

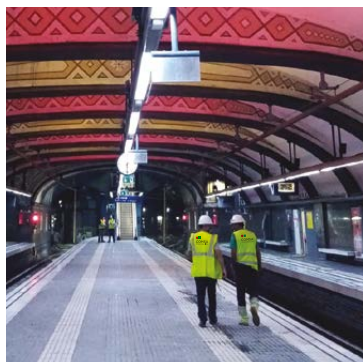


Sustainability Report

2020



TABLE OF CONTENTS



ABOUT COMSA CORPORACIÓN

MAIN MILESTONES 2020
CHAIRMAN'S LETTER
130 YEARS OF HISTORY
MISSION, VISION AND VALUES
SDG COMMITMENT
CORPORATE GOVERNANCE
TRANSPARENCY, ETHICS AND INTEGRITY



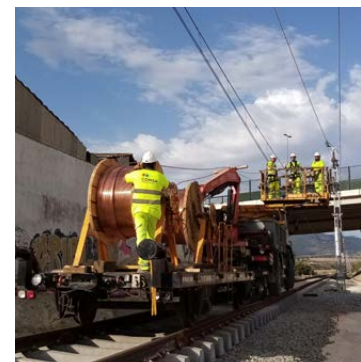
ECONOMIC SPHERE

BUSINESS MODEL
RISK MANAGEMENT
CORPORATE STRATEGY
KEY FIGURES
VALUE CREATION



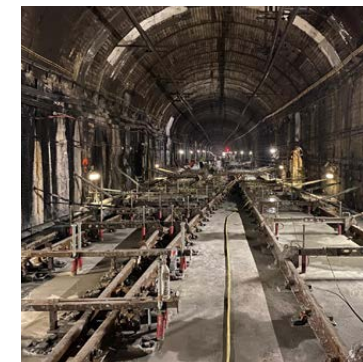
ENVIRONMENTAL SPHERE

ENVIRONMENTAL CONTRIBUTION
INNOVATION MANAGEMENT



SOCIAL SPHERE

COMSA CORPORACIÓN TEAM
EXTERNAL COLLABORATORS
CLIENTS
SOCIAL CONTRIBUTION



ABOUT THE REPORT

ADDITIONAL INFORMATION
ANNEX I: GRI TABLE OF CONTENTS
ANNEX II: SDG TABLE OF CONTENTS

ABOUT COMSA CORPORACIÓN

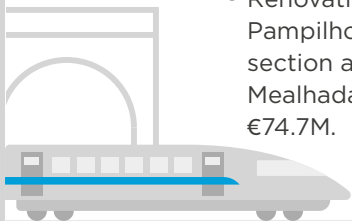




MAIN MILESTONES 2020

JANUARY

- 2019 closed with a turnover of €777M and a boost in the engineering business.
- Renovation of the Beira Alta line, Pampilhosa - Santa Comba Dão section and construction of the Mealhada bypass (Portugal) for €74.7M.



FEBRUARY

- Construction of the new production plant of the pharmaceutical company Alter in Meco (Spain) for €12M.
- San Telmo Award for the construction of the access highway to A Coruña (AC-14).



MARCH

- Award of the €80M contract for the construction of the Atotxa high-speed railway station in Donostia (Spain).
- Performance of essential services during the Covid-19 crisis.



APRIL

- Adequacy of the plant for the reception of patients with coronavirus, in the Hospital del Mar, Parc de Salut MAR in Barcelona (Spain).
- Participation in the EU Horizon 2020 5G-PICTURE project.



MAY

- Award of railway projects in Mexico worth €38M.
- Participation in the Global Compact's #InitiativeswithPrinciples campaign to tackle Covid-19.



JUNE

- Participation in the #5GMED project to connect the Catalan railway network with that of the south of France.
- Campaign with UNHCR to turn the situation of millions of refugees around.





MAIN MILESTONES 2020

JULY

- Award of engineering contracts for the installation of ITS systems in Colombia for €18M.
- Participation in the “Young Apprentices” Programme in Brazil.

AUGUST

- Award of several projects to improve the landing systems of 14 airports in Morocco for €13M.
- Carbon Footprint Certification and registration in the MITECO Register.

SEPTEMBER

- Award of the €62M contract for the duplication of 18.7 km of the N-232 in the province of Zaragoza (Spain).
- Participation in the Target Gender Equality Programme of the United Nations Global Compact.



OCTOBER

- Participation in the challenge “Drink without Plastic” promoted by Barcelona + Sustainable.
- COMSA Renovables obtains the Sustainable Biomass Program certificate.



NOVEMBER

- Award of the contract for the transformation works in sector XVII of Payuelos, León (Spain) for €25M.
- Presentation of the BiGEO system for geothermal renewable energy generation integrated in building foundations.



DECEMBER

- Award of railway infrastructure maintenance contracts for more than €5.3M, for the Alicante TRAM (Spain) and Line 10 of Metro Madrid (Spain).
- Accession to the Plataforma Hidrógen Verd Catalunya Sud to promote the expansion of this fuel.



Consult
the latest
news



LETTER FROM THE CHAIRMAN

The year 2020, which we are taking stock of in this Sustainability Report, will go down in history not only for the impact of the pandemic and its consequences, but also for the accelerated learning it has entailed, which will enable us to make progress in the profound changes on a global scale that are essential.

From an economic point of view, the immediate impact of the pandemic has been cushioned thanks to the trust, involvement, commitment and generosity of our employees, clients, suppliers and collaborators who, in a context of maximum hardship, have joined forces to continue safe workplaces, which have allowed us to maintain a good part of the operations and, therefore, a volume of business similar to that of 2019. In this sense, the continuity of the activities of essential services has once again demonstrated the will of all of us who form part of COMSA Corporación to place the company at the service of society.

In the medium term, and continuing in the economic area, the increase in the Group's order intake, which allows us to reach a portfolio of over €1,200M, as well as the successful completion of the refinancing process in 2021, will provide us with additional capacity to face the medium- and long-term future with greater guarantees of success.

All of the above has been possible thanks to the ability of our professionals to adapt to an unpredictable and unexpected situation, as Covid-19 was and is, reflected both in the way we relate to each other socially and in the way we work. And, in this context, we must continue to advance in the development of our employees from a professional and personal point of view, retaining, developing and attracting talent, and deepening equality as a framework of reference and unwavering commitment.





LETTER FROM THE CHAIRMAN

We want to extend this commitment to society as a whole, and especially to the most disadvantaged people and groups who have also been highly impacted by the pandemic. That is why we want to reaffirm our partnership with UNHCR, setting new and ambitious goals for 2021, which will allow us to provide shelter to families fleeing war or the increasingly frequent and evident effects of climate emergencies.

With regard to the climate emergency situation in which we find ourselves on a global level, at COMSA Corporación we continue to work on defining a Climate Strategy that will allow us to establish specific objectives to mitigate its effects and increase our positive impacts in adapting to climate change. During 2020 we took the first steps with the measurement of greenhouse gas emissions and certification for our core business, which we will extend to all the Group's activities in the coming years.

I would like to highlight the substantial contribution of the construction and engineering sector, in the past, in the present and, of course, in the future, to the adaptation and mitigation of climate change, as well as the contribution in terms of circular economy. In a context of far-reaching regulatory and market changes in environmental matters, with consequences for operations and the business in general, the challenge we face is to review our value chain and make changes in production processes in order to reduce our environmental impact and enable us to develop more sustainable materials, products and services. Thus, innovation, one of our values, must contribute to our differential positioning in environmental matters.

