



SUSTAINABILITY REPORT 2021



We are sustainable, we care

*We deeply believe in caring about the Planet, in fact we are sustainable from the very beginning.
And above all, we believe in childhood and social justice.*

CHAIRMAN'S LETTER

The European Commission defined the concept of Corporate Social Responsibility (CSR) as "The voluntary integration, by companies, of social and environmental concerns in their business operations and their relationships with their partners". Being socially responsible means going beyond legal obligations and taking society and the environment into account.



In recent decades, the behavior of companies is evolving toward business competitiveness based on responsible management, which focuses not only in obtaining economic benefit, but also in actions that favor their social and environmental surroundings.

In this sense, Grupo Gransolar is fully aware of Corporate Social Responsibility, and in order to promote the implementation of this culture within its organization, it has established internal objectives (KPIs) periodically supervised by the Board of Directors. We want to identify and promote those actions that allow us to be competitive and to generate positive impacts on society.

During 2021 the recovery from the pandemic crisis has been impacted by shortage of essential supplies, higher costs, serious difficulties in global transportation and inflation. We have suffered energy costs unknown in the past. All this has impacted on the ability to compete of many companies, but also has increased the level of poverty in our societies.

In the current scenario, it is necessary to take on new social and environmental challenges. We seek to identify actions that allow Gransolar to improve continuously the sustainability of our activities and to identify opportunities to contribute to the improvement of the countries, cities, and areas in which we work.

We continue to support the Global Compact, the 17 SDGs and the principles of Human Rights, Work, Environment and Anticorruption. Our spirit is to continue taking measures to achieve these goals.



Domingo Vegas

Chairman of the Board

Index

NON-FINANCIAL INFORMATION STATEMENT 2021.....	4
Human Rights.....	4
Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.....	4
Principle 2: Make sure that they are not complicit in human rights abuses.....	4
Labour.....	5
Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.....	6
Principle 4: The elimination of all forms of forced and compulsory labour.....	7
Principle 5: The effective abolition of child labour.....	7
Principle 6: The elimination of discrimination in respect of employment and occupation.....	7
Environment.....	11
Principle 7: Businesses should support a precautionary approach to environmental challenges.....	11
Principle 8: Undertake initiatives to promote greater environmental responsibility.....	12
Principle 9: Encourage the development and diffusion of environmentally friendly technologies.....	15
Anti-Corruption.....	15
Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.....	15
Sustainable Development Goals.....	17
2021 Covid-19.....	18

NON-FINANCIAL INFORMATION STATEMENT 2021

This document is an outline version of the Non-Financial Information Statement. Nondifference should appear between the two documents, but in the rare case of a difference, the text of the Non-Financial Information Statement Report prevails.

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed Human Rights.

The Group has a specific CSR Policy and to reinforce the commitment with The Human Rights, it has a specific Regulation that emphasizes, completes, and guarantees our dedication on these matters. Besides Gransolar has a Code of Conduct that promotes the fulfilment of human and labour rights, committing to the application of regulations and good practices in terms of conditions of employment, health, and safety in the workplace.

This Code specifies different reporting channels for violations of human rights and, with the purpose of assuring the compliance of the ethics code, an Ethics Committee is composed:

- The President
- The Head of Human Resources
- The Quality Manager

Communications to this ethical channel, both inquiries and reports must be communicated through any of the following forms:

- Ordinary mail to the Headquarters address in Madrid
- Email
- Fax

Moreover, during 2021, 2020 and 2019, there has not been any confirmed case reports on matters as the violation of human rights or discrimination.

Principle 2: Make sure that they are not complicit in human rights abuses.

In the Human Rights Regulation and in the Code of Conduct, there are references to the Group's commitment to face any sort of discrimination, forced labour and abolition of child labour which is directly addressed and explicitly explained in standard contracts the company makes with contractors and suppliers.

The Group demands all new significant suppliers to sign a "Suppliers Code of Conduct." The objective of said code is to procure and promote a professional, ethical, and responsible behaviour from all supplies for the Gransolar Group companies in the development of their projects worldwide, aligned with the ethics and company culture established in the Group. Between these undertaken commitments from both parties, we highlight the following:

Implementation of the regulations and good practices in terms of employment conditions, health, and safety in the job position, and acting in its professional relationships with employees with criteria of respect, dignity, and justice, considering the diverse cultural sensibilities of each person and not tolerating any form of violence, harassment, abuse, or discrimination for any reason.

