

An aerial photograph of a train traveling through a dense forest. The train consists of several long, rectangular railcars. The surrounding landscape is covered in thick, green trees. A large, white, semi-circular graphic element is positioned in the upper left quadrant of the image, containing the report's title.

2021

Sustainability

Report



TABLE OF CONTENTS

1 ABOUT COMSA CORPORACIÓN

MAIN MILESTONES 2021

CHAIRMAN'S LETTER

MORE THAN 130 YEARS OF HISTORY

MISSION, VISION AND VALUES

SDG COMMITMENT

CORPORATE GOVERNANCE

TRANSPARENCY, ETHICS AND INTEGRITY

2 ECONOMIC AREA

BUSINESS MODEL

RISK MANAGEMENT

CORPORATE STRATEGY

KEY FIGURES

VALUE CREATION

3 ENVIRONMENTAL AREA

ENVIRONMENTAL CONTRIBUTION

INNOVATION MANAGEMENT

4 SOCIAL AREA

COMSA CORPORACIÓN TEAM

EXTERNAL COLLABORATORS

CLIENTS

SOCIAL CONTRIBUTION

5 ABOUT THE REPORT

ABOUT THE REPORT

ADDITIONAL INFORMATION

VERIFICATION REPORT

ANNEX I: GRI TABLE OF CONTENTS

ANNEX II: SDG TABLE OF CONTENTS



1

ABOUT
COMSA
CORPORACIÓN





MAIN MILESTONES 2021



JANUARY

Start of renovation work on the Beira Alta line, Pampilhosa - Santa Comba Dão section and construction of the Mealhada bypass (Portugal).

Launch of the campaign "Let's turn the challenge of equality into an opportunity".



FEBRUARY

Award of the contract for the construction of the drainage system and the supply of Metkovic for €37M (Croatia).

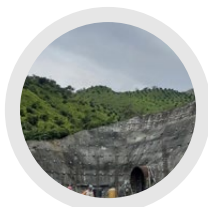
Launch of the Global Compact SDG Ambition accelerator.



MARCH

Completion of the implementation of the ITS systems for the Mulatos Tunnel on the Conexión Pacífico 2 motorway (Colombia).

GdES Greentech is positioned in the top 3 wind farms of *Energías Renovables* magazine.



APRIL

Award of the project for the design, supply, installation and commissioning of the ITS and control system equipment for the Thessaly tunnel on the Conexión Pacífico 3 motorway (Colombia).

Launch of the internal campaign "Healthy Habits".



MAY

Start of foundation work on the bridge over the Araguaia river on the BR-080 highway (Brazil).

Completion of excavation work on the Amagá Tunnel (Colombia).




JUNE

Award of the contract for the new railway access to T1 at Barcelona-El Prat airport (Spain).

Asepeyo Award for the campaign 'Don't turn your back on overexertion'.




MAIN MILESTONES 2021



JULY

Completion of the works to extend Line 4 of the São Paulo Metro (Brazil).

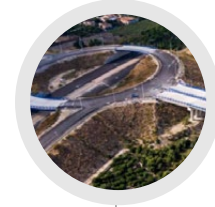
Adherence to the Global Compact Climate Ambition Accelerator.



AUGUST

Carbon Footprint certification and registration in the MITECO Register.


Partnership with Zigurat, Global Institute of Technology, to promote BIM training in the workforce.



SEPTEMBER

Entry into service of the Autovía del Reguerón highway in Murcia (Spain).


Promoting sustainable mobility during Mobility Week.



OCTOBER

Inauguration of the Cabrianes Bridge (Spain) built using BIM methodology.


Award of works for the Belém integrated transport system (Brazil).



NOVEMBER

Inauguration of the Balears Quay in the Port of Tarragona (Spain).

Completion of ITS work on the Central Cordillera Crossing tunnels (Colombia).



DECEMBER

Publication of the good practice of the "Life Gain" project in the II Catalogue of Good Practices of Circular Economy of the Ministry (Spain).

Support to nearly 1,000 families through the Salary Solidarity Programme with UNHCR programme.

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LETTER FROM THE CHAIRMAN



Jorge Miarnau, chairman of COMSA Corporación

Dear colleagues,

I am proud to present the Group's ***Sustainability Report*** for the year 2021, a year in which we have been able to face and overcome the different challenges in an uncertain and complex environment still marked by the Covid-19 pandemic, all thanks to the efforts and dedication of the people who make up this company.

With regard to the environment and in the context of the climate emergency, we are working to determine the impact of our carbon footprint, which will enable us to set the Group's climate strategy for the coming years through measurable and specific objectives. This is possible thanks mainly to a firm and decisive commitment to the digitalisation of our activity and to innovation, which has been one of the pillars since the Group was founded and to which we have allocated €8.5M in the last financial year. I would like to emphasise that our sectors, infrastructure and engineering, are and will be crucial players in tackling and overcoming the main global challenges we face as a society, such as the achievement of the different SDGs or responsible growth. In this regard, at COMSA Corporación we have joined the Global Compact's *Climate Ambition Accelerator* programme, the aim of which is to reduce the impact of our activity on the environment.

In the social sphere, we remain committed to people as key and fundamental elements of our activity, contributing to their professional development through training actions which, over the course of 2021, have increased by 37%. Additionally, in the third year of collaboration with UNHCR, staff participation has increased, reaching more than 1,000 refugee families around the world.

In the economic sphere, the 22% increase in the client portfolio has enabled us to make progress in meeting the objectives of the Strategic Plan, increasing activity in large infrastructure projects and promoting internationalisation, with a special focus on Latin America and Europe.

Finally, I would like to use these last lines to thank everyone in this great team for their effort, dedication and trust in the company, through which, together, we are building a better future for all.

Thank you very much.

Jorge Miarnau

Presidente de COMSA Corporación



OF HISTORY



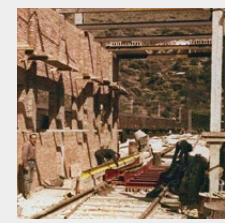
Founded in 1891 in Reus, it focused its activities, in its early years, on track works and station renovation. The knowledge of the infrastructures and the skills of its professionals quickly made COMSA one of the leading railway companies of the time.

1890 - 1920



In the **1940s**, coinciding with the second generation changeover, it began to diversify its activities, with new areas of civil engineering, starting the construction of all types of works.

1940



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

1960



With the **Group's centenary**, and coinciding with the arrival of the fourth generation of the family, COMSA began its internationalisation with the establishment in Portugal, followed by rapid expansion into Europe and Latin America.

1990



In **2019**, COMSA Service celebrates its 25th anniversary, consolidated in the maintenance and energy efficiency sector. The maintenance and services area is completed by COMSA Solutions, specialising in auxiliary services, and COMSA Security, which focuses on the installation and maintenance of security systems.

2001 - 2010



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



The Group's **more than 130 years** of experience, together with its high level of specialisation in the construction and modernisation of transport infrastructures, make COMSA Corporación a benchmark partner for clients and collaborators.

2011 - 2021

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





MISSION, VISION AND VALUES

The culture of COMSA Corporación is based on our mission, vision and values.



Mission

To offer society comprehensive infrastructure, engineering, environmental and technology services, under the principles of professionalism, quality and innovation, thus meeting the needs of clients and promoting an environment of human development within a framework of profitable and sustainable growth.



Madrid-Zaragoza-Barcelona-French border high-speed line. Calatayud-Lleida section (Spain)

Vision

To be leaders, consolidating the profitability of the various areas of activity and driving international growth, in line with the objective of contributing to economic, technological and social progress.



Bridge over the river Neris on the A1 road (Lithuania)



MISSION, VISION AND VALUES

Our values



Global vision

COMSA Corporación works with a strategy based on promoting synergies between the different lines of business in order to provide its clients with an integral service with high added value solutions, thus enhancing the strength of the Group.



Client focus

It concentrates its efforts on satisfying the needs of its clients with innovative solutions that exceed their expectations.



Results oriented

In order to position COMSA Corporación as a leading group in the sector, it is oriented towards the achievement of rigorous objectives, ensuring the efficient management of its resources.



Human resources

As people are one of the main assets of the corporation, the Group promotes their talent as a guarantor of collective success.



Excellence and initiative

COMSA Corporación bases its excellence on the professionalism and talent of its team. To this extent, the different teams and areas of the organisation are made up of people who are proactive, demanding and perfect.



Innovation and technology

COMSA Corporación is committed to innovation and new technologies as highly competitive assets in its value chain. As a result, it can offer clients the most advanced technological solutions, enabling it to anticipate their needs and improve the efficiency of their projects.



Responsibility to the environment

COMSA Corporación's business activity is carried out with full respect and commitment to society and the environment. COMSA Corporación has a clear vocation for social impact, acting under the principles of sustainability, integrity and responsibility.



SDG COMMITMENT

The SDGs: the basis of the sustainability strategy

COMSA Corporación understands sustainability as a balance between economic growth, the reduction of environmental impact and the promotion of social progress in its environment, thus contributing to generate a positive impact on its stakeholders, as reflected in the Group's **Sustainability Policy**.



SUSTAINABILITY POLICY



This document represents the reference framework of the corporate social responsibility culture at COMSA Corporación and contributes to the creation of long-term value in line with the objectives of the **2030 Agenda**. To this end, considering the Construction and Engineering sectors as key players for progress, the different areas of the company are working on the establishment of quantifiable indicators to measure the evolution of performance in the face of the main challenges we face as a society.

At the sectoral level, the main SDGs on which the Group focuses its progress in sustainability are:



SDG 7 Affordable and clean energy: Energy efficiency and the development of renewable energy sources are key to the decarbonisation of society. Throughout 2021, the Group contributed to the generation of more than 218,000 MWH of energy free of emissions through photovoltaic and wind power installations, thus contributing to an increase in the overall amount of green energy produced.



SDG 9 Industry, innovation and infrastructure: Modernising infrastructure to make it more efficient, sustainable and resilient in turn promotes the economic and social development of communities. Over the course of 2021, the Group has invested **8.5 million Euros in 36 innovation projects**, 21% more than the previous year.



SDG 11 Sustainable cities and communities: Developing smart cities makes it possible to optimise consumption and reduce their impact on the environment, in turn increasing the quality of life of their inhabitants. The development of solutions such as **GEOFIT** with the incorporation of geothermal energy in the renovation of buildings or the **CREATORS programme** which favours the creation of energy communities are some of the examples of the contribution in this field.

SDG COMMITMENT

At the same time, in carrying out its activities, COMSA Corporación works to address the main global challenges facing society:



SDG 5 Gender equality: The Group is working on various initiatives to achieve gender parity in the sector.



SDG 13 Climate action: COMSA Corporación works to reduce the Group's environmental footprint, both internally and through different solutions for its clients, with the aim of helping to meet the climate challenge.

Throughout the different sections of this report, reference is made to other specific examples in which COMSA Corporación contributes to the achievement of the SDGs, on the basis that, as stated in SDG 17, partnerships with specialised entities are essential to obtain greater positive impacts.

One of the most significant alliances in the field of sustainability is COMSA Corporación's accession to the United Nations Global Compact, thereby demonstrating its commitment to its 10 Principles in the areas of Human Rights, Labour Standards, Environment and Anti-Corruption. Beyond integrating these commitments into its day-to-day operations and disseminating its good practices on World Days, the Group has participated in various accelerated programmes to increase its ambition in different areas:



- Target Gender Equality: Accession in 2020 with the aim of accelerating the re-introduction and leadership of women at all levels of the company. Today, as a member of this community, it continues to work to increase the presence of women in the sector.

- SDG Ambition Accelerator: By adhering to this programme at the end of 2020, the company has gone further in establishing methodologies that allow it to set more ambitious goals in sustainability performance, with the aim of making the company a benchmark in the sector.

- Climate Ambition Accelerator: Accession in 2021 with the objective of setting measurable, science-based emission reduction targets and a public commitment to establish a long-term emission reduction strategy by 2022.



CORPORATE GOVERNANCE

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

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 73.88% of the shares, and the Sumarroca family, with 26.12% of the shares, as well as being one of the leading unlisted Spanish companies in the sector in terms of turnover.

This status as a family business largely determines the Group's operating and corporate governance model, as well as the decision-making process, the structure of which is shown below:

- Board of Directors.
- Executive Committee.
- Operating and Operational Committees.



Expansion of the South Campus of the IESE business school in Barcelona (Spain)

Board of Directors

This is the highest governing body of the Group, appointed by the general meeting of shareholders and made up entirely of proprietary directors, who are elected by the general meeting from among the shareholders for their knowledge of the business, management experience and training.

The Chairman of the Board of Directors, Jorge Miarnau Montserrat, is appointed by the rest of the members of the Board, and has executive functions. In particular, it has direct responsibilities for the following body areas: Economic-financial, legal and human resources.

The Group's Board of Directors consists of 7 members, all of whom are legal entities represented by natural persons. Three board members or legal entities have executive functions in COMSA Corporación. Given that the Group is a limited liability company, the position of the directors is indefinite and the length of service of all of them is 2014, except for Mifransa, S.L., which in July replaced the former director Vilmar One, S.L. and the individual representing SEP Management, S.L.U., who was appointed in July 2021.

Composición del Consejo de Administración:

- **Sheratan Management, S.L.U.** - Jorge Miarnau Montserrat, chairman
- **SEP Management, S.L.U.** - Carlos Miarnau Pascual, board member
- **Deimos Inversión, S.L.U.** - Juan Miarnau Montserrat, board member
- **Mifransa, S.L.** - Félix Boronat Miarnau, board member
- **Fibex Blue, S.L.** - Josep Luís Vilaseca i Requena, board member
- **TI 2009, S.L.** - Jorge Miarnau Montserrat, board member
- **Balmore Plus, S.L.** - Albert Sumarroca Claverol, board member
- Josep Lluís Vilaseca i Requena, non-director secretary
- Carles Mases Viñas, non-director vice-secretary



CORPORATE GOVERNANCE

The matters dealt with by the Board of Directors are:



In addition, the Board of Directors promotes on a recurring basis, as one of its functions as the highest governing body, the development of objectives, strategy, values, principles and the definition of the mission of COMSA Corporación and the companies that comprise the Group. In this regard, within the framework of updating the Group's compliance model in 2020, the Board of Directors reviewed the definition of the mission, vision and corporate values, which are included in the new version of the Group's Code of Ethics.

When taking decisions that may affect stakeholders, the Board of Directors requests relevant reports, both externally, through the use of independent consultants and sectoral bodies, and internally, through experts in environmental, social and economic matters from the Group itself. In addition, the top management of the Group attends the meetings of the Board of Directors as invited guests in order to answer any questions the Board may require and to inform it of the management decisions taken by the Operating and Operational Committees.

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

With regard to the prevention and management of conflicts of interest, this is carried out by the Ethics Committee, as provided for in the Group's Code of Ethics and the obligations arising from the Corporate Enterprises Act.

With regard to the performance evaluation of the Board of Directors scheduled for the second half of 2021, this was postponed to 2022, due to the incorporation of a new director, as well as the change of the individual representative during the month of July, so that the new members are familiar with the dynamics and the evaluation can be more useful.



CORPORATE GOVERNANCE

Executive Committee

This Committee has a consultative and non-statutory nature, with no delegated powers from the Board or powers to represent the Company, and is entrusted with the task of supervising the Group's business performance together with the CEO and/or the CFO; and to make proposals for resolutions to be adopted, if appropriate, by the Board of Directors.

The Committee is also responsible for analysing, assessing and channelling the organisation's critical concerns to the Board of Directors through the following channels:

- **Economic issues:** Economic and Financial General Management..
- **Environmental issues:** General Management of the Infrastructures, Engineering and Services Business, to which the R&I Technical Management responsible for environmental matters reports.
- **Social issues:** General Management of the Infrastructure, Engineering and Services Business and Human Resources Management.

With regard to the concerns of the different stakeholders, information is gathered through sectoral, public and private bodies, with the aim of transmitting it to the Board of Directors. In the case of the workforce, there are both works councils, which enable bi-directional communication with the workforce, and health and safety committees where issues of interest to employees in the field of prevention are discussed.

This committee is made up of:

- » SEP Management, S.L.U.
- » Sheratan Management, S.L.U.
- » Deimos Inversión, S.L.U.
- » Calabruix 2009, S.L.
- » Mr. Guillermo Lorenzo
- » Mr. Manuel Fonseca

The Executive Committee entrusts the People Department with reviewing the actions carried out by the corresponding divisions in the economic, environmental and social spheres in order to prepare the Sustainability Report, which is submitted to the Board of Directors for analysis, debate and approval, and which serves as the basis for the implementation of improvement measures.

Operating and operational committees

The main management and operational indicators of the Group are analysed and monitored through the Operational and Operational Committees, ensuring that the established objectives are met. Directors and controllers of the respective business areas may attend these committees as invited guests.


The flow of information from these committees can be made directly to the Board of Directors through the Group's chief executives, or it can be passed on to the Executive Committee for transmission to the Board at its regular meetings.

TRANSPARENCY, ETHICS AND INTEGRITY

COMSA Corporación is firmly committed to ethical management in the development of all its activities, with the **Code of Ethics and the Criminal and Anti-bribery** Compliance Policy being the high level standards of its compliance model. These documents describe the principles that inspire the Group's preventive activity of zero tolerance towards ethical and regulatory breaches and set the guidelines for the behaviour and conduct of all those who make up COMSA Corporación, requiring them to strictly respect human rights and the social and environmental surroundings in which they carry out their activities, as well as strict compliance with the regulations in force in any field and especially in matters of corruption and bribery.

Code of Ethics

The purpose of COMSA Corporación's Code of Ethics, revised and approved by the Board of Directors on 28 December 2020 and available on the corporate website, is to establish the values, commitments and principles of action which, based on ethical and regulatory compliance, must guide the daily work of all members of the Group's management bodies, executives and employees, so that their knowledge and compliance becomes binding for all members of the organisation regardless of the business area or geographical area to which they are linked.



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 it in a truthful, complete and comprehensible manner.
- 4

Express prohibition of undue payments or hospitality with the intention of obtaining benefits for the organisation or for oneself.
- 5

Act with loyalty to the organisation, avoiding any situation of conflict of interest.
- 6

Act impartially and objectively in the selection of suppliers and collaborators.
- 7

Fair competition.
- 8

Prohibition of any kind of discrimination, abuse of authority, physical, psychological or moral harassment.
- 9

Strict compliance with internal and external occupational health and safety rules.
- 10

Respect for the environment, minimising negative impacts on the environment and maximising the benefits for the community.



TRANSPARENCY, ETHICS AND INTEGRITY

Compliance and anti-bribery model

COMSA Corporación's New Compliance Model was reviewed, updated and approved on 28 December 2020, to which all the Group's companies have been adhering during 2021.

The New Compliance Model consists of a new regulatory apparatus consisting of the Code of Ethics, the Criminal Compliance Policy and the Anti-Bribery Policy, as well as the Protocols and Policies that develop them. This new model reinforces all existing measures in relation to COMSA Corporación's commitment to zero tolerance towards unlawful or unethical conduct and includes appropriate monitoring and control measures to prevent crimes or reduce the risk of them being committed, in accordance with the requirements established in the Spanish Criminal Code.

Likewise, after the approval of the New Model, an exercise has been carried out to transform COMSA Corporación's compliance model into a management system under the terms of ISO 37001 Anti-bribery. In this respect, the project to transform the general compliance model into a specific anti-bribery management system has focused on the company COMSA Instalaciones y Sistemas Industriales, S.A.U. ("COMSA Industrial"). However, many of the controls and elements of the management system are applicable and operational in the other Group companies. Without prejudice to the foregoing, it is the intention of the Ethics Committee to extend the project specifically to the other companies of the Group, starting with COMSA, S.A.U., the largest subsidiary of COMSA Corporación in terms of turnover.

COMSA Industrial obtained the ISO37001 Anti-bribery certification on 27 June 2021, which implied the updating of some documents, such as the Criminal and Anti-bribery Compliance Policy, the Protocol of the Bodies of the compliance function and the Policy on hospitality, gifts and donations.

Throughout 2021 and due to the approval of the new compliance model, the following actions have been carried out:

A lo largo de 2021 y debido a la aprobación del Nuevo Modelo de *compliance* se han llevado a cabo las siguientes acciones:

- Translation of the documents that make up the New Compliance Model into English, French and Portuguese.
- Communication and dissemination of the New Compliance Model to all employees of COMSA Corporación and the rest of the Group's companies.
- Design of a new compliance training programme for the Group's employees. On 5 November 2021, the call for compliance training was sent to all members of the organisation with a corporate email address.
- Review and implementation of the standard contractual compliance clauses to be introduced in the contracts of COMSA Corporación and its group companies with third parties.
- Introduction of new internal procedures in accordance with the new Protocols and Policies, such as: the implementation of Due Diligence to TJV partners and the implementation of the Justifying Report for Temporary Joint Ventures prior to their incorporation.



TRANSPARENCY, ETHICS AND INTEGRITY

Scope of the model

The Group's governing body is responsible for approving the documents that make up the compliance model, as well as for any review, modification or update thereof. At the time of incorporation of personnel, they are made aware of all the information relating to this model and must sign that they have received the documents, assuming the commitment to read them and carry out their functions in accordance with the principles and values established therein. In addition, staff are informed whenever there is a modification or update. With regard to partners and external parties, the contracts signed with third parties include clauses referring to the Group's compliance model and the commitment of third parties to comply with the principles and values set out in COMSA Corporación's Code of Ethics. Likewise, prior to the establishment of relations with business partners, a Due Diligence questionnaire is sent to them so that both the Legal and Finance Departments can analyse it.

Advisory mechanisms

In connection with any legal proceedings that may affect a member of the Group's management body or an employee, COMSA Corporación may instruct or has instructed external lawyers other than those advising such member of the management body or employee to assess the proceedings in question from the company's perspective. This ensures an objective analysis, enabling the Ethics Committee to take the appropriate decisions in an informed manner, guaranteeing compliance with national and international compliance regulations in force at any given time, as well as with the principles, values and objectives of the Code of Ethics and the Group's criminal and anti-bribery compliance policy.

Risk analysis within the model

The risk analysis carried out as part of the update of the compliance model, which began in mid-2019 and was updated in 2021 with respect to COMSA Instalaciones y Sistemas Industriales, S.A.U., has taken into consideration the circumstances and activities carried out by each of the Group's companies, which has made it possible to have a risk map for each company. The criminal risks under analysis include corruption-related risks.

The new compliance model has incorporated, among others, a *Protocol for the prevention of criminal risks of corruption*, a *Protocol for the management of the complaints channel*, *internal investigations and corporate reactions*, a *Policy on contracting with business partners and consultants*, as well as a *Policy on hospitality, gifts and donations*, with the aim of establishing the fundamental guidelines for action so that COMSA Corporación and, in particular, the areas or departments involved in contracting with third parties, do not engage in conduct that could entail a criminal risk of corruption.

Throughout 2021 there have been no confirmed cases of corruption; however, the Ethics Committee continues to monitor the facts, circumstances and progress of the 3 cases that are currently underway, but which in no case affect COMSA Corporación, nor the Group's companies, but rather individuals who are or have been linked to COMSA Corporación.

In addition, the Group has lodged appeals in three competition cases, one in Spain and one in Portugal. The third procedure affecting the branch of COMSA, S.A.U. in Colombia and one of its subsidiaries has concluded with a Resolution of the sanctioning body, whereby it agrees not to disqualify these entities, provided that the Group's compliance model is reviewed within a period of 2 years by an independent Monitor. As of today, the Monitor is in the process of reviewing the Group's compliance model.