Finally, I would like to conclude by expressly acknowledging all the people who, on a daily basis, contribute to making COMSA Corporación a company committed to economic, social and environmental development, within a framework of balance between technological progress and the conservation of a sustainable ecosystem.

Jorge Miarnau
Chairman of COMSA Corporación



Jorge Miarnau, chairman of COMSA Corporación



130
YEARS

OF HISTORY

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

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



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

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



4 Upon the **centenary of the Group** and coinciding with the arrival of the fourth family generation, COMSA began its internationalisation, setting up in Portugal, followed by a rapid expansion towards Europe and Latin America.

5 In **2019**, the maintenance and services area will celebrate 25 years with COMSA Service consolidated in the maintenance and energy efficiency sector. This area is completed with COMSA Solutions, specialising in ancillary services and COMSA Security, focused on installation and maintenance of security systems.

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



7 The **more than 130 years of experience** by the Group, together with the high specialisation in the construction and modernisation of transport infrastructures, make COMSA Corporación a reference partner for clients and collaborators.



MISSION, VISION AND VALUES



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

MISSION

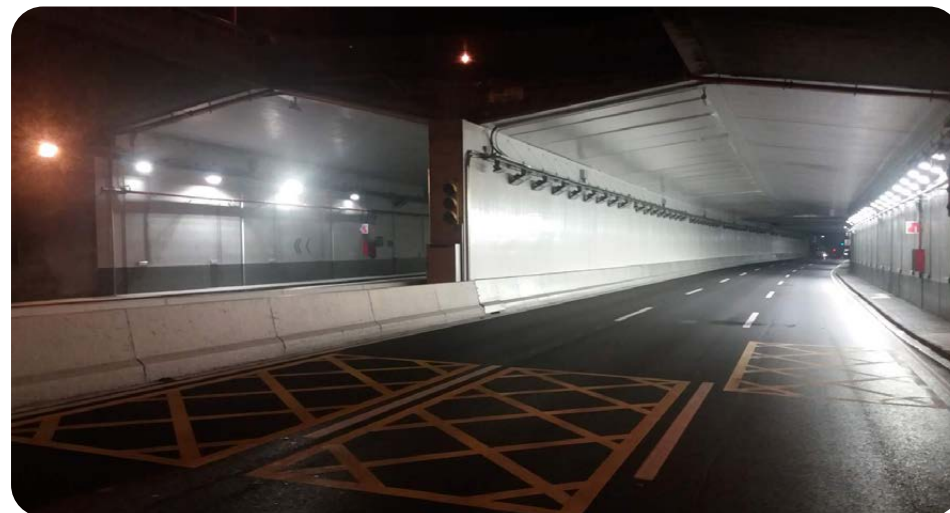
To offer society comprehensive infrastructure, industrial engineering, maintenance, and infrastructure development and concession services, under the principles of professionalism, quality and innovation, thus meeting the needs of clients and fostering an environment of human development within a framework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

VISION

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



Duplication of the BR-101 highway between the cities of Rio Largo, São Miguel dos Campos and Teotônio Vilela (Brazil)



Electrical installation in the covering works of the Ronda de Dalt ring road, Barcelona (Spain)



MISSION, VISION AND VALUES

OUR VALUES



Overview

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



Client focus

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



Results oriented

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



Human team

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



Excellence and initiative

COMSA Corporación bases its excellence on the professionalism and talent of its human team, on the search for new opportunities and on the commitment to provide the best solutions to each client, executing projects with the highest quality standards.



Innovation and technology

Technological specialisation is an integral asset of the value chain that allows us to offer clients advanced solutions to anticipate their needs and improve the efficiency of their projects.



Responsibility to the environment

The Group is fully committed to society and the environment in all its activities.

SDG COMMITMENT

In this decade marked by the **2030 Agenda** and especially by the **Sustainable Development Goals (SDGs)**, together with the health emergency caused by Covid-19, responsible management has become more important in COMSA Corporación, where the leadership and involvement of senior management, as well as the ability to adapt of the entire team that makes up the company, have been essential to overcome the problems which arose in 2020.

COMSA Corporación understands sustainability as a balance between economic growth, the reduction of environmental impact and the promotion of social progress in its environment, thus contributing to generate a positive impact on its stakeholders. For this reason, the different areas of the company are working to establish quantifiable indicators that allow us to measure the evolution of performance in the face of the main challenges we face as a society.

DIRECT IMPACT

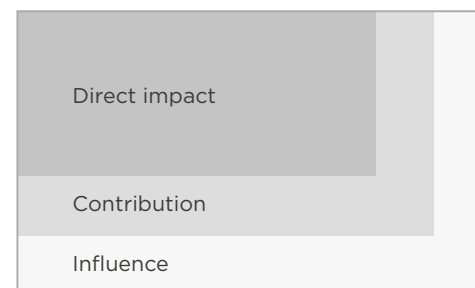


SDG 9 - Industry, innovation and infrastructure: The development of sustainable and resilient infrastructures is fundamental to the challenges we face as a society, and therefore we must focus efforts on fostering innovation. In 2020 the Group developed more than **30 innovation projects** in the field of railways and civil works, digitalisation, energy transition and smart building worth **7 million euros**.



SDG 12 Responsible consumption and production: Resource efficiency and the transition to circular production models are part of the roadmap for all businesses. Since its accession to the **Circular Economy Pact in 2019**, COMSA Corporación has been working to make efficient use of resources, extend their useful life and promote their revaluation in the different projects. In this area, 97% of the waste generated in projects in Spain has been managed for revaluation. Internally, different initiatives have been promoted in the company's day-to-day operations, such as the "Drink without plastic" challenge, the "Reduce your digital footprint" challenge, as well as campaigns to promote recycling and awareness campaigns to reduce printing.

After analysing their context, the Group prioritised the SDGs according to whether they have a direct impact through their type of activity, whether they contribute to the achievement of the SDGs in their day-to-day work, or whether they have an indirect influence on the achievement of the SDGs.



SDG 11 Sustainable cities and communities: More than half of the population now lives in cities and, as global trends suggest, these numbers are increasing, so it is essential that these spaces become more sustainable, safe and secure for all its inhabitants. In 2020, with **14 LEED and BREEAM certified projects**, the company continued to develop sustainable building projects and different mobility infrastructures in the urban environment, thus contributing to minimising the ecological footprint of cities.



SDG 13 Climate action: Combatting the consequences of climate change is the biggest challenge we face as a society, and all players must contribute. The activities of COMSA Corporación are based on sustainable construction, the promotion of energy efficiency in installations, as well as in the development of the renewable sector, essential tools to reduce emissions and dependence on polluting energies. As a sign of its commitment to the climate, in 2020 the company verified the carbon footprint of its Core Business, as a first step towards reducing emissions, and 75% of corporate offices in Spain have energy efficiency certification.



SDG COMMITMENT

CONTRIBUTION



SDG 3 Good health and well-being: COMSA Coporación's firm commitment to safety and health also extends to all employees. In 2020, as a result of the health emergency, the Group has **focused its efforts** on preserving safe environments for all staff while ensuring business continuity.



SDG 6 Clean water and sanitation: Throughout its history, COMSA Coporación has participated in projects to improve access to safe drinking water in several continents. It currently promotes the efficient use of this precious resource, both within the company, where sensors have been installed on taps to minimise consumption, and in projects, where responsible management is essential.



