | | |
| GRI 102-18 | Governance structure | 13-14 |
| GRI 102-19 | Delegating authority | 13-15 |
| GRI 102-20 | Executive level responsibility for economic, environmental and social topics | 13-15 |
| GRI 102-21 | Consulting stakeholders on economic, environmental and social topics | 15 |
| GRI 102-22 | Composition of the highest governance body and its committees | 14 |
| 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 | 18-20 |
| GRI 102-26 | Role of the highest governance body in setting purpose, values and strategy | 13-15 |
| GRI 102-27 | Collective knowledge of the highest governance body | 13-15 |
| GRI 102-28 | Evaluating the highest governance body's performance | 15 |
| GRI 102-29 | Identifying and managing economic, environmental and social impacts | 29-30, 59 |
| GRI 102-30 | Effectiveness of risk management processes | 30 |
| GRI 102-31 | Review of economic, environmental and social topics | 15 |
| GRI 102-32 | Highest governance body's role in sustainability reporting | 13, 15 |
| GRI 102-33 | Communication of critical concerns | 13, 15, 16 |
| GRI 102-34 | Number and nature of critical concerns | Not reported |



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| RI Standard | Name of the indicator | Page number or explanation |
|-------------------------------|--|---|
| GRI 102-35 | Remuneration policies | 65 |
| GRI 102-36 | Process for the determination of the remuneration | 65 |
| GRI 102-37 | Stakeholders' involvement in remuneration | Stakeholders are not involved in the retribution |
| GRI 102-38 | Annual total compensation ratio | 66 |
| GRI 102-39 | Percentage increase in annual total compensation ratio | 66 |
| Stakeholder engagement | | |
| GRI 102-40 | List of stakeholder groups | 95 |
| GRI 102-41 | Collective bargaining agreements | 72 , 102 |
| GRI 102-42 | Identifying and selecting stakeholders | 95 |
| GRI 102-43 | Approach to stakeholder engagement | 95 |
| GRI 102-44 | Key topics and concerns raised | 94 |
| Reporting practices | | |
| GRI 102-45 | Entities included in the consolidated financial statements | 93 |
| GRI 102-46 | Defining report content and topic boundaries | 93 |
| GRI 102-47 | List of material topics | 94 |
| GRI 102-48 | Restatements of information | No restatements in 2019 |
| GRI 102-49 | Changes in reporting | The data reported in this report are not directly comparable to those in report 2018, in 2019 it also includes data from COMSA Solutions and COMSA Security activities. |
| GRI 102-50 | Reporting period | From January 1 to December 31, 2019. |
| GRI 102-51 | Date of most recent report | July 2019 |
| GRI 102-52 | Reporting cycle | Annual |
| GRI 102-53 | Contact point for questions regarding the report | responsabilidad.social@comsa.com |



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| RI 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 | 109-121 |
| GRI 102-56 | Review external | <p>This report has been prepared based on COMSA Corporation's 2019 Non-Financial Information Statement required by Royal Decree Law 11/2018, which has been verified by the independent verification service provider Deloitte.</p> <p>However, this report includes additional information not required in these regulations.</p> |
| GRI 103 | MANAGEMENT APPROACH | |
| GRI 103-01 | Explanation of the material topic and its boundaries | Introduction of the different sections |
| GRI 103-02 | Management approach and its components | Introduction of the different sections |
| GRI 103-03 | Evaluation of management approach | Introduction of the different sections |



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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 | 33-35 |
| 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 | The company does not carry out this type of compensation. |
| GRI 201-4 | Financial assistance received from government | Public grants received: 2019: € 2,386 thousand 2018: € 2,856 thousand |
| GRI 202 | MARKET PRESENCE | |
| GRI 202-1 | Ratio of standard entry level wage by gender compared with local minimum wage | 65 |
| GRI 202-2 | Proportion of senior management hired from the local community | 60 |
| GRI 203 | INDIRECT ECONOMIC IMPACTS | |
| GRI 203-1 | Investment in infrastructure and services of support | 34, 91 |
| GRI 203-2 | Significant indirect economic impacts | 34 |
| GRI 204 | PROCUREMENT PRACTICES | |
| GRI 204-1 | Proportion of spending on local suppliers | 80 |
| GRI 205 | ANTI-CORRUPTION | |
| GRI 205-1 | Proportion of spending on local suppliers | 20 |