TRANSPARENCY, ETHICS AND INTEGRITY

Challenges set from 2022 onwards

- Improve the indicator of implementation of compliance clauses in contracts with business partners and suppliers.
- The implementation of a procedure for the electronic collection of periodic declarations of conflict of interest and relations with public officials.
- The study and evaluation of the adaptation of the new compliance model in the various Latin American countries for its proper implementation in the Group's corporate vehicles at the international level.
- The review of the first year ISO 37001 Certification for COMSA Instalaciones y Sistemas Industriales, S.A.U.
- In relation to the variable remuneration of particularly exposed personnel, although global objectives have been defined, it is proposed to analyse and, where appropriate, implement some indicator relating to compliance with anti-bribery regulations or to introduce a penalty in the event of non-compliance with anti-bribery regulations.
- To make a unified record of all corrective actions in order to have a history and facilitate traceability and follow-up of corrective actions.
- Implementation of supplier due diligence and supplier approval process.
- Establishment of a procedure for the verification of knowledge and understanding of the scope of the Criminal and Anti-Bribery Compliance Policy, within the framework of the processes of recruitment, promotion or change of position in the organisation to functions in which employees may be more exposed to criminal risks.
- Specific compliance training for the Compliance Officer.
- In the case of Peru, completion of the project to adapt the compliance model to national regulations, which involves integration with the Prevention Model of Law 30424 and the implementation of a local ethical channel.



Track construction on the Levante - Villarubia de Santiago section (Spain)



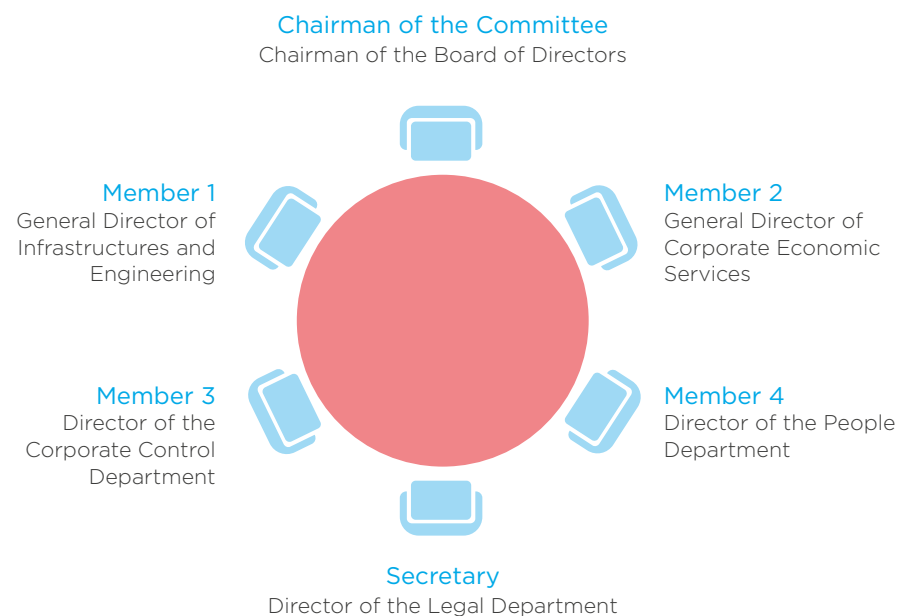
TRANSPARENCY, ETHICS AND INTEGRITY

The ethics committee

COMSA Corporación's criminal prevention body is the Ethics Committee, a collegiate body appointed by the Group's Board of Directors and endowed with autonomous powers of initiative and control under the terms provided for in the Spanish Criminal Code to supervise the operation, development and periodic review of the functioning of the Group's compliance model. Likewise, the governing bodies of the Group companies headed by COMSA Corporación may, if they deem it appropriate, appoint as a supervisory or compliance body the COMSA Corporación Ethics Committee itself and an additional person closely linked to the company's business, who shall act as a liaison person between the governing body and members of the company and the COMSA Corporación Ethics Committee, to whom they shall report periodically and, where appropriate, on a timely basis, any incidents and possible breaches of the Compliance Model (art. 4 Protocol of the Compliance Body).

During the year 2021, the Group companies have been adhering to COMSA Corporación's new compliance model, opting for the appointment of a supervisory or compliance body made up of COMSA Corporación's Ethics Committee and a liaison person, under the terms indicated by the Protocol of the Bodies of the compliance function and the Protocol of general risk management measures in Group structures.

Composition of the Ethics Committee:



The Ethics Committee, as well as the other compliance bodies of the Group's companies, are supported in the performance of their functions of supervising the operation and compliance with the compliance model by a Compliance Technician who reports hierarchically to the Ethics Committee, dedicated 100% to this function, as well as by other personnel who collaborate with and support the Compliance Technician from other Areas and Departments of the organisation (Legal, Internal Audit, HR, Research, etc.).



TRANSPARENCY, ETHICS AND INTEGRITY

Communication channels

COMSA Corporación has established a notification and consultation procedure which, supervised by the Ethics Committee, allows all members of the organisation, in good faith and safe from reprisals, to report malpractice and ethical and regulatory breaches of which they are aware. This procedure is developed through the *Protocol for managing the whistleblowing channel, internal investigations and corporate reactions*, accessible to members of the organisation and third parties through the COMSA Corporación website and corporate portal.

Communications of information, complaints, doubts, queries or alerts of possible risks of ethical and regulatory non-compliance may be made, always acting in good faith, through any of the existing communication channels in the organisation: from reporting to the hierarchical superior, written communication through the Ethics Channel or verbal communication to one of the members of the Ethics Committee or to the compliance body in the respective companies of the Group.

As far as written communications are concerned, use may be made of the Ethics Channel or Whistleblowing Channel through the following mailboxes:

- Ethics Channel e-mail: **ComisiondeEtica@comsa.com**
- Postal mail: Letter addressed to the Chairman of the Ethics Committee of COMSA Corporación at: c/Viriato, 47 - 08014 Barcelona, or to the corresponding compliance body in the case of Group companies that have one. Formulario web disponible desde 2021.
- Web form available from 2021.



CODE OF ETHICS MAILBOX

The Ethics Committee of COMSA Corporación is the competent compliance body for the management and supervision of the proper functioning of the Ethics Channel and the final recipient of the communications sent. Its competence extends not only to COMSA Corporación, but also to the rest of the Group's companies.

During 2021, only one complaint has been received through the Ethics Channel against a consortium worker in Brazil for a case not linked to corruption. The Ethics Committee was duly informed of the alleged facts and provided the report on the investigation of the complaint by the consortium leader. As the consortium adheres to the prevention model of the lead company, the Committee understood that it should not interfere in the decisions and procedure to be followed in analysing the complaint in accordance with it. However, the Committee noted that it considered that the investigation was following the appropriate criteria and that the alleged facts should be addressed primarily from an industrial relations perspective.



Project planning meeting in Barcelona (Spain)



TRANSPARENCY, ETHICS AND INTEGRITY

Training and communication

The commitment to ethical and responsible management involves the continuous training of COMSA Corporación's employees and managers, as they must know and apply the instruments, principles and rules that make up the organisation's culture of compliance, which implicitly includes issues relating to respect for human rights. In addition to promoting and implementing training actions among professionals, COMSA Corporación has introduced these principles in its value chain, involving its collaborators in this corporate culture.

In 2017, communication and training in this area was carried out for the first time, both for the governing body of COMSA Corporación and for managers and employees. Since then, training has been extended to different countries, as well as refresher courses and training for new recruits, adapting the training to the language of the country concerned: Spanish, English, French or Portuguese.

On the occasion of the approval of the New Compliance Model at the end of 2020, the Ethics Committee approved the training plan on the New Compliance Model for all staff with corporate email. On 5 November 2021, the training course on the new compliance model was launched to all members of the organisation with corporate email. This training is also given to all new recruits who have corporate email.

As of 31 December 2021, out of a total of 2,481 employees targeted for training, 1,394 employees completed the course, representing 56% of the total.

Partners and external partners: No training is provided to third parties and there are no plans at present to extend training to third parties, although this is a measure that cannot be ruled out in the future.

PERSONS TRAINED IN THE CODE OF ETHIC

Categories ¹	2021	2020	2019
Category 1	24	0	1
Category 2	73	2	10
Category 3	223	5	53
Category 4	665	3	7
Category 5	376	0	9
Total	1,361	10	80

¹ The categories include: 1 Executives; 2 Delegates, Managers, Area Managers and Department Heads; 3 Site Managers and Unit Managers; 4 Technicians and Administrative staff and 5 Operators.



TRANSPARENCY, ETHICS AND INTEGRITY

Respect for human rights

Compliance with the Code of Ethics guarantees action in accordance with COMSA Corporación's commitment to carry out its projects guaranteeing compliance with the legal requirements in force in each geographical area, based on the most current international standards, such as the International Bill of Human Rights, the Conventions of the International Labour Organization (ILO), the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises, among others. In this respect, the Group provides the means to ensure compliance with the labour provisions contained in the ILO's basic conventions, not admitting practices contrary to these either among its member companies or among those with which it collaborates, thus establishing the framework for action in the relationship between COMSA Corporación and its suppliers and partners. Along these lines, clauses referring to the principles and values of the Code of Ethics, its existence and the commitment to comply with it are included in contracts with third parties, whenever the negotiation so permits.

Another of the precepts of COMSA Corporación's Code of Ethics is the total rejection of child labour, forced labour, as well as any type of work involving arduous, extreme, inhuman or degrading conditions, as well as its total defence of the rights of minorities and indigenous peoples in any geographical area in which it carries out its activities and respect for freedom of association and collective bargaining.

To ensure compliance with the guidelines established in relation to respect for human rights, this content has been included in the training courses on the Code of Ethics since 2017. To date, the Group has not identified situations where there is a risk of human rights violations, but these can be reported through the Ethics Channel.

As a sign of the Group's commitment to respect for human rights, in 2019 COMSA Corporación joined the United Nations Global Compact, which entails a commitment to its 10 principles, the first two of which relate to human rights:

Principle 1:
Businesses should support
and respect the protection
of internationally proclaimed
human rights.

Principle 2:
Businesses should ensure
that they are not complicit in
human rights abuses.

In line with this commitment to the Global Compact, the Group is developing the necessary means to ensure compliance with the four pillars of the decent work agenda set out in **SDG 8 - Decent Work and Economic Growth**, such as job creation, social protection, rights at work and social dialogue.

In this regard, and in relation to rights at work, the Group has a Protocol for the Prevention of Harassment and other Discriminatory Conduct, the purpose of which is to establish the procedural guidelines that should govern COMSA Corporación to prevent, avoid and eradicate any harassment and/or discriminatory conduct within its organisation, with the Harassment Committee being the body responsible for monitoring and control of any case relating to this area. In 2021, the Harassment Committee received two (2) complaints through its specific complaints channel, in respect of which the Committee concluded in one case that there were indications that the treatment given by the person complained of to the complainant could be qualified as an abuse of authority and consequently contrary to the provisions of the Protocol for the Prevention of Harassment and other Discriminatory Conduct, and therefore recommended the adoption of a series of measures; and in the other case, that there was no situation of harassment.



2

ECONOMIC
AREA





BUSINESS MODEL

COMSA Corporación, a leading Spanish group in infrastructures, engineering and services, offers society its over 130 years of experience in the development of large-scale works with a high technological component, contributing decisively to the reduction of environmental impacts.

Committed to sustainability, responsible growth and the territorial structuring of the countries in which it operates, the Group works to offer solutions with high added value, in accordance with quality standards and contributing to the achievement of the SDGs established by the United Nations. All of this with the aim of satisfying the needs of its clients.

In this sense, COMSA Corporación's business model is structured around 4 main areas of work:

1. [Construction](#)
2. [Industrial Engineering](#)
3. [Maintenance, upkeep and services](#)
4. [Concession of infrastructures and promotion of renewable energies](#)

The Group exports its knowledge and extensive experience in the construction and maintenance of infrastructures all over the world, being present in Andorra, Brazil, Colombia, Croatia, Denmark, Spain, France, Latvia, Lithuania, Morocco, Mexico, Paraguay, Peru, Poland, Portugal, Sweden, Switzerland and Uruguay.

In 2021, COMSA Corporación managed a staff of 5,000 employees, which led to a turnover of €758M. In line with its strategic plan, 31% of this turnover corresponds to its international activity.

Construction

With more than 130 years of history, COMSA is a specialist in turnkey railway projects covering the construction and maintenance of high-speed lines, tramways, metropolitan and regional railways. In the field of civil works, the company also carries out comprehensive road, tunnel and bridge works, as well as hydraulic, port and airport projects, and singular buildings.

COMSA is currently a leading construction company in Spain and throughout its trajectory it has gained a solid international presence in markets such as Brazil, Croatia, Colombia, Denmark, Mexico, Lithuania, Peru, Poland, Portugal, Sweden and Uruguay.



Construction of the Amado Granell - Nazaret section of Line 10 of Metro Valencia (Spain)



MODELO DE NEGOCIO

Industrial Engineering

With more than 60 years of experience in the development of engineering projects with a high technological component, COMSA Instalaciones y Sistemas Industriales, S.A.U. has consolidated its position in the engineering, industrial and services sector, with a special focus on the design and execution of installations.

Its areas of expertise include turnkey electromechanical and industrial projects, as well as ITS and control systems for tunnels and railway systems. Instalaciones y Sistemas Industriales, S.A.U. also has excellent know-how in solutions for the biopharmaceutical sector, airports, telecommunications and electricity distribution.



Maintenance, upkeep and services

COMSA Service S.A.U., with more than 25 years of experience, is a consolidated company in the maintenance and energy efficiency sector thanks to its high degree of specialisation in facility management and property management, as well as in the optimisation of energy resources. The company also carries out the maintenance of photovoltaic and wind power installations, as well as the supply of forest-based biomass for energy recovery.

The company's experience in the design, construction and conservation of ornamental fountains, including the decorative treatment of water, light, image, fire and sound, has made it a benchmark in this field.

The maintenance, conservation and services area of COMSA Corporación also includes COMSA Solutions, specialising in auxiliary cleaning, concierge and gardening services, etc., and COMSA Security, which focuses on the installation and maintenance of security systems.



COMSA
SERVICE



COMSA
SOLUTIONS



COMSA
SECURITY



TFM



Complete renovation of the ornamental fountain in Santa Coloma de Gramenet, Barcelona (Spain)



BUSINESS MODEL

Concession of infrastructures and promotion of renewable energies

COMSA Concesiones S.A.U. has accumulated extensive experience in the development and concession of infrastructures, carrying out the development, design, financing, maintenance and management of the different assets in which it participates in the fields of transport, mobility and social facilities. In addition, it participates in international tenders in Costa Rica, Israel, Slovakia, Belgium and Colombia, among other countries.

On the other hand, COMSA Renovables S.A.U. carries out the promotion and development of renewable energy assets, mainly focused on solar PV and wind energy in Spain.

The Group's experience in complex projects, as well as the synergies between the different companies that make up the Group, enhance its know-how.



Maintenance, upkeep and services

In addition to the 4 main areas, the company complements its portfolio with different activities that allow it to broaden its range of services:

- **GMN:** Management, treatment and recovery of end-of-life tyres.
- **Egatel:** Radio frequency broadcasting systems and satellite communication systems.
- **Iconus:** Consultancy services and development of IT projects



Murcia Tramway Convoy (Spain)



RISK MANAGEMENT

COMSA Corporación has established a proactive risk management process based on early identification, assessment, management and control of risks.

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

- In terms of activity, infrastructure and industrial engineering projects are highly variable in terms of volume and type, especially in the case of industrial engineering.
- In terms of geographic scope, this is a determining factor in establishing the necessary and available resources for each project, which, together with the tight margins in which the sector operates, makes it essential to select projects appropriately and to manage risks optimally, both in the tender phase and subsequently in the execution phase.

In parallel, COMSA Corporación has other systems to identify, evaluate, manage and minimise possible risks in specific areas.

- **Criminal risks.** In 2020 COMSA Corporación approved a new Compliance Model which, taking the new Code of Ethics and the Criminal and Anti-Bribery Compliance Policy as a reference framework, develops a series of protocols, policies and procedures that ensure the Group's ethical and responsible behaviour, responding to the regulatory requirements related to the organisation's activity. Further information on this area can be found in the Transparency, ethics and integrity section of this report.

On the other hand, within the framework of the different management systems, the Group has identified different factors, both internal and external, that may represent a risk and/or an opportunity for the company, on the basis of which different actions are developed to respond to them.

Aspects related to environmental management

External factors	Internal factors
<ul style="list-style-type: none"> » Legislative changes in the environmental field. » Weather conditions (natural disasters). » Possible effects on cultural heritage. » Client requirements. » New market needs, related to expectations of clients and investors. » Technical aspects. » Social demands. » Aspects related to purchasing and management of suppliers and subcontractors. 	<ul style="list-style-type: none"> » Strategic management and leadership. » Environmental impacts and operational control. » Organisation's performance » Monitoring, measuring, analysis and assessment of environmental aspects » Significant environmental aspects during the execution of the works. » Training, capacity building and awareness-raising on environmental issues.

Security aspects

External factors	Internal factors
<ul style="list-style-type: none"> » Value chain: clients, suppliers, partners and competitors. » Technical aspects and aspects related to the production process itself. » Socio-economic situation and legal and social security of the environment. » Environmental context linked to climatic conditions and geography. 	<ul style="list-style-type: none"> » Staff competencies in terms of qualifications, skills and use of equipment. » Operational control systems. » Types of projects and geographical distribution.

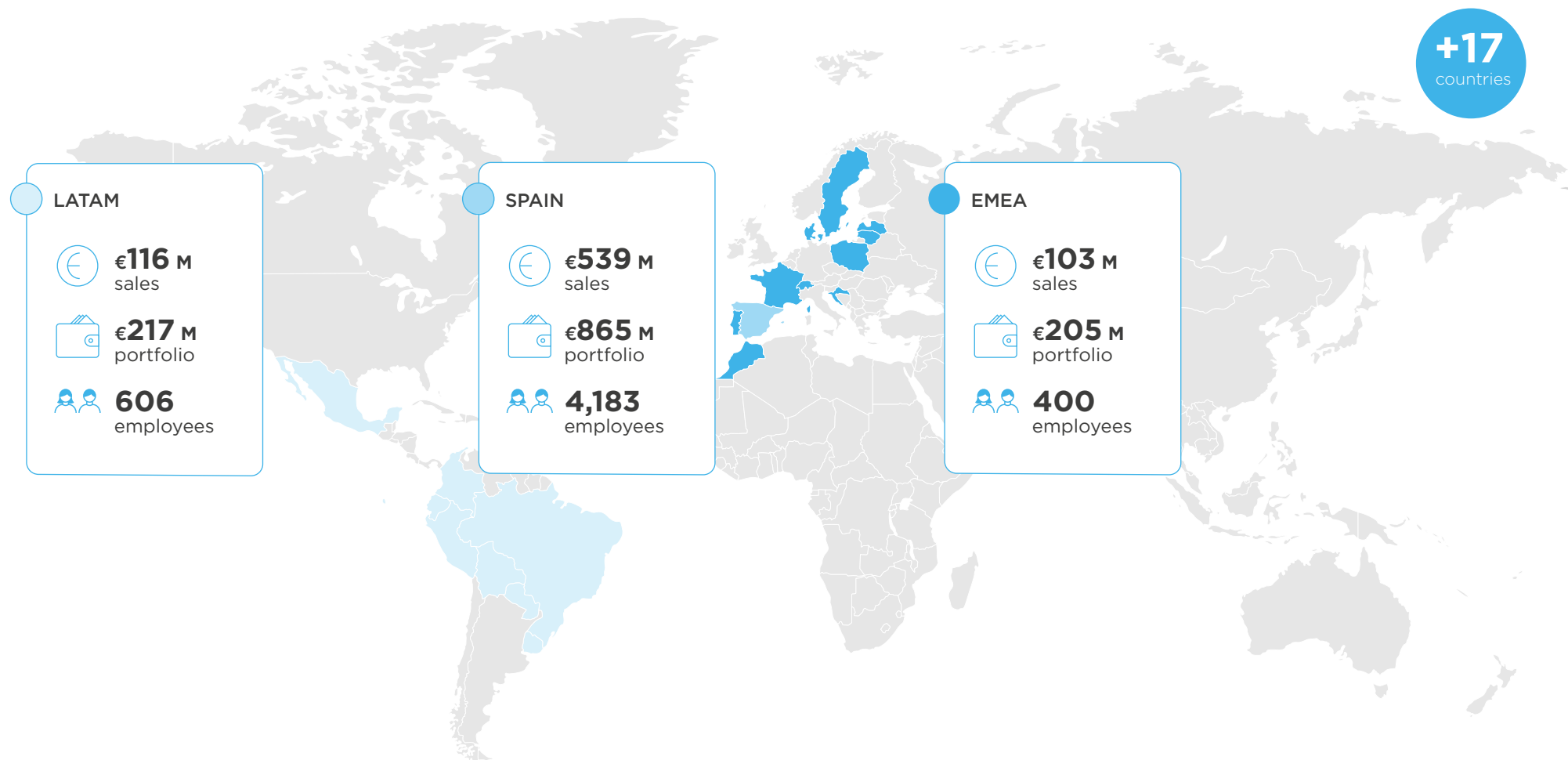


CORPORATE STRATEGY

- COMSA Corporación has made progress during 2021 in the development and fulfilment of the **Corporate Strategic Plan** defined for the period 2021-2025, highlighting the following milestones:
- Specific **commercial plans** have been developed for each of the Group's businesses and activities, with a special focus on consolidated areas such as railways and civil works, and activity linked to the environment, the generation of renewable energies and unique buildings has been boosted. Internationally, plans have been developed for the consolidation and expansion of activity in Nordic and Balkan countries in Europe, and in Brazil, Colombia and Mexico in Latin America. The commitment to high value-added activities, such as Biopharma and Intelligent Transport Systems (ITS), form the pillars of the Group's commercial strategy. The contracting figures are already showing the first results of these plans, with high levels of compliance with the targets set, as well as substantially longer lead times for meeting portfolio targets than those of competitors.
- **Development of a unified project planning system** that facilitates early warning of risks and opportunities and consequent early and rapid action. After the team training phase started in 2020, the "Control Panels" tool was implemented in 2021, which has enabled the information and the main temporary indicators, problems, risks and opportunities detected for each project to be unified in a single repository. This information can be compiled both at the individual project level and by area, thus enabling the monitoring and follow-up of its evolution. In the next phase, it is foreseen that the tool will also bring together information on the economic performance of the projects.
- Within the framework of the **digitalisation and improvement of the Group's processes**, progress continued to be made in 2021 with the launch of the supplier portal to facilitate access to and consultation of communications with suppliers, as well as the development of the My COMSA app, a key tool for boosting the Group's internal communication. Various initiatives have been carried out in the area of technological infrastructures, with a particular focus on cybersecurity aspects and on making available to teams the integrated videoconferencing technology necessary to minimise travel, thus helping to reduce the Group's carbon footprint.
- Maintaining **specialisation and comprehensive** client-focused **service**, with innovation as the backbone to enhance competitive advantages. During 2021, more than 35 innovation projects have been managed, with an investment of more than €8.5M, focused on offering products and services with a high technological component, and aligned with the global needs of the client, maximising energy efficiency and reducing the use of new materials and greenhouse gas emissions.
- **Strengthening of collaboration between the companies**, which allows us to offer a comprehensive service to clients, both nationally and in international projects. In the 2021 financial year, this strategy has resulted in a significant increase in the contracting of projects in collaboration format, which reinforces the objective of offering high added value to the client through the development of an integral solution.
- To have an **organisational model** in which the *Operations* area is the central element of the activity, supported by the different *Service Areas*, which contribute knowledge and value in their respective areas, complementing the production core; this allows us to have multidisciplinary teams to face the changing environments and challenges of the 21st century. During 2021, the organisational model that seeks to integrate practically all of the Group's operating activity has been consolidated, with the recent incorporation of the Concessions and Renewable Energy areas into this perimeter, which has given them greater commercial and business development strength specific to R&I&S activities, as well as access to the resources of the Group's service areas, all in order to meet the strategic objectives set out in the Plan.