SDG 8 Decent work and economic growth: Companies must contribute to creating fair and inclusive societies, fostering economic development in the areas where they are located, promoting equal opportunities in the workplace, and ensuring the safety and integration of different groups in the labour market. In this area, 98% of the Group's suppliers are of local origin, contributing to the development of the different territories, as well as promoting the training and integration of young people in the labour market through various collaborations.



SDG 5 Gender equality: Aware of the high masculinisation of the sector, and as a sign of the company's commitment in this area, in 2020, it joined the Global Compact's **Target Gender Equality** accelerator programme. At the same time, **Gender Equality Awareness** training has been given to the staff, as well as training to prevent harassment for reasons of sex.



SDG 7 Affordable and non-polluting energy: By 2020 the Group had contributed to the generation of **230,900 MWH of emission-free energy** through photovoltaic and wind installations, thus contributing to increasing the renewable energy mix.



SDG 17 Partnerships to achieve objectives: In order to achieve the different goals of the 2030 Agenda, the company has established partnerships with different players to maximise their results. As a result of these alliances, in 2020, the company, together with its workforce, contributed to **supporting 436 families through the Salary Solidarity Programme in collaboration with the UNHCR**. On other occasions, the company has joined client or partner projects, such as Iberdrola's ALETEO project to preserve birdlife.

INFLUENCE

Indirectly, through partnerships, such as the one established with UNHCR since 2019, the company contributes to the fight against poverty (SDG 1), eradicate hunger (SDG 2), promote education (SDG 4) and reduce inequalities (SDG 10), helping to leave no one behind. In addition, through locally based partnerships, actions are carried out, among other things, to preserve ecosystems (SDG 15). On the other hand, through sectoral alliances and participation in organisations such as the Global Compact, the company contributes to promoting the transition of institutions towards sustainability.



SDG COMMITMENT



ADHERENCE TO THE 10 PRINCIPLES OF THE UNITED NATIONS GLOBAL COMPACT

For several years now, with COMSA Corporación's adherence to the United Nations Global Compact, the company has shown its commitment to its 10 Principles in the areas of Human Rights, Labour Standards, the Environment and the Fight against Corruption.

Beyond integrating these commitments into its day-to-day business and disseminating its good practices on Global Days, in 2020, the company has gone a step further in fulfilling these principles and the targets derived from them by joining its **SDG Ambition accelerator** programme, through which it wants to set more ambitious goals in its sustainability performance, while serving as a benchmark to inspire other players in the sector.



Construction of the student residence next to Sants Station, Barcelona (Spain).



CORPORATE GOVERNANCE

COMSA Corporación is the result of the integration, in 2009, of two family business groups. The two groups have historically maintained a close working relationship that has enabled them to offer clients integrated solutions for their projects. This vision has enabled COMSA Corporación to become a benchmark in the infrastructure and industrial engineering sector.

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

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

Governing bodies and structures of COMSA Corporación:

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

BOARD OF DIRECTORS

The Group's highest governing body is the **Board of Directors**, appointed by the General Meeting of Shareholders and made up entirely of proprietary directors, who are elected by the General Meeting from among the shareholders for their knowledge of the business, management experience and training.

In 2020, the Appointment Policy for members of the Board of Directors was approved, which develops the procedure and criteria for their selection.

The Chairman of the Board of Directors, Jorge Miarnau Montserrat, is appointed by the rest of the members of the Board and has executive functions. In particular, he has direct responsibility for the following corporate areas: Finance, Legal and People.



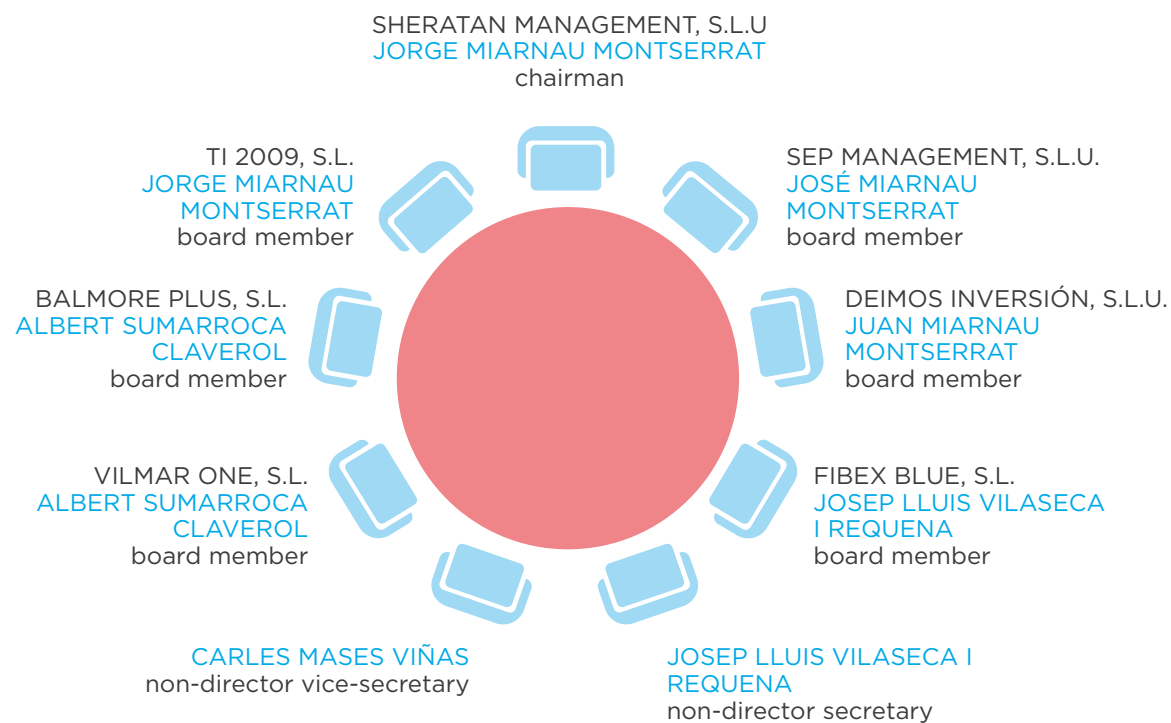
Construction of the Reguerón Highway, Murcia (Spain)



CORPORATE GOVERNANCE

The Board of Directors is made up of 7 members, all of whom are legal persons represented by natural persons. Three of the directors have executive functions in the company. As it is a limited liability company, the position of the directors is indefinite and the seniority of all of them dates back to 2014.

Composition of the Board of Directors:





CORPORATE GOVERNANCE

The matters dealt with by the Board of Directors are:



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

When taking decisions that may affect stakeholders, the Board of Directors requests relevant reports, both externally, average independent consultants and sectoral bodies, and internally, through experts in environmental, social and economic matters from the Group itself. Likewise, the meetings of the Board of Directors are attended, as guests, by the Group's top executives in the Corporate function, Fernando Perea Samarra, and in the Business function, Guillermo Lorenzo Rodrigo, both members of Senior Management, who respond to any clarifications the Board may require and inform it of the decisions taken by the Executive Committee and by the Operating and Operational Committees.

At least once every six months, in the second and fourth quarters of the year, the Board of Directors carries out an overall evaluation of the main business performance indicators. In 2020, due to the health situation, the meetings in the first half of the year were held telematically until they could be re-established in person, guaranteeing all security measures.

The Board of Directors entrusts the Ethics Committee, which constitutes the Compliance Body of COMSA Corporación, with the supervision and control of the application of the principles and values that govern the activities of COMSA Corporación. In addition, this Committee is also responsible for developing the functions of management and control of conflicts of interest, in accordance with the Conflict-of-Interest Management Protocol revised in 2020.