Finally, once the company has completed and finalized a project, Gransolar performs evaluations on suppliers worked with through a questionnaire system in which they must accredit certain circumstances.

Labour

Gransolar's staff is spread out around the world; due to the considerable number of international projects it owns. The Group has an internal policy where it prioritizes subcontracting local services in the country where the project is being developed, thus promoting local hiring.

Gransolar Group has been able to expand its workforce by 30% from 677 in 2020, to 881 in 2021, creating employment throughout in all the departments within its vertically integrated societies.

Gransolar Group's Labour figures:



Employees per-Country	Total		% 2021 vs 2020
	2021	2020	
Saudi Arabia	28	-	100%
Australia	65	55	18%
Brazil	3	4	-25%
Chile	5	1	400%
United Arab Emirates	14	15	-7%
United States of America	8	2	300%
Spain	617	490	26%
Italy	1	-	100%
Mexico	21	24	-13%
Portugal	5	4	25%
South Africa	109	80	36%
Turkey	5	2	150%
Total	881	677	30%

Employees per sex	Total	
	2021	2020
Men	652	512
Women	229	165
TOTAL	881	677

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

In terms of the promotion of precepts established by the ILO, the Group expresses its commitment to the respect of the freedom of the association and right to collective negotiation through collective bargaining agreements that apply.

Out of the whole Gransolar staff, more than the 77% is covered by a collective agreement in 2021. Regardless, the company always meets all applicable legislations in the country where its present, whilst using Spanish standards as reference.

Principle 4: The elimination of all forms of forced and compulsory work.

The Group is governed by the laws determined by each country where they have hired their workers. Regarding workers hired in Spain, which represent a 72% of the total, Gransolar follows the Spanish legal system.

In terms of the distribution of the workday, Gransolar grants its workers a criterion of flexibility in entry and exit for their distribution. For the office in Madrid and in Ingenia in Almeria, the schedule for entry is between 8 to 9 in the morning until 17:30 to 18:30, and every Friday throughout the year an intensive workday takes place from 7:30 to 9 in the morning until 13:30 to 14:30, until completing the weekly 40 hours. Moreover, for the months of July and August, there is an intensive workday from Monday to Thursday from 8 to 15 and on Fridays as the rest of the year.

Currently, the Group offers, apart from a flexible schedule, the measures collected in the Equality Plan, to facilitate family conciliation. Within the measures gathered for the Equality Plan, the Group offers various aids for the reincorporation to work life after maternity/paternity, and the possibility for its employees to enjoy their parental leave.

Since the pandemic, Grupo Gransolar has implemented Working from Home for office workers. It can be distributed as best suits both the worker and the team.

Additionally, Gransolar Group's employees receive social benefits such as medical insurance, life insurance, and a flexible salary for nursery checks, restaurant tickets, and transport tickets. As part of an emotional salary, free coffee and a healthy breakfast are distributed entirely at the Group's expense.

Principle 5: The effective abolition of child labour.

CSR Policy and its Human Rights Regulation: With the CSR Policy, and with its Human Rights regulation, the Group emphasizes its commitment to children, their health, their training, and the eradication of child labour wherever their business is located. Defending and in full accordance with the United Nations declaration of the Children's Rights.

Code of Conduct: The Gransolar Group is committed to respecting children's rights. We believe that all children have the right to a healthy and happy childhood, without being forced to work before they are ready to do so. All rights must apply to all children, without exception, and it is the state's obligation to take the necessary measures to protect children from all forms of discrimination. Once children reach the legal working age, Gransolar is committed to promoting access to employment opportunities.

Principle 6: The elimination of discrimination in respect of employment and occupation.

The Group commits to a strict compliance with current legislation in accordance with the provisions of local law as a fundamental pillar for equal treatment in the workplace.

Gransolar has a CSR Policy with three complementary Regulations: Human Rights, Community Investment and Corporate Volunteering. These three reinforce the Group's commitment with Justice and Social Equity.

CSR policy: Non-discrimination based on race, nationality, social origin, age, gender, marital status, sexual orientation, ideology, political or union opinion, religion or any other personal, physical, or social condition.

Additionally, as a measure against all sorts of discrimination, the Group has established a Code of Conduct that addresses the topics of equality in treatment and in dignity for all forms of diversity.