MAIN FIGURES IN 2021¹



¹ Consolidated Group figures. In terms of staffing levels, this refers to the average number of staff during the year.



VALUE CREATION

One of the pillars of the sustainability strategy, driven by the Senior Management of COMSA Corporación, is the conviction that long-term business viability is only possible with solid ethical and responsible action, as the company's vision contemplates the participation and commitment of all stakeholders in the value chain, in what, in short, must be a shared prosperity with clients, staff, collaborating companies, as well as with the communities in which the company carries out its projects.

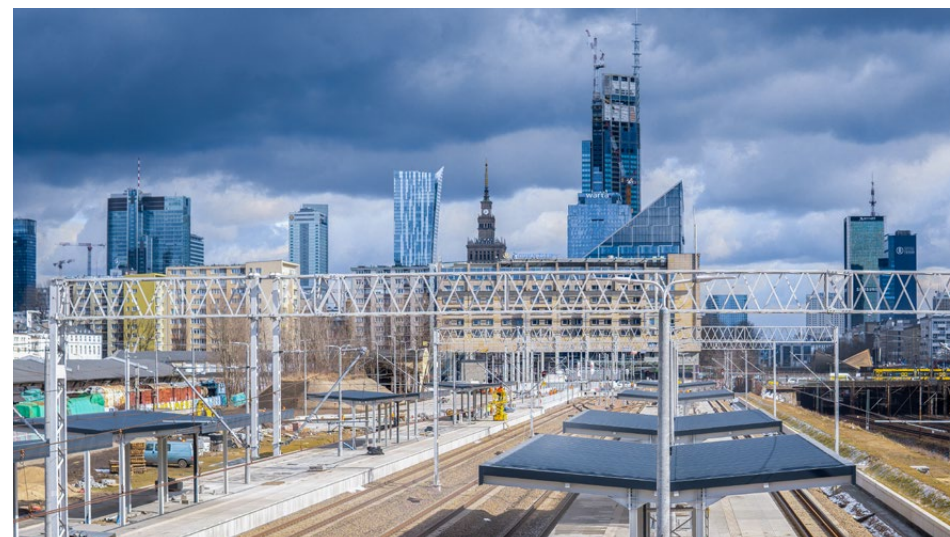
This vision of shared prosperity and value creation has, as its backbone, the desire to encourage and strengthen the talent and creativity of its professionals, through their personal and professional development, which, in turn, results in a greater capacity to offer solutions to its clients to develop projects and services that cover both explicit needs and present and future expectations.

These same principles are the basis of the commercial relationship with partner companies, fostering lasting relationships based on trust, as well as on common ethical, social and environmental principles, with the aim of maintaining long-term collaborations and creating value through the generation of quality employment and wealth in the countries in which COMSA Corporación carries out its activities.

During the year 2021, COMSA Corporación has contributed to the productive growth of society, generating stable and quality employment, with 5,189 employees¹, and more than 18,000 collaborating companies, of which more than 97% are companies based in the countries in which it carries out its activities. All in all, the activity generated by the Group in 2021 involved 12,545 direct jobs in its work centres, including both its own personnel and those from different collaborations.

In addition to its own business activities, COMSA Corporación is committed to supporting social causes in the different territories in which it is present, whether by supporting cultural, sporting or environmental institutions, or in the field of training and integration of groups at risk of exclusion, with a view to contributing directly and indirectly to the achievement of the United Nations Sustainable Development Goals.

The sustainability strategy is completed with a medium-term environmental vision, where the reduction of greenhouse gas emissions and the transition to less polluting energy models, in a context of climate emergency, are essential. And it is in this field that innovation has played and continues to play a fundamental role.



Warszawa Główna Station, Warsaw (Poland)

¹ This figure takes into account the Group's average headcount in 2021.



VALUE CREATION

KEY BUSINESS INDICATORS IN 2021

SALES (M€)

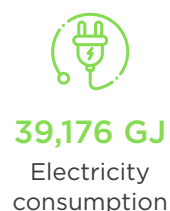


PORTFOLIO (M€)

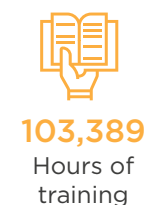
INNOVATION



ENVIRONMENTAL CONTRIBUTION



SOCIAL AREA



¹ This figure takes into account the Group's average headcount in 2021.



3

ENVIRONMENTAL
AREA





ENVIRONMENTAL CONTRIBUTION

Environmental sustainability, a pillar of our strategy

COMSA Corporación understands the correct performance in environmental matters as a key factor in the development of its activities and this is reflected in the organisation's Sustainability Policy.

This commitment is based on the different Quality, Environment and Energy Management Policies, which together integrate the general principles of environmental protection and conservation. It also has an Environmental Management System, which establishes and monitors the different actions established with the aim of achieving continuous improvement.

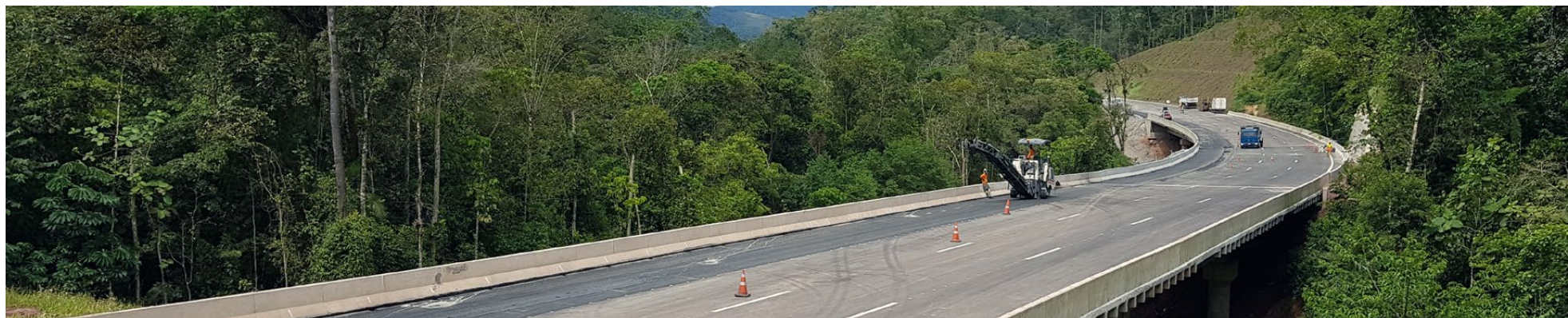
COMSA Corporación integrates, as an organisational value, respect for the environment in which its operations are carried out



The starting point of the strategy is based on the 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 stakeholders. In this regard, the Group identifies them through the analysis of processes and activities of the different business areas, and establishes actions to be implemented in this respect. The main risks include:

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

In addition, the company has taken out voluntary environmental liability insurance, both nationally and internationally, which provides coverage in the event of the materialisation of the risks described above.



Serra de Cafezal Highway (Brazil)

ENVIRONMENTAL CONTRIBUTION

Environmental Policy

This policy defines the company's principles of action in the field of environmental conservation, focusing on the following points:

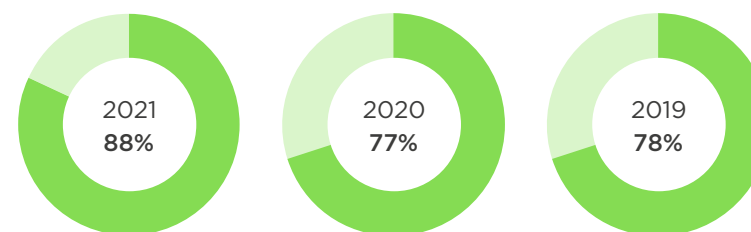
- Promoting the circular economy
- Reducing waste generation
- Optimising water consumption
- Improving energy efficiency
- Combatting climate change



ENVIRONMENTAL POLICY

Environmental Management System

To ensure the correct management of significant environmental aspects, compliance with legislation and the establishment of a commitment to continuous improvement, the Group has a consolidated management system, based on the ISO 14001:2015 standard, and integrated with the Quality and Health and Safety Management System, with which it is interrelated. Through the environmental management system, COMSA Corporación promotes continuous improvement, establishes the objectives to be achieved, monitors the achievement of the different indicators, and evaluates its performance through periodic internal and external audits in the different work centres. The percentage of certified activity in recent years is shown hereafter:



By implementing the Wordlex platform, the Group has been able to optimise its production processes by digitising various aspects. In 2019, this tool allowed centralising and automating the document management of legal requirements at the worksites, thus optimising time and resources, while in 2021, this tool has been consolidated as the basis for collecting evidence regarding consumption and waste, thus facilitating data collection and traceability.

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



ENVIRONMENTAL CONTRIBUTION

Circular economy

COMSA Corporación is committed to promoting the circular economy in its day-to-day business, as established in 2019 with the Group's adhesion to the **Pact for a Circular Economy**, promoted by the Spanish Ministry of Agriculture and Fisheries, Food and Environment. This approach enables the company's contribution to achieve the targets of **SDG 12 Responsible Consumption and Production** of the 2030 Agenda.

Thanks to the collaboration of people from the Group's various businesses and strategic partners, the development of innovative solutions has been promoted and various actions have been undertaken in the context of the use of materials and their subsequent management as waste. In addition to the development of the different projects, the company works to identify and achieve business opportunities that contribute to the circular economy through its activities, products and services.

GMN, CIRCULAR ECONOMY IN ITS PUREST FORM

Gestión Medioambiental de Neumáticos (GMN) bases its business on the integral management of end-of-life tyres (ELTs), separating the different components that make them up to make use not only of the rubber, but also other materials such as steel or textile fibre, which are subsequently used for new purposes such as the manufacture of street asphalt, artificial grass or street furniture, among other new practices.

In Spain, GMN's Maials plant processed 26,899 tonnes of end-of-life tyres for reuse, an increase of 5% over the previous year. This not only reduces the amount of waste generated, but also the use of raw materials, as well as the energy associated with their processing and transport, which consequently reduces the emissions associated with their life cycle.

As a sign of this commitment, several lines of action have been established to promote the circular economy:

- Prioritisation of the recovery of waste as a resource, minimising landfill.
- Encouraging the reuse and recycling of water throughout the activities.
- Incorporation of recycled materials in production processes.
- Development, through the innovation area, of projects related to the reuse of materials.

Mortar and concrete of volcanic origin



A clear example of the reuse of materials in 2021 can be found in the framework of the access project to the Port of Tzacorte, in Santa Cruz de Tenerife, where, due to the volcanic eruption produced from September to December by the Cumbre Vieja volcano, located just 35 km from the construction site, large quantities of volcanic materials such as lapillis and different types of sand have been used for the manufacture of mortar and concrete. In this way, in addition to reducing the environmental footprint of the project, associated with the consumption of materials, it has been possible to make use of the large quantities of materials expelled by the volcano during this period.



ENVIRONMENTAL CONTRIBUTION

Material resource consumption

The first step in COMSA Corporación’s circularity circuit is in the consumption and use of materials, a particularly relevant point in the evaluation of the environmental aspects of projects, where the complete life cycle of the infrastructure or service is taken into account. Being aware of the volume of materials required by the Group’s activity, as well as the impact on the environment that some of them generate, the company firstly encourages the efficient use of material resources, as well as proposing the use of materials with responsible certification or of recycled origin to the client, as they represent alternatives with less environmental impact.

The most significant materials in terms of volume are concrete in the building sites and paper in the offices.



Improvement of the Tauca-Pallasca section of the Chuquicara - Puente Quiroz - Tauca - Cabana - Huandoval - Pallasca road (Peru)

EVOLUTION OF MATERIALS CONSUMED

YEAR	2021	2020	2019
Concrete (m³)	292,874.04	567,013.12	209,246.62
Paper (T)	Global: 26.62	Global: 25.81	Global : 31.75
	Spain: 20.65	Spain: 16.66	Spain: 23.59
	(12.69% recycling)	(16.22% recycling)	(13.66% recycling)

These quantities are strongly linked to the volume and typology of the projects, as well as to the stage they are at, which is why there are significant fluctuations, especially in the case of concrete.



Establish a Sustainable Procurement Policy that allows for greater traceability of the use of sustainable resources in the Group.

ENVIRONMENTAL CONTRIBUTION

Waste management

At COMSA Corporación we apply the principle of waste hierarchy: recycling at source, promoting reuse and recycling and prioritising recovery over disposal, thus minimising the impact on the environment.

Some examples of the application of this principle can be found in the preparation of waste management plans for all projects, establishing reuse and recycling objectives from the start of the activity, or the specific training in waste management and environmental awareness carried out during 2021, in which more than 200 people, including project managers, personnel in charge and operators, have received guidelines to comply with the new requirements of the new waste law in Spain.

EVOLUTION OF WASTE GENERATED

YEAR	2021	2020	2019
Hazardous Waste (T)	1,667.09	398	335
Non-hazardous Waste (T)	562,586 (48.62% earth)	1,215,440 (74.46% earth)	1,384,084 (86.69% earth)

As with the use of materials, the volume of waste generated is closely linked to the typology of the projects, as well as to the activities carried out in each of their phases, with mobilised earth being the largest volume of waste produced. In this case, COMSA Corporación prioritises their use, both within the project in which they are extracted or mobilised, as well as in adjacent projects, thus avoiding their management as waste, while at the same time contributing to reducing the extractive pressure on deposits due to the need for new materials. In 2021, the volume of non-hazardous waste decreased considerably, mainly due to changes in phase and completion of works in Spain and Brazil; however, due to two new works in Spain, the overall volume of hazardous waste increased significantly.

Life Gain

As a result of steel production, large quantities of steel aggregates are generated, which, despite new recovery efforts, are still largely deposited in landfills. To avoid this, their application as aggregates in the construction of railway tracks has been studied, through the Life Gain solution. Through this initiative, an ecological alternative to these materials is achieved, since on the one hand it makes it possible to reduce the pressure of these remains in landfills, and on the other hand it reduces the need to extract new aggregates, thus reducing the environmental impact on quarries. The production of this new material has been carried out in the vicinity of the steelmaking furnaces, so that the ecological footprint linked to its transport has also been reduced. In addition to these benefits, the application on a test section has shown that the properties of this new material, in terms of strength and service life, are superior to those of conventional aggregates and therefore have great potential.

This solution has been recognised by the Ministry for Ecological Transition as one of the best practices included in its 2nd Catalogue of Best Practices in the Circular Economy.



Obtaining Zero Waste certification.

ENVIRONMENTAL CONTRIBUTION

Efficiency in the use of resources

With regard to the use of resources in the Group, as in the case of materials, priority is given to their responsible use, and therefore, within the framework of continuous improvement supported by the Environmental Management System, measures are progressively adopted to optimise this consumption.

Water consumption and management

The activities carried out by COMSA Corporación are associated with a notable consumption of water, especially in the construction sector, which is why we work to ensure an efficient use of this precious resource, especially in areas with low water availability. In some businesses, in addition to exhaustive control of the quality of water discharged into the natural environment, both to ensure compliance with local legislation and to minimise environmental impact, specific actions are also carried out to reduce consumption, such as the implementation of sensors on taps.

In 2021, the total water consumption figure was 904,650 m³.

WATER CONSUMPTION

	2021	2020	2019
Mains water consumption	30,294	49,329	55,420
Catchment water consumption	869,227	912,535	719,857
Purchased water consumption	5,129	4,103	14,151
Overall water consumption	904,650	965,967	789,428

From the moment it is extracted to the moment it reaches the user, mains water is associated, among others, with processes of collection, purification and distribution, the treatment of which involves the emission of CO₂ into the atmosphere. The evolution of these emissions is shown below:

EMISSIONS FROM MAINS WATER

	2021	2020	2019
Emissions water Works water (T CO₂/m³)	10.28	18.55	20.22
Emissions water Office (T CO₂/m³)	1.68	0.93	1.67
Global water emissions (T CO₂/m³)	11.97	19.49	21.89



Torre-Serona wastewater treatment plant in Segrià, Lleida (Spain)

ENVIRONMENTAL CONTRIBUTION

Energy consumption



The use of energy is indispensable for the performance of COMSA Corporación's activity, both electricity linked to the use of resources and lighting, and the fuel necessary for travel. For this reason, and along the same lines as the use of material and water resources, their rational use is essential.

In the electricity area, it is worth mentioning the Group's firm commitment to energy efficiency, both internally, where 100% of the corporate offices have certification that guarantees efficient energy use, and in the implementation of solutions that improve the energy efficiency of its clients. This commitment is reflected in the Group's Energy Efficiency Policy, the main objective of which is to reduce energy consumption through continuous improvement, a commitment to innovation and the promotion of the use of alternative and renewable energies.



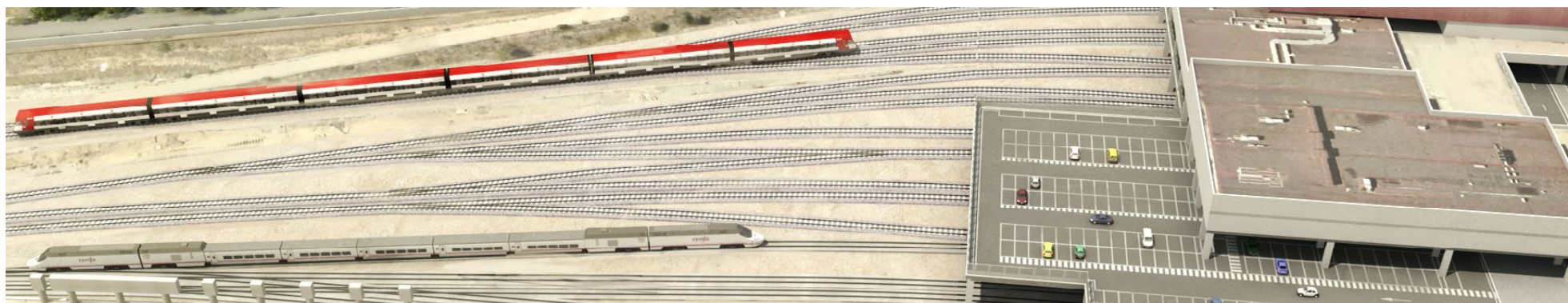
ENERGY EFFICIENCY POLICY OF COMSA CORPORACIÓN

CONSUMPTION OF ELECTRICAL ENERGY

	2021	2020	2019
Offices (GJ)	23,515	1,287	0,669
Works (GJ)	15,661	7,567	2,131
Total COMSA Corporación (GJ)	39,176	8,854	2,800

The nature of the company's activity prevents a realistic comparison of the data, as consumption varies significantly depending on the volume and type of projects carried out, as well as the stage they are at.

It is in the area of fossil fuels where the greatest energy consumption is seen, as the type of projects not only requires the movement of the vehicle fleet, but also involves consumption for machinery and other work activities.



Rendering of the new Chamartín station, Madrid (Spain)



ENVIRONMENTAL CONTRIBUTION

Consumption of Fuel

CONSUMPTION OF FUEL

	2021	2020	2019
Fuel (GJ)	276,015	316,308	296,427

In 2021 COMSA Renovables has managed 218,572 MWh of energy from renewable sources, the equivalent of one municipality of 169,000 inhabitants



MAIN ACTIONS TO REDUCE ELECTRICITY AND FUEL CONSUMPTION:

- Promotion of energy efficiency certifications in offices and projects, which guarantee the monitoring and control of consumption.
 - Staff awareness campaigns to promote the efficient use of resources.
 - Progressive replacement of luminaires with LED luminaires, which consume less energy, as well as systems to control and optimise consumption.
 - Installation of photovoltaic panels on site huts.
 - Implementation of electric recharging points in corporate centres.
 - Use of energy efficiency software with the aim of proposing more efficient and sustainable alternative solutions to the initial project solutions.
 - Commitment to the development of the renewable energy sector, through the Renewable Energy Business Area, where work is carried out both in the design and construction phases of the different types of wind farms, as well as in their day-to-day management, contributing not only to the promotion of clean energy generation, but also to guaranteeing universal access to sustainable energy.
- Substitution of fuel-using machinery with more efficient light machinery and electric or battery-powered equipment.
 - Development of vehicle rental and leasing policies, prioritising the progressive replacement of those vehicles that consume more fuel with others that are more efficient and consequently emit less greenhouse gases through new propulsion systems. The evolution of the acquisition of this type of vehicle is shown below:

2021	2020	2019
39 electric or LPG vehicles ¹	32 electric or LPG vehicles	25 electric or LPG vehicles

¹ LPG, liquefied petroleum gas, alternative fuel.

ENVIRONMENTAL CONTRIBUTION

Climate change

COMSA Corporación is aware that, in order to face the challenges posed by climate change, all actors in society must contribute. For this reason, since 2017, the Group has been working to identify and quantify its main sources of greenhouse gas emissions, with the aim of establishing an emissions reduction plan to meet the targets of SDG 13 - United Nations Climate Action.

Within the Group's Strategic Plan, a number of targets are set to achieve emission reductions:

- Assess impacts on climate change.
- Minimise energy consumption.
- Extend the scope of certification to the supply chain.
- Set emission reduction targets.
- Promote innovation projects linked to energy efficiency.

In addition, the Group has started to work on the identification and assessment of specific risks and opportunities associated with climate change, both in the short, medium and long term.



Establish the Strategic Plan to Combat Climate Change for COMSA Corporación, incorporating these risks in the Group's global risk matrix of the Group.

Climate commitments

During the year 2021, COMSA Corporación has materialised its commitment to the fight against climate change, preparing and verifying for the second year its Core Business Greenhouse Gas (GHG) report. It has also renewed its contribution to the National Registry of Carbon Footprint, Compensation and CO₂ absorption projects, promoted by the Spanish Office for Climate Change (OECC) as a body under the Ministry for Ecological Transition (MITECO).



Aware that, in order to meet this great challenge, it is necessary to do so in a collaborative manner, the Group has participated in various initiatives, both to accelerate progress in this area and to increase visibility and social awareness of this global challenge.



ENVIRONMENTAL CONTRIBUTION

— Actions to increase ambition:

Climate Ambition Accelerator: Participation in the first UN accelerator programme, which aims to provide businesses with the knowledge and skills needed to accelerate progress towards the establishment of aligned science-based emissions reduction targets that will allow us to achieve no more than a 1.5°C temperature increase and net zero emissions by 2050.