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| | | |
|---------------------|--|--|
| GRI 205-2 | Communication and training on anti-corruption policies and procedures | 19-23 |
| GRI Standard | Name of the indicator | Page number or explanation |
| GRI 205-3 | Confirmed cases of corruption and actions taken | 20 There are two cases that are under investigation, presumably related to alleged corruption and that affect natural persons who are currently or have been related in the past to any of the group companies. However, no group company is currently being investigated. |
| GRI 206 | ANTI-COMPETITIVE BEHAVIOUR | |
| GRI 206-1 | Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices | There are four ongoing files that correspond to the following companies: A case related to COMSA Instalaciones y Sistemas Industriales, S.A.U., a case related to Fergrupo Construções e Técnicas Ferroviárias, S.A. and two cases related to ADASA Sistemas, S.A.U. (company that as of the date of this report is no longer part of the group). Fines have been imposed in all cases, but in all cases the affected companies disagree with the resolution and have filed or intend to file the appropriate contentious-administrative appeals in which, in addition, it has been requested or will be requested. the adoption of precautionary measures consisting of the judicial suspension of the execution of the payment obligations, if applicable. |



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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 | 44 |
| GRI 301-2 | Recycled input materials used | 44 |
| GRI 301-3 | Reclaimed products and their packaging materials | 40-41 |
| GRI 302 | ENERGY | |
| GRI 302-1 | Energy consumption within the organization | 45 |
| GRI 302-2 | Energy consumption outside the organization | 45 |
| GRI 302-3 | Energy intensity | In relation to the global energy used: 2019: 434.19 2018: 410.17 |
| GRI 302-4 | Reduction of energy consumption | 46 |
| GRI 302-5 | Reductions in energy requirements of products and services | 46, 49 |
| GRI 303 | WATER AND EFFLUENTS | |
| GRI 303-1 | Interactions with water as a shared resource | 42-43 |
| GRI 303-2 | Management of water discharge related impacts | Not reported |
| GRI 303-3 | Water withdrawal | 42 |
| GRI 303-4 | Water discharge | Not reported |
| GRI 303-5 | Water consumption | 42 |



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| GRI Standard | Name of the indicator | Page number or explanation |
|----------------|---|----------------------------|
| 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 | 50 |
| GRI 304-3 | Protected or restored habitats | 50 |
| GRI 304-4 | IUCN Red List species and national conservation list species with habitats in areas affected by operations | Not reported |
| GRI 305 | EMISIONES | |
| GRI 305-1 | Direct (Scope 1) GHG emissions | 47 |
| GRI 305-2 | Energy indirect (Scope 2) GHG emissions | 47 |
| GRI 305-3 | Other indirect (Scope 3) GHG emissions | 47 |
| GRI 305-4 | GHG emissions intensity | 47 |
| GRI 305-5 | Reduction of GHG emissions | 46, 48 |
| 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 |
| 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 | 39 |
| GRI 306-3 | Significant spills | Not reported |
| GRI 306-4 | Transport of hazardous wastes | Does not apply |
| GRI 306-5 | Water bodies affected by water discharge and/or runoff | Not reported |



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| GRI Standard | Name of the indicator | Page number or explanation |
|----------------|--|--|
| GRI 307 | ENVIRONMENTAL COMPLIANCE | |
| GRI 307-1 | Non-compliance with environmental laws and regulations | There have been no environmental judgments during 2019 |
| GRI 308 | SUPPLIER ENVIRONMENTAL ASSESSMENT | |
| GRI 308-1 | New suppliers that were screened using environmental criteria | 81 |
| GRI 308-2 | Negative environmental impacts in the supply chain and actions taken | 82 |



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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 | 64, 98-99 |
| GRI 401-2 | Benefits provided to full-time employees that are not provided to temporary or part-time employees | 65 |
| GRI 401-3 | Parental leave | 69 |
| 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 | 73 |
| GRI 403-02 | Risk identification and incident investigation | 74 |
| GRI 403-03 | Occupational health services: description and mechanisms to ensure quality of the service | 74 |
| GRI 403-04 | Employee participation in ORP | 75 |
| GRI 403-05 | Employee training in ORP | 75 |
| GRI 403-06 | Occupational health promotion | 78 |
| GRI 403-07 | Prevention and mitigation of health impacts related to labour relations | 74, 78 |
| GRI 403-08 | Employees covered by ORP management systems | 75-76 |
| GRI 403-09 | Work-related accidents | 77 |
| GRI 403-10 | Work-related ill health | 77 |



