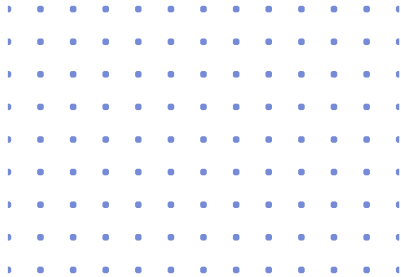




# Non-Financial Information Statement

20  
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# 1. Basic information



# 1. Basic information

The information contained herein refers to Law 11/2018 of 28 December, 2018 and Royal Decree-Law 18/2017 on the transposition of the Non-Financial Reporting Directive and forms part of the Management Report accompanying the Consolidated Annual Financial Statements of Global DOMINION Access, S.A. (hereinafter DOMINION) for financial year 2021.

In compliance with the aforementioned Law 11/2018, this report is the single, consolidated financial statement at both a group level and also at the level of those subsidiaries that, individually, in accordance with Law, meet the requirements that oblige them to report. To this end, for the purposes of this document, the “company” makes reference to the DOMINION group.

## Company information

### Company details

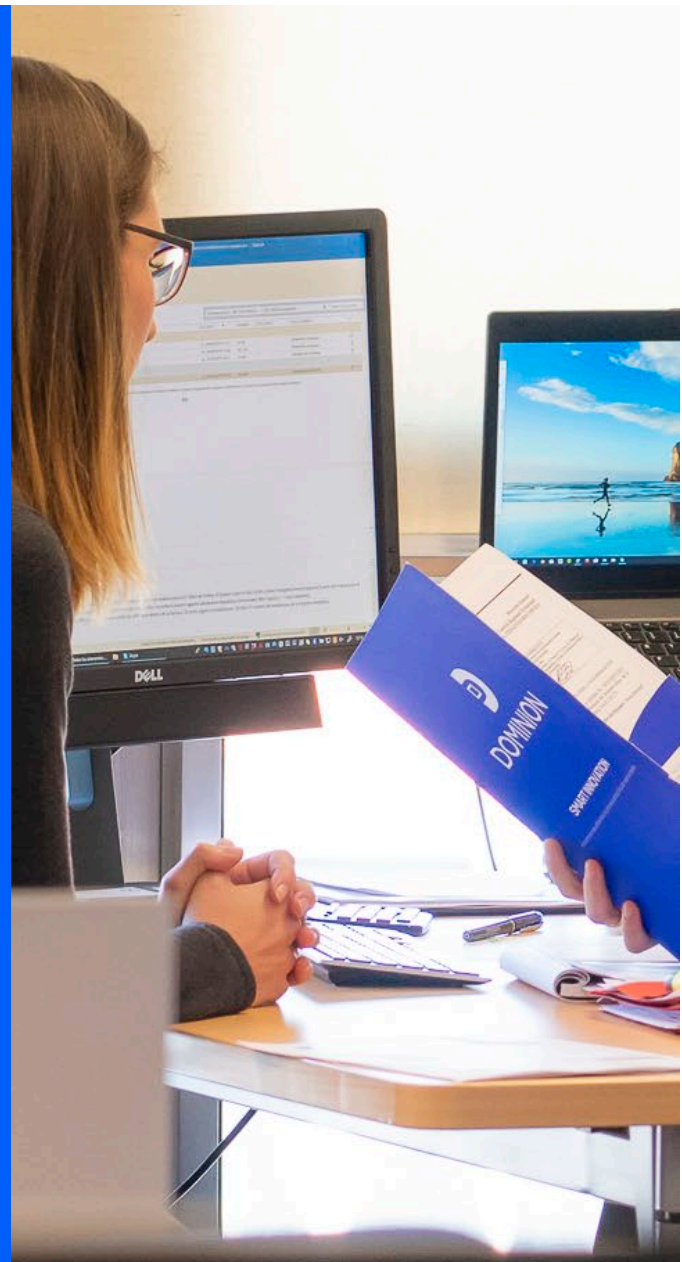
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Name	Global DOMINION Access S.A.
Address	Cl. Ibáñez de Bilbao, 28. Bilbao
Telephone no.	(+34) 944 793 787
Website	www.DOMINION-global.com
Share capital	20,087,722.125 euros
Number of Shares	160,701,777
Nominal	0.125 euros
Activity	Provision of services and solutions to other companies in a wide range of sectors. Also, the provision of services to individuals. DOMINION combines knowledge, technology and innovation to ensure its customer's processes become more efficient and sustainable.
Listed	Spanish Continuous Market.
Size of the company	In 2021 revenue totalled EUR 1,119M, as opposed to EUR 1,029M in 2020. Details of the number of employees working for DOMINION are provided in section 8 hereof.



## 2. Business Model

- 2.1. Activity and Corporate Environment
- 2.2. Markets of Operations
- 2.3. Goals and Strategy
- 2.4. Main factors and trends that could affect future progress
  - 2.4.1. Effect of COVID-19





## 2.1. Activity and Corporate Environment

DOMINION started out in 1999 in the telecommunications sector, an area characterised by deflation, high efficiency requirements (greater speed, greater quantity, cheaper) and considerable pressure on operating costs. With a track record of more than 20 years and a stable and committed team, the Company has been able to overcome a number of crises and to develop extensive specific knowledge in a number of sectors.

Today, Dominion is the global supplier of multi-technology services and solutions and specialist engineering. The company's core competence consists in offering customers solutions for the increased efficiency of their business processes, with sustainability playing a vital factor in this improved efficiency, either by undertaking the complete management of the process or through the application of specialist engineering solutions. The company carries out its operations by means of these main categories:



## B2B

### Multitechnical Services

Value-added multitechnical services in which the Company offers customers the management of a complete production process by the recurrent outsourcing of the customer service. In this segment, three different sub-segments are prominent:

- Services in the telecommunications and technology area.
- Industrial services, including, activities related to sustainability, energy efficiency, industrial heat management.
- Electromechanical and others related with information technology.
- Commercial services in which the customer is the end consumer, or else related to logistics, wholesale or distribution activities required to make the sale possible.



## B2B 360° Solutions

In this segment, "one-off" projects are performed in order to facilitate solutions or improve specific processes for customers.

The projects for solutions can be conducted in a wide range of sectors and geographical areas, the key and differentiating factor being the capacity to manage a complete 360° project and a focus on sustainability. DOMINION manages its customers' projects and everything that this entails, holistically; technological design, engineering, equipment procurement, execution, financing, subsequent maintenance, etc.



## B2C

This segment covers DOMINION's efforts to extend its 360° supplier philosophy to households.

It offers two fundamental services, which complement and support each other.

On the one hand, the PhoneHouse store chain, leader in the telephony and electricity retail market, with a unique omni-channel and multi-brand presence, and, also, the various in-house telephony and electricity services, which will be supplemented with new initiatives.

With these, DOMINION is able to provide its end customers with a varied offer, aimed towards creating long-lasting trust.



In a field defined by the rate of change and disruption in business models, DOMINION stands out for its technological dynamism, i.e. its ability to master all types of technology and apply the most suitable one at any given time to streamline its customers' production processes, with sustainability being a core aspect of this efficiency. Amongst all the technologies used, digitalization is unquestionably the core technology. DOMINION applies digitisation to its customers' production business processes, relying on sensors and algorithms to transform these processes and streamlining them.

For most of the services and solutions it provides to its customers, DOMINION uses its main brand "DOMINION", although, in specific cases, different brands are used, exclusively for commercial reasons and typically in the B2C field. The key additional brands are: Phone House, Alterna, Rentik, Tiendas Conexión and Smart House.





## 2.2. Markets of Operations

DOMINION operates in many countries, giving it a major strategic advantage in terms of its customers and it also provides extremely broad diversification, which significantly limits geographical risks by avoiding a high degree of concentration.

The way in which it maintains its presence is different in each country and changes over time. DOMINION has no manufacturing facilities which are replicated in each country, but rather, in each case, offers a different range of services and solutions, based on the customer's requirements.

In the case of multi-technological services for the telecommunications and electricity sector, this activity is conducted in the company's own offices and in third party facilities, which can be private homes (installations or management of malfunctions) or customer facilities, with the support of a warehouse for the replacement of parts, with materials that are the customer's property in many cases. Geographically, this activity is currently conducted in Spain and Latin America.

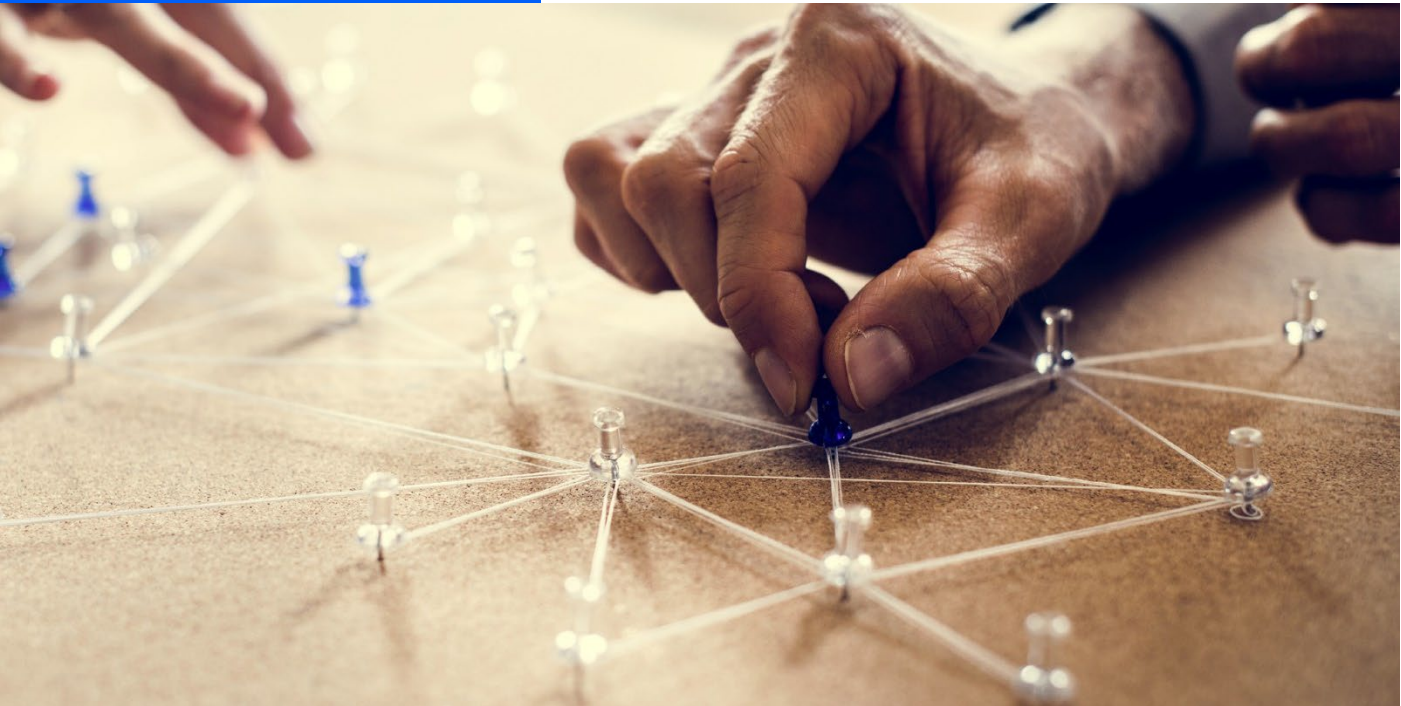
Also, with regards to industrial services, this activity is typically carried out at customer facilities, with the different services included in each DOMINION offer, sometimes provided with the support of a warehouse for any necessary spare parts or materials. Geographically, these services are provided in Europe, Latin America, the United States, the Persian Gulf and Australia.

In the case of B2C services, which cover a multi-channel concept, activities are provided in the company's own offices and stores, as well as via the internet, call centres, franchised stores and third parties, assisted through distribution via warehouses. This activity is currently only performed in Spain.

With regards to specialist engineering and solutions, the situation is very different. In the case of projects, these may be executed in practically any country in the world, according to opportunity and the customer's needs. In these cases, DOMINION provides the minimum infrastructure required to execute the project which mainly consists of offices, dismantling infrastructure once the project has been completed. Permanent offices are only established in those countries with significant repeatability or coincidence of Services, as is the case of Europe, USA and some Latin American countries. In the case of tall metal structures, DOMINION has workshops in Slovakia and Denmark, where these structures are designed and manufactured and then assembled on site.

Section 8 lists the countries where DOMINION had staff at the end of 2021. This is a reasonable and verifiable criterion by which to understand DOMINION's presence, although based on other criteria, as specified above, its presence could be even higher.





## 2.3. Goals and Strategy

### Mission

DOMINION's mission is to help its customers streamline their production processes, combining knowledge, technology and innovation, either by outsourcing or by applying specialist engineering and solutions.

## Values



Continuous improvement of in-house processes and those of the company's customers in order help achieve a management that is progressively more



Respect for the environment, working to minimize any impact. Maintain a positive footprint and support a circular economy.



Transparency, safety and quality in all their work. Commitment to governance compliant with the strictest standards.



Encouraging the Responsibility and integrity of individuals in their commitment to work well done.



Promotion of the participation, involvement and teamwork in a pleasant and safe environment.



Respect for others, for their capacity for initiative, creativity and innovation. Promote equality and take action against all forms of discrimination.

## DOMINION's Culture

DOMINION strives to be:



A benchmark as regards to quality, technology, management, innovation, design and services.



Outstanding in terms of management and governance.



A paradigm of a sustainable company, both in terms of commitment to people and the environment, as well as a focus on developing customers' environment sustainability and creating value.



Entrepreneurship: operational decentralisation that promotes autonomy, responsibility and flexibility.

## Strategy

DOMINION achieves its business goals by implementing a strategy combines organic growth, a mergers and acquisitions policy and increasing the profitability of its activities.

DOMINION presented a new Strategy Plan in 2019. One of the main reasons for this was the need to set out new goals upon completion of the previous Plan, published when the company was listed on the stock exchange in 2016, together with significant changes in the scope and expansion of activities undertaken during those years. In addition to this, there is a growing realisation that the framework that DOMINION operates in, disruption is becoming an increasingly variable, fast and ubiquitous reality, making it advisable to constantly revise DOMINION's Model and its goals.

The new plan was revised as a result of the COVID-19 pandemic and extended for an additional year (2019-2023), as explained in section 2.5.1. Under this new Plan, the Company expects to organically grow at a rate of more than 5% per year in terms of sales and more than 10% in EBITA. As a result, the Company should double its net income in the timeframe of this Plan and allocate a dividend to its shareholders that is equivalent to one third of its net income. The company also plans to continue its leading role in the sector's concentration process in the various sectors it operates in.

These goals call for a strong balance sheet as well as a strong financial standing to give the company an advantage when bidding for large-scale projects or when taking over companies.

To implement this Plan, the Company will focus its efforts on five main aspects and a specific strategy to develop sustainability as a key element in defining the type of company that DOMINION wants to be:

### **Strategies Guidelines**

-

#### **Value Proposals**

DOMINION must be able to provide innovative proposals that create barriers and allow the Company to achieve higher profit margins

In the case of B2C, the Company is convinced that we are currently witnessing a complete trade revolution, with emphasis on "customer ownership" constantly gaining ground. Accordingly, the Company is directing its efforts towards the integration of all household services, thereby providing a unique proposal rooted in its strengths: a large customer base, an across-the-board network, the capacity to develop platforms and to combine its own and third party services and brands.

With regard to B2B services, DOMINION will extend its "Tier 1" proposal, focusing on improving the efficiency of production processes by combining the following features: selective digitalization based on extensive experience in the relevant processes, a "one stop shop" offer which innovatively integrates different services that are typically provided separately, technological independence and an emphasis on service contract diversification.

Also, with regard to solutions, DOMINION will improve the "360" quality of its offer, perfecting its strategy and expanding into new sectors.

#### **Standing**

The company will concentrate on optimising its position in the value chain so as to improve its relationship with its customers that will allow it to drive efficiency, ensuring that projects are achieved properly and also to ensure both their recurrence and higher margins.

In order to do so, it will permanently review the value chains it is involved in to try and pinpoint the best role to take on, particularly bearing in mind the possibilities that digital transformation presents as a tool for efficiency generation and disruption.

#### **Diversification**

DOMINION plans to use further diversification as a critical tool, not only to create opportunities, but also to manage risks. This plan will consist of two vectors. Firstly, a geographical approach, focusing on expanding activities to geographical areas where current presence is limited to a small number of activities, thereby creating important economies of scale and increasing the company's focus on specific areas, such as Asia and Africa. Secondly, expanding its focus on the three areas of activity it

operates in most of all: T&T, Industry and Energy, diversifying its offer horizontally and vertically, as the opportunities arise.



## Digitisation

Aside from focusing on digitisation as a means of transforming the processes of its customers and, particularly, of modifying the value chains and creating efficiency, as explained in the points above, DOMINION will also further its focus on internal digitisation, thereby improving and developing new, highly efficient operation control platforms, thereby consolidating the authentic "DOMINION brand". Other developments include DOMINION's focus on developing the "platform of platforms" concept via which Dominion can provide its customers not only with its own capacities but also with those of its suppliers in an integrated and modular manner (in SaaS format).

## Organisation

The strategy plan includes development of the accompanying organisational structure. The Company must have an extremely flexible structure, capable not only of carrying out planned actions, but also of adapting to a constantly changing world, a world that demands immediate solutions to issues and situations that have not yet been addressed, as has been the case with COVID-19. In turn, it must also ensure the continuity of its 4Ds model: digitisation, diversification, decentralisation and financial discipline - all key aspects which define DOMINION and which must apply to everyone in the organisation.

Lastly, the company does not neglect ethical and compliance and governance issues, which are covered by a strict Code of Conduct and a set of specific policies designed to make sure the company carries out its activities responsibly, in compliance with the standards and good practices it is specifically bound to.



## The Strategy Plan and Sustainability

-

In addition, the Strategy Plan sets out a specific sustainability strategy, as a key aspect of the type of company it is and aspires to be. This needs to be constantly revised so as to adapt to a changing reality that also affects the various stakeholders it works with, on whom it focuses in order to establish its priorities.

This sustainability strategy is developed in section 5, but it should be pointed out that it not only considers factors to minimise negative effects, but, in relation to the challenges of climate change, it is particularly active in terms of business with a clear focus on integrating sustainability in its services and solutions offer, making it part of the added value Dominion provides its customers and anticipating its growing participation in sectors and activities with a beneficial effect, such as those associated with renewable energy and the circular economy.

This Strategy also lays down the type of company that DOMINION strives to be for its employees and sets out the main principles regarding the company's relationship with the community, placing emphasis on educational development as the main pillar of social action, although this is also supported by participation in sectors of growing social interest.



## 2.4. Main factors and trends that could affect future progress

Uncertainty is an inherent condition of the business world. What has changed and what makes this moment different is the rate and extent of change experienced by all the different sectors.

These changes are brought about by the widespread integration of digitisation (the intelligent combination of physical and digital worlds), rendered possible by combining three different factors: increased data availability, faster computing and algorithm development. This has resulted in multiple transformative technologies and specific applications (Artificial Intelligence, IoT, Blockchain,...).



This has all lead to a genuine business model revolution in pursuit of efficiency. The crises we have experienced this millennium, such as in 2008, an especially 2020, have done nothing but serve as a catalyst for this process.

These technological and business model changes are accompanied by demographic and geostrategic changes, which encourage and reinforce them. On the one hand there are new types of consumers and workers, who have different digital skills and consume in different ways, and on the other, the geostrategic focus of world development is changing and clearly moving towards Asia, where most of the world's population is based, and which has now fully embraced the digital wave.

Dominion was born and has evolved in a digital transformation environment. It sees disruption as an opportunity and devises its Strategy Plan to take full advantage of the opportunities it will bring. Accordingly, looking beyond short-term situations, it is safe to say that the Company will benefit from changes that will continue to affect all sectors. Another important factor to consider when analysing the risks which affect DOMINION is the company's strong focus on diversification, interpreted in a number of different ways, as indicated in the following table:



This wide diversification, which is one of the keys that defines the Dominion model, makes it difficult to pinpoint specific factors or trends that have a significant impact on the company's progress.



#### Services and Solutions

There are different margins, working capital investment requirements, staff performance and, most importantly, performance in the economic cycle.