With regard to the evaluation of the performance of the Board of Directors, during the 2020 financial year, the Deputy Secretary, who is not a member of the Board, has gathered information from each of the members of the Board, to subsequently draw up a report on the basis of which an internal debate has been generated, which has led to the adoption of a series of aspects for improvement in the area of governance.



CORPORATE GOVERNANCE

EXECUTIVE COMMITTEE

The Executive Committee has been delegated the power to take decisions, within certain limits, on matters entrusted to it by the Board of Directors.

The Executive Committee meets on a monthly basis to monitor the evolution of the main business indicators and objectives, as well as critical concerns regarding the main ongoing operations of COMSA Corporación. The Directors of the Corporate Areas may attend these meetings as guests.

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

The Executive Committee entrusts the Human Resources Area Management with the review of the actions carried out by the corresponding economic, environmental and social areas in order to prepare the Sustainability Report, which is submitted to the Board of Directors for analysis, debate and approval and which serves as the basis for the implementation of improvement measures.



Laying of tracks on the La Mata - Colonia Jordán section of the Istmo de Tehuantepec Railway (Mexico)



CORPORATE GOVERNANCE

OPERATING AND OPERATIONAL COMMITTEES

There are also Operating and Operational Committees to analyse and control the main management and operational indicators that ensure compliance with the established objectives, and directors and controllers from the respective business areas may attend as guests.

Each of the business areas holds quarterly committees, except the Infrastructures and Industrial Engineering Business Area, for which a monthly meeting is held. In addition to these committees, there are other Operational Committees, whose main responsibilities are to control and monitor the areas with the greatest impact on the good governance of the group. In March 2020, the Covid-19 Management Committee was established to minimise the impact of Covid-19 and to ensure, as far as possible, continuity of operations.

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

Main Operational Committees of the Group:



Contracting



Communication



Legal



COVID



Human
resources



Innovation



Finance



Drilling for the construction of the access tunnels to the E4 motorway, Skarholmen (Sweden)



TRANSPARENCY, ETHICS AND INTEGRITY

COMSA Corporación is firmly committed to ethical management in the development of all its activities.

The principles of behaviour and zero tolerance towards ethical and regulatory breaches are reflected in the **Code of Ethics and the Criminal Compliance** and Anti-Bribery Policy and are developed through the rest of the Protocols and Policies of the Compliance Model. These documents set the guidelines for the conduct of all those who make up COMSA Corporación, requiring them to strictly respect human rights and the social and environmental surroundings in which they carry out their activities, as well as strict compliance with current regulations in any field and, in particular, with regard to corruption and bribery.

CODE OF ETHICS

The purpose of COMSA Corporación's Code of Ethics, available on the corporate website, is to establish the behavioural guidelines that should guide the daily work of its professionals, whatever their responsibilities, their position in the organisation or the geographical environment in which they carry out their activities from an ethical and regulatory compliance perspective.



Code of Ethics

DECALOGUE OF EXPECTED BEHAVIOUR IN COMSA CORPORACIÓN

- 1 Respect for internationally accepted laws and practices.
- 2 Protection for responsible use of resources and information.
- 3 Transparency and reliability of financial information, transmitting it in a truthful, complete and understandable way.
- 4 Express prohibition of improper payments or hospitality with the intention of obtaining benefits for the organisation or for oneself.
- 5 Acting with loyalty to the organisation, avoiding any situation of conflict of interest.
- 6 Acting with impartiality and objectivity in the selection of suppliers and collaborators.
- 7 Fair competition.
- 8 Prohibition of any type of discrimination, abuse of authority, physical, psychological or moral harassment.
- 9 Strict compliance with internal and external occupational health and safety standards.
- 10 Fostering of the environment, minimising negative impacts on the environment and maximising the benefits for the community.



TRANSPARENCY, ETHICS AND INTEGRITY



COMPLIANCE MODEL

COMSA Corporación adopted for the first time in 2011 a **Compliance Model, which has been revised, the last update being in 2020**. This model constitutes an ethical and regulatory non-compliance risk management system for the entire group, and is comprised of the **Code of Ethics**, the [Criminal and anti-bribery compliance policy](#), and the Protocols and Policies that develop both documents, among which the following should be highlighted:

- Protocol for the prevention of criminal risks of corruption, which includes specific aspects of relations with public officials.
- Policy on engagement of partners and business consultants.
- Policy on hospitality, gifts and donations, which establishes the guidelines for action and due diligence so that the Group, and especially the areas or departments involved in contracting with third parties, do not engage in conduct that could pose a criminal risk in terms of corruption and competition.
- Competition compliance policy, which sets out the guidelines to be followed in order to avoid breaches of competition law.
- New version of the Privacy Policy, as well as the Information Security Protocol and the specific policies that develop it.
- New version of the Conflict-of-Interest Management Protocol which includes as an Annex a new Declaration regarding conflicts of interest in which shareholders, members of the Board of Directors, Senior Managers and other employees of the Organisation may find themselves in their relations with the Company, as well as with respect to possible conflicts that may arise with competitors, clients or suppliers.

The objective of the new Compliance Model approved by the Group's Board of Directors in December 2020 is to guarantee:

- Compliance with Spanish legal requirements.
- Meeting the expectations set in organisations operating in international markets.
- The prevention, detection and management of crimes and unlawful conduct regulated by anti-corruption and anti-trust laws and regulations.

As a result of the review and update of the new Compliance Model, criminal risk map reports have been drawn up for the business activity of the Group's main companies according to the Business Area of the Group to which these companies belong.



OBJECTIVE

Implementation of a procedure for the electronic collection of periodic declarations of conflict of interest and relations with public officials.

TRANSPARENCY, ETHICS AND INTEGRITY



COMPLIANCE MODEL

Within the framework of the implementation of the Compliance Model within the organisation, a series of challenges will arise from the year 2021 onwards, among which the following stand out:

- The review of the scope and assessment of the adaptation of the new compliance model to the rest of the countries.
- The Appointment of liaison officers in Latin America.
- The evaluation of the implementation of a local Ethics Channel in the case of Latin America.
- Certification under ISO 37001 Anti-bribery of the branch of COMSA, S.A.U. in Peru and of the company COMSA Instalaciones y Sistemas Industriales, S.A.U.

The documents that form part of the compliance model are delivered for their knowledge and signature to new incorporations to the Group, and employees are also informed each time they are modified or updated. With regard to partners and external parties, the contracts signed with third parties include clauses that refer to the group's compliance model and through which these third parties undertake to comply with the principles and values set out in COMSA Corporación's Code of Ethics and Criminal and Anti-Bribery Compliance Policy.

In relation to possible legal proceedings that could affect a member of the Group's governing body or an employee, COMSA Corporación uses external advisors, other than the lawyers advising the member of the governing body or employee, to assess the proceedings in question from the company's perspective. Thanks to this measure, it is ensured that the analysis carried out is objective, so that the Ethics Committee can take the appropriate decisions in an informed manner, complying with the national and international regulations in force on compliance, as well as with the principles, values and objectives of the Code of Ethics and the Group's criminal and anti-bribery compliance policy.

With regard to matters related to corruption issues that could possibly pose a risk for COMSA Corporación or any of the companies in its group, the Ethics Committee has assessed the three cases in progress, concluding that they do not affect COMSA Corporación or any of the companies in its Group, but only individuals who have been or are linked to the Group. After reviewing the facts, circumstances and progress of these proceedings, it has been decided not to open any internal proceedings or take appropriate disciplinary measures, as there are no confirmed cases.



