

Our considerations

OHLA is aware that the new challenges that arise on a global scale require sustainable, responsible, and proactive business management committed to society's development and well-being. Facing these challenges requires taking on challenges and integrating sustainability, employing a transversal approach throughout the business production chain to create long-term value while meeting and responding to the needs of our stakeholders.

This commitment to a sustainable growth model that generates economic, environmental, and social value calls for defining a roadmap that sets the basis for the sustainability strategy, integrating and controlling non-financial risks, and making the most of all opportunities.

Purpose and scope of application

The purpose of the Sustainability Policy is to establish the framework for action that supports Sustainability management throughout the Company's business model, aimed at creating long-term value and managing social and environmental aspects based on the Company's various policies and codes of conduct.

The scope of application of the Sustainability Policy covers Obrascón Huarte Lain, S.A. and the companies that make up its Group for accounting consolidation purposes (hereinafter, "Group," "OHLA" or "the company"), and over which the Company has management control (it is understood that "control" exists when a majority of the voting rights of the governing body are held). In those investee companies that are not part of the Group, and over which the Group has no control, the Company will look out for that the principles set out in this Policy are known.

Our approach

OHLA seeks to promote sustainability in all of the business's value chain links, integrating and transferring this culture to our stakeholders, involving them, and addressing their concerns in a clear, complete and honest manner.

Therefore, the company works to operate in compliance with the best standards of transparency, communication, and commitment to ESG (Environmental, Social and Governance) governance and incorporates it in its non-financial materiality analysis exercise the dual perspective: the effect of non-financial issues on OHLA, and OHLA's effect on the environment. Furthermore, it ensures strict compliance with current legislation on sustainability and voluntarily takes on specific ethical, social and environmental commitments beyond those legal obligations.

The Sustainability Policy is aligned with the Company's Code of Ethics and, therefore, with the values and conduct guidelines contained therein. Similarly, OHLA will follow the principles of action in terms of Sustainability set out below:

- Compliance with good governance practices is a cornerstone of OHLA's business and stakeholder relations.
- Responsibility, diligence and transparency in the dissemination of information.
- Support for domestic and international benchmark initiatives that promote sustainable development and are aligned with the Company's values, such as the United Nations Sustainable Development Goals (UN SDGs).

Our commitments

OHLA's relationship with its stakeholders is critical in its exercise of responsibility. Therefore, the sustainability strategy is built every day in dialog with them. This Policy aims to promote transparency about our ESG commitments and performance, as well as to encourage active involvement in all of them, and to promote the integration of sustainability into the Group's strategic lines.

Transparency and results

- Creation of long-term value and profitability for our shareholders and investors within the framework of the relationships based on ethics and transparency.
- Ensuring equal treatment of shareholders and investors by facilitating the exercise of their rights.
- Responding with transparency, diligence and truthfulness to requests for information or any request for information on Sustainability required by analysts, shareholders, or investors.
- Acting with responsibility, prudence and transparency when fulfilling tax obligations and in the relationship with the relevant tax administrations.

Commitment to people

- Promoting a motivating work environment that attracts and retains talent and fosters professional development.
- Promoting work-family balance mechanisms, as well as mechanisms that favor digital disconnection.
- Fostering an environment that promotes equal opportunities and the development of a plural and diverse workforce.
- Promoting women's access to positions of responsibility by encouraging their inclusion in succession plans.
- Generating team feeling and commitment culture as crucial factors to productivity.
- Prioritizing the safety and health of workers through a culture of prevention.

Environmental responsibility

- Progressively incorporating climate change risks assessments and opportunities into the Company's strategy, processes, and risk management.

- Actively contributing to the transition to a low-carbon economy by offsetting and reducing the intensity of our environmental footprint by incorporating new technologies and a commitment to innovation.
- Promoting a culture of preservation of natural resources and pollution prevention, favoring a responsible and efficient use of natural resources, and encouraging a circular economy as part of the production chain.
- Promoting good practices in water management.
- Ensuring respect for the environment and biodiversity of the areas where the projects are located, favoring the mitigation of the negative impacts generated.