#### Geographical

Present in almost 40 countries, at different stages of economic development and affected in very different ways by geopolitical and economic events.



#### Customers

With more than 1,000 B2B customers, with none of these customers having accounted for more than 10% of the company's global sales for many years this has given the company both



#### Sectorial

With a wide range of different areas of activity within the scope of the three fields of activity that the company works in: T&T, Industry and Energy.



#### B2B/B2C

With relevant exposure to the B2C sector, performing in a very different way than in the B2B field and also creating many new business opportunities within the framework of B2B2C trends.

The third and final one is the climate change and its effect on the company and on DOMINION's customers. As detailed in sections 5 and 7, DOMINION takes account of the risks and opportunities arising from climate change in its risk assessment and has developed a specific Climate Change Strategy, which not only focuses on reducing the risks, but also strives to take advantage of the opportunities.

### **2.4.1. Effect of COVID-19**

The global pandemic that started in 2020, causing devastating health, economic and social repercussions, continued in 2021, albeit in a different way. Throughout the year successive waves of infection have arisen as a result of the appearance and spread of new strains, but as a result of both the effect of increased vaccination, lower severity of these new variants and the fact that the healthcare system was better prepared, death rates and hospital overcrowding have not been as high as in 2020.

The economy has been affected by these fluctuations, which have been accompanied by the effects of logistical problems and microchip shortages, both related to the pandemic, as well as a temporary increase in the price of natural gas. However, this did not stop the year as a whole from enjoying a marked economic recovery, although it is important to point out that this recovery has been irregular.

#### **The Effect on DOMINION**

In the case of DOMINION, this recovery has been evident in the B2B sector. With a few exceptions, it can be stated that the various units of DOMINION have regained complete normality in terms of their activities and have been able to take advantage of the upturn in their customers' activities.

By contrast, with regards to B2C, this has not recovered fully, since the flow of customers to the main sales channels serving this segment has been affected by the health precautions and containment measures imposed by Public Administrations in response to the different waves of the pandemic. However, it should be pointed out that the results obtained when the situation was at its most normal are encouraging and show the considerable efforts made in terms of adjustment, investment and reorganization over the last two years.

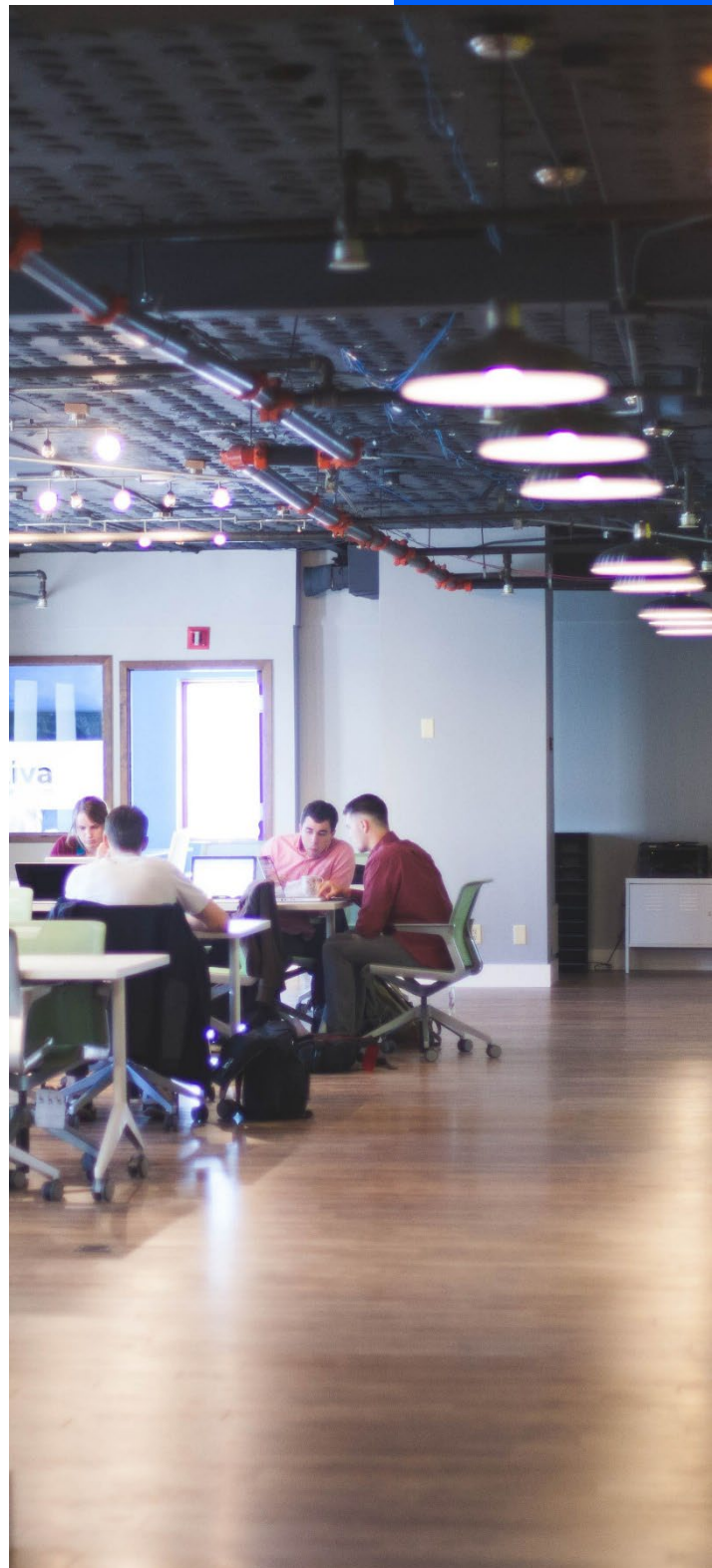
See note 1 of the consolidated annual financial statements for further details on the effect of COVID-19 on DOMINION's activities

Overall, it is safe to say that the company has successfully weathered the effects of the pandemic, something which has validated the fact that the model it follows offers the best guarantee to continue making progress. It is based on four aspects:

- **Financial discipline**, which, under these circumstances, has put DOMINION in an optimum cash position.
- **Diversification**, whereby profits (loss) do not depend on the decisions of a single country, customer or sector.
- **Decentralisation**, which has enabled its companies to adapt to the different local circumstances, with an adjusted central structure and a flexible cost structure.
- **Digitisation**, which has solved DOMINION team employee mobility restrictions in a record time as they were already familiar with digital platforms and tools they used on a daily basis. DOMINION strengthened its safety policies and systems thereby facilitating remote communication between teams and also between teams and customers and suppliers.

Accordingly, DOMINION announced that the Strategy Plan for the Group for the coming years will remain the same, and that 2020 will constitute a temporary gap, meaning that the Plan will be extended an extra year so as to achieve the goals.

In terms of sustainability, the effects of the pandemic, which are explained in detail in sections 7 and 8 of this document, were consistent with the effects experienced in DOMINION's different business activities.



Accordingly, direct and indirect CO2 emissions have been affected once again this year for two main reasons:

- Closures of stores associated with B2C activity (Scope 2).
- The problems involved in travelling medium and long distances (Scope 3).

In terms of environmental factors, the effects have been either extremely insignificant or non-existent. This is down to the fact that all related activities have not experienced an impact.

In terms of people, DOMINION maintained its prevention policy established in 2020, adapting it to the course of the pandemic and to the regulations issued by public administrations whenever applicable. Other measures included reducing trips and events, promoting collaboration tools, upholding action and hygiene procedures, providing the team with the necessary PPE, the use of digital recruiting methods, online training, adapting facilities and monitoring cases.

Also, in relation to those activities particularly affected by the pandemic, Dominion has maintained, albeit to a lesser extent, temporary redundancy measures which have been scrupulously adapted to the regulations in force in each country.



# 3.

## Risk and Materiality Management

3.1. Risk Identification. Materiality

3.2. Risk management





## 3.1. Risk Identification. Materiality

### Identification of risks

Risk identification and management is clearly structured at Dominion, following the framework set out in its Risk Management Policy.

The identification process covers risks identified from various different channels:

- From the strategic analysis performed by the company's main management bodies, in which a wide range of risks arise, both existing and new, linked to business, resources and aspects related to sustainability.
- From the analysis conducted regarding criminal defence projects undertaken by the company, with the assistance of external experts.
- From the specific materiality conducted by the company on a regular basis, also assisted by external experts in this case, and focused on identifying the most relevant aspects for the various interest groups it interacts with.
- Also, following ESMA's recommendations, DOMINION performs specific assessments of climate change effects, as explained in section 7. These analyse the effects of climate change on DOMINION, as well as the effects of DOMINION's activities on other groups. The results of this analysis contribute to the Sustainability Strategy.

## Materiality Analysis

In order to conduct this analysis, amongst other points, account is taken of the particular characteristics of the Company and its business model, the different services and solutions offered, the different sectors in which it operates and its impact on the economic, social, environmental and governance contexts. Specifically, interviews are conducted with the officers in charge of the main business and corporate departments.

The conclusions reached in the analysis, as explained in the different points of this analysis, place Dominion's materiality in the area of human capital management, sustainability and regulatory compliance.

### Criteria used in the materiality analysis

**For the materiality matrix, two axes were taken into account:**

- **Importance to the business:**  
**Assessment based on the appearance of matters in the annual reports and on the websites of the peer group selected and in the media.**
- **Importance for the company**  
**Assessment from different departments of Dominion based on the interviews conducted.**

## Analysed aspects

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<b>ECONOMIC AND SOCIAL CONTEXT</b>	<ul style="list-style-type: none"> <li>• Advances of the welfare state in developing countries</li> <li>• Evolution of public expenditure in developed countries</li> <li>• Investment in infrastructures</li> <li>• Investment in Public Healthcare</li> <li>• Recovery of economies</li> </ul>
<b>SECTORAL CONTEXT</b>	<ul style="list-style-type: none"> <li>• Volatility of gas, oil and electricity prices</li> <li>• Overcapacity of the industrial sector</li> <li>• 4.0 industry / Digital revolution</li> <li>• Concentration processes in different sectors</li> </ul>
<b>REGULATIONS</b>	<ul style="list-style-type: none"> <li>• Regulatory changes</li> <li>• Cybersecurity and Data protection</li> <li>• Taxation</li> </ul>
<b>RELATIONSHIPS WITH CUSTOMERS</b>	<ul style="list-style-type: none"> <li>• Customer categorization</li> <li>• Dependence on important customers / partners</li> <li>• Customer relations in B2C divisions</li> </ul>
<b>INVESTORS</b>	<ul style="list-style-type: none"> <li>• Investor relations</li> </ul>

## Aspects analysed in the environmental context

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<b>DIRECT ENVIRONMENTAL EFFECT</b>	<ul style="list-style-type: none"> <li>• Business related emissions</li> <li>• Indirect emissions</li> <li>• Use of renewable energies</li> <li>• Water, raw materials and energy consumption</li> <li>• Waste Management</li> </ul>
<b>CUSTOMER ENVIRONMENTAL EFFECT</b>	<ul style="list-style-type: none"> <li>• Customer environmental impact management</li> <li>• Innovation in energy improvements and water consumption of customers</li> </ul>



## Aspects analysed in the social and Human Rights Context

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### RELATIONSHIPS WITH PERSONNEL

- Attracting and retaining talent
- Training
- Diversity
- Remuneration
- Subcontractors
- Franchises

### COMMUNITY

- Developed and/or managed infrastructures
- Volunteer work and cooperation
- Social action projects

### HEALTH AND SAFETY

- DOMINION team health and safety
- Suppliers and subcontractors health and safety

### SUPPLIERS

- Support for locally-based suppliers
- Supply-chain Management

## Aspects analysed in the governance context

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### CORPORATE GOVERNANCE

- Structure of corporate governance
- Relations with majority shareholders
- Corporate risk management
- Code of conduct
- Bribery and corruption
- Reporting

## Explanation of the main risks

RISK	EXPLANATION
<b>ATTRACTING AND RETAINING TALENT</b>	<ul style="list-style-type: none"> <li>Having the right people in place to bring the company's goals to fruition.</li> </ul>
<b>DIVERSITY</b>	<ul style="list-style-type: none"> <li>Equal opportunities at all company levels</li> </ul>
<b>SUSTAINABILITY</b>	<ul style="list-style-type: none"> <li>Maintaining sufficient focus on all key objectives identified in the Sustainability Strategy.</li> </ul>
<b>CYBERSECURITY AND DATA PROTECTION</b>	<ul style="list-style-type: none"> <li>Taking appropriate measures to guarantee data protection and system security</li> </ul>
<b>PREVENTING BRIBERY AND CORRUPTION</b>	<ul style="list-style-type: none"> <li>Take suitable measures to eliminate compromising situations and mitigate the risk of improper actions.</li> </ul>
<b>MAKING THE MOST OF NEW BUSINESS OPPORTUNITIES</b>	<ul style="list-style-type: none"> <li>Having an organisation that can take appropriate advantage of the opportunities arising from disrupted business models and society's growing demand for sustainability</li> </ul>

## 3.2. Risk management

Following its risk policy and based on the results of the risk identification process from the aforementioned channels, DOMINION establishes a strategic risk matrix. This is constantly kept up to date and is used to identify all the company's tolerance levels and mitigation and elimination goals, assigning responsibilities and closely monitoring them closely. All the factors described in this section 3 form a part of DOMINION's risk management system. Section E of the IAGC expands on the information regarding DOMINION's risk management system.

This system includes performing sensitivity analyses (interest rate, exchange rate, currency, tax rates) and stress tests in relation to intangible assets, in particular goodwill.

The management of the various risks is the responsibility of different people at DOMINION, both on a corporate and operational basis, but there is also a corporate unit specifically responsible for coordinating the different system processes. The person responsible for this unit reports to the Board of Directors, through the Audit and Control Committee, providing them regular reports, which are also presented to the Management Committee. As explained in section 4, different members of this Committee have specific risk management experience and skills.



## 4. Corporate governance





## 4. Corporate Governance

Dominion is a consolidated group of companies formed by a group of subsidiaries coming under the parent company, Global Dominion Access, S.A., the latter being listed on the Spanish securities market. The Annual Consolidated Financial Statements appropriately identify the different subsidiaries and the relationship between them.

Dominion has a corporate governance system based on applicable law and international standards, designed to ensure that the company is managed in the best interest of its shareholders, including retail shareholders, and other relevant stakeholders, by means of an appropriate system of balance sheets and audits that allows the Board of Directors to exercise effective control.

Transparency and efficiency are the hallmarks of a system that inspires confidence, a system that is directed at striking a balance between the demands and needs of the different stakeholders. The Company considers it a priority to implement the principles of corporate governance, not only to boost the confidence of investors and other stakeholders, as has been explained, but also to improve financial profitability and to maintain sustained growth over time.

Specifically, and as indicated in the Annual Corporate Governance Report (I.A.G.C) and the Annual Directors' Remuneration Report (I.R.C), which the company publishes together with its Financial Statements, Dominion constantly seeks to adapt its governance and adopt all the recommendations set out in the Code of Good Governance for Listed Companies.

Point A of the ACGR provides details of the ownership structure, comprising a wide range of shareholders, with no shareholder controlling the Company and with an estimated floating capital of 55%. Dominion holds an Annual General Meeting of shareholders, based on the provisions of the Capital Companies Act (LSC), allowing remote attendance, as a way to encourage the participation of its shareholders.

The Company's principal governing bodies are the General Meeting of Shareholders, the Board of Directors and the Management Committee. There is no Executive Committee in DOMINION.

As specified in the ACGR DOMINION is managed by a 10-member Board of Directors. Consistent with its commitment to diversity, DOMINION has set itself the target of 40% female representation on the Board of Directors (see KPIs here). This percentage was 20% at the end of 2021).

Two members are executive directors, five are independent directors, two are proprietary directors and two are categorised as "other external" directors. The chairman is non-executive. In line with good governance recommendations, the Board meets regularly (six times), conducts regular assessments of its performance, relying on external experts, and limits the number of members' terms of office. It also places particular emphasis on ensuring high attendance by its members, making remote access available to them.

The members of the Board of Directors, in particular the independent members, are selected on the basis of their knowledge, skills and experience in DOMINION's core business, accounting and taxation, compliance with regulations and sustainability. Their [CVs](#) can be consulted [here](#).

The company regularly discloses information related to remuneration of its directors and the CEO (Board Remuneration Report), their shareholding in the company's capital, as well as other shareholders with a shareholding of more than 5€.

DOMINION shares are single shares, in the sense that each share carries only one vote.

In exercising its duties, the Board of Directors is supported by three committees: Audit and Compliance Committee, Appointments and Remuneration Committee and Sustainability Committee. Its duties and structure are fully described in the ACGR and follow the recommendations of good governance with regard its structure, chaired and with a majority of independent members.

The Management Committee is responsible for ensuring that the strategy established by the Board of Directors is transferred to DOMINION's daily activity and that this strategy plays a key part in DOMINION's decentralised management model.

At 31 December, 2021 the Management Committee consisted of the CEO, five business managers (one of whom also serves as General Manager) and two managers representing the corporate areas (Human Resources and Finance & Legal).

On the above-mentioned date, the Management Committee team comprised 25% women.

Reporting to the business directors are different business units, all are managed with business philosophy, that is, with autonomy and accountability for their income statement and for the net working capital.

DOMINION's governance framework is supplemented by its corporate policies, all of which are continuously updated, as explained in section 3 of this document.

# 5. KPIs and Sustainability Strategy

5.1. Sustainability Strategy

5.2. Key indicators: KPIs





## 5.1. Sustainability Strategy

### Sustainability Strategy

DOMINION's Strategy Plan is fully aware of the importance of Sustainability in shaping the company that DOMINION is and, above all, the company it wants to be in the future.



This awareness stems from the risk analysis referred to above, particularly those related to climate change, and it has been the basis for the design of a specific Sustainability Strategy, aimed towards allowing DOMINION to set out and achieve ambitious and specific goals that affect all its activities, all its personnel and also the stakeholders it interacts with.

This Strategy consists of a basic foundation around which DOMINION develops three main lines of action, which form part of DOMINION's DNA: to be, to do and to communicate.

The basic foundation is based on DOMINION's Sustainability Policy in which the company sets out its general principles: all its corporate activities and businesses are carried out while fostering the sustainable creation of value for shareholders and taking into account the other Stakeholders related to its business activities, equitably compensating all groups, promoting the values of sustainability, integration and dynamism.

In particular, DOMINION intends to work towards achieving the Sustainable Development Goals (SDGs), related to the [Global Compact](#), rejecting actions that undermine or impede them. To this end, one of the first actions taken was to join the Global Compact as a signatory.

3 lines of action

This Strategy consists of three basic aspects:

BE

Goals and KPIs				
PRINCIPALES KPIs		2020	2021	2025
MEJORAMIENTO	Reducción de la intensidad de la huella de carbono (alcances 1 y 2)**	11,8	8,75	-30%
MEJORAMIENTO	Compensación huella carbono *	100%	100%	100%
DIVERSIDAD Y TALENTO	Equidad salarial para el conjunto de DOMINION**	1,06	1,03	<1
DIVERSIDAD Y TALENTO	Mejora del ratio mujer/capital del management sobre el ratio mujer/capital de la plantilla**	<40%	42%	Superior a 45%
DIVERSIDAD Y TALENTO	Proyectos de conciliación en diversidad***	1	5	>10 anuales
SEGURIDAD LABORAL	Reducción del índice de frecuencia	12,9	11,2	<7
CADENA DE SUMINISTROS	% proveedores relevantes homologados bajo criterios de sostenibilidad	20%	30%	100%
GOBERNANZA Y GESTIÓN ÉTICA	% de mujeres en el Consejo	17%	20%	40%
GOBERNANZA Y GESTIÓN ÉTICA	% equipo directivo (directores y gerentes) formado en sostenibilidad y en prevención del riesgo de corrupción	40%	50%	100%
GOBERNANZA Y GESTIÓN ÉTICA	% Comité Dirección con objetivos vinculados a sostenibilidad	0%	0%	100%
GOBERNANZA Y GESTIÓN ÉTICA	% de consejeros independientes	33%	50%	50%

DO

% sustainable activity

Taxonomy

COMMUNICATE

Certificates

Reporting to stakeholders

- Be (this relates to DOMINION's determination to be an increasingly sustainable company, measuring and reducing its effects).
- Do (this relates to DOMINION's endeavours to adapt its activities to take better advantage of opportunities arising from climate change).
- Communicate (the sustainability strategy responds to the need for information relating to our stakeholders).