Review of electrical maintenance works, Huacho (Peru)



TRANSPARENCY, ETHICS AND INTEGRITY



THE ETHICS COMMITTEE

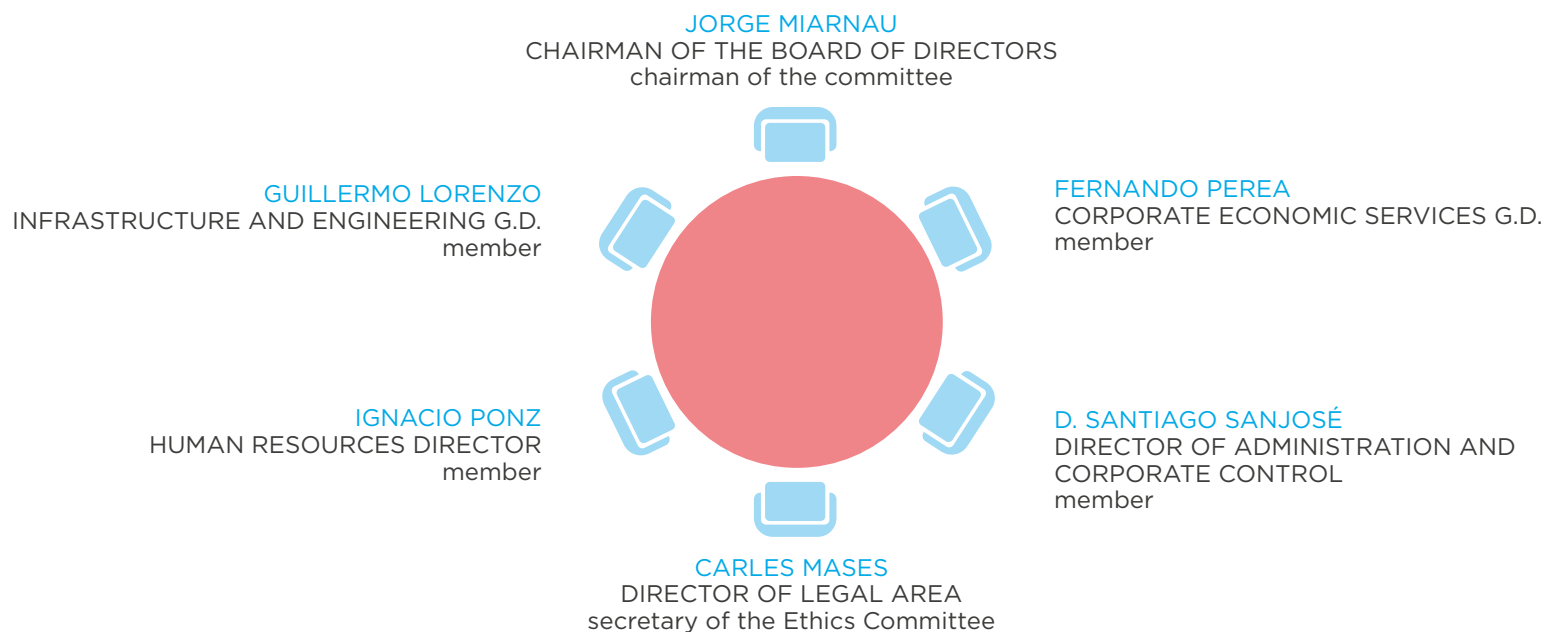
In order to ensure compliance with the principles of ethical management and zero tolerance of ethical and regulatory breaches as set out in the Code of Ethics, the Criminal and Anti-Bribery Compliance Policy and the other Protocols and Policies of the compliance model, COMSA Corporación has established different monitoring and control mechanisms.

In this regard, the analysis, investigation, evaluation and resolution of behaviour that is not in line with the provisions of the company's compliance model is carried out by the **Ethics Committee**, COMSA Corporación's compliance body, which is also responsible for the supervision, proper functioning and development of the group's compliance model, as well as for ensuring the proper func-

tioning of the organisation's Ethics Channel. This committee is also endowed with autonomous powers of initiative and control under the terms provided for by law.

At the same time, the governing bodies of the different companies in the group may appoint, if they deem it appropriate, as a supervisory or compliance body, COMSA Corporación's own Ethics Committee and an additional person closely linked to the company's business, who shall act as a link between the governing body and the members of the company and COMSA Corporación's Ethics Committee, to whom they shall report periodically and, where appropriate, on a timely basis, any incidents and possible breaches of the Compliance Model.

Composition of the Ethics Committee:





TRANSPARENCY, ETHICS AND INTEGRITY



THE ETHICS CHANNEL

COMSA Corporación has an Ethics Channel or Whistleblower Channel, where all employees and third parties can report in good faith and without fear of reprisals, behaviours and practices potentially not aligned with the provisions of the Code of Ethics, the Criminal and Anti-bribery Compliance Policy and the rest of the Protocols and Policies that develop them, especially in relation to any form of corruption, bribery or violation of human rights, including those related to health and safety, both in their application by COMSA Corporación employees and in their relations with third parties.

The Compliance Model imposes an obligation on all personnel to report any ethical or regulatory non-compliance. To this end, the Ethics Channel is designed in such a way as to guarantee confidentiality, fair treatment and action under the principle of non-retaliation.

Likewise, the Ethics Channel can be used to clarify doubts or propose improvements to the internal control systems in place in the company in the various matters contemplated in the Code or to point out behaviours or areas of risk.

COMSA Corporación has the [Protocol for managing the whistleblowing channel, internal investigations and corporate reactions](#) accessible to members of the Organisation and third parties through the website and the corporate portal of COMSA Corporación. This protocol, which complies with the requirements and recommendations established by the European Union in this field, regulates all aspects related to the function of the Ethics Channel or Whistleblowing Channel and develops the procedure for detecting, reacting to and resolving cases of whistleblowing through the Ethics Committee.

Communications and complaints in matters relating to the Compliance Model can be done through any of the following ways:

- Internet address: ComisiondeEtica@comsa.com
- Postal mail: by letter addressed to the Chairman of the Ethics Committee of COMSA Corporación, c/ Viriato, 47 - 08014 Barcelona.

The Ethics Committee of COMSA Corporación, as a criminal compliance and anti-bribery body, is the competent body for the management and supervision of the proper functioning of the Ethics Channel and the final recipient of the communications received, with the secretary of the committee being in charge.

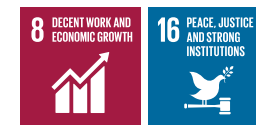
During 2020, one complaint was received through the Ethics Channel, the facts of which fall outside the scope of application of the Ethics Channel, as they have transcendence in the field of labour relations. The Ethics Committee referred the communication to the human resources department for review and appropriate action.



Guniting work on the Metro Line 4 project, São Paulo (Brazil)



TRANSPARENCY, ETHICS AND INTEGRITY



FORMACIÓN Y COMUNICACIÓN

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

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

People trained in the Code of Ethics in 2020

	2019	2020
Category 1 - Senior Managers	1	0
Category 2 - Delegates, Managers, Area Managers, Department Heads	10	2
Category 3 - Site Managers and Unit Managers	53	5
Category 4 - Technicians and Clerical Staff	7	3
Category 5 - Supervisors and Operators	9	0
Total	80	10

Throughout 2020, in the in the ISO 37.001 certification process in Peru, specific training was also carried out for 9 people responsible for its implementation and compliance.