— Visibility and awareness-raising actions:

Business Platform #ForClimate: Through this platform, which aims to promote action in the face of the climate crisis, COMSA Corporación disseminates the actions carried out in this field since 2019.



Signature collection with UNHCR: The UNHCR launched a campaign to raise awareness of climate change, which COMSA Corporación, as a strategic partner of the organisation, joined to disseminate among its collaborators. The aim was to collect half a million signatures to demand concrete measures to address the climate emergency and present them at the Climate Summit (COP 26) on 1 November, because the climate emergency causes three times more forced displacement than wars and conflicts, with natural disasters in 2020 causing 30.7 million displacements in more than 140 countries and territories.









ENVIRONMENTAL CONTRIBUTION

Emissions in the company

At COMSA Corporación, we have been calculating greenhouse gas emissions for several years and we draw up an emissions inventory following the ISO 14064 methodology, verified by an independent entity

COMPANY EMISSIONS (T CO₂EQ)

	 Scope 1 <i>Fuels</i>	 Scope 2 <i>Electricity</i>	 Scope 3 <i>Corporate Travels and Water</i>	 TOTAL
2021	17,044.91	2,417.84	1,214.68	20,677.43
2020	20,097.84	2,660.06	898.26	23,656,16
2019	19,020.68	2,311.56	2,792.32	24,124.56



Certify the Group-wide Carbon Footprint by 2022 and set measurable, science-based reduction targets



Wind farm maintenance operations (Spain)



ENVIRONMENTAL CONTRIBUTION

Sustainable construction

In Europe as a whole, buildings are responsible for around 40% of energy consumption and 36% of greenhouse gas emissions¹ during the construction, use, renovation and demolition phases. These figures point to the area of buildings as one of the main areas in which to implement reduction measures, so that two main areas of action have been identified:

— **Energy refurbishment of existing buildings:** These measures not only reduce consumption, but also increase the resilience of the inhabitants to climate variations. In this area, COMSA Corporación promotes the development of innovation projects linked to energy efficiency in building, known as smart building or intelligent buildings, as a way to promote sustainability in building through digital solutions. One example is the **GEOFIT** project, which focuses on the integration of geothermal energy generation systems in buildings under renovation.

— **Construction of new buildings based on sustainable construction standards:** This measure reduces the energy dependence of buildings, and consequently the associated emissions, both in the construction phase and during the life cycle of the building. In this field, COMSA Corporación carries out different sustainable certification projects, such as BREEAM or LEED, of recognised international prestige, which not only provide a complete framework for assessing efficiency in the use of water, energy and the selection of materials, but also guarantee better indoor air quality, as well as more comfortable and safer lighting and noise levels for users.

BREEAM®
Building Research
Establishment
Environmental Assessment
Method (BREEAM)



The Group participated in the International Seminar on Sustainable Infrastructures and Building organised by Madrid World Construction Capital (MWCC), taking part in the round table on the “Internationalisation and positioning of Spanish companies abroad”.

¹ According to the report In focus: Energy efficiency in buildings of the European Union of February 2020.

https://ec.europa.eu/info/news/focus-energy-efficiency-buildings-2020-lut-17_en#:~:text=Collectively%2C%20buildings%20in%20the%20EU,%2C%20usage%2C%20renovation



ENVIRONMENTAL CONTRIBUTION

Protection of biodiversity

Some of the activities carried out by COMSA Corporación may affect the environment in which they are located, especially when they take place in protected areas or areas of high ecological value. For this reason, the Group sets out basic principles for action to protect biodiversity:

Assess the potential impacts on biodiversity for each of the projects and services carried out.

Establish measures to eliminate impacts on the environment, and where this is not possible, implement actions to prevent and reduce damage, such as physical protection, transplanting or relocation, as well as respecting the life cycles of affected plant and animal species.

Develop and implement environmental monitoring plans to ensure compliance with established preventive measures.

In cases where impacts cannot be eliminated, restoration, reforestation or compensation for damage is carried out, with the aim of restoring the pre-intervention conditions.



Banding of invasive plants for clearing and recovery of autochthonous fish, Alto Nervión Sanitation Works, Álava (Spain)



ENVIRONMENTAL CONTRIBUTION

Noise pollution

The effects on people and the environment of high levels of noise and vibration can pose short- and long-term risks, and it is therefore essential to control the sources of noise and vibration. The activity of COMSA Corporación, especially when machinery is used, can contribute to increasing these levels, so the company employs monitoring systems, especially in areas of special interest and urban areas, to keep noise levels in a controlled range. To minimise the impact on the environment, it applies various measures depending on the needs of each territory and project:

- Time restrictions for the noisiest jobs.
- Replacement of machinery with greater acoustic impact.
- Installation of acoustic screens in the areas with the highest emissions.
- Protection of workers with specific equipment.

Light pollution

Light pollution, produced as a result of human activity, can have consequences for the health of people and living beings. In order to mitigate these effects, especially in projects executed at night, COMSA Corporación carries out Environmental Monitoring Plans in all its works, in order to establish the appropriate preventive measures and thus minimise their impact. The main actions undertaken are:

- Replacement of exterior lights with others of greater efficiency (LED).
- Use of environmentally friendly lighting devices in works that have to be carried out at night.
- Installation of presence detectors and timers to ensure minimum use of lighting.



INNOVATION AS THE LINCHPIN OF PROGRESS

In the current context, where the major challenges we face are increasingly numerous and urgent, having a broad capacity to adapt, and to do so in an agile manner, is essential in order not to lose competitiveness in the market. In COMSA Corporación this challenge is approached from two different perspectives, on the one hand internally through a cultural change and on the other hand, externally through the development of new solutions for our clients.

Internal innovation

In the era of digitalisation, the internal transformation of organisations requires a change in business culture, with the focus, more than ever, on the people within them. It is people who, through the adoption of new technologies and the development of new skills, will make it possible to take advantage of all the benefits that the transformation of society is bringing us.

In this area, COMSA Corporación's commitment to the different areas of the business is a boost for competitiveness and the transformation of one of the sectors with the greatest potential for digitalisation. Thus, the vast majority of actions undertaken based on the training of their staff can be categorised as being between:

- **New ways of working:** The development and implementation of new work technologies in cloud environments has led to increased collaboration and efficiency, as well as the optimisation of teamwork. The success of this transition has required staff training in the use of new collaborative tools, which in turn has facilitated much more agile and cross-cutting communication between teams.
- **Digitisation of internal processes:** Although it is true that progressive digitisation affects all areas of the company, for some, due to the nature of their processes, the progress made during 2021 has meant a considerable increase in their productivity, as well as a great benefit in the day-to-day life of their users. In this area there are many and varied examples that have been developed throughout 2021, such as the digitisation of invoicing processes in the purchasing area, the file management tool in the legal area, the control panel tool in the business area, the accident management tool in the prevention area, or the digitisation of employee files in the people area. These examples have made it possible not only to reduce the use of material resources, but also to facilitate the traceability of movements and reduce management times



INNOVATION AS THE LINCHPIN OF PROGRESS

Innovative solutions for our clients

At COMSA Corporación, innovation is the differentiating factor of added value for its clients, and has therefore formed part of the Group's values and corporate culture since it was founded over 130 years ago. This commitment allows us to anticipate future trends in the sector, to offer new solutions in tenders and works, and to develop new business opportunities.

Over 36 innovation projects were carried out in 2021 with an investment of €8.5m, 21% more than the previous year. This demonstrates the company's strong commitment to the development of this type of solutions, as well as its commitment to contribute to achieving some of the goals proposed by the United Nations Sustainable Development Goals:



SDG 9 Industry, Innovation and Infrastructure: Develop sustainable, resilient and modern infrastructure, especially in the rail sector, as well as promote technological capacity and innovation in the sector.



SDG 7 Affordable and clean energy: Increasing the proportion of renewable energies, increasing energy efficiency and increasing participatory energy management through the modernisation of production processes.

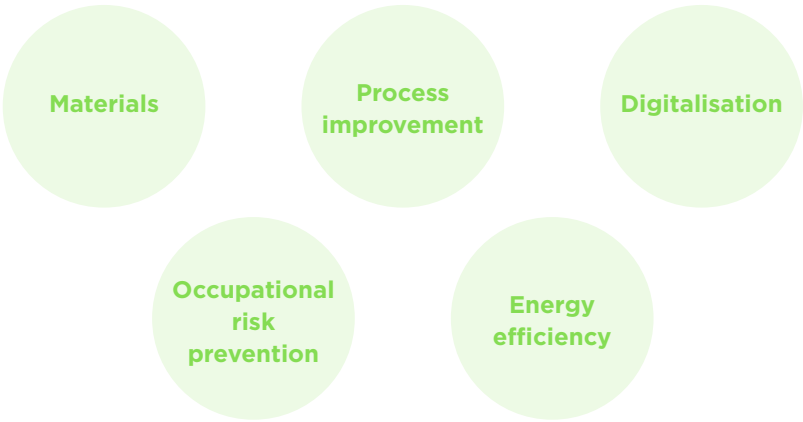



SDG 11 Sustainable Cities and Communities: Enabling the development of affordable, safe and sustainable mobility infrastructure and the climate resilience of both infrastructure and communities.



SDG 12 Responsible production and consumption: Development of new solutions to ensure more exhaustive control and more efficient use of resources; reuse of waste through the development of new materials.

Although most of the projects developed are transversal in nature and have application in different areas of the business, they pursue the following strategic areas:





OBJECTIVE

Adaptation of the R&D&I management system to the new UNE 166.002-2021 standard.



INNOVATION AS THE LINCHPIN OF PROGRESS

Materials

The incorporation of new materials in the execution processes of works must guarantee an improvement, not only in the technical characteristics of the materials themselves, but must also lead to an environmental improvement in the production processes, either in the environmental conditions of their production and installation, or in their potential reuse or recycling at the end of their useful life, thus complying with the principles of the Circular Economy.

In this regard, COMSA Corporación's project portfolio includes numerous products based on the reuse of materials such as steel slag or rubber from used tyres or urban waste. Examples include the **Birbalast** and **Ballaxt** projects.

Process improvement

As a company specialising in construction, and with proven experience in railway works, COMSA's technological developments have an impact on each of the elements and construction processes of the infrastructures. At the same time, special attention is paid to improving corporate processes in order to achieve excellence in client service. This results in shorter construction times and a higher quality and more durable construction.

An example of this is projects such as **Qualitic**, where a vision system is being developed for quality control and on-site execution, **RESILTRACK**, which provides real-time information on the state of railway infrastructure and its impact in the event of climatic phenomena or adverse human actions, this makes it possible to predict its behaviour in the face of the effects of climate change and increase its resilience, and in the area of **5GMED** connectivity, which consists of the deployment of 5G connectivity in the railway sector with projects between Spain and the South of France, and **Safe4RAIL**, which develops new Train Control and Monitoring Systems (TCMS) for passengers and freight.

Energy Efficiency

Given the global context of climate emergency and in line with European objectives, COMSA is committed to energy efficiency and renewable energies, in geothermal and photovoltaic energy projects and their integration with storage and intelligent management systems in buildings. Examples are the **Geotech** projects on geothermal technology for sustainable cooling and heating in building foundations, **GEOFIT** for the incorporation of geothermal solutions in the energy rehabilitation of buildings, **LifeBIPV** which is an innovative zero net energy building integrated photovoltaic system, Creators where integrated local energy systems (Energy Islands) are developed, among others.



Demonstration of the Life BIPV project in the Port of Barcelona (Spain)



INNOVATION AS THE LINCHPIN OF PROGRESS

Digitalisation

COMSA Corporación is also committed to the digital transformation process. In particular, there has been a strong push for BIM methodology, as well as for a large number of advanced management tools based on sensors and collaborative platforms. In this way, a framework of execution control is established that results in a very significant optimisation of the information flows, both internal and external, of the work. Examples include the **Bimiótica** project for the digitalisation of Occupational Risk Prevention processes in the construction sector, where **BIMtable** has been developed, and the **Sphere** project on the development of a “*Digital Twin*” platform based on BIM methodology to optimise the building life cycle, reduce costs and improve energy efficiency in residential buildings. This platform enables the integration and synchronisation of data, providing information and knowledge to all multidisciplinary teams involved in the different phases of a building’s life.

Risk prevention

En COMSA consideramos que no sólo debemos garantizar y mejorar la prevención de riesgos durante los trabajos de construcción, sino que también debemos mejorar la calidad de vida y seguridad de los usuarios de nuestras infraestructuras. Para ello, dedica un gran esfuerzo a desarrollar herramientas y metodologías que aprovechen al máximo el potencial ofrecido por la tecnología para reducir el nivel de riesgo y evitar cualquier incidente que pueda poner en peligro la integridad física de cualquier persona que participe en la obra. Y el proyecto Stream donde se desarrollan herramientas inteligentes para la seguridad del trabajo ferroviario y la mejora del rendimiento es un claro ejemplo de ello.

Corporate Venturing

In the field of Corporate Venturing, and as part of its commitment to digital transformation, the company has been collaborating since its inception with the technology transfer programme “The Collider”, promoted by the Mobile World Capital Barcelona, whose main objective is to connect entrepreneurial and scientific talent to drive innovation. As a result of this collaboration, the Group has created the start-up **SmartTower**, for the commercialisation of a remote inspection system for electricity and telecommunications towers based on an IoT (Internet of Things) platform that enables real-time data collection, data capture and training.

On the other hand, during 2021, **NEOBALLAST S.L.** has been developing the machine for the industrial production of NEOBALLAST®, a new type of high-performance ballast that extends the useful life of this material with respect to conventional ballast, as well as reducing noise and vibrations caused by train traffic. In the course of the year, the development phase of the machinery for the manufacture of this new material was completed, enabling it to be launched as a solution on the railway market.



INNOVATION AS THE LINCHPIN OF PROGRESS

Strategic alliances

The Group sees collaborative work and strategic alliances as the best way forward to meet the challenges facing the sector. Therefore, within the framework of **SDG 17 Partnerships to achieve the goals**, it works with different nationally and internationally recognised entities to develop new methodologies, solutions and materials.

KEY PARTNERSHIPS IN 2021

- COMSA Corporación is a founding partner and member of the Board of Directors of **The Railway Innovation Hub Spain**, a cluster that aims to promote the international projection of the Spanish railway system.
- As a company specialising in the development of railway infrastructures, COMSA Corporación also forms part of the **Railway Technology Platform (PTFE), integrated in the European Rail Research Advisory Council (ERRAC)**.

COLLABORATIONS WITH SPECIALISED ENTITIES:

- Area of construction: The Group is a member of the **Steering Committee of the European Construction Technology Platform (ECTP)** and belongs to the **Association of Construction Companies and Infrastructure Concessionaires (SEOPAN)**.
- Energy field: Collaboration with **Energy Efficient Buildings (E2B)**, the Energy Efficiency Cluster of Catalonia (CEEC) and the **Photovoltaic Energy Cluster**.
- Artificial Intelligence (AI): In the field of BIM methodology, the Group is a member of Building Smart and of the **Commission for the Implementation of BIM** in Spain, led by the Ministry of Transport, Mobility and Urban Agenda.
- Research centres: Stable collaboration with several centres such as the **Institut Químic de Sarrià (IQS)** with which it has been collaborating since 2017 on various research and technology transfer projects.
- Training centres: Agreements for the development of training, dissemination and promotion of talent, such as the one established with **Zigurat Global Institute of Technology** to access the Master's Degree in #BIM Management in Civil Engineering.



INNOVATION AS THE LINCHPIN OF PROGRESS

Participation in forums

Participation in industry forums and events helps to give visibility to the Group's innovation actions and projects, so that other entities can follow the example and/or build on these experiences, thus contributing to the advancement and development of innovative solutions in the industry for the benefit of society as a whole:

Participation as speakers at the technical conference on R&D&I in Materials Construction and Maintenance Technology for Railway Infrastructure, organised by the Construction Engineering Laboratory of the University of Granada (LabIC.UGR), the Centre for Public Works Studies and Experimentation (CEDEX) and the Spanish Railway Technology Platform (PTFE).

Participation as a member of the jury of the II BIM Startup Award of the UPC School, whose winner was 'Koadü, Renewable Energy Community', an innovative platform for the management, monitoring and commercialisation of self-produced energy by small consumers.

Participation in the webinar promoted by the Railway Innovation Hub where the conclusions of the work of the Railway BIM classification initiative were presented.

Speech at the Círculo de Infraestructuras conference "5G connectivity. Challenges and opportunities for the mobility of the future".

Participation in the International Building Digital Twins Congress, the first event dedicated to digital twins for building, through the European SPHERE project.

Expansión - Cellnex Telecom conference on 5G in the Mediterranean Corridor.

Infrastructure Commission of the Spanish Chamber of Commerce in Mexico City (online). The Neoballast, 5GMed and Safe-4rail projects were presented.

Conference on energy transition in the port of Barcelona. Presentation of the CREATORS project. Online. October

Smart Cities / Smart Ports Fair. Presentation of the CREATORS project.

Technology Dissemination Day: Intelligent Predictive Maintenance - Railway Innovation Hub (webinar). Presentation of the Resiltrack project. November



4

SOCIAL
AREA



COMSA CORPORACIÓN TEAM

For COMSA Corporación, its employees represent the Group's most valuable asset and, for this reason, ensuring decent working conditions, respect for diversity and promoting the development and collaboration of the people who make up the Group is a priority.

Also aware of the economic impact that employment has on the territories in which it operates, the Group complies with the collective bargaining agreements in each sector, and is committed to permanent, full-time employment, as a guarantee of stable, quality employment that enables the professional development of the workforce. These aspects are carried out safeguarding at all times the safety and health of people, as well as favouring personal reconciliation, thus fulfilling the company's commitment to achieve the goals promoted by **SDG 8 - Decent Work and Economic Growth**.

Through the **COMStruimos 2021-2022 Project**, the Group is working to adapt the reality of the workforce to increasing globalisation, the use of new technologies and new working methods, which translates into the need to place people at the centre of the processes, through the ongoing training of the teams as a tool for their professional development. In order to evaluate, manage and develop talent within the company, various tools have been made available to the different managers, with Performance Evaluation and its digitalisation being the backbone.

Human capital management¹

At the end of 2021, the global workforce of COMSA Corporación will total 4,607 people. The Group is also aware of the importance of local roots and sensitivity to the particularities of each territory, and promotes the direct involvement of local employees and managers, with 92% and 95% respectively of local origin in 2021, with more than 60 nationalities. This transversal and multidisciplinary nature is a benefit for the company, as having this great diversity of skills allows it to adapt to the needs of each client, depending on the project and geography in an agile manner.

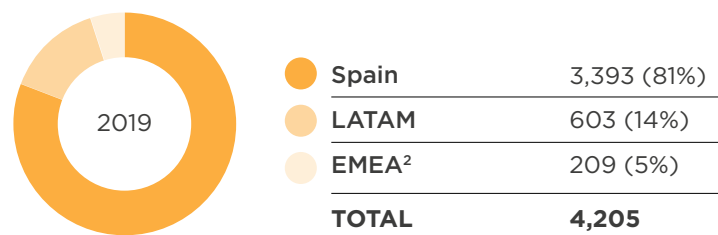
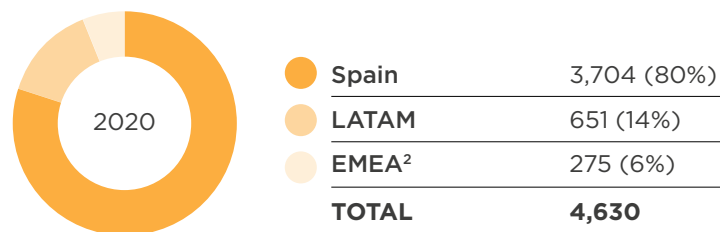
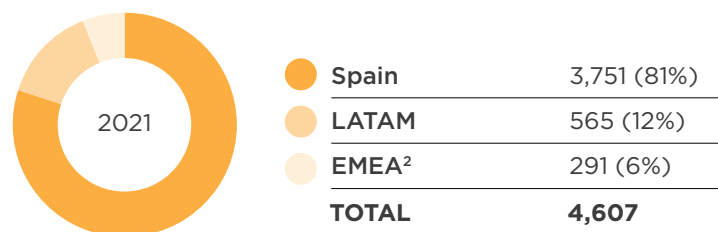


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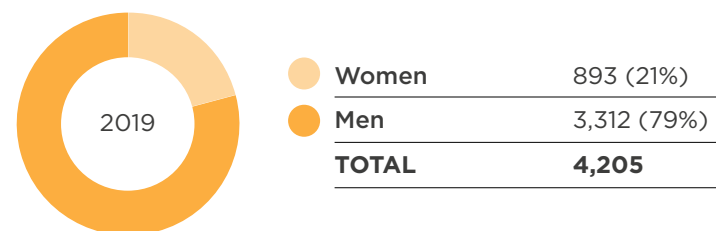
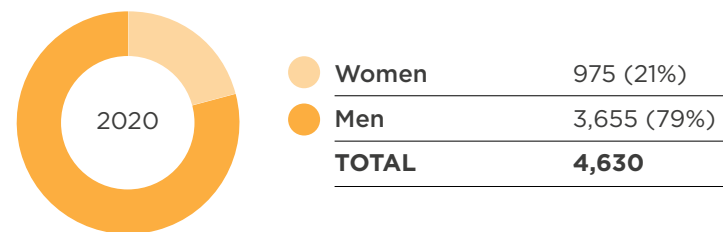
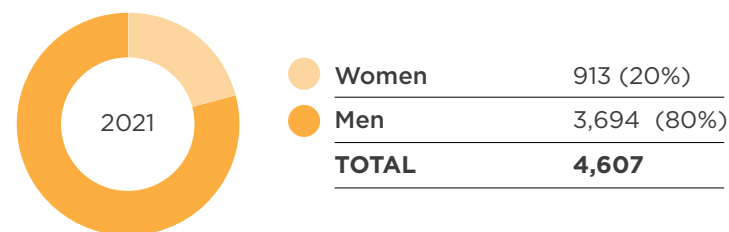


COMSA CORPORACIÓN TEAM

STAFF BY GEOGRAPHIC AREA



DISTRIBUTION OF STAFF BY GENDER

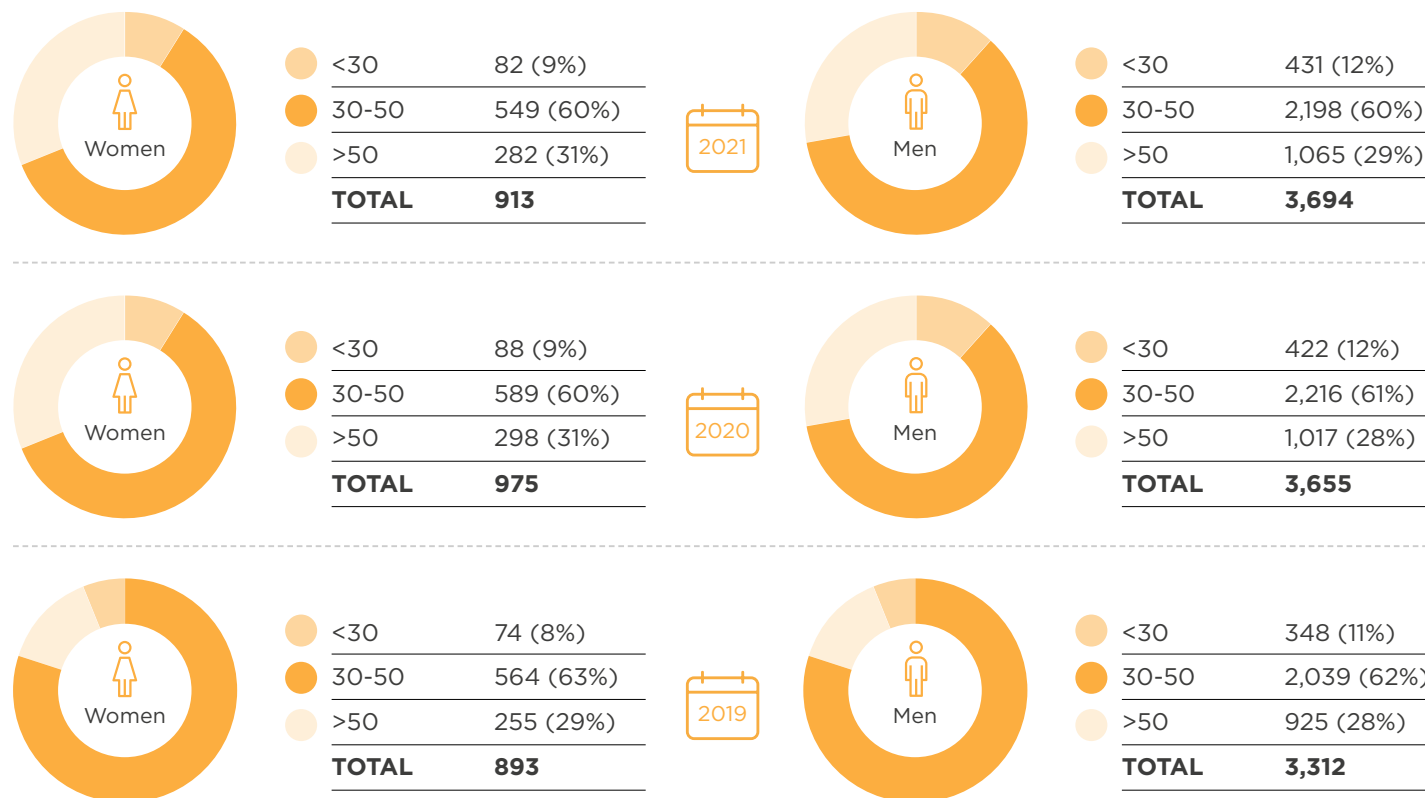


1 Unless otherwise specified, all figures, tables and comparisons in this section refer to the countries and businesses included in the scope of this report.