### Being Sustainable:

The path towards becoming a sustainable company, in line with DOMINION's own goals and as is increasingly called for by our stakeholders, is a long process of continuous improvement. At the same time, DOMINION is extending its scope for identifying and measuring its effects and also setting itself goals for improvement, as explained below.

- Also, with regards to the **environment** DOMINION places emphasis on preventing and controlling contamination (carbon footprint and other gases), reduction of and adapting to climate change and transition to a circular economy.
- With regards to **talent management and diversity**, DOMINION places emphasis on having an increasingly diverse workforce, with an egalitarian remuneration scheme, where there is no room for discrimination, in a safe and healthy working environment and where digitisation plays an important role. This is an appealing environment for attracting and keeping talent, which must include the necessary development tools.
- With regards to **Corporate Governance** DOMINION places emphasis on adopting best practices in this area, ensuring that ethics and sustainability govern all of its actions, having a representative management body and contributing towards developing society by complying with all of its tax obligations.
- **Occupation Safety** is critical for DOMINION, both because how important protecting its employees is to the company and because of the high standards demanded by its customers. Accordingly, DOMINION sets itself continuous improvement goals in this area.
- Finally, best practices with regards to sustainability call for companies to apply their commitment to their own **supply chain**, supply chain, demanding similar conduct, thereby increasing the scope of the improvement process. To this regard, DOMINION is making changes to its certification, selection and purchasing processes, incorporating requirements to this effect.

DOMINION's commitment to achieving these goals is reflected in a series of key indicators or KPIs, which are described below.

Also, these commitments, the measured scopes and the measures taken to alleviate or remedy them are fully in line with the Sustainable Development Goals the company adopted as part its Board of Directors decision to sign the United Nations Global Compact, mentioned above. DOMINION prepares an annual SDG progress document, based on the actions described in this document.

DOMINION globally manages the impacts resulting from its business, based on the principles contained in its Sustainability policy. This policy not only establishes the basic principles of business, but also the systems for monitoring performance, the associated risks and the channels for communication, participation and dialogue with stakeholders. The Auditing and Compliance Committee is responsible for reviewing non-financial information, delegating the day-to-day management to the Head of Compliance, who coordinates his work with the Corporate Director of Human Resources and the head of Investor Relations. The Sustainability Committee assists the Auditing and Compliance Committee in this matter and monitors the implementation of the Sustainability Policy and Strategy.

As part of the Materiality Analysis mentioned in point 3 hereof, DOMINION has constantly assessed what its relationship is and should be with the different stakeholders, especially with regards to sustainability. A total of nine stakeholders have been identified, understanding as such those individuals and groups that have an influence on the achievement of the Company's corporate objectives or are affected by its activities. The Company aims to establish a relationship of trust and mutual collaboration with each stakeholder, in order to meet their expectations and protect their reputation.

To compare the measured effects, DOMINION incorporates the "Global Reporting Initiative" standards, adapting them to the real circumstances of its business model and activity.

### **Creating Sustainability**

DOMINION's strategy considers sustainability to be a factor that will radically change the world we live in and the way things are carried out, and aims to capitalise on the opportunities that arise from this. DOMINION's current sustainability-related activities already account for a significant proportion of its business, but the strategy is to take this further, not only by increasing this percentage, but also by encouraging DOMINION units to constantly analyse how their services and solutions can help their customers to become more sustainable and thus more efficient.

This includes extensive training initiatives, supplementing those already provided in the "Be" area, as well as the complete revision of the communication material for our activities.

In this context, it should be noted that process by which to respond to the information requirements of EU Taxonomy, in terms of identifying eligible activities as per the published appendices, was conducted over the course of 2021. The results of this analysis are at 7.5.

**Communicate:**

Similar to financial information, different stakeholders (customers, investors, companies, public administrations, etc.) require details of our strategy, goals and sustainability indicators, in order to assess DOMINION's commitment in this area.

For this reason, part of DOMINION's strategy consists of making an effort to report and disclose information in different ways:

- On the one hand, by being increasingly active in responding to the different sustainability certificate requirements requested by these stakeholders, both internally, requested directly by a customer or by an investor, specialists in sustainability, as well as those managed by third party certifying bodies.
- Secondly, by providing additional information to that published by the company itself, particularly by means of this document, the Financial Reporting Statement, which DOMINION publishes annually pursuant to the guidelines published by the CNMV (the Spanish stock market regulator). This document is verified by an external auditor. This document provides a comprehensive and structured description of how DOMINION responds to the mandate received from the Board, described in the Strategy above, to make sustainability a priority in its strategy and operations.
- On its website, DOMINION also includes a dedicated section on Sustainability, providing extensive details on its approach to each component (environment, society, occupational safety, supply chain, company and governance).



## 5.2. Key indicators: KPIs

### “Be” indicators:

The goals set out in the first point of DOMINION's Sustainability Strategy, “Be”, consist of a series of indicators that DOMINION has established as KPIs.



	MAIN KPIs	2020	2021	2025
ENVIRONMENT	A reduction in the <b>intensity</b> of the <b>carbon footprint</b> (scopes 1 and 2)*	11.8	8.15	-30%
ENVIRONMENT	<b>Carbon footprint compensation</b> *	100%	100%	100%
DIVERSITY AND TALENT	<b>Pay equity</b> in DOMINION as a whole**	1.06	1.03	≈1
DIVERSITY AND TALENT	A higher <b>ratio of women</b> /total management to women/total headcount**	≈0%	42%	Higher than 45%
DIVERSITY AND TALENT	Projects relating to <b>diversity awareness</b> ***	1	5	>10 years
OCCUPATIONAL SAFETY	Reduction of the <b>Frequency Rate</b>	12.9	11.2	<7
SUPPLY CHAIN	% of <b>relevant suppliers</b> certified under sustainability criteria	20%	30%	100%
GOVERNANCE AND ETHICS MANAGEMENT	% of <b>women</b> on the <b>Board</b>	17%	20%	40%
GOVERNANCE AND ETHICS MANAGEMENT	% of <b>Management Team members</b> (directors and managers) <b>trained in sustainability</b> and <b>corruption</b> risk prevention	40%	50%	100%
GOVERNANCE AND ETHICS MANAGEMENT	% Management Committee with <b>sustainability-related goals</b>	0%	0%	100%
GOVERNANCE AND ETHICS MANAGEMENT	% of <b>independent board members</b>	33%	50%	50%

\* see section 7.2. Intensity as TnCO2/MM€ revenue

\* see section 8.3.

\*\*\* in-house diversity projects

## "Do" Indicators

The "Do" goals are set out in Section 7 and focus on increasing the percentage of DOMINION's sustainability-related activities.

# 6. Ethical Framework and Policies

6.1. Ethical Framework

6.2. Corruption and Bribery Prevention

6.3. Measures in the Fight Against Money  
Laundering

6.4. Cases Reported





## 6.1. DOMINION's Ethical Framework

DOMINION is fully aware that in order to implement its strategy and make progress towards its goal of being recognized as a leading company in sustainability, it requires a strong ethical framework that meets the expectations called for by its different stakeholders.

This Ethical Framework has been a reality at DOMINION since its creation and is deeply rooted in the company's values and culture, encompassing all its companies. It is also fully consistent with its commitments to the Global Compact and the best practices disclosed by regulators and requested by specialist sustainability certifiers.

## Model for the Prevention of Criminal Offences

However, an ongoing effort to adapt the Ethical Framework is required to ensure that it does not lose its relevance. A fundamental aspect of this endeavour is the corporate project for the Prevention of Criminal Offences. This comprehensive project is primarily aimed at complying with the different regulations relating to the criminal liability of companies and their members and Spanish directors, but it also aims to continuously review and adapt the Ethical Framework, pursuant to the provisions of ISO 37301. The main aspects of the current review process are as follows:

- Strengthening leadership and commitment.
- Risk assessment.
- Revising procedures and checks.
- Training and awareness.
- Monitoring of the Whistleblowing Channel.
- Governance.
- Performance assessment.

## Components of the Ethical Framework

The Compliance Policy and the Code of Conduct are two key aspects that take pride of place above the various policies and procedures that make up DOMINION's Ethical Framework.

The Compliance policy establishes the following DOMINION's commitments with regard to compliance:

- Promoting a culture of integrity and respect for ethical standards and regulations that allows swift actions to be taken in the event of risks of non-compliance of these standards and regulations, and that takes account not only Dominion's interests but also the requirements and expectations of its stakeholders.
- Upholding conduct that complies with both ethical standards and regulations.
- Creating a joint compliance model and ensure that it is effectively implemented.
- Establishing a zero-tolerance philosophy and avoiding any actions that go against the provisions of this Compliance Policy and the established in-house policies and procedures, applying disciplinary, corrective or penalty actions under current labour legislation, as necessary.
- Promoting the training and reporting of the Compliance model to company employees, including its directors - as well as third parties associated with the company, as applicable - so that they are familiar with and understand all the compliance regulations and commitments required to carry out their activities.
- Promoting internal reporting of any Compliance-related complaints.
- Continuously reviewing and updating the Compliance Programme to ensure it is in line with the best practices.

## DOMINION

The Code of Conduct is a repository of ethical principles and rules of conduct that must govern the conduct of everyone associated with DOMINION and is, therefore, the core aspect of the Ethical Framework. Abiding by the Code of Conduct and the other internal regulations is also instrumental for the prevention of different types of risks that may arise as a result of potential legal or ethical breaches.

The Chairman and the CEO have both written letters to emphasise the importance of ensuring that all employees, and other associates, at DOMINION are familiar with this Code and act accordingly. For this reason, the Company has implemented a number of initiatives directed at making the Code known: a number of physical and digital dissemination channels have been set up, as well as its permanent publication on the website. Likewise, new recruitment is required to sign the Code, as a way of ensuring that employees are aware of and committed to the Code. Moreover, Dominion has set up its Online University in which the Company's principal Directors are trained in the different aspects of regulatory compliance. They must view a video that discusses the values and principles governing the Company, follow a course relating to potential criminal offences and pass a test in this respect, as well as read and subsequently sign the Code of Conduct.

As an additional measure, specific informative and training material has been prepared, as well as a specific course for the Company's senior managers. The course includes a video with the contents of the Code of Conduct together with other significant contents, in order to allow them to further their knowledge on related risks.

The company has a Whistleblowing Channel available for employees and stakeholders, for reporting irregularities, queries, concerns or conduct that does not comply with the Code of Conduct. This allows for anonymous reporting and provides various means of access. Reports are handled appropriately according to the procedure established for this purpose, which expressly states that no reprisals will be taken in response to complaints. The Audit and Compliance Committee is responsible for the whistleblowing channel which, in turn, delegates responsibility to the Advisory Group of the Criminal Defence Body, formed by four members. The Company has established some rules of procedure for analysing any complaints received and reporting these to the Audit and Compliance Committee.

Other than the Code of Conduct and the Compliance policy, DOMINION's activity is governed by different policies, as well as related in-house procedures which, in addition to respecting the law, must be consistent with the two main elements. These policies, which are listed below, have been approved by the Board of Directors, and govern relationships with the different stakeholders and constitute the action guidelines set out by the Company for its members. The policies are public, on the company website.

The Standards Compliance department and the Human Resources department are responsible for implementing and updating these internal policies and procedures, always based on the Regulatory Framework. They also promote various training and disclosure actions to facilitate and encourage their adoption, while monitoring and auditing actions are carried out to ensure compliance. Non-compliance with DOMINION's Ethical Framework is subject to penalties, as provided for in each policy.



## DOMINION's Main Policies

### **SUSTAINABILITY POLICY**

It serves as a basis for the integration of social responsibility in DOMINION's business model and in its strategy.

### **CODE OF CONDUCT**

Principles and guidelines for conduct, directed at ensuring the ethical and responsible behaviour of all professionals at DOMINION when performing their duties.

### **WHISTLEBLOWING**

#### **CHANNEL REGULATIONS**

To report irregularities or any non-compliance with the Code of Conduct, DOMINION has set up some reporting channels.

### **CORPORATE GOVERNANCE POLICY**

This is based on compliance with DOMINION's rules of governance, and the ongoing review and improvement of the same.

### **HUMAN RIGHTS POLICY**

Directed at ensuring respect for human rights, in accordance with the Company's Code of Conduct and the principles of the United Nations Global Compact.

### **QUALITY AND ENVIRONMENT POLICY**

The planning of actions with regard to quality and the environment, striving towards continuous improvement, ongoing innovation and the prevention of pollution.

### **DIVERSITY AND EQUAL OPPORTUNITIES POLICY**

This is designed to guarantee real and effective equal opportunities for men and women, and applies to all of DOMINION's activities, irrespective of where they are based in the world.

### **RECRUITMENT AND SELECTION POLICY**

It establishes the objectives to be met in the implementation of the Recruitment and Selection process.

### **OCCUPATIONAL HEALTH AND SAFETY POLICY**

It establishes the principles to prevent workplace accidents and occupational illnesses, thereby achieving high occupational health and safety standards.

### **COMPLIANCE POLICY**

It indicates DOMINION's commitments regarding Compliance for all the companies it consists of.

### **ANTI-CORRUPTION POLICY**

The Company undertakes to fight corruption by establishing principles that must guide the behaviour of all the Company's employees.

### **SOCIAL ACTION POLICY**

This lays down the principles for helping to improve the communities in which Dominion operates.

### **SHAREHOLDER AND MARKET INFORMATION AND COMMUNICATION POLICY**

It governs communication and contacts with shareholders, institutional investors and voting advisers and other stakeholders.

### **PRIVACY AND DATA PROTECTION POLICY**

The common and general principles and guidelines of conduct that should regulate the protection of personal data, providing a constant guarantee that applicable legislation will be met.

### **CONFLICT OF INTEREST POLICY**

The procedures that must be followed to prevent or, as the case may be, address conflicts of interest that may arise between shareholders, members of the Administrative Body, Directors and other DOMINION employees in their dealings with DOMINION's activities, as well as regarding conflicts that may arise with customers, suppliers and other stakeholders.

### **ANTITRUST POLICY**

The guidelines to follow to promote free competition, establishing an in-house preventive framework that eliminates or, at least, reduces any risks of non-competitive conduct.

### **SUPPLIER AND SUPPLY-CHAIN MANAGEMENT POLICY**

the guidelines to follow when dealing with suppliers and managing purchases of goods and services, establishing an in-house preventive framework that eliminates or, at least, reduces any possible corruption during the course of its activities and serves as a guide and model to follow to combat corruption and fraud.



## 6.2. Corruption and Bribery Prevention

Principle No. 10 of the Global Compact states that "Businesses should work against corruption in all its forms, including extortion and bribery." DOMINION not only stands by this point, but also fully agrees that corruption and bribery are financial crimes that also have a significant effect on intangible assets that the company must protect, such as reputation, team morale and business relationships.

For this reason, corruption and bribery are an integral part of DOMINION's Ethical Framework, in particular in the Code of Conduct, but also in other policies such as gifts and hospitality. Even so, DOMINION has sought to raise awareness of these crimes, creating a specific policy with the aim of raising appropriate awareness among all its employees and also all third parties who deal with DOMINION, that this policy is also intended for.

DOMINION's policy makes a statement regarding its commitments and specifies that no financial transaction, contract, agreement or arrangement should be entered into whenever there is sufficient reason to believe that any improper or corrupt activities are involved. It also provides details of a series of specifically prohibited types of conduct. It must be pointed out that DOMINION makes no contributions to political parties and that all of its philanthropic or sponsorship activities are subject to a meticulous due diligence and monitoring process beforehand in order to prevent any possible risks.

The policy also includes a series of control criteria and reiterates the existence of a Whistleblowing Channel, which is confidential and open to third parties, to report any conduct that may involve any wrongdoing or any illegal actions or any actions that go against the Code of Conduct or Policy.



## 6.3. Measures in the Fight Against Money Laundering

In accordance with its current range of solutions and services, DOMINION is not a passive subject in money laundering regulations and, as such, is not subject to it.

That said, DOMINION is active in preventing dangerous operations in this area, fundamentally in two ways:

- B2C Transactions: in transactions where there is a relationship with the end customer, DOMINION has established a series of internal rules directed at fraud in cash payments.
- This is achieved by maintaining permanent contact with its financial managers in countries where this is practised, sharing the guidelines to avoid the use of tax havens, the use of banks included on black lists, cyber-security, etc.

Money laundering is one of the offences analysed in the Model for the Prevention of Criminal Offences and, as such, its impact is regularly reviewed.





## 6.4. Cases Reported

A total of 3 reports were filed in 2021.

They have been dealt with in accordance with the established procedure. One of them was ruled out and the other two are still being analysed, as they were received at the end of the year.

# 7.

## Environmental issues

7.1. DOMINION and the Environment

7.2. Greenhouse Effect Gases and Emissions (GEI) Carbon footprint

7.3. Circular economy and the prevention and management of waste

7.4. Sustainable use of resources

7.5. Climate change

7.6. Biodiversity protection







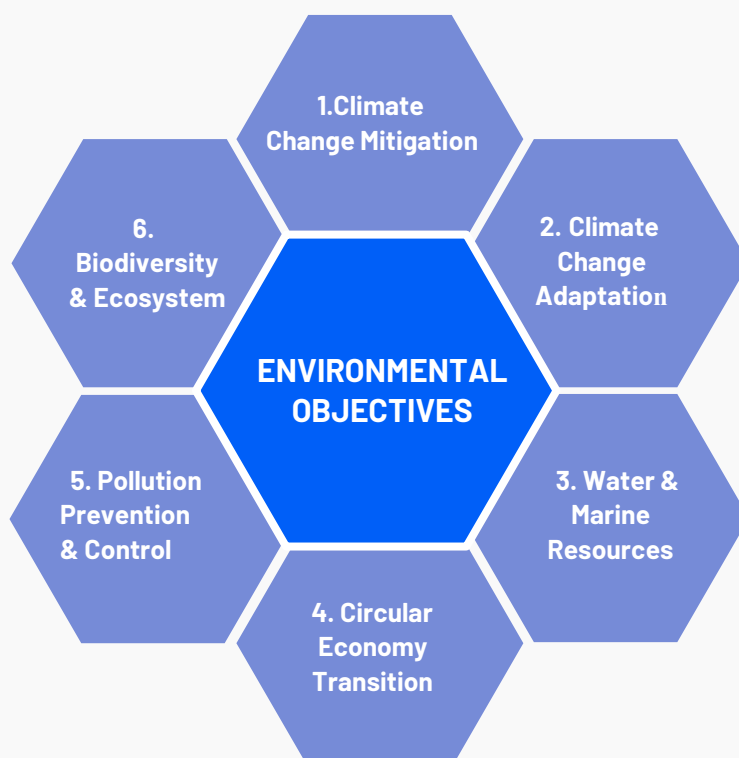
## 7.1. DOMINION and the Environment

Dominion's sustainability strategy and commitment, explained in section 5, extends far beyond simply adhering to legal requirements. As soon as it defines its mission, DOMINION already recognises that it will strive to contribute to creating a better world by designing comprehensive solutions designed to improve its customers' efficiency and sustainability. As stated in the Sustainability Strategy, DOMINION is not satisfied with "Being" a company aware and committed to reducing its impacts, it also wants to be an active player in this change.

As a member of the United Nations Global Compact, DOMINION is fully committed to principles 8 "Businesses should undertake initiatives to promote greater environmental responsibility" and 9 "Businesses should encourage the development and diffusion of environmentally friendly technologies." This is also a DOMINION commitment that is endorsed in its Sustainability policy.