The headcount is composed of 881 employees as of 31 December 2021 (677 in 2020), 229 of whom are women and 652 are men (165 women and 512 men in 2020), respectively representing 26% and a 74% of the total (24% and 76% in 2020).

Upon the principle of Integrity, Gransolar tries to include all minorities in its workforce, as well as complying with Spanish law on disability, the company counts on multiple employees with a handicap of 33% or more. Additionally, the company contributes to social initiatives that provide both employment and professional training for people with disabilities.

The Equality Plan: this Plan is a set of measures, adopted after having completed a diagnosis on the situation, tending to reach equality in treatment and opportunities between males and females, and to eliminate any sort of discrimination for any reason within the company:

- To eliminate any type of discrimination in terms of gender, respecting the individuality of all people and their cultures
- To modify any conduct based upon discriminative ideas, establishing an inclusive language and images in all workspaces.
- Equal opportunities for all genders
- To prevent situations of sexual harassment or of other sexual motives
- To improve personal, familiar, and professional conciliation
- To promote that Human Resources is a constant support for these goals, always focused on the search and development of the best professionals.

In response to the global issue of the gender wage gap, Gransolar is committed to pay an equal salary for work of equal value across all its companies and departments, always respecting each country's minimum interprofessional salaries, to never allow gender to be a roadblock to an employee's personal and professional growth.

The Group's remuneration policy promotes equal treatment between males and females, advocating for equal pay. The retribution model rewards the level of responsibility and professional trajectory, ensuring internal equity and external competition.

The salary model is materialized through two differentiated elements:

- A fixed salary, which considers the level of responsibility, the developed roles and the professional trajectory of each employee, the principles of internal equity and the market value for their function, being the most relevant for the overall compensation.
- A variable compensation which is associated to the various levels of the company, knowing that 6 levels exist which after 3 have a variable:
 - Level 3: 15%
 - Level 4: 20%
 - Level 5: 30%
 - Level 6: 40%

This means that approximately 21% of the total employees receive said variable according to their achievement of pre-established goals, divided by company, department, and personal goals.

On a yearly basis, the Group allocates a training budget for each of the companies and departments to take upon the completion of a training plan in accordance with the strategy and needs of the Organization and its employees. Among the objectives implemented by Gransolar Group on its training plan, we highlight:

- Improving the efficiency and efficacy of the organization through an adequate development of the people holding their job positions.
- Helping to face changes resulting from the evolution of the organization's surroundings or future projects.
- Promoting the personal development, motivation, and professional enrichment of employees.
- Helping solve internal problems.

In 2021 a total of 22.961,41 of training for the Group's employees were held, of which included the launch of a leadership program "Extraordinary Leader," a program specifically aimed to improve the efficiency of leaders to improve business performance.

Gransolar bets on young talent and contributes with the following initiatives so they (participants) can gather the experience needed to end up as employees of the company.

"School of Talent"

We have continued with the talent school that it was launched in 2019, which consisted of project called "Escuela de Talento," (School of Talent) 6-month scholarships to train students in PLC programming, automation, and robotics. For the selection, many different filters took place consisting of the review of resumes, phone interviews and group dynamics.

After the success achieved through this program, the Group has decided to continue with this staunch support for scholarships to guarantee a sustained growth in different departments by expanding and investing in the training and integration of young people in the job market.

By the closing of 2021, 16 employees with university degree were incorporated into the staff, between Madrid, Almería, and Valencia, with the idea of them acquiring more responsibility and functions to allow them to end up as employees of the company.

To this day, Gransolar Group has cooperation agreements with various universities in the Community of Madrid such as the: Polytechnic University of Madrid (UPM), Autonomic University of Madrid (UAM), Carlos III University of Madrid, Rey Juan Carlos University, Alcalá de Henares University (UAH), Complutense University of Madrid (UCM), University Centre of Financial Studies (CUNEF) and the University of Burgos (UBU).

"Dual Professional Training Program"

Furthermore, as a company that bets on young talent, the Group decided to expand its search for talent and that is why it is the first year that it started working with the "Programa de FP Dual," (Dual Professional Training Program) a program consisting of a year of theoretical teaching and another of practical learning. The idea behind it is to adapt education with the demands of the market and the socioeconomic reality. For this, first-year students are participating in Economic-financing areas, Computing, Procurement, Digital Design, and Software.