2 EMEA includes Europe, Middle East and Africa.

COMSA CORPORACIÓN TEAM

DISTRIBUTION OF STAFF BY AGE



These indicators reflect some of the characteristics of the construction and industrial engineering sector, such as hiring linked to offshoring and type of projects and the gender distribution of the workforce. However, COMSA Corporación is committed to the creation of quality employment that contributes to the development of the communities in which it operates and, therefore, at global level in 2021, 75% of contracts were permanent and 91% of them full-time, which represents an increase of 2% compared to 2020 in both cases.

COMSA CORPORACIÓN TEAM

Talent development at COMSA Corporación

Aware that talent is key to standing out in highly competitive environments, COMSA Corporación focuses not only on selecting the most qualified people when filling new vacancies, but once they join the company, talent becomes a valuable asset that is developed and preserved throughout their professional career.

To make this possible, in 2019 the company drew up the Group's **Map of Competencies**, which helps to determine the training needs of each position in terms of soft skills, complemented by specific **Annual Training Plans**, both being the basis of the professional development model to enhance the talent and skills of each of the people who make up the corporation in an equitable manner.

In order to create the best pool of talent and to achieve the targets of **SDG 4 - Quality Education**, the organisation ensures that this training is inclusive, equitable and of high quality, while promoting learning opportunities throughout the workforce's career. In this line, a total of **103,389 hours of internal training** were provided in 2021, both face-to-face and through the company's online platform, an increase of more than 37% compared to 2020, demonstrating the Group's strong commitment in this area.

2021

865,670 €

Total investment

103,389 h

Total training hours

Average training by gender


20 h

23 h

2020

636,509 €

Total investment

75,391 h

Total training hours

Average training by gender


13.1 h

17.1 h

2019

590,391 €

Total investment

62,175 h

Total training hours

Average training by gender


11.7 h

15.6 h

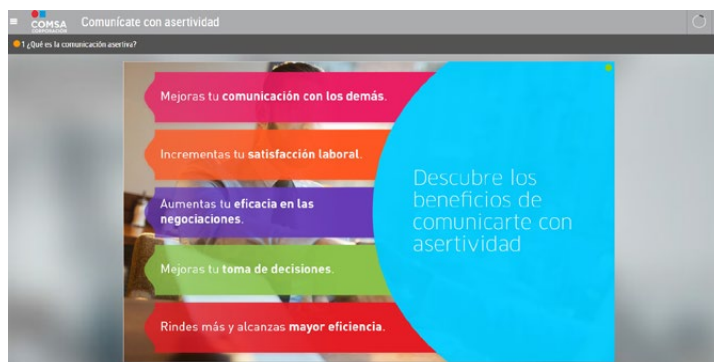


COMSA CORPORACIÓN TEAM

In 2021, this increase in training has focused on the development of new skills, which are essential to face new challenges such as digitalisation or the development of transversal projects in collaborative environments. In this respect, the company has focused on two areas:

Soft Skills development for all staff:

Through various training actions throughout the year, different personal skills such as communication, time management, proactivity and project management have been developed, as well as skills to improve the development of people in charge and leadership in middle management.



The company also focuses on developing the talent of future professionals in the sector, which is why it establishes alliances with different actors, giving rise to:

- » Collaboration agreements for scholarship holders, allowing them to integrate a practical vision of the studies they are pursuing related to the position to perform. Through this modality, 8 women and 17 men have been recruited in 2021.
- » Internship agreements for professionals who have already graduated as a “first job” with different training centres of reference, such as the Escola del Treball in Barcelona and various vocational training institutes, thus facilitating the incorporation of these professionals into the world of work.

Transforming managerial leadership:

Through the innovative Leadership Circle methodology, which focuses on the two components of leadership, which are, on the one hand, creative competencies (how results are obtained and how teams are influenced to obtain the best results) and, on the other, reactive competencies (putting precaution before obtaining results) through which a new creative leadership focused on people is achieved, thus increasing the ability to guide and positively influence teams and create work environments that encourage motivation and commitment, which are necessary to face the new paradigm where digitalisation and the dynamism of the environment are the protagonists.

LEADERSHIP
CIRCLE®

- » EOLIS University in Mexico has continued to encourage the transfer of knowledge from experienced staff to new recruits, thus contributing to their training and integration not only in the company, but also in the sector.

Simultaneously, the company participates in forums that advocate the promotion of talent, such as **Talent Day21**, organised by *Equipos y Talento*. During the day there was a debate on how to bring technology and people together to build more humane, sustainable, flexible, committed and inclusive organisations. COMSA Corporación participated for the second consecutive year in one of its round tables, this time focusing on transparency, responsibility and technology as the keys to training talent in the new labour paradigm.

COMSA CORPORACIÓN TEAM

Remuneration management

The Group determines staff remuneration on the basis of the salary structure set out in the collective bargaining agreements for each sector. In general, such remuneration is made up of the following items:

- » Fixed salary: Corresponding to the professional category on the basis of the collective agreement and the country, together with seniority and the corresponding additional bonuses, related to the specific conditions and the amount of work performed.
- » Variable remuneration: This remuneration is based on the Group's and area's results as well as on the individual performance of each person quantified through the evaluation of their performance. This performance evaluation allows an objective assessment of the results of the objectives and individual competencies of the staff, based on their responsibilities and role within the company, allowing professional development plans to be established according to personal needs. This mechanism seeks to ensure pay equity between different groups, thus contributing to the achievement of **SDG 10**, which calls for the **reduction of inequalities**.

The percentage of staff who have received variable remuneration, as their performance has been formally assessed, is shown below:

In the case of Spain, 84% of the professionals subjected to the assessment of the disengagement have done so through the Success Factors tool which, in addition to allowing detailed monitoring of all the phases of the process, offers a complete vision of internal talent, allowing specific professional growth plans to be established according to the needs detected.

At the same time, all the Group's employees have access to the Flexible Remuneration Plan, which allows them to optimise their salaries, so that, depending on the country, employees can acquire certain products or services with tax advantages, enabling them to maximise their remuneration. This allows access to transport allowances, per diems, medical or life insurance, as well as access to childcare and training.

In line with the Group's commitment to transparency, COMSA Corporación publishes the remuneration of the Board of Directors annually in the management report. The amount accrued during the financial year 2021 for the current members of the Board of Directors is EUR 477 thousand, EUR 797 thousand in 2020 and EUR 796 thousand in 2019.

STAFF RECEIVING VARIABLE REMUNERATION

	2021	2019	2019
% of staff receiving variable remuneration	71%	69%	74%
Countries	Spain, Brazil, Colombia, France, Mexico, Portugal, Denmark, and Sweden	Spain, Argentina, Brazil, France and Peru	Spain, Argentina, Brazil, France and Peru



COMSA CORPORACIÓN TEAM

COMSA Corporación is committed to achieving wage equity in relation to gender in all the activities and countries in which it is present, and therefore, to this end, a salary analysis is carried out to identify possible cases of differences in remuneration between male and female employees with identical jobs. With this analysis, it is determined whether there is a gender pay gap in jobs of equal activity or whether the difference is due to other causes (seniority, results, etc.).

AVERAGE REMUNERATION BY COUNTRY AND GENDER IN 2021 (€)

Country	Women	Men
Brazil	18,590	41,541
Colombia	10,854	19,057
Denmark	57,174	61,906
Spain	27,130	29,754
France	31,285	33,832
Mexico	9,360	8,524
Portugal	20,465	18,567
Sweden	40,974	50,211

In this regard, the overall ratio between the minimum wage received in the company and the minimum wage in the global countries for the Group is 1.05 on average, compared to 1.18 and 1.43 in 2020 and 2019 respectively.

OVERALL¹ WAGE GAP BY CATEGORY² AND AGE IN 2021

Age	Category 1 and 2	Category 3	Category 4	Category 5
<30	-	4%	-1%	-6%
30-50	33%	17%	11%	22%
>50	16%	21%	23%	27%

With regard to the figures relating to the global gap, it should be noted that in addition to the grouping of differentiated geographical areas, in order to facilitate the calculation, some categories have also been grouped together. In this sense, the values obtained in categories 4 and 5 are due to the grouping of differentiated groups, on the one hand, category 4 groups together technical and administrative staff, and on the other hand, category 5 groups together the salaries of site workers and cleaning staff, in both cases, with very differentiated salary bands and representation of groups by gender.

OVERALL ANNUAL COMPENSATION RATIO³

2021	2020	2019
13.45	13.86	13.85

This figure is derived from the annual gross fixed salary plus variable compensation.

¹ The gap is obtained from the total remuneration, consisting of the annual gross fixed salary and variable remuneration, where applicable.

² The categories include: 1 Executives; 2 Delegates, Managers, Area Managers and Department Heads; 3 Site Managers and Unit Managers; 4 Technicians and Administrative staff and 5 Operators.

³ Ratio of the annual total compensation of the Group's highest paid individual to the median annual total compensation of the Group (excluding the highest paid individual).

COMSA CORPORACIÓN TEAM

Staff satisfaction and commitment

COMSA Corporación's relationship model with its staff is based on satisfaction, loyalty and commitment to people. In order to guarantee these objectives, it has put in place a number of mechanisms such as:

- » **Follow-up interviews** with new recruits to ensure that they join the team in an appropriate manner and meet the expectations of the new recruits of both parties.
- » **Exit interviews**, at the time of voluntary termination of the professional relationship, to collect possible areas for improvement.

At the same time, and taking into account the characteristics of the sector and the productive reality of each project, the hiring of specialised personnel is strongly linked to the type of project, its development phase and its location. The turnover of the staff in recent years is presented below:

NUMBER OF ADDITIONS BY GENDER AND AGE

Age	<30		30-50		>50		Total Additions
	W	M	W	M	W	M	
2021	91	324	150	617	84	203	1,469
2020	101	323	207	757	95	227	1,710
2019	81	293	168	723	61	178	1,504

This turnover is mainly explained by the following factors:

- » **Geographical dispersion of projects:** This hampers the possibility of extending recruitment, with contract termination being the main cause of turnover in the company with more than 50% of the cases.
- » **The contractual requirements of the project:** Due to the nature of some service contracts, and in order to guarantee the best conditions and continuity for the client, the Group subrogates personnel with extensive experience and knowledge of the type of work to be performed. This same process also occurs in reverse, when one of the Group's companies ceases to provide services for a contract of this type, and the personnel assigned to it are subrogated to the new company that takes over the service.

NUMBER OF DEPARTURES PER YEAR

	Dismissal	Voluntary Termination	End of contract	Retirement	Total Departures
2021	140 (11.6%)	419 (34.7%)	612 (50.7%)	35 (2.9%)	1,206
2020	171 (14.1%)	376 (30.9%)	634 (52.2%)	34 (2.8%)	1,215
2019	170 (7.5%)	819 (35.9%)	1,261 (55.3%)	30 (1.3%)	2,280

COMSA CORPORACIÓN TEAM

Diversity, equality and inclusion

For COMSA Corporación, its employees represent the Group's most valuable asset, as they guarantee the quality and correct performance of the different projects. For this reason, the Group promotes a human capital management model focused on promoting diversity, equal treatment and inclusion, key pillars around which the company's day-to-day activities are developed.

Under this premise, set out in the Group's *Code of Ethics*, we offer inclusive, safe, healthy and discrimination-free work environments, where all people can grow and develop their careers, regardless of their professional profile, gender, race, sexual orientation, religious beliefs, political opinions, nationality, social origin, disability or any other characteristic that could lead to discrimination, where diverse talent, professionalism and the search for excellence in daily performance are a value that is an integral part of the organisation.



OBJECTIVE

Develop a framework policy encompassing all actions carried out in the field of diversity, equality and inclusion in the Group.

- » **Gender equality:** Aware that the construction and engineering sector has traditionally been linked to physical strength, a fact that justified partly the strong masculinisation of some jobs, this situation is being reversed in recent years, due to the incorporation of women into the world of work and, specifically, into certain professions, thanks, in part, to the growing digitalisation of processes that reduces the physical dependence of many jobs, as well as to the actions that are being carried out for full equality in the world of work by different organisations.

The distribution of COMSA Corporación's workforce broken down by type of contract by gender is shown below, with slight increases in the number of permanent contracts and the number of full-time contracts among female employees.

TYPE OF CONTRACT BY GENDER

Gender	Indefinite			Temporary			Total
	W	M	Total	W	M	Total	
2021	750 (82%)	2,718 (74%)	3,468 (75%)	163 (18%)	976 (26%)	1,139 (25%)	4,607
2020	763 (78%)	2,623 (72%)	3,386 (73%)	212 (22%)	1,032 (28%)	1,244 (27%)	4,630
2019	688 (77%)	2,492 (75%)	3,180 (76%)	205 (23%)	820 (25%)	1,025 (24%)	4,205

TYPE OF CONTRACT BY TYPE OF WORKDAY AND GENDER

Gender	Complete			Partial			Total
	W	M	Total	W	M	Total	
2021	568 (62%)	3,629 (98%)	4,197 (91%)	345 (38%)	65 (2%)	410 (9%)	4,607
2020	554 (57%)	3,580 (98%)	4,134 (89%)	421 (43%)	75 (2%)	496 (11%)	4,630
2019	514 (58%)	3,228 (97%)	3,742 (89%)	379 (42%)	84 (3%)	463 (11%)	4,205

COMSA CORPORACIÓN TEAM

In order to reverse these figures and progressively approach equity between the different profiles, the Group is working on SDG 5 - Gender Equality, to ensure equal conditions within the company. In this framework, some of the main actions carried out are presented:

- » **Equality Plan 2019-2023:** Instrument used by the Group to guarantee equality between women and men, where, based on a diagnosis of the situation, a calendar is established with actions and different measures to be implemented in the different businesses. Among them, the one that establishes that, given equal conditions between candidates, priority should be given to hiring or promoting women.
- » **Promoting gender awareness:** Awareness-raising and training to combat stereotypes is crucial to achieve equality and the transmission of egalitarian values and a gender perspective, as well as the prevention of workplace and sexual harassment and non-discrimination in the workplace. For this reason, in 2021, all staff were trained in gender awareness, and this content was integrated into the initial training programme for new recruits.

‘Let’s turn the challenge of equality into an opportunity’, the slogan of COMSA Corporación’s gender awareness campaign

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- » **Target Gender Equality:** Since 2020, the company has been part of this community founded by the United Nations Global Compact with the objective of accelerate the representation and leadership of women in business, so that it participates in the different initiatives promoted by this accelerator programme throughout the year.



OBJECTIVE

To increase the visibility of female referents in the sector, thus giving visibility both within and outside the sector outside the company, contributing to the promotion of the choice of STEM professions among young women.

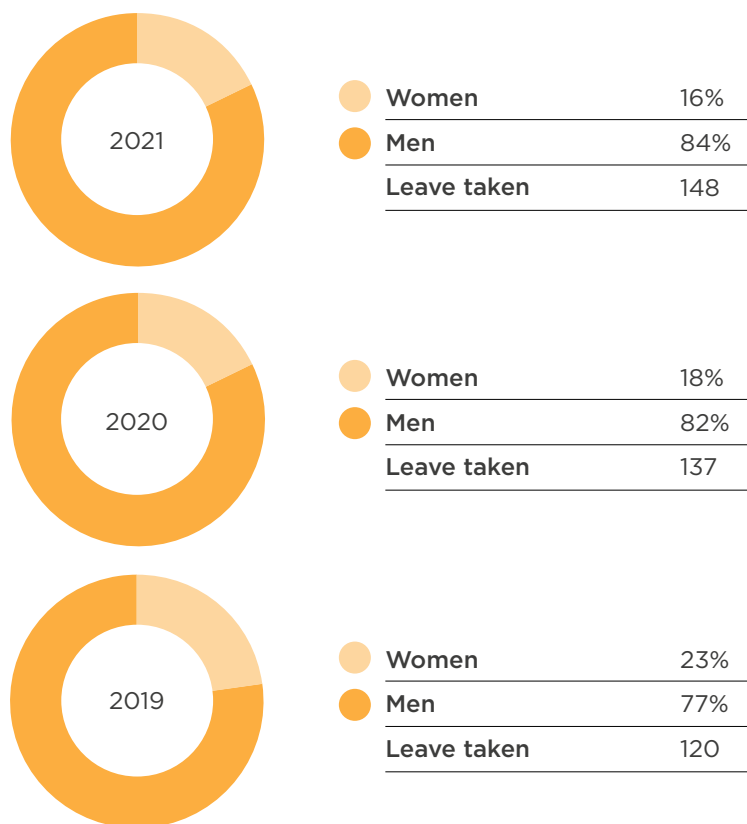


Poster for the dissemination of the Gender Awareness Campaign

COMSA CORPORACIÓN TEAM

» **Offspring leave:** Family co-responsibility is a fundamental part of achieving the full incorporation of women into the workplace, which is why the company accepts all requests received for paternity or maternity leave, as established in the regulations. Thanks to the company's reconciliation policies, throughout 2021, all men and women who have requested this type of leave in the different countries have returned to their respective positions after taking it.

PATERNITY OR MATERNITY LEAVE TAKEN



Other actions carried out that contribute to gender equality, as well as to the development of equity, inclusion and non-discrimination in different areas of the company are:

» **Protocol for the prevention of harassment and other discriminatory behaviour:** The aim of this document is to prevent and, where appropriate, to sanction all those conducts that violates the dignity, equality and moral and sexual freedom of any person who is part of the Group, establishing the relevant reporting channels and guaranteeing confidentiality throughout the process. During the year 2021, two potential cases have been assessed in this area which, after having carried out the relevant investigation, and although they were not considered as harassment cases, appropriate measures have been taken.

» **Promoting work-life balance:** For the Group, the commitment to quality employment goes beyond the workplace, as it understands that work organisation must favour full personal and family reconciliation, thus improving the well-being of the workforce. For this reason, COMSA Corporación has established policies and actions that favour work-life balance, flexibility and disconnection, within the framework of the different organisational realities and needs of the different work centres. Some examples of these measures adopted in Spain are:

- Flexible working hours between working days, in and out of the office.
- Intensive working day on Fridays all year round.
- Continuous working day in summer periods.
- Flexibility in the choice of holiday periods, and the possibility of extending them beyond the calendar year.

» **Promoting inclusive language:** Inclusive language is one of the basic tools that show the commitment of organisations to non-discrimination. For this reason, the company pays special attention to the use of language and the images it conveys, both in its internal communications and through the different external communication channels.



COMSA CORPORACIÓN TEAM

» **Inclusion:** The commitment to diversity within the company also includes a commitment to the integration of different profiles in the workplace, including people of diverse origins and cultures, with more than 60 nationalities in 2021, as well as those with difficulties in accessing the world of work, such as vulnerable groups or those with diverse abilities.

In order to do so, the Group uses entities specialised in labour integration and special employment centres that serve as a pool for integrating the best talent into the Group. Whenever possible, depending on the requirements of each position, the Group prioritises the internal recruitment of these people, thus facilitating their full integration into the world of work, which can be seen in the gradual increase in the recruitment of this group. In those cases where, due to the requirements of the position or the tasks to be performed, or due to the lack of supply of certain profiles in the labour market, this direct recruitment is not possible, services are contracted out to special employment centres that provide the necessary conditions for these people to be able to perform the different tasks without limitations. Another of the Group's formulas for promoting the integration of this group into the labour market is indirectly through donations to special employment centres to enable and encourage their social purposes.



Visit of the Spanish Ambassador to the Skärholmen construction site, Stockholm (Sweden)



COMSA CORPORACIÓN TEAM

Social dialogue

To encourage social dialogue between the different interlocutors in the company, different formulas are available, from formal options such as works councils, meetings or e-mail boxes for specific issues, to other options whose purpose is to make all the information and documentation they may need available to the workforce, such as the website, the corporate portal or the new employee app. Some of these channels have established periodicity and others are used when events considered relevant occur.

» **Works councils:** These are grouped by business and by geographical area, and represent both the workers and the company on an equal footing. These committees deal with a variety of issues through specific meetings for each of the topics to be discussed. Some of these, for example, are the meetings of the Health and Safety Committee, where aspects related to Occupational Risk Prevention are discussed, the Equality Commissions, and the Training Commissions.

» **Outreach channels:**

- **Corporate website:** It contains all public information about the Group, its areas of work and the Group's main events.
- **Corporate Portal or Employee Portal:** Renewed in 2020, its aim is to be a space of reference and collaboration between the company's staff and the company, bringing together all the resources and information that the workforce needs on a daily basis.
- **My COMSA mobile app:** Its launch in 2021 was a step forward in the Group's internal communication, as it offers all employees the opportunity to learn more and better about the company and the companies that make up the Group and their activities in the different projects, while also disseminating content related to curiosities, historical facts and traditions related to the sector in the countries in which the Group is present.