“On the occasion of the approval of the new compliance model, several meetings have been held with the Directors and members of the Ethics Committee to establish new general content and specific topics for training from 2021 onwards, as well as different campaigns to disseminate the model.

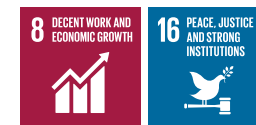


OBJECTIVE

Specific training for all group personnel depending on the assessed risk.



TRANSPARENCY, ETHICS AND INTEGRITY



RESPECT FOR HUMAN RIGHTS

Compliance with the Code of Ethics guarantees action in accordance with COMSA Corporación's commitment to carry out its projects in compliance with the legal requirements in force in each geographical area, based on the highest international standards, such as the International Bill of Human Rights, the Conventions of the International Labour Organisation (ILO), the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises, among others. In this regard, the Code of Ethics states that COMSA Corporación makes every effort to ensure compliance with the labour provisions contained in the basic ILO conventions, not admitting practices contrary to these either among the companies that make up the Group or among those that collaborate with it. The Code of Ethics establishes the framework for COMSA Corporación's relationship with suppliers and partners. Along these lines, clauses referring to the principles and values of the Code of Ethics, its existence and the commitment to comply with it are included in contracts with suppliers and partners, whenever the negotiation allows it.

On the other hand, the purpose of the Protocol for the Prevention of Harassment and other Discriminatory Conduct is to establish the procedural guidelines that must govern COMSA Corporación in order to prevent, avoid and eradicate any harassment and/or discriminatory conduct within its organisation, with the Harassment Committee being the body responsible for monitoring and controlling any case relating to this area. In general terms, discrimination is any distinction, exclusion, restriction or preference which has the purpose or effect of nullifying or impairing the recognition, enjoyment or exercise by all persons, on an equal footing, of human rights and fundamental freedoms.

COMSA Corporación expresses its total rejection of child labour, forced labour, as well as any type of work involving harsh, extreme, inhuman or degrading conditions, as well as its total defence of the rights of minorities and indigenous peoples in any geographical area in which it carries on its activities and respect for freedom of and collective bargaining.

In the same vein, COMSA Corporación expresses its commitment to the development of the four pillars of the decent work agenda, i.e., job creation, social protection, rights at work and social dialogue, which are central elements of the United Nations Sustainable Development Goal 8.

To ensure compliance with the guidelines established in relation to respect for human rights, this content has been included in the training courses on the Code of Ethics since 2017.

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

Any situation of possible violation of human rights can be reported through the Ethics Channel. On the other hand, the Group has not identified situations in which there is a risk of human rights violations.

ECONOMIC SPHERE





BUSINESS MODEL

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

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

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

- Construction
- Industrial Engineering
- Maintenance, conservation and services
- Promotion and concession of infrastructures

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

In 2020, COMSA Corporación managed a staff of 5,000 employees, which led to a turnover of €778M. In line with its strategic plan, 38% of this turnover corresponds to its international activity.

CONSTRUCTION

COMSA has been involved in the development of railway infrastructures for 130 years, where it offers a comprehensive service, covering the construction, renovation and maintenance of high-speed lines, tramways, metropolitan and regional railways.

In the field of civil works, COMSA carries out comprehensive works on roads, airports, housing developments, maritime and port works, hydraulic and sanitary works, etc. In building, the company stands out as an experienced builder of unique and architecturally complex works.

COMSA is Spain's leading non-listed construction company and has a solid international presence in markets such as Brazil, Chile, Croatia, Colombia, Denmark, Lithuania, Mexico, Peru, Poland, Portugal, Sweden and Uruguay.





BUSINESS MODEL

INDUSTRIAL ENGINEERING

With 60 years of experience in the development of engineering projects with a high technological component, COMSA Industrial has consolidated its activity by focusing on the design and execution of installations for the infrastructure, industrial and service sectors.

Its areas of specialisation include turnkey projects in electromechanical and industrial matters, as well as ITS and control systems for tunnels, electrification and railway systems. The company also has excellent know-how in solutions for the biopharmaceutical sector, fire protection, airports, telecommunications and electrical distribution.

It is currently present in Andorra, Colombia, France, Morocco, Mexico, Paraguay, Poland, Portugal, Switzerland and Uruguay.



Electrical engineering works in the tunnel of the FGC Railway Line, Sabadell (Spain)

MAINTENANCE, CONSERVATION AND SERVICES

COMSA Service, with more than 25 years of experience, is a consolidated company in the maintenance and energy efficiency sector thanks to its high degree of specialisation in facility management and property management, as well as in the optimisation of energy resources through the installation of photovoltaic panels integrated in buildings, among others.

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

COMSA Corporacion's range of maintenance and services is completed by COMSA Solutions, specialising in auxiliary cleaning services, concierge services, gardening, etc., and COMSA Security, focused on the installation and maintenance of security systems.



Modernisation of the Fountain of the Shepherds, Paris (France)

BUSINESS MODEL

PROMOTION AND CONCESSION OF INFRASTRUCTURES

COMSA Corporación has accumulated extensive experience in the development of projects and concessions for infrastructures of all kinds.

This area includes, on the one hand, the COMSA Renovables area, which promotes and develops renewable energy installations, focusing on photovoltaic solar energy and wind power in Spain. It is also present in the solar thermal technology sector and in the supply of forest-based biomass for energy recovery.

On the other hand, there is the area of transport and social infrastructure concessions, headed by COMSA Concesiones.



OTHER ACTIVITIES

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

- GMN: Management, treatment and recovery of tyres
- Egatel: Radio frequency broadcasting systems, as well as satellite communications systems.
- Iconus: Consulting services and development of IT projects.



Les Colladetes wind farm, El Perelló (Spain)

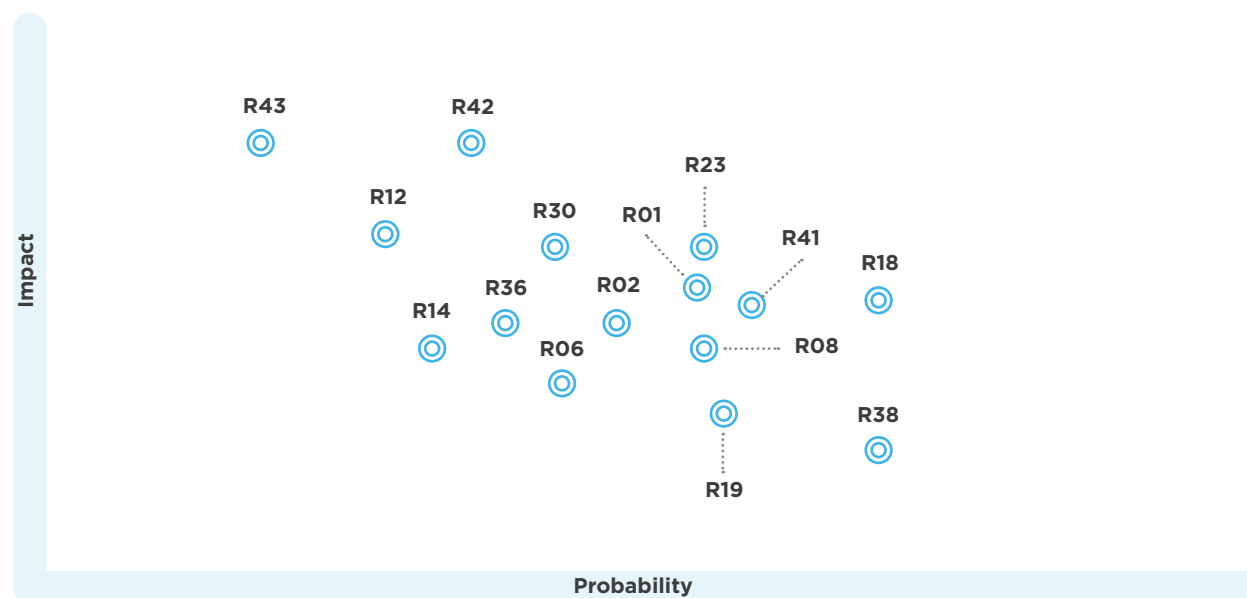
RISK MANAGEMENT

COMSA Corporación has established a proactive risk management process based on early identification, assessment and mitigation of risks. This is why the Board of Directors considers the risk map to be a key tool for detecting new opportunities for improvement.