IN FIGURES

Gender Equality

From 2020 to 2021

**35,2% Growth in
Female Workforce**

Contract Types

■ Fixed ■ Temporary



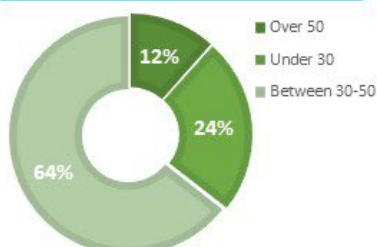
Young Talent

Total Training Hours 2021

Gransolar Group bets on young talent, participating in social initiatives for professional training for young people, collaborating with local universities and offering internships at the company.

By Professional Category	Total
Directors & Managers	2.152,50
Technicians & Graduates	12.087,41
Administratives	3.205,00
Officers	2.488,50
Operators	2.177,00
Scholarship	119,50
ETT	777,00
Partner	14,50
Total	22.961,41

Employees by Age



Salary Model

Variables for Compensation

~ 21% receive variable remunerations


Environment

Gransolar's activity is linked to the mitigation of climate change and its impact on the environment since its main activity is the development and construction of photovoltaic plants. The Group is aware that society nowadays has an increasing demand for a better quality of life and the conservation and preservation of the planet's many valuable natural resources, which is why it operates to guarantee reliable and quality work whilst acting conscientiously towards pollution prevention, resource optimization and energy efficiency.

The Group has a Quality and Environmental Policy that includes all the company's environmental prevention activities, these policies are shared with all third parties with whom the Group works with. The aim is to raise awareness by making the policies known to suppliers, subcontractors, and clients. Moreover, Gransolar has implemented its own environmental management system in all the projects it is executing, extending it to subcontractors to ensure compliance with environmental requirements.

In addition, the Group is certified in ISO [9001](#) and [14001](#) in its main centres.

Gransolar also counts with an internal and a supplier Code of Conduct that establishes a scrupulous compliance with environmental legislation, as one of the main targets in the Group's social responsibility, of which all stakeholders should be part of:

- Commitment to protect and conserve the environment.
- Commitment to prevent contamination.
- Commitment to comply with the legislation applicable to the related activities.
- Application of the "3 R's" rule: reduce, recycle, and reuse.
- Responsible use of resources.
- Cooperation with the authorities and organizations in the development of the plans that are intended to protect the environment.
- Assessment of risks to the environment in all activities.
- Carrying out environmental improvement programs.

Principle 7: Businesses should support a precautionary approach to environmental challenges.

The Gransolar Group carries out a risk assessment for its environmental management system (risks associated with the establishment in other countries as legal, regulatory, commercial, and logistic, etc.) considering external and internal factors in the context of the organization, needs and stakeholder expectations, as well as other environmental issues, aspects and emergencies related to its activity. This analysis highlights the relevance of the specific environmental requirements where the construction activity takes place, which are agreed with the clients. In this type of activities, the signed contracts include clauses related to the guarantees that must be applied to prevent environmental risks or of measures set up to comply with environmental regulations established by the country where the activity is being carried out.

As a first phase, the Group identifies the project requirements based on several factors: country, contract, specific environmental legislation and permits, studies, environmental impact statements, etc. Once all the requirements are identified, specific environmental monitoring plans are drawn up to ensure that all applicable requirements are included and considered during the construction phase with the objective of developing all

requirements from an environmental point of view, that both Gransolar's own personnel and the subcontractors participating in the project, have the obligation to comply with.

The Group allocates different resources for environmental prevention. On one hand, Gransolar has hired its own staff that oversees the coordination of different actions and projects from an environmental point of view. This team is made of 6 people, distributed in different strategic locations inside the Group who coordinate these actions both nationally and internationally. On the other hand, to more specifically meet the environmental needs required in each project, there are subcontracted companies dedicated to this purpose that carry out direct actions in the locations where the Group operates, always under the coordination of Gransolar's internal team.

The Gransolar Group has an environmental management system, periodically reviewed by the Board, in which different environmental aspects are evaluated and through which compliance with environmental goals are monitored.

Principle 8: Undertake initiatives to promote greater environmental responsibility.