Construction of the Andarax River - El Puche section of the Mediterranean Corridor, Murcia-Almería (Spain)

COMSA CORPORACIÓN TEAM

Health and safety

With the aim of promoting quality jobs, COMSA Corporación looks after the health and safety of its main asset, its people. For this reason, the company has an Occupational **Health and Safety Management System** based on the requirements of the ISO 45001 standard, aligned with the principles of decent work of the International Labour Organisation, as well as with the goals of **SDG3 - Health and Wellbeing** of the United Nations.

In 2021, 87% of COMSA Corporación's sales have been executed under the guidelines and directives of the international ISO 45001 occupational health and safety standard.



Rehabilitation of the La Mata - Colonia Jordán section of the Isthmus of Tehuantepec Railway (Mexico)

In this area, the Group's Health and Safety Policy establishes the 5 basic principles on which it works to achieve a vision of zero harm, promoting a culture of prevention rather than correction:

HEALTH AND SAFETY POLICY

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



HEALTH AND SAFETY POLICY OF COMSA CORPORACIÓN

This is a transversal policy which, together with the Environmental Policy and the Quality Policy, is worked on in an integrated manner by the Prevention, Quality and Environment Area, in this case approached from three divisions:



Joint Prevention
Service



Prevention, Quality
and Environment
National
and International



Internal audit

COMSA CORPORACIÓN TEAM

Planning and control of working conditions

The preventive culture of the organisation is based on the following points:

- Specialised personnel who provide global coverage of the organisation's occupational risks.
- Risk analysis, both general and specific to each project, based on the probability of occurrence and severity.
- Measures to reduce risks, which may be of a technical nature, collective or individual protective equipment, organisational or related to human factors. These shall eliminate or reduce risk levels to the moderate category, as the Group's Health and Safety Policy prohibits processes involving high or very high risks.
- Periodic examinations of the workforce through an external Prevention Service, guaranteeing the confidentiality of the information at all times.
- Internal and external controls and audits to check the effectiveness of the measures implemented and the health of workers.
- Promotion of activities that promote the health and wellbeing of the workforce through various initiatives such as taking out private health insurance through the Flexible Compensation Plan or incentives to participate in sporting events.

Training as a basis for prevention

As a reinforcement of the Occupational Health and Safety Management System, COMSA Corporación has an Annual Training Plan specific to each position, which from 2020, thanks to the company's on-line training platform, has made it possible to speed up and extend many training courses.

In addition, specific meetings are held at the start of the works, where emphasis is placed on the risks and the measures planned for their prevention specific to each project.

More than 36,500 hours of risk prevention training in 2021.



Consultation and participation

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

Along the same lines, and in order to guarantee the continuous improvement approach required by the management system, it is reviewed periodically in order to identify possible new risk situations and propose new preventive actions for their planning and implementation. To this end, the access and participation of the company's employees is fundamental, and they can make their contribution through different channels, such as the Health and Safety Committees, joint company-worker representation bodies, or the periodic coordination meetings for each project.

COMSA CORPORACIÓN TEAM

Evolution of accident rate

The main figures describing the company's accident rate in recent years are shown below:

ACCIDENT RATE

	2021	2020	2019
Frequency index¹	24.56	21.39	20.66
Severity index²	0.83	0.43	0.48
Incidence rate³	48.63	44.92	38.91



Building maintenance operations (Spain)

As far as accidents are concerned, and regardless of whether they cause sick leave or not, their investigation, as well as the development of actions for their future prevention, are indispensable in the case of both own and subcontracted workers. The breakdown of these by type is shown below:

DISTRIBUTION OF ACCIDENTS BY TYPE⁴

	2021	2020	2019
Knocks or falls	44.44%	20.70%	31.90%
Thermal or electrical contact	2.90%	1.10%	1.50%
Cutting agent contact	7.25%	13.70%	5.30%
Crushing or Trapping	5.31%	7.70%	1.50%
Musculoskeletal disorders	37.68%	41.00%	37.10%
Other	2.42%	15.80%	22.70%
	100.00%	100.00%	100.00%

¹ Frequency index: Number of accidents per million hours worked.

² Severity index: Days lost per thousand hours worked.

³ Incident rate: Number of accidents per thousand workers.

⁴ Types have been grouped to facilitate comparability.

COMSA CORPORACIÓN TEAM

As far as occupational diseases are concerned, there was one case in 2021, as was the case in 2019 and 2020, with 2018 being free of this type of pathology.

On the other hand, one fatal accident was detected in 2021, while there were no fatal accidents in 2020 or 2019, with one in 2018.

GENDER DISTRIBUTION OF ACCIDENTS

	2021	2020	2019
Women	6%	4%	5%
Men	94%	96%	95%

Absenteeism

Over the course of 2021, the number of days lost amounted to 69,391 and the absenteeism rate corresponds to the following figures:

GENDER DISTRIBUTION OF ACCIDENTS

	2021	2020	2019
Absence due to common contingencies	4.37%	4.03%	3.72%
Absenteeism due to accidents at work	0.64%	0.27%	0.61%

The increase is mainly due to the impact of COVID-19 during the year 2021.



Electrical installations of the Merck Serono building, Aubonne (Switzerland)

COMSA CORPORACIÓN TEAM

Commitment to continuous improvement

In line with the commitment to continuous improvement established in the Occupational **Health and Safety Management System**, the company develops different initiatives throughout the year to promote health and safety among the members of the company, focusing on prevention and contributing to achieving the goals set out in **SDG 3 - Health and Well-being**.

During 2021, on the occasion of World Day for Safety and Health at Work, the company launched the **COMSA Corporación Healthy Habits Promotion Plan**, an initiative aimed at all the businesses and countries in which the Group is present with the aim of focusing on some of the most critical aspects of health in society. During the year, training and workshops were offered on the prevention of **cardiovascular risk**, with special emphasis on the prevention of **stroke**, as well as various awareness-raising activities on the promotion of **healthy nutrition** and **proximity**. From 2022 onwards, it is planned to continue to address issues related to the prevention of sedentary lifestyles, smoking, alcohol and drug use.

On the occasion of the Internal Occupational Accident Prevention Week, the BR101/AL consortium construction site in Brazil organised a day with several interactive lectures on different safety and health-related topics.



HEALTHY HABITS CAMPAIGN

The company's efforts in the field of prevention are rewarded through various awards for the initiatives undertaken. An example of this is the ex aequo award in the category '**Best practice for risk control**' at the IX Edition of the Asepeyo Antoni Serra Santamans Awards, which recognises best practices in prevention. In the 2021 edition, COMSA Corporación was awarded for its project 'Don't turn your back on overexertion', a specific action plan for the identification and evaluation of ergonomic risk factors launched in 2017, with the aim of reducing the accident rate caused by so-called musculoskeletal disorders. Since then, the incidence of this type of accident has been reduced by 33% thanks to the implementation of this initiative.



DON'T TURN YOUR BACK ON OVEREXERTION' PROGRAMME



Renovation of electrical and fibre-optic installations and network and telecommunications support in the CERN sites, Preveessin and Meyrin (France)

EXTERNAL COLLABORATORS

The proper management of the value chain is essential for the correct performance of COMSA Corporación, as it is a strategic asset for competitiveness.

In this regard, in 2020 the Procurement Committee carried out a review of the Procurement Model established at corporate level, the aim of which was to ensure transparency at all times in contracting processes, favour free competition and detect risk situations, while reinforcing the Group's ethical commitment, established in the New Compliance Model, which includes matters relating to competition, the contracting of business partners and the acceptance of gifts and donations, as well as the new General Procurement Procedure, which streamlines workflows and optimises the acquisition of strategic materials and services.

As a sign of its commitment, COMSA Corporación requires its suppliers to assume its ethical, social and environmental principles, and therefore includes clauses in the contracts where they state their knowledge of and adherence to the following fundamental principles:



Second phase of Line 4 of the São Paulo Subway (Brazil)



Ethical Principles

Compliance with human rights in its commercial relations is materialised through the application of a zero tolerance policy in the face of potential situations of child labour, forced labour, serious risk to the health of workers, or behaviour contrary to the Group's Code of Ethics. In addition, since 2019, security providers are required to include training on respect for human rights in the performance of their work, or in their manuals and protocols for action.



Social and environmental principles

In order to ensure that the entire value chain is adapted as quickly as possible to the growing expectations of the various stakeholders, and in addition to the requirements set out in the selection of suppliers, the Group has started to work with a number of suppliers who offer cross-cutting services to promote the development of sustainability solutions within their organisations. In this area, incentives are provided, for example, for the integration of groups, purchases from local suppliers or the increase in actions to reduce the environmental impact of their facilities.

EXTERNAL COLLABORATORS

In order to guarantee compliance with the quality, environmental and occupational risk prevention requirements, supplier companies are systematically monitored and evaluated during the contractual relationship.

During 2021, the Group's supply chain will be made up of more than 18,000 suppliers, focusing on fostering local procurement and supporting the generation of positive social impact through the creation of wealth and investment in the countries where the Group is present, with more than 98% of suppliers being local.



More than **€ 530 M**
earmarked for payment of suppliers



97.23%
of purchases made from local suppliers



Design, construction and commissioning of Odense tramway (Denmark)

EXTERNAL COLLABORATORS

Selection and approval of suppliers

COMSA Corporación selects its suppliers on the basis of quality, services offered, rates, health and safety conditions, supply conditions and environmental and ethical criteria, in order to ensure that they meet the Group's standards.

The main criteria used for the approval of suppliers are:



With the formalisation of the contract, the supplier companies undertake to respect with the requirements regulations of and legal the country, as well as to adopt COMSA Corporación's Code of Ethics in the performance of their activity. In this regard, to facilitate two-way communication, the COMSA Corporación Ethics Channel is available to suppliers, as well as to third parties that are or have been in contact with the Group, through which, in addition to making queries pertaining to ethical and regulatory compliance, they can report any type of irregularity in good faith. In this regard, the company has not received any complaints in the last 4 years.



Carmonita substation, Badajoz (Spain)

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.



Annually, different suppliers considered critical by the volume of turnover are evaluated. The result of this process makes it possible to classify suppliers into advisable suppliers, i.e. all those that can be ordered from, and non-advisable suppliers. Among the latter, 3 categories are distinguished: with incidences, which means that orders can be placed, but their evolution must be analysed during the life of the contract; 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 that a supplier presents a negative performance in the evaluations, a specific action plan is developed. In 2021, no supplier has been identified that presents significant negative environmental impacts, either real or potential, but with regard to criteria related to prevention, where two cases of potential risk to health and safety have been detected. In one case, it has been decided to stop working with the supplier and in the other case, joint efforts are being made to remedy the incident. With regard to the other social aspects, such as respect for human rights, these are expressly included in the Group's Code of Ethics, and are therefore mandatory in order to establish a contractual relationship. With the exception of specific cases, the supplier evaluation process does not include on-site audits.

Preventive culture in the value chain

COMSA Corporación works to ensure and promote a culture of prevention throughout its entire value chain, establishing transversal measures applicable to all the projects in which it is present, both in terms of its own workforce and that of its collaborating companies.

OVERALL ACCIDENT RATES

	2021	2020	2019
Frequency¹	24.56	21.91	19.37
Gravity²	0.83	0.31	0.40
Incidence³	42.6	42.55	30.01

¹ Frequency index: Number of accidents per million hours worked.

² Severity index: Days lost per thousand hours worked.

³ Incident rate: Number of accidents per thousand workers.



EXTERNAL COLLABORATORS

Digitalisation

The Purchasing area is currently immersed in a process of internal digitalisation with the aim of optimising processes and working in a more agile and efficient way with the different collaborators. Under this premise, in 2020 the new Purchasing Procedure has been approved, which includes the following aspects:

- 1 Procurement Planning Tool for large projects: This tool allows for improved purchasing forecasting, as well as speeding up and optimising the search for materials and services.
- 2 Optimisation of the materials database: A broader arrangement of categories of materials and services makes it easier for the user to sort and select materials and services. Similarly, in the case of strategic materials, specific parameters have been defined on the basis of which better purchasing decisions can be made.
- 3 Centralisation of processes for large projects: This centralisation from the purchasing area improves control and optimises consumption in critical projects for the Group.
- 4 Streamlining procurement processes:
 - a. Approval of operations from the bid comparison phase.
 - b. New application for the approval of invoices that reduces processing times and, consequently, the rest of the related procedures.
- 5 Signing of contracts by the person in charge of the procurement.

In addition, some tools are being developed within the Purchasing area to optimise processes and dialogue with external collaborators:



Tender Portal: This tool facilitates the management and collection of information in a more agile and transparent way in tenders with suppliers. Since 2020 it is already being used within the purchasing area for the awarding of some purchases, and it is expected that, in the future, its use can be extended to other areas of the business.



Supplier Portal: Allows a more agile management of orders and invoices, both internally and externally, while providing greater traceability to the different transactions.



Approvals Portal: It will allow the pre-registration in an autonomous way of new suppliers to collaborate with. Each interested supplier will be able to upload business information and specific requirements to the platform according to its type of supply, and based on this information, its incorporation or maintenance as a collaborating company of the Group will be assessed.



New internal procurement portal (E-Carrito): This new web portal was launched in 2021 and allows to manage the purchase of those products and services negotiated through a framework agreement with pre-negotiated tariffs, in particular, those susceptible to repetitive and small purchases.

In addition, work is being carried out in different areas to increase the digitalisation of different processes within the company, thus making it possible to save resources, as in the case of the digitalisation of documentation, which speeds up procedures and at the same time reduces paper consumption.

CLIENTS

Over more than 130 years of history, COMSA Corporación has established itself as one of the benchmark groups in the sector, thanks to its active listening to both client needs and the environment, which not only allows it to respond to current needs, but also to anticipate future expectations.

To ensure this, the Group is strengthening the following aspects:



- » **Professionalism of the staff:** The adaptive capacity and resilience of teams is essential to meet the daily challenges in increasingly demanding and changing environments.



- » **Commitment to innovation and technological development:** The new solutions developed by the company make it possible to optimise the company's performance in the different projects, even exceeding the client's expectations, is a key factor in the success of the project. In this area, the company is immersed in a process of integral digitalisation in different areas of the business:

- Automated, real-time data collection to increase data quality and to ensure more agile control.
- Breakdown of indicators by project, business unit or country according to needs.
- Application of new technologies during project inspections to streamline processes.



- » **Encouraging the global vision:** Thanks to the diversity of businesses that make up the Group, a wide range of resources are available to offer integrated solutions based on internal synergies, providing added value to the client.



- » **Commitment to quality:** Thanks to the rigorous planning of each phase through different tools and the strict fulfilment of the commitments acquired, quality is one of the hallmarks of COMSA Corporación.



- » **Enhancing organisational learning:** The continuous improvement systems that are part of the organisation make it possible to detect new opportunities in project development.

Thanks to the principle of continuous improvement on which the internally and externally audited Quality Management System is based, the company is gradually improving its performance in the following processes

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Thanks to COMSA Corporación's Quality Policy, together with the Quality Management System, based on the ISO 9001:2015 standard, clients are guaranteed that the projects carried out comply with the highest quality standards and with the regulations in force at all times.

CLIENTS

The ultimate aim of the Quality Management System is to meet the explicit and implicit expectations of our clients. In this sense, the percentage of sales covered by the Quality Management system has increased significantly in the last year, as shown in the following table:

SALES COVERED BY THE QUALITY MANAGEMENT SYSTEM

	2021	2020	2019
Sales under ISO 9001	92%	80%	80%

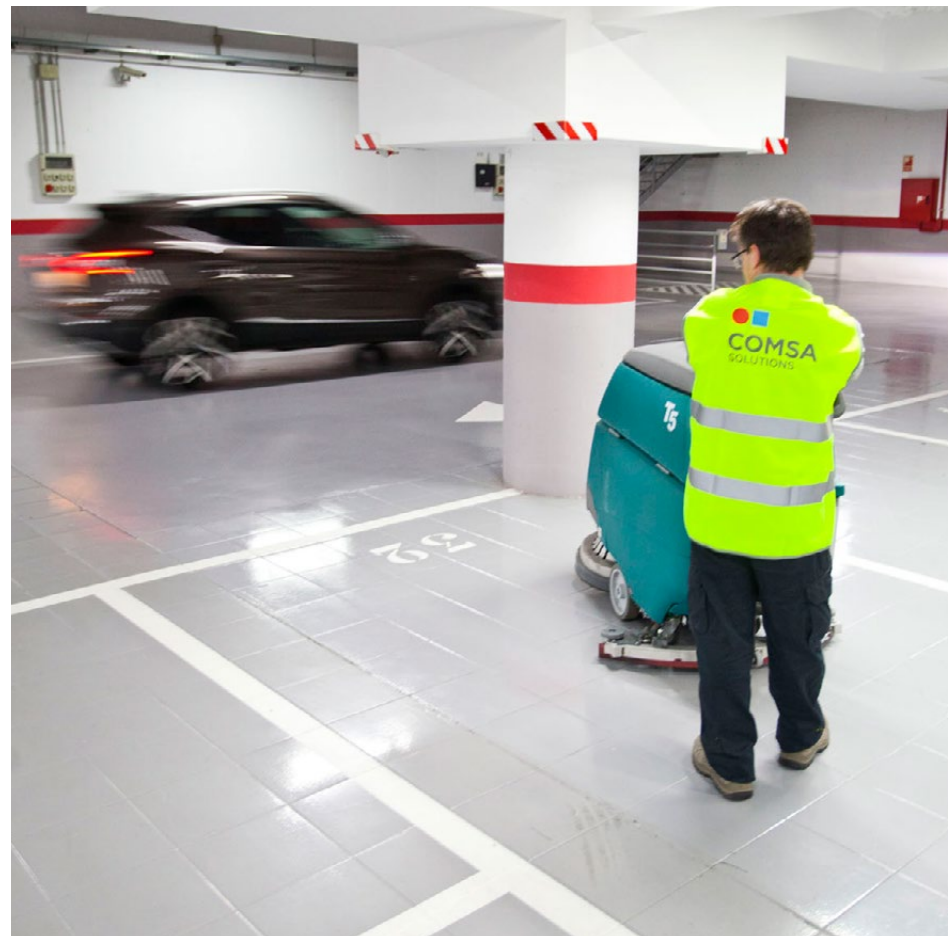
In all projects a Quality Plan is developed which includes:

- All applicable regulatory requirements.
- The Inspection Point Programmes, which detail the sequence and scope of the verifications and include the specific requirements of the clients.
- Test Plans.

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



QUALITY POLICY



Cleaning service in a car park (Spain)



CLIENTS

Client satisfaction

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

The mechanisms established in the Quality Management Systems guarantee the adequate treatment of claims and complaints received in the evaluations, allowing COMSA Corporación to identify and evaluate its strengths and weaknesses, as well as the risks and opportunities of the different projects.

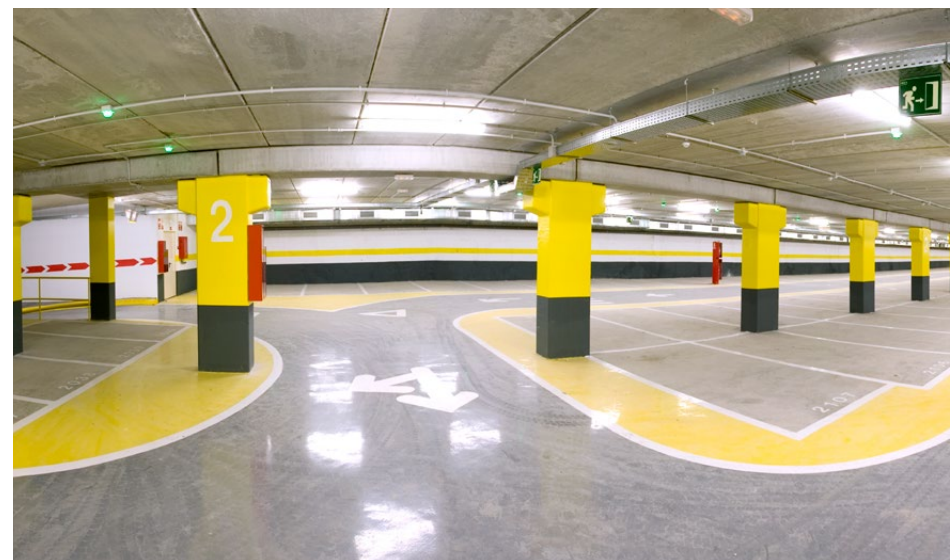
This system is designed to deal with any claim or complaint from the client or his representative, as well as from any other interested party, such as neighbours, associations, environmental organisations, etc. The process is systematically supervised through first, second and third party audits, thus guaranteeing its objectivity.

Once the claims or complaints have been analysed, if it is considered that additional competences to those of COMSA Corporación are required, alliances are established with external partners and consultants in line with the corporate principles and values, especially in terms of ethical behaviour and integrity.

Client satisfaction is evaluated on the basis of satisfaction surveys, whose criteria are periodically reviewed and weighted to adapt to client needs. Currently, thanks to the digitalisation process in which the Group is immersed, most surveys are carried out through digital platforms, allowing not only a more agile response from the client, but also a greater capacity to react to proposals for improvement.

Stages established within the framework of the Quality Management System:

- 1 Identification and communication of claims and complaints received.
- 2 Analysis of provisions to be adopted for their resolution.
- 3 Adoption of the proposed provisions on the basis of their significance.
- 4 Adoption of the adopted provisions.
- 5 Verification of the effectiveness of the provisions and closure of the claim or complaint.



Parc Sanitari Pere Virgili car park in Barcelona (Spain)

CLIENTS

Main evaluation criteria in satisfaction surveys:

- Technical capacity of the teams
- Meeting deadlines and commitments
- Capacity to respond to unforeseen events
- Fluency in communication
- Final quality of the project
- Environmental Management


2021
423

Surveys sent

90.5%

Response rate

8.6 / 10

Average score

2020
509

Surveys sent

61%

Response rate

8.34 / 10

Average score

2019
556

Surveys sent

73%

Response rate

8.23 / 10

Average score

During these last years, marked by the difficulties of the environment, the fact of increasing the valuation obtained by the different clients is a great recognition of the effort made by all the professionals who make up COMSA Corporación.



Cleaning at the Banc de Sang i Teixits building, Barcelona (Spain)

SOCIAL CONTRIBUTION

In 2021 COMSA Corporación made donations
in various areas to the value of
€261,000



Throughout the more than 130 years that COMSA Corporación has been carrying out its activity, it has been able to maintain the principles linked to the fact of being a family business, such as caring for people and the link with the environment, and today it is a multinational that employs more than 5,000 people.

In the social sphere, aware of the important role of corporations in the achievement of the main global challenges, it works with a strategic and long-term vision in the creation of stable alliances with specialised entities, with the aim of maximising achievements and progress.

Similarly, at the internal level, social action is articulated around two premises:

- Involve the **workforce in all actions**, with the aim of raising awareness and spreading positive values, both inside and outside the company, as the Chinese proverb says: *"If you walk alone, you will go faster; if you walk together, you will go further"*.
- Focus collaboration with **entities that are related to the business**, either because of their mission or their presence in the territory.



OBJECTIVE

Establish a Social Action Policy and, through the creation of a network of local ambassadors, thus promoting the development of actions more aligned with local needs.



SDG 17: The Group is a member of the Global Compact, the world's largest business network for sustainability, where it not only disseminates good practices to inspire others, but also participates in its various initiatives in order to speed up the transition from commitment to action and thus maximise achievements.