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

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

Key risks map



- R01** Own damage in project execution
- R02** Errors during construction
- R06** Breach of contract with third parties
- R08** Health and Safety
- R12** Administrative civil and criminal liability
- R14** Damage to the environment
- R18** Delays or insolvencies of clients
- R19** Exchange rates
- R23** Reputational risk
- R30** Shareholder actions
- R36** Reporting of project progress information
- R38** Loss of talent
- R41** Contractual clauses
- R42** Compliance with the Strategic Plan
- R43** Loss of ability to contract

RISK MANAGEMENT

At the same time, COMSA Corporación has other systems to identify, evaluate, manage and minimise possible risks in specific areas.

- **Criminal risks.** In 2020 COMSA Corporación has approved a new Compliance Model which, taking the new Code of Ethics and the Criminal Compliance Policy as a reference framework, develops a series of protocols, policies and procedures that ensure the ethical and responsible behaviour of the Group, responding to the regulatory requirements related to the organisation's activity. For more information on this area, please refer to the Transparency, Ethics and Integrity section of this report. Within the framework of the review of the

Compliance Model, in 2020 COMSA Corporación has drawn up reports on the criminal risk map of the business activity of the different companies in the group (including risks associated with corruption), according to the Business Area to which these companies belong.

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

• Aspects related to environmental management.

External factors	Internal factors
<ul style="list-style-type: none"> • Legislative changes in the environmental field. • Weather conditions (natural disasters). • Possible effects on cultural heritage. • Client requirements. • New market needs, related to client and investor expectations. • Technical aspects. • Social demands. • Aspects related to purchasing and management of suppliers and subcontractors. 	<ul style="list-style-type: none"> • Strategic management and leadership. • Effects on the environment and operational control. • Organisation's performance. • Monitoring, measurement, analysis and evaluation of environmental aspects. • Significant environmental aspects during the execution of the works. • Education, training and awareness-raising on environmental issues.

• Security aspects.

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

Some of the actions planned for 2020 in the framework of the continuous improvement processes linked to the management systems have been affected or postponed due to the new priorities set by Covid-19.



CORPORATE STRATEGY

COMSA Corporación, during the year 2020, has defined the Corporate Strategic Plan for the period 2021-2025, which is structured into the following fundamental objectives:

- Development of specific **commercial plans** for each of the Group's businesses and activities.

During 2020, the commercial strategy for the main business areas has been defined.

In the domestic sphere, it is worth highlighting the reinforcement in the most consolidated markets for the Group, as well as the strengthening of markets related to the environment, the generation of renewable energies, and unique construction.

In the international sphere, from a geographical point of view, the objectives are established in the consolidation and expansion of the activity in Nordic and Balkan countries in Europe, as well as in Latin American countries such as Brazil, Colombia and Mexico, promoting access to new projects in Central America. From the point of view of activity, the objectives are focused on increasing activity in the field of Biopharma, Intelligent Transport Systems (ITS) and railway infrastructures.

- **Develop a unified project planning system** to anticipate risks and opportunities for more agile decision-making.

During 2020, a new project planning model has been defined and training has begun for the different teams, with the aim of promoting its implementation during the second half of 2021.

- Continue with the **digitalisation of the Group** both in the support in the execution of projects, as well as in the improvement of internal processes.

In 2020, progress was made in the digitalisation of internal processes, such as Success Factors for performance evaluation and improvement of professional skills, or the new Corporate Portal, a basic tool for internal communication.

With regard to external processes, systems have been developed that are fundamentally focused on the relationship with collaborating companies, such as the Supplier Portal or the Supplier Approval Portal.

At the same time, over the coming years, a significant increase in the digitalisation of certain production processes is expected.

- Maintain the **specialisation and comprehensive service** focused on the client, with **innovation** as the backbone to enhance competitive advantages.

During 2020, more than 30 innovation projects have been managed, with an investment of more than €7M, focused on offering products and services with a high technological component, and aligned with the global needs of the client, maximising energy efficiency and reducing the use of new materials and greenhouse gas emissions.

- Continue to **strengthen collaboration between the Group's investee companies** in international projects.

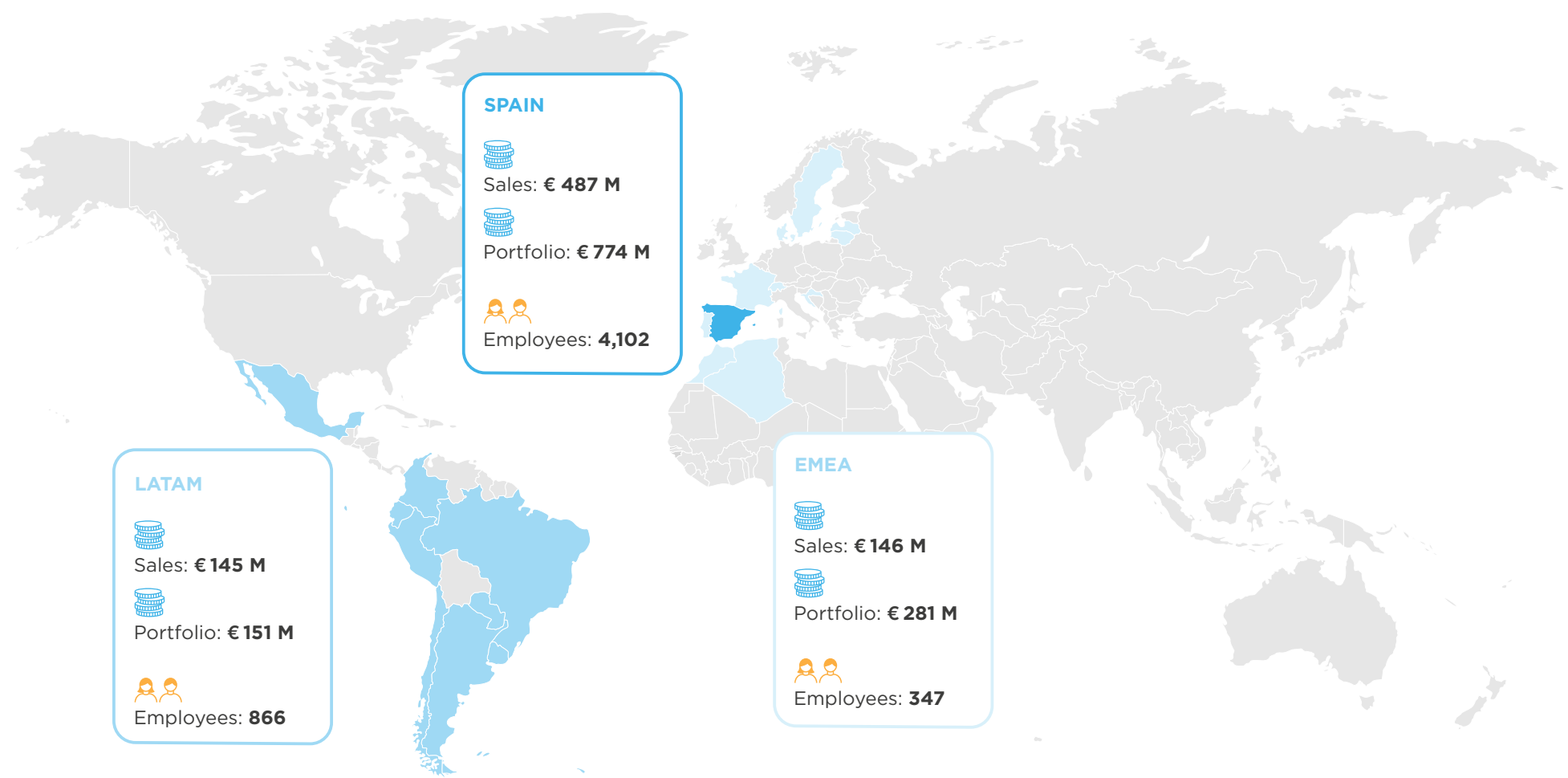
In 2020, the collaborative strategy between the Group's companies in the international sphere continued, offering global solutions in the field of infrastructures to clients in target markets. In 2021, this collaboration is expected to result in new recruits for the Group.