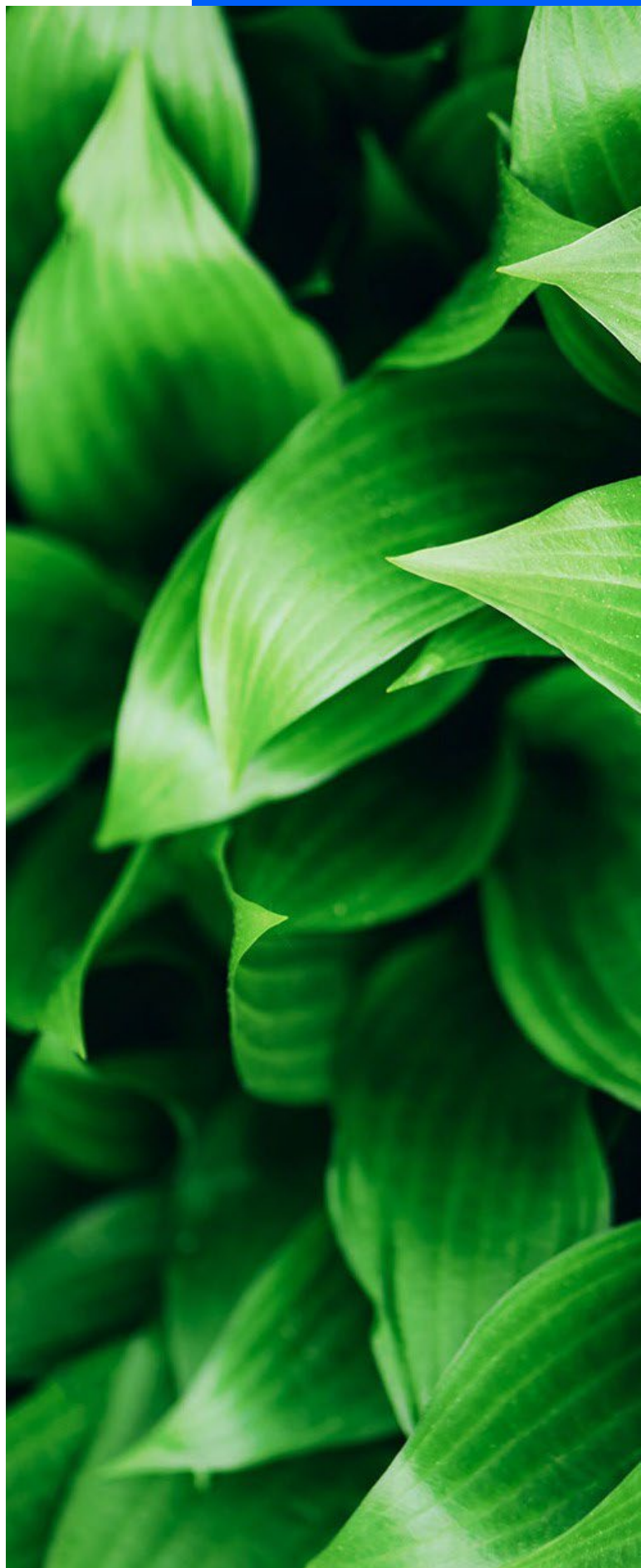
Being and Doing are channelled by means of a series of actions which are in line with European environmental sustainability objectives:

EU OBJECTIVE	DOMINION NFIR CORRESPONDENCE
<b>CLIMATE CHANGE MITIGATION</b>	7.5. Climate change
<b>CLIMATE CHANGE ADAPTATION</b>	7.5. Climate change
<b>WATER AND SEA RESOURCES</b>	7.4. Sustainable use of resources
<b>TRANSITION TO A CIRCULAR ECONOMY</b>	7.3. Circular economy and the prevention and management of resources
<b>CONTAMINATION PREVENTION AND CONTROL</b>	7.2. Pollution 7.4. Sustainable use of resources
<b>PROTECTION OF BIODIVERSITY AND ECOSYSTEMS</b>	7.6. Biodiversity protection



The following points outline DOMINION's stance regarding each of these issues, which are analysed in more detail below:

- **7.2. Pollution:** DOMINION's impact is relatively low, given that there are almost no manufacturing processes. However, all activities have some impact and DOMINION is fully aware of the need to measure and mitigate them. Accordingly, it calculates its carbon footprint and seeks ways to reduce it.
- **7.3. Circular economy:** Dominion has defined this area as a strategic growth driver. Within the framework of its offer, DOMINION seeks to provide its customers with services that offer a 360° vision with waste management playing a fundamental role. This is why it is carrying out an increasing amount of activity in this area, both in the B2C and B2B worlds. Dominion also applies recycling systems for its own activities.
- **7.4. Sustainable use of water resources:** Although committed to measuring its consumption and in seeking measures to reduce this consumption, DOMINION's production processes do not generally involve water.
- **7.5. Climate change:** DOMINION has included the analysis of risks (and opportunities) associated with Climate Change in its risk management process. Its Sustainability Strategy includes the conclusions reached and they underlie the decisions taken and described in section 5.
- **7.6. Protection of biodiversity:** DOMINION's potential impact in this field mainly involves major 360° projects where its activity is governed by the most stringent environmental impact analysis standards.





## Categorisation of activities

DOMINION's activities are categorised below according to the type of effects they involve:

- Services provided from own facilities.
  - Services provided at the customer's facilities.
  - 360° Projects.
  - Tall structure projects.
- > **Services provided from own facilities:** The most relevant potential impact of DOMINION's activity is located in the Company's offices and warehouses, due to the use of electricity for lighting, running water and the generation of waste (paper, batteries and toners, basically), and also due to employee travel by plane, train or car, both at a corporate level and for deployment and maintenance activities for all types of networks.
- > **Services provided at the customer's facilities:** The services and solutions provided at a customer's facilities are subject to the management parameters that are determined and managed by that customer. Therefore, any impacts must be included in the customer's measurements.

Whenever waste is treated, it is handled as instructed by the customer and on the customer's behalf. On the rare occasions when the customer requests that DOMINION manage the waste, an authorised waste manager is contracted and these quantities are reported.

> **360° projects:**

Given their size, complexity and multi-year nature, the major projects DOMINION undertakes involve their own environmental and social impact assessment (ESIA: Environmental and Social Impact Assessment), normally carried out under the IFC environmental standards of the International Finance Corporation which operates under the World Bank, as well as relevant monitoring reports regarding the implementation of the approved measures (ESMP: Environmental Social Management Plan). Their effects are also analysed in the rest of this section, but also in sections 9.3 and 10.1, given their social implications.

> **Tall structure projects:**

DOMINION executes projects for different types of tall structures, usually located at the customer's manufacturing facilities. The environmental effects of these projects are usually included in the environmental effect analysis carried out by the customer itself, normally large global corporations, as DOMINION's work usually forms part of larger projects.

For these projects, DOMINION is responsible for purchasing concrete and metalwork from local suppliers, who then buy back any surplus. Any waste resulting from the work is typically managed by the customer.

The tall structure activity includes one of the units developing the metal structures market, following a slightly different approach to the others. Metal structures are designed and developed in DOMINION's workshops in Slovakia and Denmark. These structures are then erected at the customer's premises. This is a discrete manufacturing process, related to firm projects commissioned by customers.

How the raw materials used in the activity are managed is addressed in section 7.4. "Consumption of raw materials".

Waste management and recycling is addressed in section 7.3. "Circular economy".

### Precaution Principle

As a member of the United Nations Global Compact, DOMINION is fully committed to Principle 7 "Businesses should take a precautionary approach to environmental challenges" and applies it to the management of all its solutions and services, pursuant to the management approach described in the previous point.

### Sustainability Certificates

DOMINION has a Certification Department that deals with any sustainability certification requests made by the Company's customers. This team is also in charge of obtaining any environmental certificates required (ISO14000 essential) for all activities for which this is required, thereby assisting in achieving the objectives indicated in sustainability.

### Subsidies and disputes. Provisions and guarantees

In 2021, there were no claims or lawsuits to mention, neither has the Company obtained subsidies or tax deductions for environmental reasons. Neither are there any provisions or guarantees for environmental risks.





## 7.2. Greenhouse Effect Gases and Emissions (GEI) Carbon footprint

By means of its Sustainability Strategy, DOMINION is committed to meeting its stakeholders' environmental expectations. Controlling and reducing greenhouse gases is without a doubt one of the key aspects.



DOMINION calculates its carbon footprint by compiling the various effects according to the activity description in section 2.1, using an external tool to support the compilation and calculation of the footprint across its three scopes. However, DOMINION's commitment is not limited to calculating these effects more accurately each time; it is also committed to gradually reducing them and mitigating emissions. A aspect which is relevant to this is the ability to compensate, by producing energy from renewable sources, as explained below in this section.

## Calculation of the carbon footprint CO<sub>2</sub>:

DOMINION calculates the carbon footprint with three scopes using an external tool for this process and subsequent calculations that follows the principles of ISO 14064. Besides the intensity reduction goals referred to in section 5, DOMINION also aims to achieve an annual increase in the scope of the effects covered in each of the different scopes. Scopes 1 and 2 cover more than the 80% threshold now. With regards to scope 3, the company is making constant progress, compiling increasing amounts of effects.

### Scope 1: Direct Emissions

Given DOMINION's limited manufacturing activity, which focuses on providing solutions and services aimed towards improving the efficiency and sustainability of its customers, there are few direct emission sources associated with production processes. DOMINION has focused on the effect of its own vehicles and on the fuel used by the power generators, which are sometimes uses for some of its projects (21,498,554 litres).

The equivalent volume of CO<sub>2</sub> tonnes in 2021 amounted to 5,437 T of CO<sub>2</sub>, compared to 8,017 T of CO<sub>2</sub> recorded in 2020. The reason for this difference, despite the increased coverage achieved, is that the effect of the vehicles is now split between effects 1 and 3.

SCOPE 1	2021	2020
EQUIVALENT TONNES OF CO <sub>2</sub>	5,437	8,017

### Scope 2: Indirect Emissions

ELECTRICAL CONSUMPTION	2021	2020
ANNUAL KWH CONSUMPTION	7,683,840	8,843,087

Indirect emissions relate only to electricity consumption, limited to DOMINION's use of this energy in its own offices, stores, warehouses and workshops.

These measurements are converted into equivalent tonnes of CO<sub>2</sub> using the ratio proposed by DEFRA, with the relevant factor applied to each electrical consumption in each country. The results of these emitted volumes are as follows:

SCOPE 2	2021	2020
EQUIVALENT TONNES OF CO <sub>2</sub>	2,994	2,741

### Scope 3: Other indirect emissions

In terms of other indirect emissions, DOMINION is gradually increasing the scope of its coverage. Accordingly, as well as monitoring the trips its team made in Spain, the effect of the logistics of major projects carried out by DOMINION and the effect of the operations vehicles that DOMINION uses to carry out process outsourcing services for the customer are also now monitored.

The equivalent volume of CO<sub>2</sub> tonnes recorded in 2021 amounted to 5,627 tonnes of CO<sub>2</sub>, of which 736 tonnes of CO<sub>2</sub> were recorded in Spain, compared to 1,252 tonnes recorded in 2020.

TOTAL CARBON FOOTPRINT CALCULATION	2021	2020
SCOPE 1 AND 2 (CO <sub>2</sub> Tonnes)	8,431	10,758
SCOPE 3 (CO <sub>2</sub> Tonnes)	5,627	1,252

### Emission of other gases:

The emission of other gases has been almost non-existent given the low manufacturing activity.



## Measures to prevent, reduce or mitigate these emissions. Compensation.

In furtherance of the contents of its Sustainability Strategy, as described in point 5, DOMINION has established various goals regarding measuring and reducing its carbon footprint. It has also set the goal of offsetting and reducing its footprint.

### Compensation:

With regards to compensation, it manages this by calculating the equivalent of non-emitted gases as a result of the production of renewable energies (handprint). At the end of 2021, DOMINION's renewable facilities had generated 120,769,000 kWh over the course of the year, which is equivalent to preventing the emission of 30,192.25 tonnes of CO<sub>2</sub> into the atmosphere (applying a mix factor of suppliers without Guarantees of Origin (Ministry for Ecological Transition)). Accordingly, now, Dominion has not taken out contracts with any suppliers who identify in their invoices a percentage of renewable energy in the mix supplied to the Company.

### Mitigation:

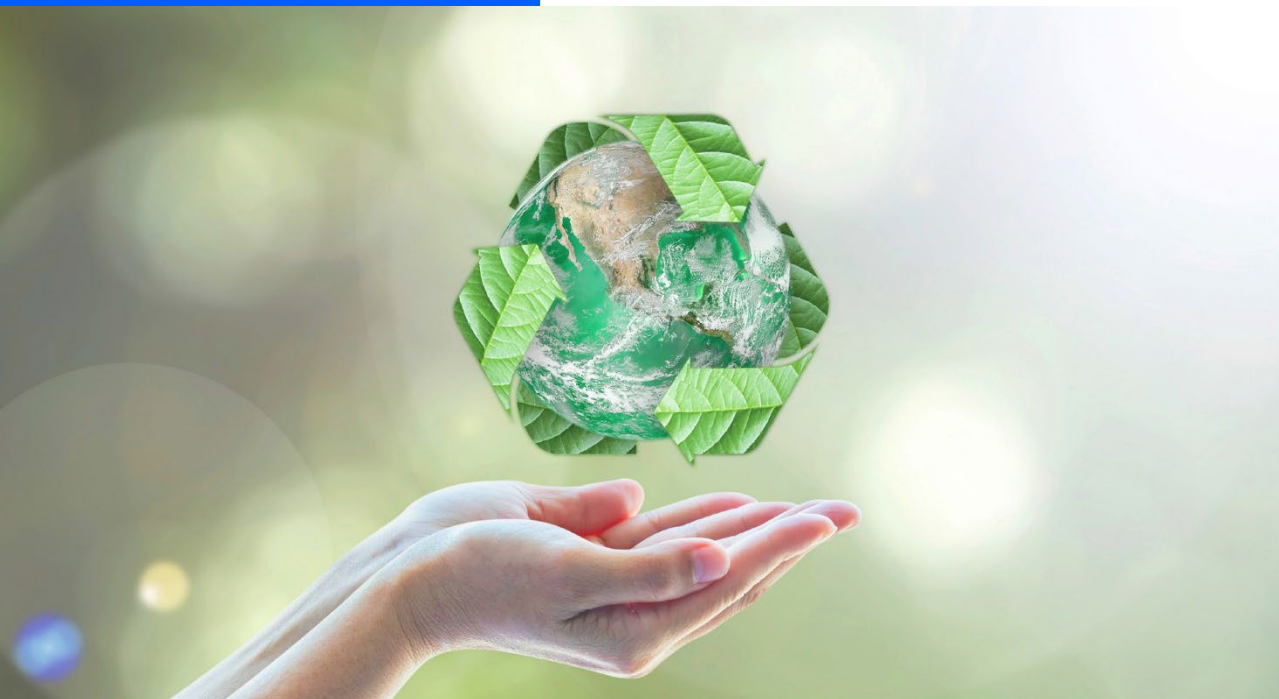
With regards to mitigation, DOMINION has implemented various initiatives, including the following:

- For the appropriate management of the impacts that occur there and to try and extend a culture of environmental responsibility to all people making up DOMINION in the activities they perform, DOMINION has an office guide which contains the recommendations and obligations for the Company's offices and warehouses, while also providing parameters directed at facilitating the way in which the quantification of these impacts must be reported, so that this information may be aggregated for monitoring purposes, as well as information on how to pass on this information to employees.

- As explained previously, one of the "Ds" making up DOMINION's model is commitment to digitisation in terms of tools used in relation to its activity with its customers and internally. Before the pandemic, but obviously to a much greater extent during the pandemic, DOMINION invested heavily in collaborative tools throughout the entire DOMINION organisation. This resulted in a significant reduction in the number of trips, both for its own staff and for third parties. Accordingly, DOMINION has provided its teams with more than 8,608 collaboration licences and an extensive video conferencing network in all its offices in 2021, as well as cloud servers for all critical applications. All of this has made remote working and interaction between teams and also between teams and customers and suppliers much easier.
- In terms of the efficiency of its premises, DOMINION conducts energy audits on its buildings through third-party auditors and implements measures geared towards reducing energy consumption, such as switching to LED light fixtures.

## Other types of pollution: noise and light

DOMINION's activity does not directly affect noise and light pollution levels. In fact, DOMINION helps its customers to reduce both by offering solutions and services specifically tailored to this end.



## 7.3. Circular economy and waste management

### Circular economy

One of the actions implemented on the basis of DOMINION's Strategy Plan has been the decision to increase its presence in the Circular Economy. Notwithstanding other initiatives, this will gradually come into play through three activities:

- This builds on DOMINION's presence in mobile device commerce, promoting the refurbishment of used devices so that they can be sold back to the market avoiding the need to buy a new device. DOMINION refurbished 48,496 mobiles for resale in 2021.
- DOMINION has developed a biomass plant in a logging area in northern Argentina. This plant serves to recover waste wood from forestry activities in the area where the plant is located by using it to generate electricity. The plant completed its first year of operation in 2021, reusing 162,466 tonnes of waste wood.
- Within the framework of industrial services, where Dominion's main goal is to provide a 360° offer to customers to manage or maintain all "non-core" processes at their facilities. Intermediate waste management, to enable recycling and recovery, is a logical extension of this process and one which DOMINION will play an increasingly important role in.

## **Waste: Measures for prevention, recycling, reuse and other forms of waste recovery and disposal.**

How production-related waste is processed and how office and warehouse waste is dealt with is distinguished below:

### **Production-related waste:**

DOMINION often purchases finished products for processes related to its activities, and mainly does so from world leading companies in its different areas of activity. As a result, these products do not undergo any waste-generating transformation processes. On other occasions, the equipment or products used are provided by the customer or it is the customer who is responsible for the waste that is generated. Taking these factors into account, overall, DOMINION generates relatively little manageable waste. However, there are certain activities that generate waste and DOMINION, consistent with its commitments to this regard, takes measurements with a view to identifying ways for improvement, and carries out appropriate waste management.

Particularly in the case of major 360° projects, DOMINION conducts Environmental and Social Impact Analyses that address the different types of waste produced in projects.

It should also be pointed out that, as explained in section 7.1, DOMINION obtains environmental certificates for most of its regular activities with the destination of the waste created analysed in great detail. Whenever the waste must be dumped, this procedure must always be managed by authorised waste disposal companies.

### **Office or warehouse waste:**

DOMINION has an office guide that contains the obligations and recommendations the teams must follow, while also providing instructions on the quantification of these impacts, so that this information may be controlled and aggregated for monitoring purposes. This guide contains instructions as to which types of materials must be recycled (paper, batteries, toners, etc.) and how all other waste must be disposed of.

Regarding food waste, DOMINION has practically no connection with food, and therefore no actions are foreseen in this area.

## **Measurements**

The total non-hazardous waste managed in 2021 amounted to 362,153 kg. The amount of hazardous waste is not relevant.



## 7.4. Sustainable use of resources

### Water consumption

DOMINION is committed to the proper use of all resources, especially scarce resources like water.

Even though water is not used in most of DOMINION's processes, the company's Sustainability Strategy includes measuring water consumption in any activities where it is used, taking measures to reduce this use.

It is mainly used in the following situations:

- In terms of offices and warehouses, this relates to the use of running water on DOMINION's premises. In most cases this is managed on as a whole by the lessor who assigns the proportional share to DOMINION. DOMINION always makes every effort to promote the efficient use of water using the actions set out in the "Office Guide".
- In the specific case of workshops where metal structures are designed and built, in the tall structures department, water consumption totalled 12,074 m<sup>3</sup> (2020: 1,973 m<sup>3</sup>).
- Finally, for the biomass project in Argentina, water is used to produce steam, which is subsequently turbined. The volume used in 2021 amounted to 451,868 m<sup>3</sup> compared to 116,166.76 m<sup>3</sup> in 2020.

The total water volume recorded in 2021, combining the above figures, amounted to 562,924 m<sup>3</sup> compared to 146,400 m<sup>3</sup> recorded in 2020. This growth is due to the expansion of the scope of coverage and the specific effect of the biomass plant described in the previous point. Of this total consumption, 228 m<sup>3</sup> were used in the water stress zone.

Finally, the return of water from the biomass plant activity amounted to 100,737 m<sup>3</sup>. This was appropriately treated before being returned to the river where it was taken from.





## Raw material consumption

As explained above, DOMINION's raw material consumption is limited to very specific activities, in which case this consumption is strictly controlled with special attention to excess material and the destination of waste.

The raw materials are used in two main activities:

- **Tall structure projects:** for those which make use of concrete and steel framework. The following amounts were used in 2021:
  - Concrete: 90,781 m<sup>3</sup>
  - Steel framework: 10,278 tonnes
- **The biomass plant in Argentina:** where waste wood is used to generate electricity. 162,466 tonnes were used in 2021.

## Energy. Data centers

This issue was addressed in section 7.2, under scopes 1 and 2 of the carbon footprint.

DOMINION also increasingly makes use of third-party data centers in the cloud to meet its processing and storage requirements.