In May 2017, an evaluation of the company's main offices was conducted and the BREEAM ES certification was obtained (Building Research Establishment Environmental Assessment Method). This certification evaluates and certifies the sustainability of existing buildings of non-residential use that are at least two years old. This guarantees a structure that is both safe and productive for its occupants as well as efficient in terms of the resources used; through a selection of tools and procedures that measure, evaluate, and ponder the level of sustainability of a building from its design stage, through to its construction and maintenance.

To obtain this accreditation, the following areas were evaluated:

- Management
- Health and Wellness
- Energy
- Transport
- Water
- Materials
- Waste
- Land use and Ecology
- Pollution and Innovation

The Group's strategy has focused fundamentally on the search of projects outside of Spain. Considering its experience in the international area, the environmental issues in any activity carried out in developing countries is a tremendously critical factor. For this reason, Gransolar is committed to reinforcing locally hired staff's awareness on environmental matters, to deepen the environmental component in the development-offer phase, as well as in the construction phase.

The impact of the Group's activity is not considered to be significant in terms of noise or light pollution, because the photovoltaic plants are in isolated areas, the factories in industrial areas and the offices have no impact on this. However, these aspects are controlled and there is no record of any complaints or claims regarding these issues.

During 2021 Gransolar Group has achieved a reduction of 2.831.160 Tn CO₂ eq/MWh. In this sense, Grupo Gransolar is fully aware of its Social Responsibility, and to promote the implementation of this culture within its organization, it has established internal objectives (KPIs) periodically supervised by the Board of Directors. We want to identify and promote those actions that allow us to be competitive and to generate positive impacts on society, as already mentioned by our President.

Sustainability:	2021R	2022	2023	2024	2025
• Planning and spreading a 360 Recycling procedure	0%	E22	GRS	PVH / Deeptrack	100%
Energy Efficiency					
• Tons of CO2 saved in the Group in 2021	2.831.160 Tn CO2 eq/MWh	2.859.471 Tn CO2 eq/MWh +1%	2.888.066 Tn CO2 eq/MWh +1%	2.916.946 Tn CO2 eq/MWh +1%	2.946.116 Tn CO2 eq/MWh +1%
• Energy consumption per ton of steel processed	17,58 kw-h/Tn	17,40 kw-h/Tn ↓ -1%/year	17,23 kw-h/Tn ↓ -1% /year	17,05 kw-h/Tn ↓ -1% /year	16,88 kw-h/Tn ↓ -1% /year

Other measures to improve our footprint

Measures
Use of natural light and rational use of lighting: awareness and sensibilization
Use illumination by areas
Installation of photosensitive cells
Installation of time switches
Installation of movement detectors
Renegotiation of contracted power
Buying efficient equipment with energy saving mode
Use of multiple power strips with switch and / or programmable plugs
Configure the energy saving mode of the equipment and manage its consumption

Gransolar carries out different actions with the aim of reducing greenhouse gas emissions:

- The use of electric vehicles to travel within the different factories.
- The rental fleet has hybrid and electrical vehicles.
- The Group's offices have printers with MyQ, which stores print requests and prints through a code. This action has meant a paper saving of 25%.
- The Headquarters car park has three electrical charging points, as an incentive for the purchase and use of electronic vehicles.
- The headquarters' building has lights with a motion detector.
- All headquarters lights are low consumption led bulbs.

The Gransolar Group maintains an environmental strategy based on the circular economy and responsible waste management (reuse, recovery and recycling of waste generated by the activity - offices, factories, or construction activities), with the firm purpose of a reduction of the possible negative impacts the activity could cause on the environment.

Glasses and other plastic containers have been removed, encouraging the use of bottles and other glass utensils. As well as promoting different recycling campaigns among the Group's staff, such as: Prescription glasses in good condition to donate

The Group has different operational controls for each of the centres for waste management, related, among others, to the management of hazardous and non-hazardous waste. Gransolar has various mitigation and control guidelines such as:

- Hazardous waste is not removed from the work / facility other than to be sent to a duly accredited Authorized Manager.
- The mixing of hazardous waste of a different nature is not allowed, and it will be mandatory to separate waste by type.
- The container and the waste dumping area must be marked on a mandatory basis.
- For waste of a hazardous nature, its storage deadline is 6 months, while for those of a non-hazardous nature the deadline will be a maximum of 2 years.
- In case of activities related to construction, waste management is the responsibility of the contractor and may be carried out in two ways, according to its nature and the volume generated:
 - In a properly equipped and signposted storage area, or in independent containers for each fraction.
 - Bulky waste (earth, rubble, ...) will be deposited directly on trucks for removal by an authorized manager and / or carrier.
 - The abandonment, dumping, burning or uncontrolled disposal of hazardous waste is expressly prohibited.