Innovation and excellence

- Seeking excellence in project execution and service delivery as a critical indicator of customer satisfaction.
- Supporting the R&D&I necessary to obtain and apply new technologies, processes, products, and services that will allow the Group to increase productivity, reduce costs, improve its competitive capacity, and differentiate itself from its competitors. These achievements will contribute to the sustainable growth of the Group.

Responsible supply chain

- Promoting awareness and applying the Code of Ethics and the principles on which the Group's Purchasing Policy is based.
- Considering sustainable criteria in the supplier procurement and approval process.
- Promoting among suppliers the protection of Human Rights of the United Nations Universal Declaration of Human Rights and the observance of the United Nations Global Compact principles.

Shared value

- Encouraging the development of strategic alliances with organizations, public institutions, companies, and associations to achieve the strategic goals set out in our global roadmap for Sustainability.
- Contributing to the promotion of public administration commitments within the framework of the 2030 Agenda goals.
- Contributing to economic development and social cohesion in the cities and regions where we are present through local employment and support for social and economic initiatives.
- Exercising due diligence to ensure the respect and protection of Human Rights in developing our activities wherever we are present.
- Supporting innovative programs in social action and promoting corporate volunteering in our different operating environments.

Ethical conduct and good governance

- Promoting best corporate governance practices through ethical, responsible, and comprehensive business management, in line with good governance recommendations generally recognized in the international markets.
- Leading and promoting sustainability from the highest governing bodies of the Company.
- Promoting information transparency and communication with the different stakeholders.
- Prudently and responsibly managing social and environmental risks as part of the business, establishing internal control mechanisms, and adequately managing the opportunities derived therefrom.

Governance and oversight model

The OHLA Executive Committee, in compliance with the provisions set out in the Capital Companies Act, its Bylaws, and the Regulations of the Executive Committee, has among its non-delegable powers the responsibility to approve the general policies and strategies of the Company and, in particular, the Sustainability Policy.

Similarly, the Executive Committee shall be ultimately responsible for supervising compliance with this Sustainability Policy, delegating this function to the Appointments and Remuneration Committee to ensure that the principles of action set forth therein are integrated in a timely and accurate manner in the development of activities.

The functions of the Appointments and Remuneration Committee include the assessment and review of the Company's Sustainability performance, in order to review the effectiveness of this Policy, as well as compliance with the goals established in this area; and its annual report to the Committee on the implementation and general monitoring of this Policy.

The Sustainability Department will regularly review the good practices in this area and evaluate its actions to ensure understanding and compliance with the commitments acquired in the Sustainability Policy. It will also promote the dissemination, knowledge, and compliance with the Policy through the plans approved from time to time by each Corporate Directorate for such purposes. At least once a year, or in the event of any situation requiring changes to this Policy, the Sustainability Department shall review and submit to the consideration of the Appointments and Remuneration Committee all and any updates and modifications as may be deemed necessary or advisable from time to time.

The General Directorates, with the support of the Sustainability Department, are responsible for defining the plans and actions necessary to comply with the Sustainability Policy, as well as proposing the quantitative and qualitative goals for each of these actions and the associated monitoring indicators.

Communication

OHLA Group has multiple communication tools and channels adapted to the needs of its stakeholders for Sustainability matters, such as the corporate website, Intranet, social networks and the ethical channel, among others. These mechanisms seek to offer and allow all stakeholders to develop fluid, transparent and effective communication in all terms while favoring dialog and participation and generating trust and understanding among all parties.

The Company will also report annually on the progress made in implementing this Policy in its Consolidated Management Report.

José Antonio Fernández Gallar

Chief Executive Officer OHLA Group

This Policy has been approved by the Executive Committee, at the proposal of the Chief Executive Officer, at its meeting held on 20 January 2022.

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