The criteria used to select which data centers to use include the PUE (Power Usage Effectiveness) and the percentage of renewable energy used out of the total consumed by the data center.





## 7.5. Climate change

### **The climate change risk in the risk management framework**

DOMINION has included the climate change risk in its risk management process, as explained in section 3.

The conclusions drawn form part of the basis of its Sustainability Strategy, which is explained in Section 5.

## Reflection on the climate change risk

As part of the process to incorporate climate change risk into its risk management process, DOMINION has made considerations following the recommendations of the TCFD (Task Force on Climate-related Financial Disclosures). Some of its aspects include.

### Governance

As described in section 4, DOMINION's Board of Directors, via two committees – the Auditing and Compliance Committee and the Sustainability Committee – exercises its surveillance and monitoring role concerning sustainability and non-financial information provided by the Company.

As part of this task, these Committees have approved and monitored the company's Sustainability Strategy, explained in section 5, which includes a relevant factor in these considerations made by DOMINION regarding the risks and opportunities associated with climate change.

DOMINION's management team, especially the Management Committee, has been involved in the considerations made regarding climate change and in the preparation of the aforementioned Sustainability Strategy. It receives regular information from the parties responsible for its implementation: the business units and the corporate sustainability manager.

### Strategy

Insofar as DOMINION's mission is to help its customers, with its services and solutions, to becoming more efficient, and with sustainability clearly becoming increasingly relevant in the pursuit of achieving this efficiency, DOMINION's risks and opportunities are closely related to the requirements of and measures taken by its customers. Therefore, in the case of DOMINION, the different scenarios used yield very similar results.

Accordingly, DOMINION is not particularly exposed to raw materials and intermediate products, which are abundant and geographically dispersed, and therefore does not foresee any disruptions in the supply chain caused by climatic events. With regard to finished products, mainly mobile phones in the B2C area, the logistics situation over the past few months is included in other strategic risks.

DOMINION does not have any significant manufacturing facilities that require large amounts of energy or generate greenhouse gas emissions or any other hazardous waste. For the same reason, the effect of possible chronic or temporary events on the facilities affects DOMINION indirectly, i.e. by way of the effects they may have on its customers.

DOMINION's exposure to the Oil&Gas sector is limited, mainly consisting of the supply of environmental services that enable the reduction and recovery of waste, which is then reintegrated into the production process. The trend towards the development of clean energy and less dependence on fossil fuels have resulted in tall structure activities, traditionally providing services to a wide range of customers in the fossil energy sector, significantly changing its scope, focusing on new activities such as constructing silos, complex demolition or renovating facilities or the renovation of facilities with a view towards improving efficiency and reducing emissions.

In terms of water, and as described in section 7.4, this is not part of any production process in DOMINION's activities, except for water that is used to produce steam at the biomass plant.

Accordingly, any potential risks that DOMINION has included in its risk management process related to climate change are low or medium, as no serious risks resulting from the application of restriction policies, new legislative measures, technological changes or market or reputational changes have been identified, aside from the obvious need to adapt to the expectations of relevant stakeholders, especially its customers, with regards to each of these points.

By contrast, opportunities are identified, in the short, medium and long term, arising from customers' need to adapt to these changes (resource efficiency, green services, climate resilience), as well as in new sectors or areas of activity that are gaining prominence as climate change awareness grows.

Following this reflection, in 2016 DOMINION set up a business unit exclusively focused on renewable energy projects and services, a unit that currently has a relevant number of references and a significant weight in the company, and has subsequently created an environmental services unit with the specific purpose of accompanying its customers during the adaptation process. Also, as a result of this reflection, DOMINION has reviewed its solutions and services range with a view to improving its contribution to the climate change problem.

The consequences of these opportunities will mainly be specified in the chapter on income and derived expenses, and, to a lesser extent, in the chapter on investments in assets that may be required to carry out new activities.

As stated in section 5 of the Sustainability Strategy description, DOMINION aims to meet these challenges through three main factors: being, doing and communicating.

In the case of "being", DOMINION assumes the fact that it is increasingly important for its customers to have suppliers who are committed to sustainability when assessing their effects and taking measures to reduce them. DOMINION has therefore set itself the goal of continuously expanding the scope of its assessment and setting improvement and effect reduction goals, as described in section 5.

In the case of "doing", DOMINION focuses on the opportunity to consolidate and expand DOMINION's existing sustainability offering for its customers. Accordingly, it aims to redesign its offer to meet these new requirements, whilst also expanding into different activities where it expects to see an increase in interest in coming years.

"Communicating" has been explained in section 5, although it is worth noting DOMINION's commitment to increasing the visibility of its effects and efforts, including with the CDP (Carbon Disclosure Project).

## **Risk management**

As described in section 3, DOMINION performs comprehensive management of different risks (strategic, criminal, climate, etc.) as a preliminary step for establishing its strategy and different reduction and improvement projects, as is the case with criminal defence. To this regard, the risks and opportunities detected in relation to sustainability have led to the development of the aforementioned Sustainability Strategy Plan.

When managing these risks, the different business lines are responsible for reducing them and taking advantage of any opportunities, but they must always be accompanied by the corporate sustainability manager, who agrees with the corporate risk manager, who is the person responsible for including this information in DOMINION's non-financial information report, as well as reporting progress to both the Management Committee and the two Committees of the Board of Directors responsible for this matter.

## **Metrics and Goals**

In terms of "being", in section 5 of this document, DOMINION explains the key metrics used to measure its environmental effect and, in particular, the carbon footprint of its different scopes. Likewise, section 5 includes details of the different KPIs that the company has established in order to monitor its progress towards the goals it has set for itself with regards to sustainability.

In terms of "doing", the main metric set is the percentage of eligible activities as per the European Union's Taxonomy of Sustainable Activities. The first data relating to this metric is provided below, although it is still incomplete, as the Taxonomy has not yet been published in full. Once this process is complete, including eligibility and alignment, the company will establish targets based on this.

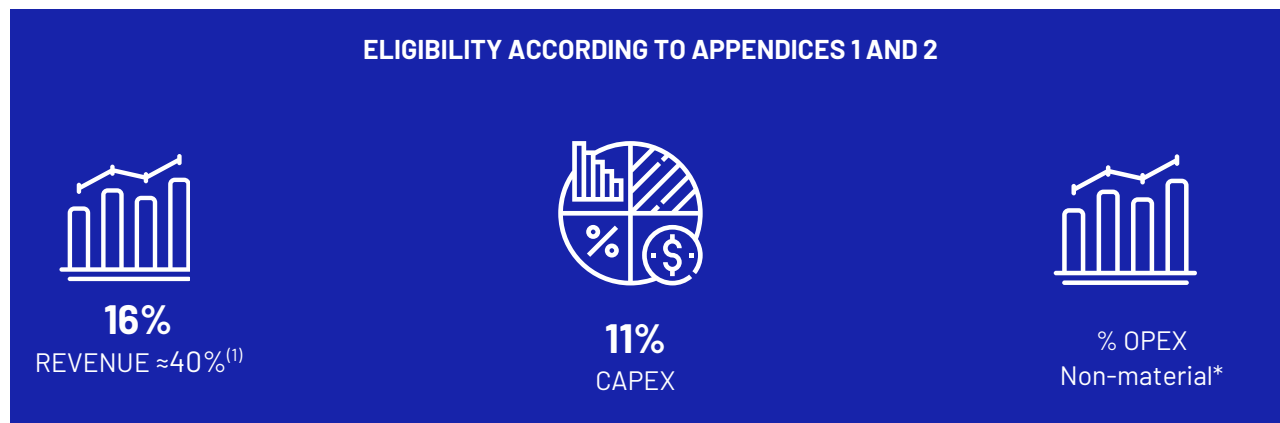
In line with the details in section 7.1 regarding DOMINION's commitments to the Global Compact, undertaking various SDGs as the objectives underpinning these commitments, DOMINION is particularly concerned with how it can help to reduce climate change and also provide assistance to help institutions and companies adapt to this.



## EU TAXONOMY: reporting on KPIs for eligible activities

The European Union, as a driving force behind the decarbonisation process and in line with climate change goals, developed the Taxonomy Regulation (EU 2020/852), which is the first step towards obliging companies to disclose how and to what extent their activities are associated with sustainability-related issues.

By 2021, the new regulation will require companies to report the percentage of eligible activities according only to Appendices 1 (climate change reduction) and 2 (climate change adaptation).



*\*It is reported that the denominator of the OpEx KPI (operating expenses), which is the sum of the following items: repairs, operating leases and R&D expenses (see note 25 of the Consolidated Annual Financial Statements) amounts to EUR 11,981,000.*

<sup>(1)</sup> DOMINION, as a company committed to the aforementioned goals, reports not only the percentage of eligibility requested, but also the overall percentage, according to its own calculation based on the existing drafts of the other Appendices: % total eligibility (in-house estimate) on revenue = approximately 40%

### Process used to calculate Taxonomy

In order to calculate this data, the following must be pointed out:

The activities relating to all the companies included in the scope of consolidation included in DOMINION's Annual Financial Statements have been accounted for, except for those companies accounted for using the equity method (note 9 to the Annual Financial Statements), which have not been included.

Revenue:

The basis for calculating the denominator of the revenue KPI was the 2021 adjusted revenue, taken from the consolidated annual financial statements (note 5 of segmentation of the Consolidated Financial Statements where the implications thereof are explained).

For the numerator, a previous comparison was made between the information contained in the annual financial statements and the management information. Once the validity of this information was confirmed, the activities included in the various management accounting centres were analysed and compared with the Taxonomy Regulation in order to determine their eligibility. In those cases where the activities of the management centres were identical and eligible, the total amount for the management centre was considered; in the case of different activities, previous separation was performed. Calculating revenue based on analysing the management accounting centres has meant that any double entries were avoided in the calculation, as each management accounting centre has its own associated revenue, which is unique from the others.

**Operating expenses (OpEx) defined according to the Taxonomy regulation:**

Considering DOMINION's characteristics, a company dedicated to providing services and solutions to its customers to help them achieve greater efficiency and sustainability, where there are no relevant manufacturing facilities, it has been estimated that the type of expenses foreseen by the Taxonomy Regulation (maintenance and repairs, short-term leases, building refurbishment and R&D) is not significant as regards DOMINION's total expenditure, so the decision has been made not to report the percentage of eligible operational expenditure, pursuant to the provisions of Delegated Regulation 2021/2078 of 6 July, Appendix I, section 1.1.3.2. The denominator is calculated from the sum of the following items taken from the annual financial statements (the items included in note 25 of the annual financial statements regarding other operating expenses): repairs, operating leases and R&D expenses.

**Capex:**

To calculate the denominator, the total number of new tangible and intangible assets recorded in the annual financial statements, including new assets acquired as a result of business mergers (see note 5 on tangible fixed assets and note 6 on intangible assets), was used.

As regards the numerator, both the nature of the assets and the specific activity they are intended for were checked against the Taxonomy Regulation, based on the work carried out for the revenue chapter. In those cases where the asset was eligible and related to an activity for which the management accounting centre is only partially eligible, a percentage adjustment was made in line with the level of eligibility.

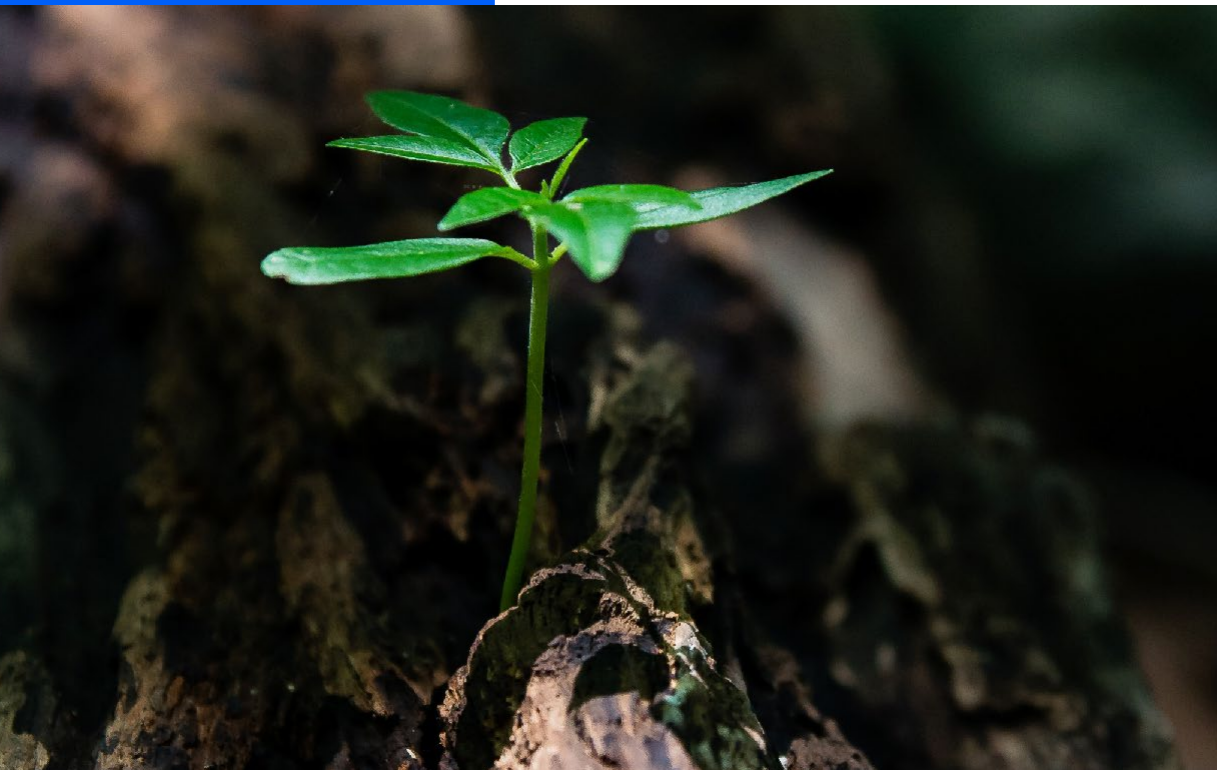
Just as with the process used to calculate the revenue numerator, in calculating the Capex KPI numerator, special attention was given to avoid any duplicate counts.

Eligible economic activities vary in nature and include the following: the construction and maintenance of renewable photovoltaic, wind and biomass facilities, projects for the construction of electricity transmission and distribution networks and substations, the construction of facilities to improve building sustainability, the management of non-hazardous waste and the development and implementation of energy efficiency software solutions. With regards to revenue, the most significant amounts relate to the construction of renewable facilities, the construction of electricity transmission networks and the construction of facilities designed to improve building sustainability.

It must also be pointed out that DOMINION's activities also affect other environmental goals set out in the Taxonomic Regulation, but these are not yet the subject of Delegated Acts. The company has made an internal estimate of the percentage of revenues from its activities that could be eligible based on the published draft, applying criteria similar to those described here.

**Climate change adaptation**

DOMINION also carries out activities that help its customers adapt to the effects of climate change, whether they are chronic or unexpected. This includes projects designed to improve the country's electricity transmission capacity, providing energy alternatives and cutting back on deforestation and the consumption of polluting energies, or tall structures projects that allow companies to render their gas emission facilities more efficient and cleaner. Also, helping customers reduce their noise pollution at their production facilities located near to residential areas by implementing noise reduction systems on tall structures (chimneys and other items).



## 7.6. Biodiversity protection

Protecting ecosystems is one of the SDGs that was one of the commitments assumed on signing the Global Compact.

In DOMINION's case, this commitment is put into practice in the 360° Projects. For all other projects, DOMINION carries out its activities on sites that have already been developed, typically for industrial purposes, and, in most cases, on the customer's own premises.

By contrast, 360° Projects are carried out at different locations depending on each case in question and they also involve a wide range of activities. Comprehensive Environmental and Social Impact Assessments (ESIAs) are always performed for these projects: Environmental and Social Impact Assessment), normally carried out under the IFC environmental standards of the International Finance Corporation which operates under the World Bank, which follow relevant monitoring reports regarding the implementation of the approved measures (ESMP: Environmental Social Management Plan).

These provide detailed analysis of the effects projects have on local ecosystem, and in particular whether high-value biosystems are affected. Based on these analyses, project features are adjusted to adapt to the results with preventive, mitigating and compensatory measures then taken, when appropriate.

As an example, and so as not to provide too much detail, in 2021, the efforts undertaken in the Dominican Republic in relation to the flora, fauna and landscape conservation sub-program are noteworthy: Birdlife control. This programme has two main goals:

To identify the various species of birds that live in or cross "Mata de Palma" and to analyse the effect that the plant may have on the diversity of birdlife.

By doing so, the team aims to become a benchmark for this type of research in other power generation plants and to be able to expand its methods to other similar projects.

Examples of the birds analysed:



Double-striped thick knee / Venezuelan Curlew (*Burhinus bistriatus*).



Limpkin (*Aramus guarauna*)



# 8. Employees

8.1. Diversity and inclusion

8.2. Employment

8.2.1. Employment

8.2.2. Training

8.3. Remuneration policy

8.4. Health and safety

8.5. Social relationships







## 8.1. Diversity and inclusion

At year-end 2021, DOMINION is made up of a workforce of 10,615 people, working in 27 countries, with a multicultural team of 78 different nationalities (9,434 people, 24 countries and 74 nationalities in 2020). This represents a 12.5% increase.

### Characteristics of our workforce:

1. International presence
2. Importance in Operational Services
3. Male-dominated workforce
4. Generational diversity

1. **DOMINION's workforce is characterised by its international presence.** This allows for global management policies to be applied, focusing on local idiosyncrasies and enriching personnel management.

DOMINION's presence has grown in 3 countries (Canada, Panama and Austria) and has also seen significant growth in Colombia, Mexico and Spain. Spain, with 3,702 employees, accounts for 34.8% of the total workforce.

2. **Based on the predominant sectors it operates in,** DOMINION considers itself to be a global services and comprehensive projects company in which human capital increases among officers. Accordingly, 68.4% of the workforce is made up of the group dedicated to executing Operational Services.
3. **Similarly, the typology of our sectors results in a male-dominated workforce.** Having said this, female presence in our workforce has increased by 12% in 2021 compared to last year.
4. **Fourthly, DOMINION's workforce is defined by its generational diversity.** 4 generations of employees currently work together in our teams, with the age group ranging from 30 to 50 years of age, Generation Y, being the most prominent in terms of number of employees. The average age in 2021 was 38.88 (39.29 in 2020).

Recruitment of professionals under 30 in 2021 increased by 62% (2,985 in 2021 and 1,844 in 2020).