Some specific measures are the reuse of pallets, recycling of paper, cardboard and toner and recovery of waste.

Gransolar promotes various initiatives to combat food waste in construction camps. In this sense and considering that most of the works are carried out in locations far from urban centres, the Group's philosophy allows workers to take advantage of leftover food and take it with them for their personal consumption.

The greatest impact on biodiversity is identified during the construction of photovoltaic solar plants.

Regarding the effect on the vegetation near the activity carried out by Gransolar, the following measures are proposed:

- Removal of the topsoil layer for its collection, conservation, and subsequent reuse in the areas to be revegetated.
- Revegetation of the lands cleared immediately after the work, in the most suitable sowing and / or planting period for each species.
- Establishment of good environmental practices aimed at minimizing the probability of fires, according to:
 - Removal of bulky pruning and cleaning remains to prevent fire risks.
 - Preventive maintenance of machinery, as well as an effective use of it, avoiding the generation of sparks or flames.

On the other hand, the Group, depending on the project, establishes programs for the protection and conservation of wild fauna that is considered as the rescue, protection, and restoration of habitats of both flora and fauna, which may affect the development of its activities. To carry out these programs, the following activities presented below are carried out:

- Wildlife tracking and search activities are carried out prior to the start of site preparation activities, and during the period of operation of heavy machinery on site, as well as construction and assembly activities.
- And later, the activities of transport, relocation and release of fauna found during the search are carried out.

Principle 9: Encourage the development and diffusion of environmentally friendly technologies.

Gransolar Group with its own activity promotes the production of renewable energies since its main activity is the development and construction of photovoltaic parks. Gransolar's role endorsing these technologies is intricately linked to the mitigation of climate change and a reduction of the emissions of gases that cause the greenhouse effect.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

The Group has several Policies such as Criminal Compliance, the Code of Conduct that is reviewed regularly, the CSR Policy, with the Regulations for Investment in the Community and Corporate Volunteering, which reflect Grupo Gransolar's firm commitment to transparency, as and as can be deduced from the institutional declaration signed in the Board of Directors of December 2019, endorsed in the Councils of 2021.

Moreover, the Group's Code of Conduct is focused on guaranteeing the fulfilment of the values that rule Gransolar, with the objective of maintaining integrity within the organization. The Code demands everyone affected by these rules to show a fair and honest behaviour, which includes the ban of workers, contractors, or suppliers to give public officials any economic benefit under any pretext or circumstance.

Another measure established in the Code is that no employee in the Gransolar Group can offer, grant, request or accept, directly or indirectly, gifts or donations, favours, or compensations, or any of its nature, from any authorities or officials.

There is no record of any reports on cases of corruption through our reports channel in 2021 (or in 2020, neither in 2019).

Sustainable Development Goals

The Group's vision, in addition to providing economic value to their clients through the construction and management of solar photovoltaic installations, is to provide social and environmental value.

For this reason, the Group has a Corporate Social Responsibility Policy with the objective of maintaining a sustainable development growth, through one-time or permanent donations, solidarity as small as it may be, for an active and positive contribution to social development and the environment. Gransolar is committed to meet, in the following years, all 17 global goals, presented by world leaders in 2015.

During the years 2019 and 2020, the Group has achieved 13 of the 17 goals, and its purpose is to continue working on these during the following years. As evidence to this, is its continuous collaboration in various projects of different nature. Gransolar Group counts with a specific budget that is spent on Social Projects, as well as to contribute and help employees to do altruistic volunteering hours for different social causes.



SUSTAINABLE DEVELOPMENT GOALS



2021 Covid-19 actions

The Group's ability to adapt has been demonstrated since March 2019, when the COVID19 pandemic began, immediately implementing specific protocols that minimized the risk of contagion and provided its workers with a safe return to their offices, without harm neither the development of the company nor its customers and maintaining remarkably high quality and efficiency standards. From June 2020, after confinement, until September 2021, the Group has had a Work from Home percentage of more than 65% of the working day, for office staff. The construction staff never stopped attending to their fieldwork. From September 6, 2021, 100% of the workers returned to face-to-face work, maintaining a percentage of less than 30% of Remote Working.



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