SOCIAL CONTRIBUTION

Long-term partnership with UNHCR

In 2019, COMSA Corporación and the Spanish Committee of the UNHCR, the United Nations High Commissioner for Refugees, signed a collaboration agreement with the aim of formalising the commitment that the company has maintained for years with the organisation. The aim of the agreement is to contribute to improving the coverage of basic needs and shelter for displaced persons, through the solidarity of the people who make up the corporation.

This collaboration is materialising through the **Solidarity Payroll Programme**, through which staff who wish to do so can make monthly contributions to the UNHCR from their paychecks, with the commitment that COMSA Corporación will match their contribution simultaneously.

During these 3 years of collaboration with the UNHCR, nearly 1,000 families have received support thanks to the solidarity of the employees and the matching by COMSA Corporación.

”

At the end of the **2021** fundraising period, **the contribution has increased by 8%**, which has meant more than €16,000 to provide **460 families around the world**, through:

- 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, toilets).

In addition, the company also collaborates in the different initiatives promoted by the UNHCR to fulfil its mission of supporting displaced people. In 2021, through an internal signature campaign, it participated in the call for action against the climate emergency, which called on the UN and governments to take urgent measures to tackle the climate crisis.



Temporary Emergency Settlement (Poland)

SOCIAL CONTRIBUTION

Actions 2021



» Childhood and education

In this area, there has been collaboration with the Casa da Infância in Portugal, which sponsors and supports the studies of children from disadvantaged backgrounds. On the other hand, for the second consecutive year, the company participated as a jury member in the national children's competition "Let's paint a tree", organised by the National Forestry Commission of Mexico, with the aim of increasing environmental awareness among children.



» Social and cultural sphere

In this year still marked by the consequences of the pandemic, the Group has strengthened partnerships with a number of entities with which it has established a long-term relationship.

In the area of assistance, the contribution to the Mexican Red Cross, which provides support in different areas to people in need, as well as the work to clear snow from various stretches of road as a result of the Filomena storm at the beginning of 2021, stands out. On the other hand, considering culture to be a precious asset for society as a whole, it contributes to the aims of the Fundació del Gran Teatre del Liceu in Spain.



» Sports and health

The company also supports a number of charitable initiatives in the field of health, where employees health initiatives, where employees are actively involved in raising funds for research into various diseases. During the year, we took part in popular races, such as the **OnCodines Trail** in Catalonia, the proceeds of which went to the Barcelona Brain Health Initiative, as well as new participation formulas, where new technologies have made it possible for people at different times and in different geographies to add up their kilometres for a common goal. In the first of these initiatives undertaken by the Group through the **#sumakmporalzheimer's** challenge, COMSA Corporación sportsmen and women from Spain, Mexico and France have collaborated, making it the company that has contributed the most kilometres to the cause.



5

ABOUT THE
REPORT



ABOUT THE REPORT

Scope and coverage

With this fifth Sustainability Report of the Group (from 2017 to 2019 it was called “Corporate Social Responsibility Report” and in parallel, from 2018 to 2020, the “Statement of Non-Financial Information” was published to comply with the requirements established in **Law 11/2018, of 29 December, on non-financial information and diversity**, from the 2020 report it is decided to unify both documents) COMSA Corporación de Infraestructuras, S.L., referred to throughout this report as “COMSA Corporación” or “the Group”, aims to provide in a single document all the information relating to environmental, social and governance aspects (ESG), relevant to its stakeholders and other interested parties.

This document shows information and relevant data corresponding to the financial year from 1 January to 31 December 2021 for COMSA Corporación and the following business areas in Spain:

- » 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.
- » Generación de Energías Sostenibles, S.L.
- » GdES GREENTECH, S.L.
- » COMSA Auxiliary Solutions, S.L.
- » COMSA Security Service, S.L.U.
- » NORTUNEL, S.A
- » DEISA Industrial Water Solutions S.L.

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

Due to variations in the scope, the data presented in the different tables are not strictly comparable between the different years:

2018 scope: Includes data relating to the Trackja Group’s activity in Poland, although without consolidating this information with the rest of the data in the report.

2019 scope: As a result of the change in the perimeter of the financial audit, this year’s figures do not include information on the Trakcja Group. In addition, the following companies are added to the sustainability figures: COMSA Auxiliary Solutions, S.L., COMSA Security Service, S.L.U. and Generación de Energías Sostenibles, S.L.

2020 scope: In Spain, the company NORTUNEL, S.A. is also added to the perimeter established in 2019 due to its turnover and the relevance of the business in the Group as a whole, as well as GdES GREENTECH, S.L., whose activity is split from its parent company Generación de Energías Sostenibles, S.L. On the other hand, it is worth mentioning that the activity of TFM Energía Solar Fotovoltaica, S.A. is integrated into the business of COMSA Service Facility Management, S.A.U.

2021 scope: In this edition, due to the reduction of activity, Argentina and Peru are not included, and the company DEISA Industrial Water Solutions S.L. in Spain is included.



ABOUT THE REPORT

This Sustainability Report forms part of the Group's Consolidated Management Report and has been prepared on the basis of compliance with and in line with the requirements established by Law 11/2018 of 29 December on non-financial information and diversity, including the guidelines and requirements set out in the Global Reporting Initiative (GRI) standards, both in the definition of the content and the inclusion of the different stakeholders, the context of sustainability, materiality and completeness, as well as with regard to the quality of the information, taking into account the principles of accuracy, balance, clarity, comparability, reliability and timeliness, as well as meeting the goals established by the 2030 Agenda in the various Sustainable Development Goals (SDGs). Therefore, in order to respond to the different requirements, and with the aim of facilitating the traceability of the information, different annexes have been included:

- » ANNEX I. GRI Table of Contents
- » ANNEX II. SDG Table of Contents



Integrated emergency mobile communications system of the Community of Madrid (Spain)

ABOUT THE REPORT

Material issues related to sustainability

This report has been prepared in response to the main material issues identified in the Group's materiality analysis, carried out as part of the preparation of COMSA Corporación's first CSR Report.

Material issues identified:



OBJECTIVE 2022

As a result of the changes in the scope of the report, as well as the numerous changes that the company has undergone since this first analysis, a renewal of the Group's materiality analysis is planned, with the aim not only of responding to the new expectations of the Group's stakeholders, but also of articulating the strategy of COMSA Corporación's sustainability strategy.



CORPORATE GOVERNANCE

- * Integrity
- * Compliance
- * Risk management
- * Prevention of corruption and bribery



ECONOMIC MATTERS

- * Competitiveness
- * Fiscal responsibility



ENVIRONMENT

- * Circular economy
- * Water management
- * Climate change
- * Impact on biodiversity
- * Acoustic impact



LABOUR

- * Equality and diversity
- * Attracting and retaining talent
- * Health and safety



SUPPLY CHAIN

- * Supply chain risks
- * Human Rights
- * Service quality
- * Client satisfaction



SOCIAL

- * Relationship with the community
- * Institutional relations
- * Social impact
- * Social commitment
- * Volunteer programmes




ABOUT THE REPORT

Communication with stakeholders

As a key aspect of the business model, the Group is committed to maintaining stable and transparent relations with its various stakeholders. To this end, COMSA Corporación makes various internal and external communication channels available to them, enabling them to communicate their concerns and expectations with the aim of integrating them into the Group's strategy. In 2021, it is worth highlighting the creation of a new communication channel with daily content for staff, the My COMSA app for mobile devices, created with the aim of enabling the Group's employees to learn more and better about the company, promote synergies, and highlight the work of other departments and businesses, while also serving as a platform to disseminate other content related to sectoral

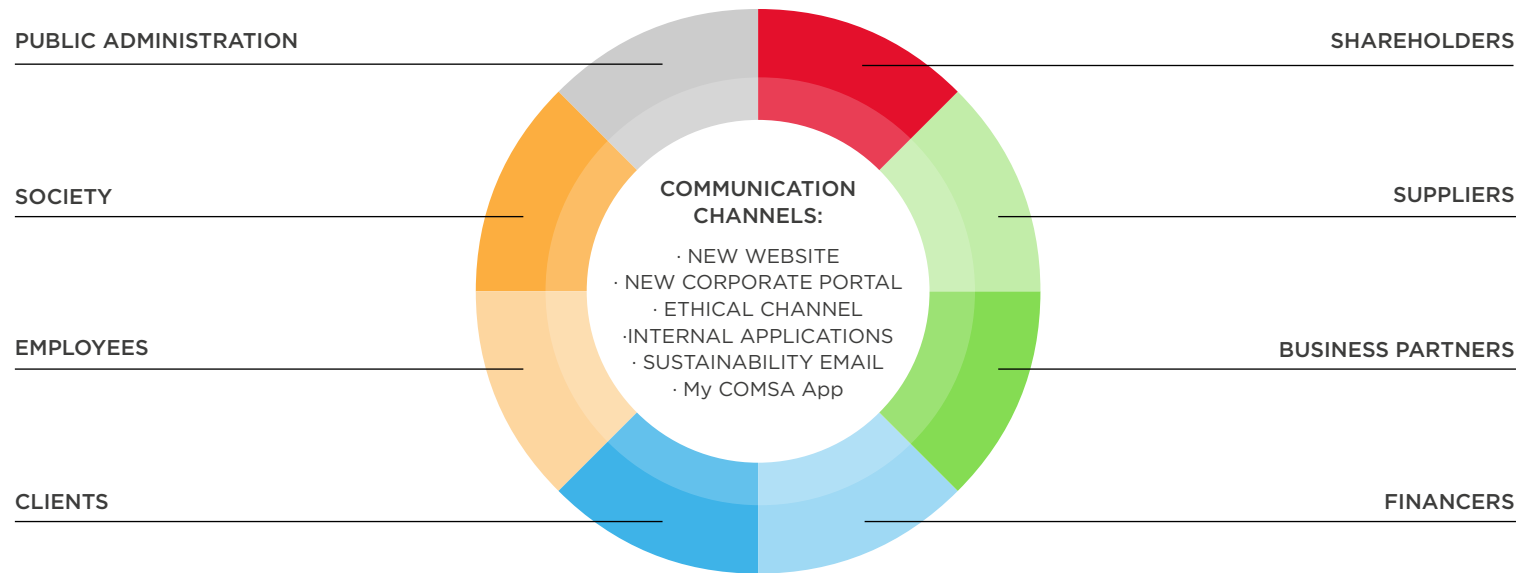
curiosities, traditions of the countries in which it operates or historical facts, among others.



OBJECTIVE

The company is working on the development of new communication channels with its stakeholders, which encourage two-way communication between both parties, in order to identify and manage new material issues in an agile manner.

COMSA Corporación stakeholders and communication channels established





ABOUT THE REPORT

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 of the Group. Much of the data presented here complements and expands on the Annual Summary 2021 published in March 2022, available on the Group's website. In the event of divergence of information between the two documents, the information in this document prevails as it has been verified by an independent verification service provider, within the framework of the application of Spanish Law 22/2018.

Queries about this report may be directed to the following e-mail address sostenibilidad@COMSA.com

Relevant facts

COVID 19 Balance

The emergence of the Covid-19 Coronavirus in China in January 2020, and its rapid global spread, has posed major challenges to the management of society and companies around the world.

In the case of COMSA Corporación, the repercussions of this new situation have been dealt with in the different sections of this Report, in such a way that all the points in which Covid-19 has posed a challenge or a change in the company's day-to-day business have been addressed, although it is still too early to be able to make an overall assessment of its long-term consequences. However, the directors and management of the Group made a preliminary assessment of the situation, highlighting the following non-financial reporting issues:



Ankara metro extension (Turkey)



ABOUT THE REPORT

- » **Business model:** A Committee was created to reduce the impact on the business and guarantee the continuity of operations. On the basis of this model, work continues on adapting the day-to-day work to the new regulatory developments.
- » **Continuity of operations:** 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 projects.
- » **Environmental issues:** The impact in this area is closely linked to the activity carried out, so that in some areas such as indirect emissions, linked to corporate travel, have been significantly reduced as a result of the mobility restrictions experienced in the different geographies and the promotion of teleworking, while other aspects such as the generation of waste or materials, linked to the type and phase of each project, have been maintained or increased. In this area, in projects where activity had been affected, the gradual return to normality has also re-established the consumption of resources and the generation of waste specific to each phase and project.
- » **Staffing issues:** This new situation has made it possible to implement mechanisms that favour remote work or teleworking, which have not only made it possible, to a large extent, to continue operations in support of the core business, but have also meant a step forward in the development of new formulas for work-life balance and flexibility for the workforce. At the same time, as a result of changes in the business, the Group has also had to make use of employment regulation practices. In this area, at the date of publication of this report, a part of the activity is maintained in teleworking mode in all those posts that allow it.
- » **Health and safety issues:** Since the beginning of the crisis, the Group has taken the necessary measures to ensure the health and safety of employees and clients at all times.
- » **Supply chain issues:** The global supply of some goods has been affected by the initial shutdown of some of the activities, this has had consequences on the supply of some materials and/or services, which are still latent in 2022.



ADDITIONAL INFORMATION

DISTRIBUTION OF STAFF BY PROFESSIONAL CATEGORY¹

	2021		2020		2019	
Professional category ²	% Women	% Men	% Women	% Men	% Women	% Men
Category 1	5 (0.5%)	17 (0.5%)	4 (0.4%)	19 (0.5%)	3 (0.3%)	15 (0.5%)
Category 2	15 (1.6%)	100 (2.7%)	16 (1.6%)	109 (3.0%)	16 (1.8%)	102 (3.1%)
Category 3	88 (9.6%)	307 (8.3%)	89 (9.1%)	300 (8.2%)	73 (8.2%)	291 (8.8%)
Category 4	547 (59.9%)	703 (19.0%)	519 (53.2%)	686 (18.8%)	495 (55.4%)	660 (19.9%)
Category 5	258 (28.3%)	2,567 (69.5%)	347 (35.6%)	2,541 (69.5%)	306 (34.3%)	2,244 (67.7%)
Total	913	3,694	975	3,655	893	3,312

DISTRIBUTION OF THE WORKFORCE BY GENDER, AGE AND PROFESSIONAL CATEGORY SPAIN 2021

Age	<30		30-50		>50		
Gender	W	M	W	M	W	M	Total
Category 1	0	0	4	4	1	12	21
Category 2	0	0	9	52	3	34	98
Category 3	4	9	61	168	5	65	312
Category 4	39	78	275	292	93	128	905
Category 5	7	156	82	1,316	156	698	2,415
Total	50	243	431	1,832	258	937	3,751

¹ The % of Women and Men has been calculated in relation to the category and not 100% of the workforce.

² The categories include: 1 Executives; 2 Delegates, Managers, Area Managers and Department Heads; 3 Site Managers and Unit Managers; 4 Technicians and Administrative staff and 5 Operators.



ADDITIONAL INFORMATION

DISTRIBUTION OF THE WORKFORCE BY GENDER, AGE AND PROFESSIONAL CATEGORY SPAIN 2020

Age	<30		30-50		>50		Total
Gender	W	M	W	M	W	M	
Category 1	0	0	3	6	1	11	21
Category 2	0	0	13	55	1	32	101
Category 3	4	5	60	168	4	64	305
Category 4	27	66	291	298	80	113	875
Category 5	17	136	125	1,280	189	655	2,402
Total	48	207	492	1,807	275	875	3,704

DISTRIBUTION OF THE WORKFORCE BY GENDER, AGE AND PROFESSIONAL CATEGORY SPAIN 2019

Age	<30		30-50		>50		Total
Gender	W	M	W	M	W	M	
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

TYPE OF CONTRACT BY GENDER

Gender	2021			2020			2019		
	Indefinite	Temporary	Total	Indefinite	Temporary	Total	Indefinite	Temporary	Total
Women	750 (82%)	163 (18%)	913	763 (78%)	212 (22%)	975	688 (77%)	205 (23%)	893
Men	2,718 (74%)	976 (26%)	3,694	2,623 (72%)	1,032 (28%)	3,655	2,492 (75%)	820 (25%)	3,312
Total	3,468 (75%)	1,139 (25%)	4,607	3,386 (73%)	1,244 (27%)	4,630	3,180 (76%)	1,025 (24%)	4,205

TYPE OF WORKING DAY BY GENDER

Gender	2021			2020			2019		
	Complete	Partial	Total	Complete	Partial	Total	Complete	Partial	Total
Women	568 (62%)	345 (38%)	913	554 (57%)	421 (43%)	975	688 (77%)	205 (23%)	893
Men	3,629 (98%)	65 (2%)	3,694	3,580 (98%)	75 (2%)	3,655	2,492 (75%)	820 (25%)	3,312
Total	4,197 (91%)	410 (9%)	4,607	4,134 (89%)	496 (11%)	4,630	3,180 (76%)	1,025 (24%)	4,205

AVERAGE TRAINING BY PROFESSIONAL CATEGORY AND GENDER¹

Age	Gender	Category 1	Category 2	Category 3	Category 4	Category 5
2021	Women	43	47	28	26	1
	Men	45	40	23	34	19
2020	Women	34	38	25	19	0
	Men	21	30	26	28	13
2019	Women	65	49	26	15	1
	Men	74	33	19	26	11

¹ The calculation is based on the total number of persons per category.



ADDITIONAL INFORMATION

DISTRIBUTION OF STAFF BY COUNTRY¹

Country	Staff 2021	Staff 2020	Staff 2019
Argentina	-	4 (0.1%)	7 (0.17%)
Brazil	17 (0.4%)	20 (0.4%)	30 (0.71%)
Colombia	81 (1.8%)	65 (1.4%)	39 (0.93%)
Denmark	12 (0.3%)	27 (0.6%)	20 (0.48%)
Spain	3,751 (81.4%)	3,704 (80.0%)	3,393 (80.69%)
France	53 (1.2%)	54 (1.2%)	57 (1.36%)
Mexico	467 (10.1%)	549 (11.9%)	451 (10.73%)
Peru	-	13 (0.3%)	76 (1.81%)
Portugal	190 (4.1%)	168 (3.6%)	120 (2.85%)
Sweden	36 (0.8%)	26 (0.6%)	12 (0.29%)
Total	4,607	4,630	4,205

¹ In 2021, Argentina and Peru are not included in the scope.



ADDITIONAL INFORMATION

AVERAGE REMUNERATION BY COUNTRY AND GENDER¹

Country/gender	2021		2020		2019	
	Women	Men	Women	Men	Women	Men
Argentina	-	-	-	17,002.42	-	17,680.52
Brazil	18,590	41,541	12,270.48	42,683.14	15,048.33	32,361.21
Colombia	10,854	19,057	10,883.68	11,904.79	12,026.95	13,560.39
Denmark	57,174	61,906	49,040.07	63,406.03	51,091.51	72,700.99
Spain	27,130	29,754	25,641.42	29,859.21	25,578.06	23,318.63
France	31,285	33,832	31,706.65	30,929.42	28,728.30	32,690.16
Mexico	9,360	8,524	8,603.76	7,698.30	10,039.36	9,381.54
Peru	-	-	9,276.27	31,085.54	7,583.47	14,507.42
Portugal	20,465	18,567	17,960.52	17,321.20	18,861.11	14,141.29
Sweden	40,974	50,211	37,139.28	48,286.14	40,892.91	47,423.95

AVERAGE REMUNERATION BY COUNTRY AND AGE²

Country	<30			30-50			>50		
	2021	2020	2019	2021	2020	2019	2021	2020	2019
Argentina	-	-	12,043.55	-	-	21,893.88	-	-	16,574.33
Brazil	-	23,254.23	16,410.91	27,532.91	29,728.69	31,121.58	60,901.63	44,516.01	16,826.08
Colombia	6,049.89	8,473.94	7,169.72	17,218.25	12,306.18	14,410.65	58,285.97	11,239.57	13,622.25
Denmark	47,966.42	50,425.94	53,893.85	64,961.23	67,442.53	67,202.03	-	-	-
Spain	21,882.74	22,503.43	21,858.02	29,302.93	29,051.80	28,771.37	30,915.00	30,115.25	29,198.14
France	30,062.66	33,290.00	31,483.33	33,779.66	30,283.43	30,174.43	32,091.28	32,693.31	35,179.27
Mexico	5,209.36	4,654.08	5,464.38	8,798.94	8,429.86	10,107.14	16,393.86	12,576.26	14,553.39
Peru	-	10,924.67	8,876.36	-	23,894.78	12,175.57	-	-	24,601.64
Portugal	10,761.81	9,882.53	9,420.60	18,196.24	17,445.24	14,387.48	23,502.47	22,185.11	19,076.91
Sweden	41,998.77	40,859.85	40,778.04	49,657.28	47,105.80	47,351.02	-	-	-

1, 2 In 2021, Argentina and Peru are not included in the scope.



ADDITIONAL INFORMATION

AVERAGE REMUNERATION BY COUNTRY AND CATEGORY: 2021

Country	Category 1	Category 2	Category 3	Category 4.2. Technicians	Category 4.1. Administrative	Category 5
Argentina			-			
Brazil		60,571			16,556	
Colombia	-		34,465.01	8,975.01		16,875.43
Denmark	-	-	64,160.08	57,821.22		
Spain	88,524		49,942.40	35,445	23,949	22,775.47
France	-		44,037.78	33,211.02		26,013.69
Mexico	-	32,282		8,680.84		5,681.81
Peru			-			
Portugal	-	40,814		18,540.70		13,606.20
Sweden		-		47,389		

AVERAGE REMUNERATION BY COUNTRY AND CATEGORY: 2020

Country	Category 1	Category 2	Category 3	Category 4.2. Technicians	Category 4.1. Administrative	Category 5
Argentina			17,002.42			-
Brazil		69,868.41			19,428.80	
Colombia	-			14,154.75		6,058.61
Denmark	-	73,801.64		49,701.45		-
Spain	87,782.45		49,293.01	34,958.61	24,586.33	22,421.77
France	-	35,989.40		30,009.71		26,729.25
Mexico	-	37,361.82		8,114.19		5,120.08
Peru	-		27,736.34			5,887.63
Portugal	-	37,992.58		17,708.21		12,192.94
Sweden	-			44,427.61		



ADDITIONAL INFORMATION

AVERAGE REMUNERATION BY COUNTRY AND CATEGORY: 2019

Country	Category 1	Category 2	Category 3	Category 4	Category 5
Argentina	-	-	23,808.54	15,060.07	
Brazil	-	-	43,534.13	15,904.91	
Colombia	-	-	14,804.24		9,349.28
Denmark	-	71,701.04		58,279.02	-
Spain	87,806.10		48,587.24	31,471.26	21,430.88
France	-	37,556.39		31,471.26	21,430.88
Mexico	-	40,905.63		28,172.22	26,809.67
Peru	-	44,775.54	31,405.93	12,523.21	7,811.32
Portugal	-	64,246	26,267.75	16,378.91	10,328.85
Sweden	-	-		44,702.68	

NUMBER OF DEPARTURES BY GENDER AND AGE 2021

		Dismissal	Voluntary termination	End of contract	Retirement	Total Departures
<30	Women	3	12	63	0	78
	Men	16	98	110	0	224
30-50	Women	23	50	71	0	144
	Men	49	203	220	0	472
>50	Women	16	20	61	6	103
	Men	33	36	87	29	185
Total		140	419	612	35	1,206
% by type		11.61%	34.74%	50.75%	2.90%	100.00%



ADDITIONAL INFORMATION

NUMBER OF DEPARTURES BY GENDER AND AGE 2020

		Dismissal	Voluntary termination	End of contract	Retirement	Total Departures
<30	Women	0	21	59	0	80
	Men	12	78	120	0	210
30-50	Women	22	48	91	0	161
	Men	73	176	212	0	461
>50	Women	12	13	44	7	76
	Men	52	40	108	27	227
Total		171	376	634	34	1,215
% by type		14%	31%	52%	3%	100%

NUMBER OF DEPARTURES BY GENDER AND AGE 2019

		Dismissal	Voluntary termination	End of contract	Retirement	Total Departures
<30	Women	4	36	0	0	96
	Men	29	152	280	0	461
30-50	Women	16	55	28,076	0	147
	Men	81	474	665	1	1,221
>50	Women	6	10	23	4	43
	Men	34	92	158	25	309
Total		170	819	1,261	30	2,280
% by type		7.5%	35.9%	55.3%	1.3%	100%



ADDITIONAL INFORMATION

NUMBER OF DEPARTURES BY COUNTRY AND TYPOLOGY

Country	Dismissal			Voluntary departures			End of contract			Retirement		
	2021	2020	2019	2021	2020	2019	2021	2020	2019	2021	2020	2019
Argentina	-	0	32	-	1	12	-	0	148	-	0	1
Brazil	0	0	2	1	2	1	4	9	0	0	0	0
Colombia	0	11	15	22	6	8	5	5	2	0	0	0
Denmark	1	2	0	13	6	5	3	3	0	0	0	0
Spain	112	145	76	218	220	246	473	413	353	32	29	22
France	0	1	0	10	4	0	5	2	0	0	0	0
Mexico	23	7	42	111	125	57	114	146	92	3	5	6
Peru	-	0	0	-	0	481	-	53	662	-	0	0
Portugal	4	4	3	37	10	8	7	2	4	0	0	1
Sweden	0	1	0	7	2	1	1	1	0	0	0	0
Total	140	171	170	419	376	819	612	634	1,261	35	34	30

NUMBER OF HIRES BY COUNTRY¹

Country	2021		2020		2019	
	Number of hires	% Hires	Number of hires	% Hires	Number of hires	% Hires
Argentina	-	-	1	0.06%	17	1.13%
Brazil	3	0.20%	3	0.18%	7	0.47%
Colombia	44	3.00%	30	1.75%	47	3.13%
Denmark	2	0.14%	18	1.05%	13	0.86%
Spain	1,119	76.17%	1,214	70.99%	912	60.64%
France	21	1.43%	4	0.23%	7	0.47%
Mexico	189	12.87%	336	19.65%	257	17.09%
Peru	-	-	22	1.29%	205	13.63%
Portugal	73	4.97%	63	3.68%	29	1.93%
Sweden	18	1.23%	19	1.11%	10	0.66%
Total	1,469	100%	1,710	100%	1,504	100%

¹ Percentage regarding to the total number of hires in the scope.