# Our personnel in 2021

## 10.615 people



**81%**  
men

**19%**  
women

**22%**  
< than 30 years

**61%**  
30 - 50 years

**17%**  
> than 50 years

**78**  
nationalities

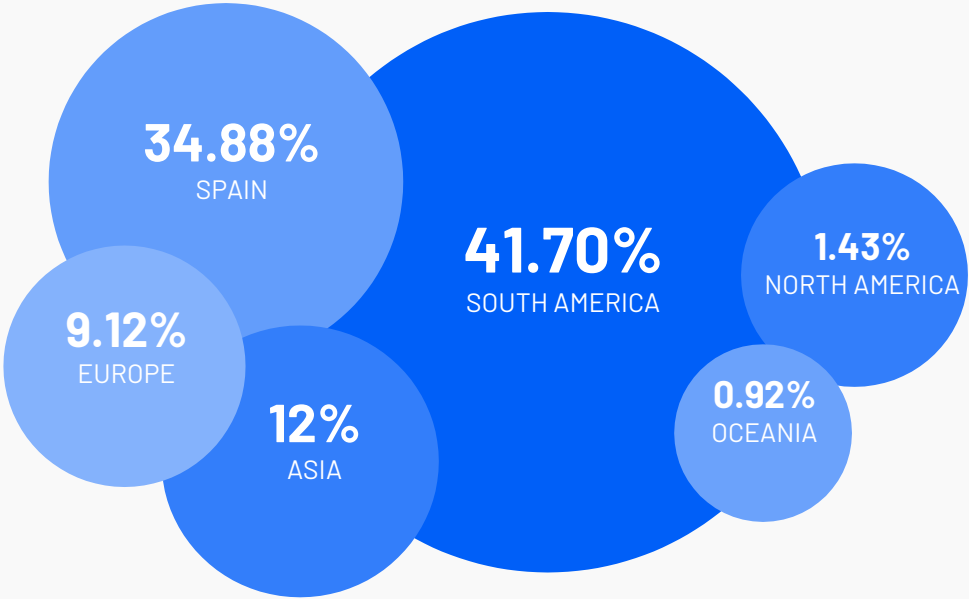
	2021		2020	
	WORKFORCE	%	WORKFORCE	%
DISTRIBUTION BY GENDER				
MALE	8,609	81%	7,646	81%
FEMALE	2,006	19%	1,788	19%
TOTAL	10,615	100%	9,434	100%
DISTRIBUTION BY AGE				
< 30 YEARS	2,378	22%	1,917	20%
FROM 30 TO 50 YEARS	6,452	61%	5,930	63%
> 50 YEARS	1,785	17%	1,587	17%
TOTAL	10,615	100%	9,434	100%
DISTRIBUTION BY CATEGORY				
MANAGER	103	1%	73	1%
MANAGER / OFFICER IN CHARGE	373	4%	330	4%
TECHNICIAN	2,121	20%	1,980	21%
ADMINISTRATIVE WORKER	754	7%	594	6%
OFFICER	7,264	68%	6,407	68%
TOTAL	10,615	100%	9,434	100%

	2021		2020	
	WORKFORCE	%	WORKFORCE	%
GEOGRAPHICAL AREA				
NORTH AMERICA	152	1.43%	186	1.97%
SOUTH AMERICA	4,426	41.70%	3,459	36.67%
EUROPE	968	9.12%	860	9.12%
SPAIN	3,702	34.88%	3,524	37.35%
OCEANIA	98	0.92%	79	0.84%
ASIA	1,269	12.00%	1,326	14.10%
TOTAL	10,615	100%	9,434	100%

	2021	2020
EUROPE		
GERMANY	396	404
AUSTRIA*	10	
DENMARK	64	77
SLOVAKIA	87	62
FRANCE	154	136
REUNION ISLAND**	34	
ITALY	41	45
POLAND	85	81
PORTUGAL	94	45
UNITED KINGDOM	3	10
TOTAL	968	860
SPAIN		
SPAIN	3,702	3,524
TOTAL	3,702	3,524

	2021	2020
NORTH AMERICA		
CANADA*	16	
UNITED STATES OF AMERICA	136	186
TOTAL	152	186
SOUTH AMERICA		
ARGENTINA	256	238
CHILE	887	869
COLUMBIA	769	278
MEXICO	800	433
PANAMA*	1	
PERU	1,698	1,631
THE DOMINICAN REPUBLIC	15	10
TOTAL	4,426	3,459

	2021	2020
ASIA		
SAUDI ARABIA	527	529
BAHREIN	52	39
UNITED ARAB EMIRATES	335	341
INDIA	327	352
INDONESIA	20	40
OMAN	3	3
VIETNAM	5	22
TOTAL	1,269	1,326
OCEANIA		
AUSTRALIA	98	79
TOTAL	98	79



(\*) New country in 2021.  
(\*\*) Reunion Island forms part of French territory and is not considered to be a country.



3,702  
SPAIN



968  
EUROPE



152  
NORTH AMERICA



4,426  
SOUTH AMERICA



98  
OCEANIA



1,269  
ASIA

DOMINION is governed by the following main lines of action:

- Ensuring non-discrimination.
- Disclosing our Diversity policies.
- Transmitting knowledge regarding diversity.
- Adapting integration and conciliation measures.
- Activating whistleblowing channels for a harassment-free environment and communicating.
- Encouraging the use of inclusive language.

DOMINION promotes more diverse and inclusive working environments and their actions are aimed towards the entire workforce developing their professional potential, doing away with any form of discriminatory practices. DOMINION promotes diversity among its employees by fostering the Diversity policy and the principles of Inclusive Language from the moment employees join the company and by transmitting and communicating them to all countries and businesses.

In 2021, DOMINION in Poland joined the Diversity Charter, thereby joining Spain, which joined in 2019 and then renewed membership in 2021. This is a European Commission initiative, under which companies that join it commit to promoting basic principles of equality and non-discrimination, and to promoting diversity and inclusion in the workplace.

In terms of in-house activities, in May 2021 the company celebrated the International Month of Cultural Diversity for Dialogue and Development, in line with the initiative promoted by the UN, to raise awareness of the importance of intercultural dialogue, diversity and inclusion, to combat stereotypes and build support for diversity, with genuine gestures, in our daily lives.

Gender equality and female empowerment form part of DOMINION's principles. As DOMINION's workforce is predominantly male because of the sectors it operates in, it encourages and promotes female presence in all categories. In fact, in 2021, the percentage of women in management positions increased by 70% and by 50% in Manager and Officer in Charge positions, compared to the previous year.

In Chile, where DOMINION's core business is multi-technical services with a predominantly male workforce, the recruitment of women is both supported and encouraged by means of seminars and lectures to strengthen their role in this environment. DOMINION Peru also received an award in 2021 for the Promotion of Equality in Technical Telecommunications Services as part of the "Mujeres en Red" (Network Women) project.





Accordingly, this year, DOMINION joined the **Gender Equality Index** and took part in the **Target Gender Equality Scheme of the Global Compact**. In this regard, it has taken part in the diagnosis of the WEP Business Gender Tool, a collaboration project of the UN Global Compact, which allows for assessment of the company's strategic approach, identifying gaps and opportunities for gender equality and contributing to the UN Sustainable Development Goals by investing in women and girls.

In 2021, DOMINION has continued promoting female education in Senegal, collaborating with the Xaley Foundation, which carries out work and initiatives, working towards promoting education access for girls living in communities where their work is performed.

There is still a long way to go to achieve an equal presence of women in the sectors in which DOMINION operates, which is why the company seeks to collaborate in society. In 2021, it joined the STEAM Initiative of the Spanish Ministry of Education and Vocational Training to promote STEAM vocations (Science, Technology, Engineering and Mathematics in relation to Arts and Humanities) for girls and young women. This project, called "Girls in Science", aims to join forces, seek synergies and promote projects that contribute to improving conditions for girls and young women in this field, with the goal of shaping an education and training system that gender stereotypes associated with certain professional vocations, promoting female talent in STEAM disciplines from the earliest stages of education, thereby helping to eliminate the gender gap when it comes to gaining access to these disciplines.

In Spain, companies with an Equality Plan and those currently negotiating one address measures in different fields of labour relations such as selection, recruitment, promotion, training, occupational health, remuneration and reconciliation of work and family life. These measures are designed to encourage and promote equal opportunities.

It ensures equal access to career development opportunities and works towards creating safe environments free from harassment and violence while promoting pay equality. (Further information relating to the Wage Gap) Since its incorporation, DOMINION has shared the Code of Conduct with its employees and has also provided them with reporting mechanisms in order to take prompt and effective measures in the event of harassment.

There are protocols for sexual and/or gender-based harassment and we have an inclusive language guide that promotes more gender-equal communication in the workplace.



DOMINION is committed to complying with universal accessibility principles. DOMINION's workplaces meet the functional and dimensional requirements that guarantee independent use for people with disabilities or mobility problems. We are also committed to making technical adaptations at any workplaces that require specific modifications. There are currently 42 people with disabilities in our workforce (40 in 2020). In the case of Spain, this commitment is accompanied by an investment in the purchase of goods and services produced or provided by Special Employment Centres. In 2021 this amounted to EUR 857,409.07 compared to EUR 1,109,930 in 2020.

DOMINION promotes measures to facilitate combining work and family life, with special emphasis on shared responsibility. Equality plans negotiated at DOMINION serve as suitable instruments to establish measures aimed towards achieving this goal: to consider shared responsibility as both a right and a duty.

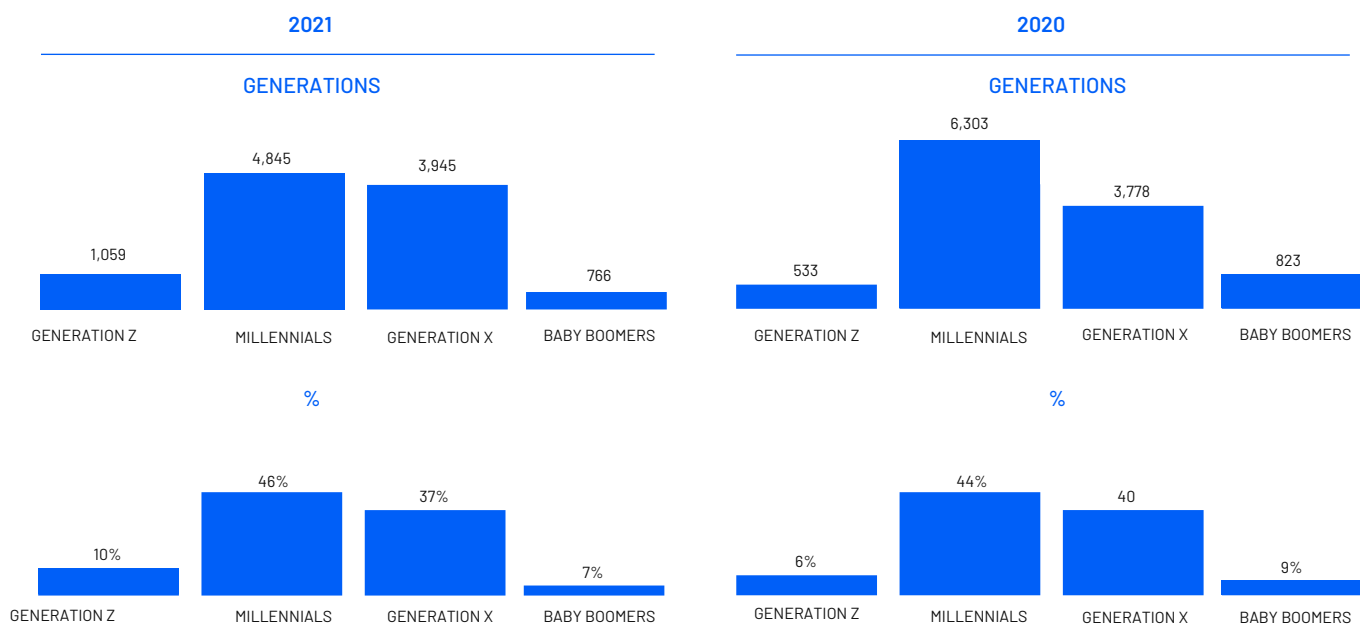
In 2021, as in previous years, 100% of our employees in Spain were entitled to parental leave. Apart from the aforementioned shared responsibility, equality plans include other measures to combine personal and professional life.

Internationally speaking, DOMINION works towards improving the rights granted by the local legislation in each country through conciliatory policies. Depending on their characteristics, countries adopt measures that focus on the quality of life, developing talent, improving creativity and commitment, as well as the professional motivation of employees.

There are other measures such as paid and unpaid leave to help both men and women combine work and family life.

WOMEN BY CATEGORY	FEMALE
MANAGER	16.50%
MANAGER / OFFICER IN CHARGE	27.10%
TECHNICIAN	17.00%
ADMINISTRATIVE WORKER	54.80%
OFFICER	15.30%
<b>GENERAL TOTAL</b>	<b>18.90%</b>

#### WORKFORCE BY GENERATION





## 8.2. Employment

Personnel management at DOMINION has once again proven its ability to adapt to the exceptional circumstances of a global and diverse company with an entrepreneurial and committed talent pool.

DOMINION promotes cultural change, **decentralisation, diversification** and internal transformation of the company by placing employees at the core of all the initiatives it undertakes. It also promotes new ways of working based on collaboration, mainstreaming, empowerment, **digitisation**, the implementation of new management methods and **financial discipline**, which are common factors behind its success.

These initiatives focus on three areas:

- Culture and practices that encourage more flexible and collaborative working models with DOMINION's 4D's as the main pillars.
- Work organisation and methods which make it possible to address challenges in a more innovative and creative way. DOMINION continues to promote collaborative communities and actions and to implement communication processes.
- Flexibility by providing people with spaces, technological tools and intelligent ways of working that pursue the development of digital capabilities, efficiency in our value chain, and sustainability in our revenues.

Ongoing digital transformation has meant that we can continue to operate normally in the face of the continuing COVID scenario. We are also reshaping how we work with our work force the field, focusing on improving their daily work, involving them from the outset on how to use the tools, which will enable them to work more autonomously and flexibly. This is all in line with our strategy framework.

DOMINION is committed to guaranteeing stimulating, stable and safe working environments, where equal opportunities and professional development exist, and where we safeguard the conditions of our employees. As we operate in numerous countries in different contexts, our local teams guarantee this commitment by providing prompt responses, adapting to the local idiosyncrasies of each country. The 2021 financial year was once marked by the global Covid-19 pandemic.

During this period, our efforts and priorities were focused on preserving health and employment. In line with the actions taken last year, DOMINION once again demonstrated its ability to manage a workforce predominantly located on site.

The information and awareness-raising campaign, along with the provision of PPEs, the adaptation of facilities, testing and individualised monitoring of each case, has always been a priority.

Given the development of the health situation, DOMINION has continued to adapt its safety measures and adapt its workforce in line with activity levels.

In all countries where DOMINION operates, the main goal has been to safeguard employment, in all other countries, the company has acted in accordance with local legislation to deal with the effects of the pandemic.

DOMINION's Code of Conduct sets out the standards of conduct that DOMINION staff must adhere to when carrying out their professional duties.

DOMINION is growing sustainably by carrying out its activities in line with society's requirements and by making a responsible contribution in the industrial, energy, service and telecommunications sectors wherever it operates.

DOMINION's drive is reflected in its efforts to recruit younger people into its team, thereby contributing towards achieving a younger workforce and providing opportunities for professional development in a multinational environment. Generation Z at DOMINION has increased by 4% in 2021 (10% in 2021 and 6% in 2020). Also, new recruitment indicates that the number of female employees is 63% higher than last year (1,168 in 2021 and 717 in 2020).

DOMINION has grown in an organised fashion in all categories, while maintaining its habitual proportionality. The officers category is the largest again, in line with the nature of its business. The multi-technical services sector grew organically in Colombia, Mexico and Spain.

Although Spain is the main country in which DOMINION operates and has expanded in terms of personnel (3,702 in 2021 and 3,524 in 2020), its global representation has dropped, thereby consolidating the growth of a global company. Accordingly, Dominion remains committed to indefinite-term international contracts, promoting steady, quality employment in all countries.



	2021				2020			
CONTRACT TYPE	INDEFINITE		TEMPORARY		INDEFINITE		TEMPORARY	
	WORKFORCE	%	WORKFORCE	%	WORKFORCE	%	WORKFORCE	%
DISTRIBUTION BY GENDER								
MALE	4,731	44.57%	3,878	36.53%	4,440	42%	3,206	30%
FEMALE	1,301	12.26%	705	6.64%	1,368	13%	420	4%
TOTAL	6,032	56.83%	4,583	43.17%	5,808	55%	3,626	34%
AGE								
<30	947	8.92%	1,431	13.48%	1,011	10%	906	9%
30-50	3,864	36.40%	2,588	24.38%	3,705	35%	2,225	21%
>50	1,221	11.50%	564	5.31%	1,093	10%	495	5%
TOTAL	6,032	56.83%	4,583	43.17%	5,808	55%	3,626	34%
PROFESSIONAL CLASSIFICATION								
MANAGER	103	0.97%	0	0.00%	73%	1%	0	0%
MANAGER / OFFICER IN CHARGE	342	3.22%	31	0.29%	349	3%	31	0%
TECHNICIAN	1,467	13.82%	654	6.16%	1,388	13%	592	6%
ADMINISTRATIVE WORKER	523	4.93%	231	2.18%	449	4%	145	1%
OFFICER	3,597	33.89%	3,667	34.55%	3,549	33%	2,858	27%
TOTAL	6,032	56.83%	4,583	43.17%	5,808	55%	3,626	34%



57%  
INDEFINITE



43%  
TEMPORARY



45%  
MEN

12%  
WOMEN



36%  
MEN

6%  
WOMEN

	2021				2020			
WORKING DAY TYPE	FULL-TIME		PART-TIME		FULL-TIME		PART-TIME	
DISTRIBUTION BY GENDER	WORKFORCE	%	WORKFORCE	%	WORKFORCE	%	WORKFORCE	%
MALE	8.246	78%	363	3%	7.336	78%	310	3,30%
FEMALE	1.380	13%	626	6%	1.194	13%	594	6,30%
TOTAL	9.626	91%	989	9%	8.530	90%	904	9,60%
AGE								
<30	2.074	20%	304	3%	1.666	16%	251	2,70%
30-50	5.866	55%	586	6%	5.359	50%	571	6,10%
>50	1.686	16%	99	1%	1.505	14%	82	0,90%
TOTAL	9.626	91%	989	9%	8.530	80%	904	9,60%
PROFESSIONAL CLASSIFICATION								
MANAGER	102	1%	1	0%	72	1%	1	2,70%
MANAGER/OFFICER IN CHARGE	353	3%	20	0%	3.71	3%	9	0,10%
TECHNICIAN	2.046	19%	75	1%	1.892	18%	88	0,90%
ADMINISTRATIVE WORKER	700	7%	54	1%	539	5%	55	0,60%
OFFICER	6.425	61%	839	8%	5.656	53%	751	8,00%
TOTAL	9.626	91%	989	9%	8.530	80%	904	9,60%

91% FULL-TIME



78%  
MAN

13%  
WOMAN

9% PART-TIME

20%  
<30 years

55%  
30-50 years

16%  
>50 years

	2021		2020	
UNFAIR DISMISSALS	WORKFORCE	%	WORKFORCE	%
ACCORDING TO GENDER				
MALE	325	60%	336	77%
FEMALE	220	40%	102	23%
<b>TOTAL</b>	<b>545</b>	<b>100%</b>	<b>438</b>	<b>100%</b>
ACCORDING TO AGE				
<30	88	16%	63	14.40%
30-50	384	16%	286	65.30%
>50	73	13%	89	20.30%
<b>TOTAL</b>	<b>545</b>	<b>100%</b>	<b>438</b>	<b>100%</b>
BY CATEGORY				
MANAGER	5	1%	3	1%
MANAGER / OFFICER IN CHARGE	32	6%	22	5%
TECHNICIAN	89	16%	131	30%
OFFICER	49	9%	256	58%
ADMINISTRATIVE WORKER	370	68%	26	6%
<b>TOTAL</b>	<b>545</b>	<b>100%</b>	<b>438</b>	<b>100%</b>

### 8.2.1. Employment

DOMINION's talent is the core value by which the company conveys its passion and way of doing things to its customers, which is why talent is there to serve.

In terms of management, emphasis is placed on drawing the best talent, creating development opportunities, encouraging learning and providing a safe and motivating working environment.

In financial year 2021, DOMINION strengthened its value offer as an employer by promoting communication with candidates and potential candidates. We are also moving ahead with the digitisation of our processes and process management. Job interviews are now an easier online experience for our candidates, and faster and more efficient for our teams. This ensures a more flexible and sustainable process, significantly reducing the use of paper and having to travel.

The work system implemented at the organisation is conducive towards knowledge sharing and involving all personnel in DOMINION's culture and *modus operandi*. Professional development, training and remuneration policies seek to improve the team as a whole, provide growth opportunities for the most talented individuals and retain the most important employees.

DOMINION's growth is closely tied to that of its personnel. For this reason, it remains committed to providing its teams with opportunities for development, internal promotion and mobility.

In 2021, the information gathered from the different appraisals conducted on professionals will allow us to design tailor-made development plans adapted to the identified requirements.

On the one hand, development programmes are encouraged through on-the-job experience. Along these lines, internal rotation programmes are preferred that enable new knowledge to be applied in real situations, as well as participation in cross-cutting projects or temporary assignments.

In addition to this, the company has two career models; on the one hand, management careers, with vertical promotion leading to positions involving more responsibility and team management; and on the other hand, technical careers, aimed towards creating and identifying experts in specific areas of knowledge that are considered to be critical for DOMINION.

Working towards increased transparency and communication with its employees, in 2021 DOMINION launched various initiatives to promote communication, such as the Employee Portal in Spain or working environment surveys with 13% of the workforce in two countries.

At the global level, projects were set into motion to facilitate across-the-board communication, such as The HUB, where news from DOMINION's different segments and individuals are gathered and shared, as well as #DOMINIONStories which highlights inspirational examples of DOMINION's professionals with a social and environmental focus.