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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 | 67 |
| GRI 404-2 | Programmes for upgrading employee skills and transition assistance programmes | 59, 67-68 |
| GRI 404-3 | Percentage of employees receiving regular performance and career development reviews | 65 |
| GRI 405 | DIVERSITY AND EQUAL OPPORTUNITY | |
| GRI 405-1 | Diversity of governance bodies and employees | 60-63, 71 |
| GRI 405-2 | Ratio of basic salary and remuneration of women to men | 66 |
| GRI 406 | NON-DISCRIMINATION | |
| GRI 406-1 | Incidents of discrimination and corrective actions taken | There have been no incidents in 2018 or in 2019. |
| 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 | 80 They have not been detected. |



ANNEX I. GRI TABLE OF CONTENTS

| 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 | 80 |
| GRI 409 | FORCED OR COMPULSORY LABOUR | |
| GRI 409-1 | Operations and suppliers at significant risk for incidents of forced or compulsory labour | 80 |
| GRI 410 | SECURITY PRACTICES | |
| GRI 410-1 | Security personnel trained in human rights policies or procedures | 80 |
| GRI 411 | RIGHTS OF INDIGENOUS PEOPLES | |
| GRI 411 | Cases of violations of the rights of indigenous peoples | There is no record of cases in 2019 |
| 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 | 23 |
| GRI 412-3 | Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening | 82 |
| GRI 413 | LOCAL COMMUNITIES | |
| GRI 413-1 | Operations with local community engagement, impact assessments, and development programmes | 34 , 37 , 87-91 |
| GRI 413-2 | Operations with significant actual and potential negative impacts on local communities | 34 , 50-51 |
| GRI 414 | SOCIAL EVALUATION OF PROVIDERS | |
| GRI 414-1 | New suppliers that have passed selection filters according to social criteria | 81 |
| GRI 414-2 | Negative social impacts in the supply chain and actions taken | 82 |



ANNEX I. GRI TABLE OF CONTENTS




| GRI Standard | Name of the indicator | Page number or explanation |
|----------------|--|--|
| GRI 415 | PUBLIC POLICY | |
| GRI 415-1 | Political contributions | No political contributions were made in 2018 nor 2019. |
| GRI 416 | CUSTOMER HEALTH AND SAFETY | |
| GRI 416-1 | Evaluation of the impacts on health and safety of the products and services | 85 |
| GRI 416-2 | Assessment of the health and safety impacts of product and service categories | There is no record of cases in 2019. |
| 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 | There is no record of cases in 2019 |
| GRI 419 | SOCIOECONOMIC COMPLIANCE | |
| GRI 419-1 | Non-compliance with laws and regulations in the social and economic area | In 2019, the company COMSA Service Facility Management, S.A.U. has received a sanction in the field of Occupational Risk Prevention amounting to 5,120 euros |



ANNEX II. 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 | 87 |
|  2 ZERO HUNGER | End hunger, achieve food security and improved nutrition and promote sustainable agriculture | 87 |
|  3 GOOD HEALTH AND WELL-BEING | Ensure healthy lives and promote well-being for all at all ages | 11, 59, 73, 78, 87 |
|  4 QUALITY EDUCATION | Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all | 59, 87 |
|  5 GENDER EQUALITY | Achieve gender equality and empower all women and girls | 11, 59, 69, 87 |
|  6 CLEAN WATER AND SANITATION | Ensure availability and sustainable management of water and sanitation for all | 11, 37 |
|  7 AFFORDABLE AND CLEAN ENERGY | Ensure access to affordable, reliable, sustainable and modern energy for all | 11, 37 |
|  8 DECENT WORK AND ECONOMIC GROWTH | Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all | 11, 18, 52, 59, 73, 87 |
|  9 INDUSTRY, INNOVATION AND INFRASTRUCTURE | Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation | 10, 37, 52 |

| SDG | Implication | Page |
|--|--|--|
|  10 REDUCED INEQUALITIES | Reduce inequality within and among countries | 59, 87 |
|  11 SUSTAINABLE CITIES AND COMMUNITIES | Make cities and human settlements inclusive, safe, resilient and sustainable | 10, 37, 52, 87 |
|  12 RESPONSIBLE CONSUMPTION AND PRODUCTION | Ensure sustainable consumption and production patterns | 10, 37, 52 |
|  13 CLIMATE ACTION | Take urgent action to combat climate change and its impacts by regulating emissions and promoting developments in renewable energy | 10, 37, 48 |
|  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 | 37, 87 |
|  16 PEACE, JUSTICE AND STRONG INSTITUTIONS | Promote peaceful and inclusive societies for sustainable development | 18 |
|  17 PARTNERSHIPS FOR THE GOALS | Strengthen the means of implementation and revitalize the global partnership for sustainable | 11, 52, 87 |



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