ADDITIONAL INFORMATION

PERCENTAGE OF EMPLOYEES COVERED BY COLLECTIVE AGREEMENT BY COUNTRY

Country	2021		2020		2019	
	Women	Men	Women	Men	Women	Men
Argentina	-	-	0%	25%	0%	17%
Brazil	100%	100%	100%	100%	100%	100%
Colombia	-	-	-	-	-	-
Denmark	-	-	100%	100%	100%	100%
Spain	99%	99%	99%	99%	99%	99%
France	100%	100%	100%	100%	100%	100%
Mexico	0%	38%	0%	33%	0%	43%
Peru	-	-	-	-	-	-
Portugal	100%	100%	100%	100%	100%	100%
Sweden	100%	100%	100%	100%	100%	100%



VERIFICATION REPORT

Translation of a report originally issued in Spanish. In the event of a discrepancy, the Spanish-language version prevails.

INDEPENDENT LIMITED ASSURANCE REPORT ON THE CONSOLIDATED NON-FINANCIAL INFORMATION STATEMENT

To the Shareholders of COMSA Corporación de Infraestructuras, S.L.,

In accordance with Article 49 of the Spanish Commercial Code, we have performed the verification, with a scope of limited assurance, of the non-financial information contained in the accompanying 2021 Sustainability Report ("NFIS") for the year ended 31 December 2021 of COMSA Corporación de Infraestructuras, S.L. ("COMSA Corporación") and Subsidiaries ("the Group"), which forms part of the Group's Consolidated Directors' Report for the year ended 31 December 2021.

The 2021 NFIS includes information, additional to that required by current Spanish corporate legislation relating to non-financial reporting and by the Global Reporting Initiative Standards for sustainability reporting in their core option ("GRI standards"), that was not the subject matter of our verification. In this regard, our work was confined solely to verifying the non-financial information identified in Appendix I, Non-Financial Information Law Table of Contents.

Responsibilities of the Directors

The preparation and content of the NFIS included in the Group's Consolidated Directors' Report are the responsibility of the Directors of COMSA Corporación. The NFIS was prepared in accordance with the content specified in current Spanish corporate legislation and with the criteria of the GRI standards in their core option.

These responsibilities of the Directors also include the design, implementation and maintenance of such internal control as is determined to be necessary to enable the NFIS to be free from material misstatement, whether due to fraud or error.

The Directors of COMSA Corporación are also responsible for defining, implementing, adapting and maintaining the management systems from which the information necessary for the preparation of the NFIS is obtained.

Our Independence and Quality Control

We have complied with the independence and other ethical requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants (IESBA), which is based on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies International Standard on Quality Control 1 (ISQC 1) and, accordingly, maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Our engagement team consisted of professionals who are experts in reviews of non-financial information and, specifically, in information on economic, social and environmental performance.

Our Responsibility

Our responsibility is to express our conclusions in an independent limited assurance report based on the work performed.

We conducted our review in accordance with the requirements established in International Standard on Assurance Engagements (ISAE) 3000 Revised, Assurance Engagements other than Audits or Reviews of Historical Financial Information, currently in force, issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC), and with the guidelines published by the Spanish Institute of Certified Public Accountants on attestation engagements regarding non-financial information statements.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement and, consequently, the level of assurance obtained is also substantially lower.

Our work consisted of making inquiries of Management and the various units of COMSA Corporación that participated in the preparation of the NFIS, reviewing the processes used to compile and validate the information presented in the NFIS, and carrying out the following analytical procedures and sample-based review tests:

- Meetings held with Group personnel to ascertain the business model, policies and management approaches applied, and the main risks relating to these matters, and to obtain the information required for the external review.



VERIFICATION REPORT

- Analysis of the scope, relevance and completeness of the contents included in the 2021 NFIS based on the materiality analysis performed by the Group and described in the section "5. About the Report - Scope and Coverage", taking into account the contents required under current Spanish corporate legislation.
- Analysis of the processes used to compile and validate the data presented in the 2021 NFIS.
- Review of the information relating to risks and the policies and management approaches applied in relation to the material matters presented in the 2021 NFIS.
- Verification, by means of sample-based review tests, of the information relating to the contents included in the 2021 NFIS, and the appropriate compilation thereof based on the data furnished by the information sources.
- Obtainment of a representation letter from the Directors and Management.

Basis for Qualified Conclusion

As a result of the procedures carried out and the evidence obtained, limitations on the verification of the completeness of the contents and misstatements were identified due to partial presentation or omissions of the contents required by Spanish corporate non-financial information reporting legislation. The misstatements detected are detailed in the "Basis for Qualified Conclusion" table attached hereto, which forms part of this report.

Qualified Conclusion

Based on the procedures performed in our verification and the evidence obtained, except for the effect of the matters described in the "Basis for Qualified Conclusion" section, no additional matter has come to our attention that causes us to believe that the non-financial information included in Appendix I, Non-Financial Information Law Table of Contents, to the 2021 Sustainability Report of COMSA Corporación de Infraestructuras, S.L. and Subsidiaries for the year ended 31 December 2021 was not prepared, in all material respects, in accordance with the content specified in current Spanish corporate legislation and with the criteria of the selected GRI standards.

Use and Distribution

This report has been prepared in response to the requirement established in corporate legislation in force in Spain and, therefore, it might not be appropriate for other purposes or jurisdictions.

Appendix to the Independent Limited Assurance Report

Basis for Qualified Conclusion

Non-Financial Information Law		Basis for conclusion
1.5.1	Climate change	The number of Greenhouse Gas (GHG) emissions disclosed for Scope 3 relating to indirect emissions outside of the organisation's direct control does not include all the emissions through the Group's value chain.
5.4.1	Earnings obtained on a country-by-country basis	Information not disclosed.
5.4.1	Income tax paid	Information not disclosed.



ANNEX I: GRI TABLE OF CONTENTS

GRI Standard	Name of the indicator	Page number or explanation
UNIVERSAL STANDARDS		
GRI 101	Principles	
GRI 102-00	Organizational profile	
GRI 102-01	Name of the organization	COMSA Corporación de Infraestructuras S.L.
GRI 102-02	Activities, brands, products and services	24-26
GRI 102-03	Location of headquarters	España c/ Viriato 47, 08014 Barcelona
GRI 102-04	Locations of operations	24 , 29
GRI 102-05	Ownership and legal form	Limited Society
GRI 102-06	Markets served	24
GRI 102-07	Scale of the organization	29-30
GRI 102-08	Information on employees and other workers	55-56 , 91-93
GRI 102-09	Supply chain	72-73
GRI 102-10	Significant changes to the organization and its supply chain	85-86
GRI 102-11	Precautionary principle or approach	15-17 , 22 , 27 , 33-34
GRI 102-12	External initiatives	10-11 , 22 , 35 , 37 , 41-42 , 51-52 , 58 , 63 , 81-83
GRI 102-13	Memberships of associations	50-52 , 81-83
GRI 102-130	Strategy	
GRI 102-14	Statement from senior decision-maker	6
GRI 102-15	Key impacts, risks and opportunities	27
GRI 102-150	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	15-22
GRI 102-180	Governance	
GRI 102-18	Governance structure	12



ANNEX I: GRI TABLE OF CONTENTS

GRI Standard	Name of the indicator	Page number or explanation
GRI 102-19	Delegating authority	12-13
GRI 102-20	Executive level responsibility for economic, environmental and social topics	12-14
GRI 102-21	Consulting stakeholders on economic, environmental and social topics	12-14
GRI 102-22	Composition of the highest governance body and its committees	12-14
GRI 102-23	Chair of the highest governance body	12
GRI 102-24	Nominating and selecting the highest governance body	12
GRI 102-25	Conflicts of interest	13, 15-16
GRI 102-26	Role of the highest governance body in setting purpose, values and strategy	13
GRI 102-27	Collective knowledge of the highest governance body	12-13
GRI 102-28	Evaluating the highest governance body's performance	13
GRI 102-29	Identifying and managing economic, environmental and social impacts	12-14
GRI 102-30	Effectiveness of risk management processes	27
GRI 102-31	Review of economic, environmental and social topics	12-14
GRI 102-32	Highest governance body's role in sustainability reporting	14
GRI 102-33	Communication of critical concerns	12-14
GRI 102-34	Number and nature of critical concerns	89-90
GRI 102-35	Remuneration policies	59
GRI 102-36	Process for the determination of the remuneration	59
GRI 102-37	Stakeholders' involvement in remuneration	Suppliers, clients and the public administration are not involved in the design of remuneration policies, but society, shareholders and financing entities are involved.



ANNEX I: GRI TABLE OF CONTENTS

GRI Standard	Name of the indicator	Page number or explanation
GRI 102-38	Annual total compensation ratio	60
GRI 102-39	Percentage increase in annual total compensation ratio	60
GRI 102-390	Stakeholder engagement	
GRI 102-40	List of stakeholder groups	88
GRI 102-41	Collective bargaining agreements	66 , 100
GRI 102-42	Identifying and selecting stakeholders	88
GRI 102-43	Approach to stakeholder engagement	88
GRI 102-44	Key topics and concerns raised	87
GRI 102-440	Reporting practices	
GRI 102-45	Entities included in the consolidated financial statements	85-86
GRI 102-46	Defining report content and topic boundaries	85-86 , 89
GRI 102-47	List of material topics	87
GRI 102-48	Restatements of information	85-86
GRI 102-49	Changes in reporting	85-86
GRI 102-50	Reporting period	From January 1 to December 31, 2021.
GRI 102-51	Date of most recent report	July 2021
GRI 102-52	Reporting cycle	Annual
GRI 102-53	Contact point for questions regarding the report	sostenibilidad@COMSA.com
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	
GRI 102-56	External review	



ANNEX I: GRI TABLE OF CONTENTS

GRI Standard	Name of the indicator	Page number or explanation
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
THEMATIC STANDARDS		
GRI 200	Economic	
GRI 201	ECONOMIC PERFORMANCE	
GRI 201-1	Direct economic value generated and distributed	29-30
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 public administrations	€1,579 thousand in 2021
GRI 202	MARKET PRESENCE	
GRI 202-1	Ratio of standard entry level wage by gender compared with local minimum wage	60
GRI 202-2	Proportion of senior management hired from the local community	54
GRI 203	INDIRECT ECONOMIC IMPACTS	
GRI 203-1	Investment in infrastructure and services of support	10 , 30-31 , 48
GRI 203-2	Significant indirect economic impacts	30 , 89-90
GRI 204	PROCUREMENT PRACTICES	
GRI 204-1	Proportion of spending on local suppliers	73
GRI 205	ANTI-CORRUPTION	
GRI 205-1	Proportion of spending on local suppliers	17
GRI 205-2	Communication and training on anti-corruption policies and procedures	17 , 20-21



ANNEX I: GRI TABLE OF CONTENTS

GRI Standard	Name of the indicator	Page number or explanation
GRI 205-3	Confirmed cases of corruption and actions taken	17
GRI 206	ANTI-COMPETITIVE BEHAVIOUR	
GRI 206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	17
GRI 207	Taxation 2019	
GRI 207-1	Fiscal approach	The Group has a Tax Policy and a Tax Strategy approved by the Board of Directors and applicable in all the countries in which it operates. The objective of this policy is to minimise risks in the tax area, and to this end it has a Protocol for the prevention, control and management of tax and Social Security risks that guarantees compliance with the principles of transparency, integrity, efficiency and prudence in this area.
GRI 207-2	Fiscal governance, control and risk management	COMSA Corporación is aware that its tax contribution is a significant part of the development of the communities in which it operates, so the rigorous regulatory compliance in this area, included in the company's risk map, is framed within the Group's compliance model, with the Tax Department, supervised by the Group's Finance Department, being responsible for complying with the Tax Policy.



ANNEX I: GRI TABLE OF CONTENTS

GRI Standard	Name of the indicator	Page number or explanation
		Internally, tax compliance awareness, as part of the Group’s compliance model, is essential, especially for positions potentially exposed to tax risks. In this regard, communication with the Corporate Tax Department, in terms of consultation and coordination, is essential, both nationally and internationally.
GRI 207-3	Stakeholder Engagement and Concerns Management in Tax Matters	With regard to external stakeholders, there are various channels of communication that allow any type of concern or suggestion to be collected, including those of a tax nature due to their special sensitivity. In relation to external business partners, temporary joint ventures, joint ventures or other similar forms of collaboration, a transparent relationship is encouraged, with a rigorous analysis of the taxation of any project in any geographical area.
GRI 207-4	Country-by-country reporting	29
GRI 300	Environmental	
GRI 301	MATERIALS	
GRI 301-1	Materials used by weight or volume	36
GRI 301-2	Recycled input materials used	35-36
GRI 301-3	Reclaimed products and their packaging materials	35-36



ANNEX I: GRI TABLE OF CONTENTS

GRI Standard	Name of the indicator	Page number or explanation
GRI 302	ENERGY	
GRI 302-1	Energy consumption within the organization	39-40
GRI 302-2	Energy consumption outside the organization	39-40
GRI 302-3	Energy intensity	Energy used (electricity and fuel) compared to global sales (GJ/M€): 2021: 415.82 2020: 469.36 2019: 434.19
GRI 302-4	Reduction of energy consumption	40
GRI 302-5	Reductions in energy requirements of products and services	44 , 48-50
GRI 303	WATER 2018	
GRI 303-1	Interactions with water as a shared resource	38
GRI 303-2	Management of water discharge related impacts	38
GRI 303-3	Water withdrawal	38
GRI 303-4	Water discharge	Not reported
GRI 303-5	Water consumption	38
GRI 304	BIODIVERSITY	
GRI 304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Not reported
GRI 304-2	Significant impacts of activities, products, and services on biodiversity	45
GRI 304-3	Protected or restored habitats	45
GRI 304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	Not reported



ANNEX I: GRI TABLE OF CONTENTS

GRI Standard	Name of the indicator	Page number or explanation					
GRI 305	EMISSIONS						
GRI 305-1	Direct (Scope 1) GHG emissions	43					
GRI 305-2	Energy indirect (Scope 2) GHG emissions	43					
GRI 305-3	Other indirect (Scope 3) GHG emissions	43					
GRI 305-4	GHG emissions intensity	Emissions relative to global sales					
			Scope 1	Scope 2	Scope 3	Total	
		2021	22.49	3.19	1.60	27.28	
		2020	25.83	3.42	1.15	30.41	
		2019	24.48	3.09	3.16	30.74	
GRI 305-5	Reduction of GHG emissions	40-41					
GRI 305-6	Emissions of ozone-depleting substances (ODS)	Not reported					
GRI 305-7	Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions	Not reported					
GRI 306	WASTE						
GRI 306-1	Waste generation and significant waste-related impacts	38					
GRI 306-2	Management of significant waste-related impacts	37					
GRI 306-3	Waste generated	They have not been produced throughout 2021.					
GRI 306-4	Waste not destined for disposal	Does not apply					
GRI 306-5	Waste for disposal	Not reported					
GRI 307	ENVIRONMENTAL COMPLIANCE						
GRI 307-1	Non-compliance with environmental laws and regulations	Throughout 2021, 3 minor administrative sanctions were received in the environmental field.					



ANNEX I: GRI TABLE OF CONTENTS

GRI Standard	Name of the indicator	Page number or explanation
GRI 308	SUPPLIER ENVIRONMENTAL ASSESSMENT	
GRI 308-1	New suppliers that were screened using environmental criteria	74
GRI 308-2	Negative environmental impacts in the supply chain and actions taken	75
GRI 400	Social	
GRI 401	EMPLOYMENT	
GRI 401-1	New employee hires and employee turnover	61
GRI 401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	59
GRI 401-3	Parental leave	64
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	67
GRI 403-02	Risk identification and incident investigation	27, 67-68
GRI 403-03	Occupational health services: description and mechanisms to ensure quality of the service	67-68
GRI 403-04	Employee participation in ORP	68
GRI 403-05	Employee training in ORP	68
GRI 403-06	Occupational health promotion	71
GRI 403-07	Prevention and mitigation of health impacts related to labour relations	68
GRI 403-08	Employees covered by ORP management systems	68
GRI 403-09	Work-related accidents	69
GRI 403-10	Work-related ill health	69



ANNEX I: GRI TABLE OF CONTENTS

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	57
GRI 404-2	Programmes for upgrading employee skills and transition assistance programmes	58
GRI 404-3	Percentage of employees receiving regular performance and career development reviews	59
GRI 405	DIVERSITY AND EQUAL OPPORTUNITY	
GRI 405-1	Diversity of governance bodies and employees	55 , 91
GRI 405-2	Ratio of basic salary and remuneration of women to men	60
GRI 406	NON-DISCRIMINATION	
GRI 406-1	Incidents of discrimination and corrective actions taken	22
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	75
GRI 408	CHILD LABOUR	
GRI 408-1	Operations and suppliers at significant risk for incidents of child labour	22 , 72
GRI 409	FORCED OR COMPULSORY LABOUR	
GRI 409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	22 , 72
GRI 410	SECURITY PRACTICES	
GRI 410-1	Security personnel trained in human rights policies or procedures	72
GRI 411	RIGHTS OF INDIGENOUS PEOPLES	
GRI 411	Cases of violations of the rights of indigenous peoples	Since 2018 there is no record of claims in this area.
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.









ANNEX I: GRI TABLE OF CONTENTS

GRI Standard	Name of the indicator	Page number or explanation
GRI 412-2	Employee training on human rights policies or procedures	21-22
GRI 412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	72
GRI 413	LOCAL COMMUNITIES	
GRI 413-1	Operations with local community engagement, impact assessments, and development programmes	30, 81-83
GRI 413-2	Operations with significant actual and potential negative impacts on local communities	45, 46
GRI 414	SOCIAL EVALUATION OF PROVIDERS	
GRI 414-1	New suppliers that have passed selection filters according to social criteria	74
GRI 414-2	Negative social impacts in the supply chain and actions taken	75
GRI 415	PUBLIC POLICY	
GRI 415-1	Political contributions	They have not been carried out in 2020.
GRI 416	CUSTOMER HEALTH AND SAFETY	
GRI 416-1	Evaluation of the impacts on health and safety of the products and services	77-78
GRI 416-2	Assessment of the health and safety impacts of product and service categories	Since 2018 there is no record of claims in this area
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	Since 2018 there is no record of claims in this area
GRI 419	SOCIOECONOMIC COMPLIANCE	
GRI 419-1	Non-compliance with laws and regulations in the social and economic area	Throughout 2021, 1 minor sanction was received in the area of prevention.



ANNEX II: SDG TABLE OF CONTENTS

SDG	Implication	Page
 1 NO POVERTY	End poverty in all its forms everywhere	30 , 82
 2 ZERO HUNGER	End hunger, achieve food security and improved nutrition and promote sustainable agriculture	82
 3 GOOD HEALTH AND WELL-BEING	Ensure healthy lives and promote well-being for all at all ages	15 , 70-75 , 81
 4 QUALITY EDUCATION	Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all	21-22 , 27 , 31 , 51 , 57-58 , 63 , 68
 5 GENDER EQUALITY	Achieve gender equality and empower all women and girls	4 , 11 , 62-64
 6 CLEAN WATER AND SANITATION	Ensure availability and sustainable management of water and sanitation for all	33 , 38 , 43-44
 7 AFFORDABLE AND CLEAN ENERGY	Ensure access to affordable, reliable, sustainable and modern energy for all	10 , 39-40 , 48-49
 8 DECENT WORK AND ECONOMIC GROWTH	Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all	22 , 54
 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation	10 , 40

SDG	Implication	Page
 10 REDUCED INEQUALITIES	Reduce inequality within and among countries	59 , s
 11 SUSTAINABLE CITIES AND COMMUNITIES	Make cities and human settlements inclusive, safe, resilient and sustainable	10 , 44 , 48
 12 RESPONSIBLE CONSUMPTION AND PRODUCTION	Ensure sustainable consumption and production patterns	35-40 , 48-49
 13 CLIMATE ACTION	Take urgent action to combat climate change and its impacts by regulating emissions and promoting developments in renewable energy	5 , 6 , 11 , 27 , 30 , 34 , 41-44 , 48-49 , 82
 14 LIFE BELOW WATER	Conserve and sustainably use the oceans, seas and marine resources for sustainable development	Fuera de alcance por la actividad de la compañía
 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	45
 16 PEACE, JUSTICE AND STRONG INSTITUTIONS	Promote peaceful and inclusive societies for sustainable development	15
 17 PARTNERSHIPS FOR THE GOALS	Strengthen the means of implementation and revitalize the global partnership for sustainable	4-5 , 6 , 11 , 33 , 41-42 , 44 , 51-52 , 58 , 79 , 81-83



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