### 8.2.2. Training

DOMINION's evolution and growth are closely tied to that of its personnel. For this reason:

- Training begins with the Onboarding process. Professionals are trained as soon as they join the company, learning fundamental principles such as the Code of Conduct. As well as this, **Welcome Training** includes cross-cutting content relevant to Health and Safety at Work, Sustainability, Diversity and Inclusion, Ethics and Corporate Culture. All of this serves to promote ongoing training for professionals throughout their professional career at the Company, from the first moment onwards.
  - Employee development is focused on the needs of the business, maximising the potential of each person in their position. Naturally, the contents are adapted to the requirements of each area, business and country.
  - With the post-Covid-19 scenario still ongoing, and with a strong emphasis on the use of digital environments, training and development for professionals acquires crucial relevance with regards to personnel management strategies, within the context of change and digitisation.
- again prominent this year, with 48% of training provided in virtual environments such as the eLearning platform "DOMINION University", which provides online training for various types of skills.
- Given the nature of the business, on-the-job technical training is particularly important in the officer or "blue collar" segments on site or in our stores.
  - In positions of responsibility, where requirements are not purely business-related, DOMINION increases its training offer to include courses geared towards people management as well as technical training for the job.
  - DOMINION's Knowledge Sharing policy establishes the basis for identifying and promoting guidelines to ensure know-how sharing and retention in teams.
  - In 2021, special mention should be made of the significant training work provided in Colombia, where 68,790 teaching hours were taught, in response to the significant number of professionals joining the company, in line with the growth in the country over the course of the year.

# 633

NUMBER OF COURSES\*

# 4,803

NUMBER OF PARTICIPANTS\*\*

# 121,589

TOTAL NUMBER OF

- It must be pointed out that online training was

(\*) Total number of courses counted once, regardless of the student who have taken them.

(\*\*) Total number of students counted once, regardless of the courses they have taken.



TRAINING BY CATEGORY	HOURS
MANAGER	754.8
MANAGER / OFFICER IN CHARGE	1,983.0
TECHNICIAN	41,502.4
ADMINISTRATIVE WORKER	7,273.6
OFFICER	70,075.6
<b>TOTAL</b>	<b>121,589.5</b>

TRAINING HOURS PER TYPE OF TRAINING	MALE	FEMALE	GENERAL TOTAL	%
PROFESSIONAL TRAINING	12,456	5,960	18,416	15%
LANGUAGES	330	515	845	1%
HEALTH AND SAFETY	95,343	6,986	102,329	84%
<b>TOTAL</b>	<b>108,128</b>	<b>13,461</b>	<b>121,589</b>	<b>100%</b>

METHOD OF PROVIDING	TRAINING	%
BLENDED LEARNING (TELE/PRESENTIAL & ONLINE) / BIMODAL	78	0%
E-LEARNING	15,445	48%
PRESENTIAL	16,905	52%
<b>GENERAL</b>	<b>32,428</b>	<b>100%</b>

TRAINING HOURS BY COUNTRY		
COUNTRY	ACCUMULATED HOURS 2021	ACCUMULATED HOURS 2020
GERMANY	1,381.5	2,842
ARGENTINA	757	105
AUSTRALIA	664	454
CHILE	6,284	681
COLUMBIA	68,790.5	-
DENMARK	685.2	624
SPAIN	23,446.15	4,442
SLOVAKIA	245	247
UNITED STATES	1,788	1,990
FRANCE	2,656.3	1,037
INDIA	527	-
ITALY	471	985
MEXICO	3,258	2,442
PERU	9,112	-
POLAND	655	605
PORTUGAL	592	80
UNITED KINGDOM	48	108
<b>GENERAL TOTAL</b>	<b>121,589.45</b>	<b>70,852</b>



## 8.3. Remuneration policy

DOMINION's criteria for actions and values regarding remuneration strive to constantly adapt to the cultural framework, respecting the idiosyncrasies of the work and business environments in the 27 countries where we employ staff.

As stipulated in the Fundamental Principles of People and Culture, DOMINION is obliged to provide full compensation schemes for its staff, based on equal opportunities, with no discrimination of any kind:

To achieve this, DOMINION developed an organisational model based on transparency, flexibility and long-term sustainability.

This model guarantees external competitiveness and internal equity, promoting variable remuneration in accordance with each employee's contribution, in line with the Principles of People & Culture as per the legislation in force in each country.

The analysis carried out in financial year 2021 indicates parity between men and women's wages at DOMINION.

The data in the table is affected by the spread of the countries and businesses DOMINION operates in.

Salary increases are established every year for groups and these can be approved either by the company or established through collective bargaining or local legislation.

The mean wage data by gender indicates parity at DOMINION. There is a wage difference of 1.03, compared to 0.94 in Spain (\*).

By gender, the mean female wage at DOMINION as a whole stood at EUR 17,447 gross per year, while the mean male wage was EUR 16,967 gross (in 2020, EUR 19,239 for women compared to EUR 18,197 for men). In terms of equal wages, the wage gap is the indicator that provides wage transparency.

WAGE GAP	2021	2020
TOTAL	1.03	1.06

(\*) To establish this indicator, the retail business group was removed, which is mainly made up of women. Additionally, the gap between these professionals was analysed, resulting in a figure of 0.98.

The Board of Directors and General Managers reporting to the CEO and forming part of the Management Committee, receive a remuneration that is commensurate with their contribution to the company, in line with their market positioning in comparison with other companies of a similar size or activity and in accordance with the provisions of the Rules of the Board of Directors.

The Appointment and Remunerations Committee proposes to the Board of Directors the remuneration policy which will be applicable to this group.

The information relating to this matter is set out in the Annual Corporate Governance Report and in the Annual Report on Directors' Remuneration, that are part of these Annual Financial Statements.

	2021			2020		
<b>AVERAGE REMUNERATIONS (FIXED SALARY) FOR THE DOMINION GROUP</b>	<b>MALE</b>	<b>FEMALE</b>	<b>DIFFERENCE</b>	<b>MALE</b>	<b>FEMALE</b>	<b>DIFFERENCE</b>
<b>BY CATEGORY</b>						
MANAGER	€103,984	€94,506	0.91	€97,483	€94,755	0.97
MANAGER / OFFICER IN CHARGE	€48,246	€41,266	0.86	€48,002	€43,241	0.9
TECHNICIAN	€22,837	€24,996	1.09	€22,787	€24,209	1.06
ADMINISTRATIVE WORKER	€9,875	€16,097	1.63	€9,803	€16,435	1.68
OFFICER	€13,262	€12,979	0.98	€14,696	13,374	0.91
<b>TOTAL</b>	<b>€16,967</b>	<b>€17,477</b>	<b>1.03</b>	<b>€18,197</b>	<b>€19,239</b>	<b>1.06</b>
<b>ACCORDING TO AGE</b>						
<30	€9,963	€11,950	1.2	€11,373	€12,658	1.11
30-50	€16,269	€18,720	1.15	€17,264	€19,833	1.15
>50	€26,813	€28,918	1.08	€27,810	€35,552	1.28
<b>TOTAL</b>	<b>€16,967</b>	<b>€17,447</b>	<b>1.03</b>	<b>€18,197</b>	<b>€19,239</b>	<b>1.06</b>

The difference compared to 2021 is: the effect of the Commercial business. In 2021, the retail business group was removed, which is mainly made up of women.



2021				2020		
MEAN WAGES (FIXED AND VARIABLE SALARY) AND DIFFERENCE FOR SPAIN	MALE	FEMALE	DIFFERENCE	WORKFORCE	FEMALE	DIFFERENCE
<b>BY CATEGORY</b>						
MANAGER	€117,030	€104,130	0.89	€110,640	€108,234	0.98
MANAGER / OFFICER IN CHARGE	€51,520	€46,752	0.91	€47,999	€46,335	0.97
TECHNICIAN	€32,182	€28,422	0.88	€20,387	€19,431	0.95
ADMINISTRATIVE WORKER	€20,580	€20,252	0.98	€20,387	€19,431	0.95
OFFICER	€23,361	€19,787	0.85	€21,905	€16,127	0.74
<b>TOTAL</b>	<b>€29,236</b>	<b>€27,547</b>	<b>0.94</b>	<b>€27,460</b>	<b>€22,396</b>	<b>0.82</b>
<b>ACCORDING TO AGE</b>						
<30	€22,100	€20,231	0.92	€19,943	€17,395	0.87
30-50	€29,161	€28,719	0.98	€27,436	€22,694	0.83
>50	€32,155	€29,758	0.93	€31,233	€30,951	0.99
<b>TOTAL</b>	<b>€29,236</b>	<b>€27,547</b>	<b>0.94</b>	<b>€27,460</b>	<b>€22,396</b>	<b>0.82</b>

The difference compared to 2021 is the effect of the Commercial business. In 2021, the retail business group was removed, which is mainly made up of women.



## 8.4. Health and safety

One of the essential tasks in human resource management is occupational risk prevention. DOMINION's management has included fulfilment of preventive goals, responsibility for implementation and leadership of the implementation of our Occupational Health and Safety system in its Occupational Health and Safety policy.

DOMINION is committed to the safety, health and well-being of its professionals with a view towards reducing the risk of accidents as much as possible, by ensuring compliance with the work legislation in force for this area and in each geographical area, as well as implementing prevention projects in line with the objectives laid down in the Prevention Strategy Plan.

The established management system, based on the provisions of standard ISO 45001, makes it possible to obtain indicators for monitoring and assessing the achievement of the proposed goals. This analysis of indicators makes it possible to anticipate the implementation of action plans, whereby DOMINION promotes a preventive culture, guaranteeing the necessary human and technical resources to ensure implementation of preventive planning, promoting health monitoring of its professionals.

In 2021, the Occupational Health and Safety area continued to be particularly relevant due to the global pandemic, and the procedures established in 2020 were maintained, adapting them to the specific requirements required during the different stages of the pandemic. Pursuant to the "COVID-19" procedure, based on risk assessment and comprising the basic action guidelines for all DOMINION staff, we continued to inform employees about safety and hygiene measures (hand washing, safety distance, etc.). All DOMINION employees, regardless of where they were located, continued to receive protective equipment (masks, gloves and hydroalcoholic gel), and PCRs and antigen tests were also carried out.

More extensive cleaning and disinfection of communal areas continued, as well as encouraging more flexible working hours and shifts for attending offices in person and more flexible working hours for teleworking in cases of potential close contact.

Specifically, and always based on the statistical data compiled following accident research, an awareness campaign was launched in relation to on-the-job accidents and specifically to those involving traffic accidents.

Also, and always with a view to raising awareness, World Occupational Health and Safety Day was celebrated, and for the first time ever, various activities were organised to mark the occasion, including a message from our CEO to all of DOMINION's staff.

Work-related accidents, particularly their frequency and seriousness, occupational illnesses, by gender.

In Spain in 2021 there were 104 accidents involving sick leave, of which 31 (29.8%) occurred on the job, meaning the number of accidents in the normal place of work totalled

73. Excluding on-the-job accidents, this represents an increase of 4 accidents (5.79 %) compared to 2020 (from 69 in 2020 to 73 in 2021), although it also represents a decrease of 16 accidents (17.8 %) compared to 2019, the year of reference as COVID did not affect this year.

It should be noted that there were no fatal, very serious or serious accidents in 2021, and no occupational illnesses were recorded.

### **Absenteeism**

The absenteeism rate in 2021 amounted to 4.67%, reducing the rate compared to 2020 by 2.1% (4.78% in 2020). During the last quarter of 2021, an absenteeism project was launched in two geographical areas. During this 3-month period, the absenteeism rate fell from 1.93% to 0.76%, which is the first indication of a downward trend in the absenteeism rate.

Specifically, and always based on the statistical data compiled following accident research, an awareness campaign was launched in relation to on-the-job accidents and specifically to those involving traffic accidents.

Also, and always with a view to raising awareness, World Occupational Health and Safety Day was celebrated, and for the first time ever, various activities were organised to mark the occasion, including a message from our CEO to all of DOMINION's staff.

	2021			2020		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
ACCIDENTS	85	19	104	79	13	92
FREQUENCY RATE	15.67	2.7	11.24	14.01	3.62	12.97
SEVERITY RATE	0.66	0.04	0.45	0.85	0.35	0.76
INCIDENCE RATE						
ACCIDENTS DURING THE WORKING DAY	2,745.9	473.19	1,968.72	2,301.22	835.23	2,270.22



## 8.5. Social relationships

DOMINION's Code of Conduct and Responsible Practices includes, as part of its in-house regulations, the content of the different national and international laws and agreements and conventions that apply in the areas that the company operates in, and undertakes to abide by them.

With regard to work organisation, the Code specifically regulates respecting the limits set out in the legislation of each country, regarding matters such as weekly working hours and overtime.

In practice, legislation and collective bargaining agreements that apply to DOMINION establish maximum annual working hours for employees, on the basis of which working schedules are then established. DOMINION has working hours control mechanisms in place, pursuant to the applicable regulations in each market.



### **Organisation of social dialogue, including procedures to inform and consult personnel and negotiate with them**

As a member of the United Nations Global Compact, DOMINION is fully committed to principle 3 "Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining ". This is a commitment made by DOMINION and set out in the Code of Conduct and in the Fundamental Human Rights Principles and Policy.

DOMINION, as a member of the United National Global Company, considers that freedom of association refers to the right of businessmen and worker(s) to form associations and unions, based on their needs.

It therefore upholds that it should not interfere in an employee's decision on his/her right to join a trade union and neither should the employee be discriminated against for doing so.

The management of labour relations at DOMINION is conducted according to the legislation governing each geographical area, within a framework of ongoing, constructive dialogue, through regular and extraordinary meetings with the Works Councils and Health and Safety Committees.

Annual and weekly working hours, start and finish times, as well as holiday periods are adjusted in line with the relevant work calendars, schedules and culture at each company so as to give all employees as much flexibility as possible and always respecting the annual working hours established in the different collective bargaining agreements.

### **Percentage of employees covered by collective bargaining agreements by country.**

DOMINION adheres to the collective agreements that are applicable according to the labour legislation in force in each country.

### **An assessment of collective agreements, particularly in the area of occupational health and safety.**

DOMINION has Health and Safety Committees with an equal number of Company directors and employees, which can be either locally-based at the workplace or national, depending on the applicable legislation in each country.

During the pandemic period, remote working was facilitated when necessary to protect team health and safety, as well as facilitating balancing work and personal life.

# 9.

## Human Rights

9.1. Commitment

9.2. Due Diligence

9.3. Mitigation and Remediation

9.4. Formal complaints for cases of the violation of  
Human Rights





## 9.1. Commitment

In the context of its vision of being a sustainable company that responds appropriately to all stakeholders' concerns, DOMINION is committed to respecting Human Rights.

This commitment is not limited to mandatory compliance with the legislation in force in each of the territories in which it operates. The Company is also committed to respecting internationally recognised human rights, covering the rights listed in the International Human Rights Charter and the principles relating to the rights established in the Declaration of the International Labour Organisation (ILO). As a significant part of this commitment, DOMINION is part of the United Nations Global Compact and it fully committed to its Principles, set out in the different declarations made by the United Nations in the areas of human rights, labour, the environment and anti-corruption, which enjoy universal consensus. DOMINION raises awareness of these international agreements by referring to them on its website, intranet, etc.

But equally important in DOMINION's commitment is its in-house implementation of the same, through its Code of Conduct, a policy approved by the Board of Directors, which is fully consistent with its Code of Conduct. This policy is accessible and intended for all employees, as well as suppliers and any other individual or company that interacts with DOMINION.

The main principles contained therein are as follows:

- **Avoid discriminatory practices:** DOMINION undertakes to ensure a working environment free from discrimination due to gender, race, age, sexual orientation, nationality, sexual orientation, marital status or socio-economic status.
- **Reject the use of forced and child labour:** DOMINION undertakes to ensure that no cases of forced or child labour occur in any of its activities. Moreover, it undertakes to comply with the labour legislation in the countries in which it operates and to take corrective measures where appropriate.
- **Offer decent employment:** DOMINION undertakes to pay its employees a fair salary, in keeping with their skills and knowledge. Likewise, DOMINION undertakes to comply with the labour legislation in all those places in which it operates and, insofar as is possible, to establish measures directed at flexitime.
- **Protect human health:** DOMINION undertakes to offer its employees a safe and healthy workplace environment, strictly complying with any applicable legal requirements.
- **Facilitate collective bargaining and freedom of association:** DOMINION respects the rights of its employees to freedom of trade union association and collective bargaining. As far as possible, the Company will facilitate employee meetings to freely discuss relevant matters relating to their jobs.
- **Foster a culture of respect for human rights** and the awareness of DOMINION's employees on this matter. In particular, those places in which compliance with these rights is at greater risk.
- **Encourage commitment to Human Rights throughout the value chain:** DOMINION undertakes to disseminate this policy to suppliers, contractors, partner companies and customers, promoting and motivating the various components of the value chain to develop their own policy in this regard.





## 9.2. Due Diligence

When implementing its commitments with regards to Human Rights, DOMINION distinguishes a number of areas where the company applies due diligence procedures designed to detect and prevent any risks of adverse effects on human rights.

- **With regards its own employees, and as explained in details in section 8**, DOMINION applies the fundamental resolutions of the International Labour Organisation as a reference framework, in combination with strict compliance with local regulations and corporate control that ensures that relationships with those people forming a part of the organisation is governed by respect for diversity, equal opportunities, non-discrimination and aligning the interests of professionals with the Company's strategic goals.



- **With regards to the supply chain (subcontractors and suppliers),** DOMINION calls for strong commitment towards compliance with human rights and environmental issues. These requirements are set out in the Purchasing policy and in the commitments to be met by suppliers, as well as in the supplier and supply chain management policy and the suppliers' code of conduct which they must follow if they do not have their own.
- **For those projects,** in which, as explained above, social and environmental impact analyses (ESIA: Environmental and Social Impact Assessment) are performed, typically under **IFC environmental standards**, of the International Finance Corporation, a subsidiary of the World Bank), in which risks of infringement of human rights are analysed, particularly in groups such as local communities, indigenous groups, migrants, children, etc., and preventive, mitigating or compensatory measures are proposed.
- **In the establishment of new business relations** (acquisitions, joint ventures...), with the process including analysis of the reputational history of potential shareholders and the inclusion of DOMINION's standards in the Joint Ventures it forms a part of or a request for similar standards.



## 9.3. Mitigation and Remediation

As regards mitigation and remediation, it is important to note the monitoring reports regarding the implementation of the approved measures (ESMP: Environmental Social Management Plan) which follow the Environmental and Social Impact Analysis (ESIA) performed. These monitor the adopted preventive, mitigating or compensatory measures.

The following actions are worthy of note to this regard:

**IN THE MESA MORENOS WIND PROJECT:**

- The construction of a water catchment tank for domestic use.
- The installation of sluice gates for irrigation channels.
- Channelling and drainage in the community centre.
- Fences using posts for livestock.

**IN THE SANTA ROSA BIOMASS PROJECT:**

- The transfer of GPS equipment to track biomass transporters.
- Equipment funding to streamline sawmill production.
- The donation of support and protection equipment for the Fire Brigade.

**IN THE MATA DE PALMA AND EL SOCO PHOTOVOLTAIC PROJECT:**

- The purchase of a waste collection truck.
- The donation of school material to the various educational centres in the area.

**IN THE ANGOLA PROJECT:**

- Packages for the most vulnerable, including seeds, animals, agricultural tools and information billboards for Communities.



## 9.4. Formal complaints for cases of the violation of human rights

**As an important part of the prevention and detection of possible breaches, DOMINION has made a whistleblowing channel available to all those forming part of the organisation and to third parties. This can be used for queries, to report illegal conduct or breaches of the Code of Conduct and, specifically, , violations of Human Rights. The Company guarantees the confidentiality of the whistleblower.**

No reports related to human rights violations were received in 2021.

# 10. Relationships with the Company

10.1. The company's commitment to sustainable development

10.2. Relationships with Public Administrations.

10.3. Associations

10.4. Political Parties

10.5. Supply chain

10.6. Consumers

10.7. Tax information

10.8. Innovation Management. Public Subsidies  
Received

10.9. Privacy Protection

10.10. IT Security







## 10.1. The company's commitment to sustainable development

DOMINION's activity is a clear driver for economic and social wealth and development. As a signatory to the United Nations Global Compact, DOMINION endeavours being active in the 17 objectives of Sustainable Development and, in particular, those linked to the commitment to society's sustainable development.

These commitments come in various forms:

**1. Diversity:**

DOMINION's specific commitment to diversity is set out in section 8 of this document.

**2. Projects that improve local development and the quality of life in communities:**

DOMINION develops solutions and services which improve the quality of life of the people in the communities it interacts with.

- Firstly, as DOMINION creates quality local employment with these projects, that also help to provide leverage to existing businesses, which in turn help to strengthen the economy.
- Secondly, since the activities it carries out often bring significant social benefits. The table below provides details of some of the main types of projects and the benefits they bring to communities.

	
<b>SOCIAL PROTECTION</b>	<b>HEALTH</b>
Platforms for the coordination of prevention and reaction to disasters:	Improvement in hospital treatment:
<ul style="list-style-type: none"><li>• Weather network projects.</li><li>• Tsunami prevention projects.</li><li>• Irrigation projects</li></ul>	<ul style="list-style-type: none"><li>• Hospital technological equipment.</li><li>• Solutions for improvement in the management of hospital dietetics</li><li>• Tools for the integral management of hospital pharmacy</li></ul>
	
<b>INFRASTRUCTURES.</b>	<b>RENEWABLE ENERGY GENERATION</b>
Improvement in safety in the railway sector:	<ul style="list-style-type: none"><li>• Photovoltaic, wind power and biomass projects.</li></ul>
<ul style="list-style-type: none"><li>• Use of video content analytics for accident prevention at level crossings.</li></ul>	
Accessibility to energy:	
<ul style="list-style-type: none"><li>• Electric transmission project.</li></ul>	

### 3. Philanthropy / Social action: Contributions to non-profit entities and foundations:

DOMINION has a Social Action Policy in which it sets forth its commitment to the community and the action principles that it must pursue in its projects, continually striving to contribute towards improving the communities where it operates, whilst encouraging employee commitment. There is also a clear commitment towards developing due diligence processes in each specific case to safeguard the company's reputation.

The policy established in 2018 continued to be pursued in 2021, although, following the approval of the Sustainability Committee, this was modified to focus on three criteria:

- Preferably philanthropy projects will be centred on **education**, education, ideally in relation to the technology sector. Based on this focus, DOMINION seeks to achieve more coherent social action related to developing local economy capacities, opening a vast potential of interrelation modalities that also contribute to contribute to appropriate monitoring possibilities and visibility.
- DOMINION also gives significant emphasis to the fact that, whenever possible, projects should include **volunteer** schemes for people associated with the company, as it believes that this is a positive approach towards improving personal development and increasing team commitment.
- Finally, it also considers any connections to actions related to **commitments to prevention, mitigation and remediation** tied to the aforementioned ESSiAs, which often lead to actions that result in significant improvements for communities (adaptation of roads, municipal facilities, etc.). As indicated in section 9.3.

The total contribution made in the Social Action area amounted to EUR 911,113 in 2021 compared to EUR 17,500 in 2020. The main actions and initiatives backed in 2021 (in addition to those already indicated in section 9.3) are as follows:



Xaley Foundation: "Right to exist, right to study" project.



Mondragón University: Lego League.



Deusto University: Ted Deusto.



Collaborations with the Guggenheim Museum and the Fine Arts Museum.

Also other projects undertaken in 2021, such as:

- **Social Solver:** A platform that establishes a connection between the requirements of the most vulnerable communities on the planet and the skills and knowledge of professionals.
- **Sauce:** Educating groups of victims of anti-personnel mines or polio.
- **Proyecto Únete** (Unite Project) to help children suffering from cancer in Guatemala.



## 10.2. Relationships with Public Administrations

The relations with Public Administrations in DOMINION must be conducted within the framework of the strictest legality, transparency and collaboration, both when referring to obtaining any type of permits and in the event of bidding for public projects or any other situation.

To this regard, it should be stressed that the Ethical Framework referred to in section 6 above has been improved, in particular in relation to the Gifts and Hospitality Policy, the Conflict of Interest Policy and the Anti-Corruption Policy, as well as the Code of Conduct and the Anti-Corruption Policy.





## 10.3. Associations

The Company, directly or via one of its subsidiary companies, participates in different sectorial associations, providing it with access to training opportunities, discussion forums, business opportunities, R&D&I, dissemination of news, etc. DOMINION's does not play a lobbying role in these associations.

The amount spent on these associations in 2021 totalled EUR 85,769.





## 10.4. Political Parties

As explained in section 6.2, DOMINION does not make contributions to political parties.



## 10.5. Supply chain

### Supply-chain Characteristics

As already explained, DOMINION does, in the majority of cases, procure finished products, fundamentally from world leaders in their different areas of activity.

On many occasions, this purchase is made either as a partner of the producer in question or by purchasing these products from the distribution channel created by the manufacturer. Additionally, it is worth mentioning that recurrence in purchasing in the area of solutions is very low given the great variety of projects undertaken. Finally, the quantity of raw materials purchased is very small.

## Policies and procedures applicable to purchases and the supply chain. Sustainability

Based on this situation, DOMINION, aware of the importance of including ethics and social and environmental responsibility in its purchasing process, includes taking its self-imposed sustainability management requirements to its supply chain as part of its Sustainability Strategy.

To this end, it places emphasis on two aspects:

- On the one hand, reinforcing in-house procedures. Professionals who work in the Purchasing Department are guided by DOMINION's Code of Conduct, the Anti-Corruption and Fraud policy and the supplier management policy, specifically aimed at defining obligations at each stage of the purchasing process. This policy is a cornerstone to ensure that the Company has a sound base of suppliers in line with universally recognised ethical, labour, social and environmental principles and based on which the Company directs its activity.
- On the other hand, on building appropriate relationships with suppliers. These are based on mutual trust, but also require suppliers to meet social and environmental responsibility requirements. To this end, and making the appropriate distinctions based on the characteristics of the aforementioned suppliers, an approval procedure is applied to them, which includes, amongst other aspects, the use of General Purchasing Conditions and compliance with the code of conduct for suppliers, drawn up and required by DOMINION. It is important to stress that there is a Whistle-Blowing Channel which can be used by suppliers to report irregular conduct. During 2021 there was no allegation with regard to this area.

## Monitoring and auditing certification systems

Here, DOMINION makes a distinction between personnel outsourcers and equipment and material suppliers.

In the specific area of subcontractors, it is worth mentioning that DOMINION uses this alternative in some specific activities which helps it to respond to activity peaks, fundamentally in the case of Spain. The quality and safety demands are the same as those of DOMINION, thereby ensuring compliance with a sustainable and responsible chain. To this end, and supported by an IT tool, the information requested, which will depend on the activity performed, on the existing regulations, on the requirements made by the end customer and on the requirements made by DOMINION vis-à-vis its suppliers, is continuously updated, including those relating to social and environmental aspects. In the event of any incident, easily detectable in the tool, the subcontractor is contacted in order to resolve it quickly.

In the case of the other suppliers, DOMINION includes sustainability in their certification process, calling for compliance with the suppliers code of conduct as a prerequisite for a business relationship. Subsequently, it performs a verification process according to the different types of suppliers.



## 10.6. Consumers

### **Customer characteristics: difference between B2B and B2C**

DOMINION provides Services and Solutions to more than one thousand companies throughout the world so that they can concentrate on their core activity, reduce costs and improve their efficiency. Its portfolio is fundamentally comprised of leading companies in their sector and is highly diversified both from the perspective of sectors and geography.

In the B2C sector, i.e. sales to retailers, these are primarily centred on a few very specific units at DOMINION, mainly through Phone House. Accordingly, DOMINION sells Services with an omni-channel approach to millions of end customers. In its virtually 500 stores, platforms and its websites, Phone House sells telephone terminals, connection services, electricity and other services for the home and people, placing the customer at the centre of its strategy.

### **Measures for the health and safety of consumers**

In terms of health and safety, the type of products (telephone terminals and related accessories) does not involve relevant risks.

Furthermore, in the design of its Phone House stores, special care is taken in ensuring that they comply with all the accessibility and safety requirements in the facilities for both customers and employees.

### **Customer Satisfaction**

The majority of the sales made is based on the personal service of Phone House professionals who advise customers on the various lines of products and services sold. The vast network of sales points, characterised by closeness to the customer, is comprised of own stores and franchises, but both maintain similar customer service procedures. Phone House measures customer satisfaction after a store visit, regardless of whether the customer has made a purchase or not. To do so, it uses the Net Promote Score (NPS) study as a reference, via which, a few days after the customer's visit to the store, they are contacted by phone and asked if they would recommend their Phone House experience.

### **Systems for claims, complaints received and their resolution**

Within the framework of its commitment to the customer, the companies in DOMINION's B2C area are subject to a strict complaints management system. Accordingly, in 2021 2,741 complaints were received and managed in Phone House's actual stores and 73 in those of the Conexión stores.

Moreover, as described in section 9.9, it is worth highlighting that the company is well aware in relation to the confidentiality of personal data, in particular with regard to those of its customers and employees.





## 10.7. Tax information

### **Profit obtained country by country Taxes on profit paid.**

DOMINION's activity contributes to the economic dynamism of the communities where it is present via the payment of taxes, employment and the hiring of suppliers.

In this sense, the Code of Conduct and DOMINION's Tax Policy emphasise the importance of satisfying tax obligations in accordance with the legislation in force. These rules explicitly prohibit the avoidance of payments or obtaining undue profit at the cost of the Public Finance authorities or Social Security. DOMINION also continues to strive towards improving the quality of its financial reporting. 2021 was the first year in which a "Country by country" report was prepared.

The Profit before Tax obtained by DOMINION throughout 2021 is reflected in the following table:

	2021	2020
COUNTRY	PROFIT/(LOSS) BEFORE CORPORATE TAX (thousands of EUR)	PROFIT/(LOSS) BEFORE CORPORATE TAX (thousands of EUR)
Germany	37	-2,482
Saudi Arabia	3,565	2,003
Argentina	26	-2,288
Australia	1,628	1,728
Bahrain	128	115
Canada	1,146	652
Chile	2,114	-2,906
Columbia	96	32
Denmark	-3,536	957
Arab Emirates	3,507	58
Slovakia	91	70
Spain	34,852	19,444
France	5	605
India	2,165	2,349
Italy	1,091	591
Mexico	-2,618	6,660
Qatar	1	-5
Oman	-372	-776
Panama	170	0
Peru	1,186	-172
Poland	-1,235	3,497
South Africa	-5	-11
United Kingdom	51	-140
USA	-2,269	157
<b>TOTAL</b>	<b>41824 30138</b>	

With regard to the amounts paid in 2021, the detail of the information is featured in the following table:

	2021	2020
COUNTRY	CORPORATE TAX PAID (CASH SETTLEMENT SYSTEM) (THOUSAND OF EUR)	CORPORATE TAX PAID (CASH SETTLEMENT SYSTEM) (THOUSAND OF EUR)
Germany	216	164
Arabia	572	505
Argentina	19	31
Australia	306	191
Chile	1,084	31
Spain	3,354	1,331
France	0	13
India	237	849
Mexico	751	920
Peru	398	290
Poland	30	367
(*) Others	201	401
<b>TOTAL</b>	<b>7168</b>	<b>5093</b>

\*Others includes the following countries: Slovakia, Colombia, Angola, Ecuador, Gibraltar, Guatemala, Portugal, Dominican Rep. and USA.

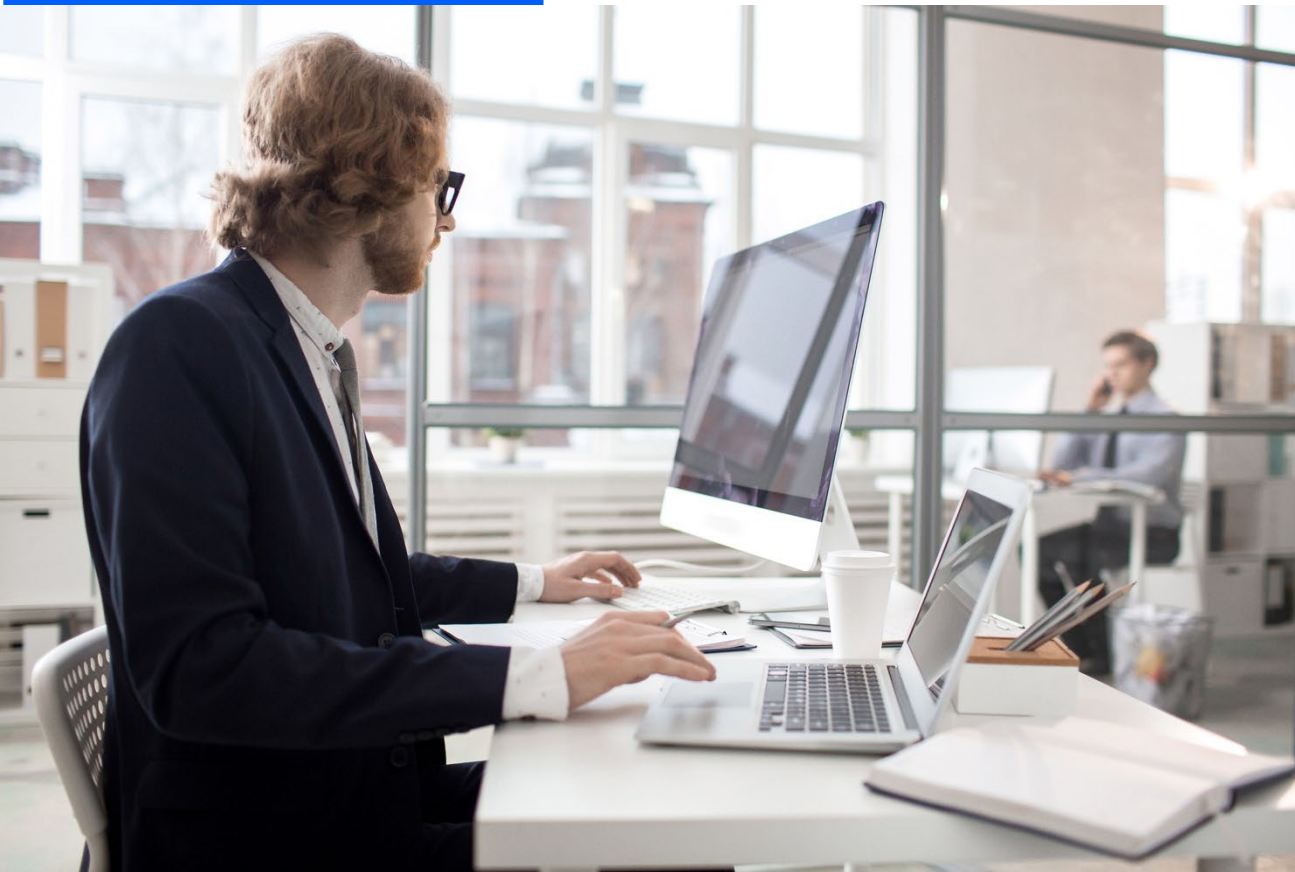
In relation with both tables, it is worth highlighting that the non-existence of a direct relationship between them responds to the lack of time correlation between both and the existence of a negative tax base corresponding to previous financial years which many have been offset.



## 10.8. Innovation Management. Public subsidies received

As part of its technological vitality concept, DOMINION's different units maintain, at all times, a permanent review attitude regarding its offer based on different technological developments in order to be able to offer the solution or services best adapted to the customer's needs at all times. The innovations are both product and process innovations.

Within this context, DOMINION is active in the presentation of its R&D&I projects for financing programmes supported by public bodies. During financial year 2021 the amount received in this respect amounted to EUR 239,315.00 compared to EUR 995,046 in the previous year. The above was received exclusively in Spain. Additionally, other subsidies were received, not related to R+D+i, for an amount of EUR 11,210, compared to EUR 4,366 in the previous year.



## 10.9. Privacy protection

As part of its commitment to sustainability, as well as a risk that is considered in the company's corporate risk management system, DOMINION attaches the utmost importance to the proper processing of personal data it has access to during its activities.

It should be noted that with regards to most of its B2B operations – typically strongly focused on industrial activities – third party data is generally not used or of little relevance, except for data relating to existing employment relationships, which DOMINION pays particular attention to. By contrast, with regards to B2C operations, given the significant number of customers the company works with and the fact that they are typically individuals, personal data must be appropriately obtained, protected and processed.



The key factors for adequate privacy protection are as follows:

- A Privacy Policy and a Confidentiality Policy
- An ongoing adaptation process, supported by third parties
- IT security measures
- Customer rights and information

### **A Privacy Policy and a Confidentiality Policy**

DOMINION has implemented a privacy policy that expresses its commitment to the various affected stakeholders, providing the details of the principles this commitment is based on.

Additionally, the policy regarding confidentiality and the use of transferred assets supplements the in-house privacy policy, highlighting, among other aspects, the diligence obligations incumbent on all DOMINION employees in relation to the confidential and personal data to they have access to in relation to the activities they perform. These obligations are consistent with those also stipulated in the Code of Conduct, which all DOMINION employees adhere to.

### **An ongoing adaptation process**

DOMINION undertakes an ongoing process of adaptation to the regulations that are in place in the different countries where it operates, assessing all new activities and monitoring the conclusions and measures taken in relation to the activities underway.

This process is led by the Corporate DPO (Data Protection Officer), who has his own team and is assisted by external experts to monitor and audit the processes underway, as well as to assess new activities.

### **IT security measures**

As a result of the different analyses carried out for those activities involving personal data processing, conclusions are drawn as to whether the existing IT security regulations, covered in section 10.10, and the Confidentiality policy are appropriate to protect the processed data, or whether, if this is not the case, additional measures need to be taken and, when necessary, implemented.

### **Customer rights and information**

By means of the information on its websites, in contracts and other media, DOMINION appropriately notifies its customers of the information collected, how it is used, how long it is kept and the options available to the user with regard to managing it, in addition to other related matters.

### **Claims Received**

3 incidents were received from the Spanish Data Protection Agency (regulatory body) in 2021. DOMINION dealt with all of them appropriately. Two have been archived whilst the other is still being processed.



## 10.10. IT Security

DOMINION relies heavily on digitisation as a means to improve the efficiency of its customers' activities, as well as its own, and for this reason appropriate management of digitisation-related risks is vital for the company.

DOMINION has an in-house IT security policy, which defines the minimum requirements to be met at all DOMINION facilities, notwithstanding any necessary local adaptations. There is also a policy on Confidentiality and Use of Assets which is intended for each DOMINION employee, insofar as it specifies how DOMINION tools must be used and the diligence required with regards any confidential information they have access to.

In this context, cybersecurity is particularly relevant, given that this is a matter of growing concern for the company as well as all its stakeholders. Accordingly, in 2021, DOMINION significantly tightened up its prevention measures and contingency plans to provide protection against such events.

Appendix I.  
Traceability  
between Law and  
GRI/ Other  
reporting criteria



## TRACEABILITY BETWEEN LAW AND GRI/ OTHER REPORTING CRITERIA

Business model	GRI [102-1; 102-2; 102-3; 102-4; 102-6; 102-7; 102-14]
Risk and Materiality Management	GRI [102-15]
Corporate Governance	GRI [103]
KPIs and Sustainability Strategy	GRI [102-54; 103]
Ethical framework and policies	GRI [102-16; 102-17; 103; 205-2; 205-3; 413-1]
Environment	
• DOMINION and the Environment	GRI [103]
• Pollution	GRI [103; 102-11; 305-1; 305-2; 305-3]
• Circular economy and waste management	GRI [103; 306-3]
• Sustainable use of resources	GRI [103; 301-1; 303-4; 303-5; 303-5-b]
• Climate change	GRI [103; 302-1]
• Biodiversity protection	GRI [103; 304-2]
Employees	
• Diversity and inclusion	GRI [103]
• Employment	GRI [102-8; 103; 401-1; 404-1; 405-1; 405-2]
• Remuneration policy	GRI [103; 403-2]
• Health and safety	GRI [103; 403-2; 403-3]
• Social relationships	GRI [102-41; 103; 403-4]
Human Rights	GRI [102-16; 102-17; 103; 406-1; 407-1; 408-1; 409-1; 412-2]
Relationships with the Company	GRI [102-9; 102-12; 102-13; 102-43; 103; 201-4; 203-1; 203-2; 308-1; 413-1; 413-2; 414-1]
EU Taxonomy	Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 and related delegated regulations.



DOMINION