- Revise the **organisational model** of the Infrastructure and Industrial Engineering perimeter during 2020 to place the work at the heart of the model.

During 2020, work has been carried out on the company's organisational model which, in the first months of 2021, has integrated the Concessions and Renewable Energies areas within the Infrastructures and Industrial Engineering scope, thereby contributing to the development and achievement of the strategic objectives.



MAIN FIGURES IN 2021¹



¹ Consolidated group figures



VALUE CREATION

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

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

These same principles are the basis of the commercial relationship with co-operating companies, fostering relationships of trust under the criteria of ethical, social and environmental principles, with the aim of maintaining stable and lasting collaborations, creating value through the generation of quality employment and wealth in the countries in which COMSA Corporación carries out its activities.

During 2020, COMSA Corporación has contributed to the productive growth of society, generating stable and quality employment, with 5,315 employees¹, and close to 19,000 collaborating companies, of which over 98% are companies based in the countries in which it carries out its activities. All in all, the activity generated by the Group in 2020 involved 11,893 direct jobs at its work centres, including its own employees and co-workers.

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

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



Night work on railway infrastructures, Vila Nova de Cerveira (Portugal)

¹ This figure takes into account the total headcount of the Group at the end of December 2020



VALUE CREATION

KEY BUSINESS INDICATORS IN 2020

SALES (M€)



Infrastructures and
Industrial Engineering
€1,184 M
Other Businesses
€22 M

PORTFOLIO (M€)



€ 7 M
R&D&I
Investment



30
Innovation
projects



Management
System in R&D&I
certified by
UNE 166002



+ than 10
Collaborative
partnerships

INNOVATION

ENVIRONMENTAL CONTRIBUTION



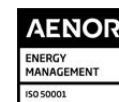
77%
of sales with
ISO 14001
certification



48,854 GJ
Electric
consumption



1,215,838.31 T
(74% soils)
Non-hazardous waste
managed



SUSTAINABLE CONSTRUCTION
75% ISO 50001 certified corporate offices
14 Sustainable Certification Projects

SOCIAL SPHERE



98%
Local
providers



80%
of sales with
ISO 9001
certification



8.3/10
Average client
satisfaction



+ 5,000¹
Direct
employees



22.5%
Reduction in severity
rate of work accidents



75,391
Hours of
training



76%
of sales with
ISO 45001
certification

¹This figure takes into account the total headcount of the Group at the end of December 2020

ENVIRONMENTAL SPHERE



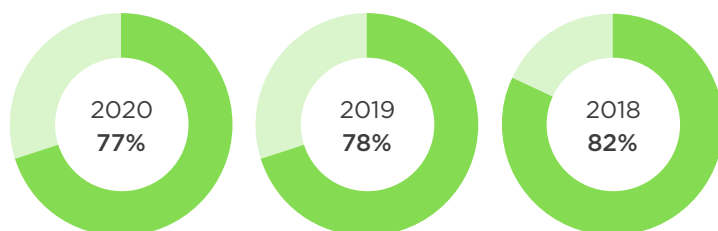


ENVIRONMENTAL CONTRIBUTION

ENVIRONMENTAL SUSTAINABILITY, A PILLAR OF OUR STRATEGY

COMSA Corporación has a consolidated **Environmental Management System** oriented towards excellence, certified on the basis of the ISO 14001:2015 standard, which guarantees the correct management of significant environmental aspects, compliance with legislation and the establishment of a commitment to continuous improvement.

During the year 2020, the percentage of certified activity amounted to 77%. The following graph shows the evolution of the percentage of certified activity in the last three years:



COMSA Corporación has an **Environmental Policy** that establishes the company's principles of action in matters of environmental conservation.

- ✓ Promoting the circular economy
- ✓ Combating climate change
- ✓ Reducing water consumption
- ✓ Improving energy efficiency
- ✓ Reducing waste generation



**COMSA Corporación
Environmental Policy**



Finally, it is worth mentioning that 2020 has been an unusual year in terms of the environmental performance of COMSA Corporación. The health crisis caused by Covid-19 has led to the paralysis or delay of some projects, which has had a direct impact on the results of the environmental indicators. For comparative purposes, the key environmental performance indicators for the last three years are included throughout this chapter, so that the evolution of the same can be referenced and the expected result in a normal situation can be foreseen.



Commissioning of the section of the BR-101 highway, from km 124 to km 130 (Brazil)



ENVIRONMENTAL CONTRIBUTION

CIRCULAR ECONOMY AND WASTE MANAGEMENT

COMSA Corporación sees the circular economy as an opportunity to contribute to sustainable development. Circularity is therefore integrated into the business lines, contributing to progress towards a more sustainable economic model.

This model prioritises the reduction in the use of materials, segregation at source and the efficient management of the waste generated, as well as the development of R&D&I projects focused on the circular economy.

COMSA Corporación is a member of the **Circular Economy Pact**, promoted by the Spanish Ministry of Agriculture and Fisheries, Food and Environment. Through this initiative, all signatories are involved in the transition to a new, more sustainable and environmentally friendly economic model

Thus, the main lines of action to promote the circular economy in the company are::

- to promote the use of recycled and/or certified sustainable materials, offering this type of more environmentally friendly alternatives to clients.
- assess the environmental aspects of projects taking into account the life cycle of the infrastructure or service.
- impacts in terms of waste management, prioritising waste recovery over disposal.
- business opportunities to contribute to the circular economy through activities, products and services.



GMN PLANT IN MAIALS

Gestión Medioambiental de Neumáticos (GMN) bases its business on the integral management of end-of-life tyres (ELT), separating their components and recycling the rubber to be reused.

In Spain, GMN's Maials plant has reused 25,547 T of recovered end-of-life tyres for reuse.



Anti-cracking road construction with tyre powder with high recycled rubber content, Huelva (Spain)



ENVIRONMENTAL CONTRIBUTION

CONSUMPTION OF MATERIALS

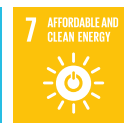
COMSA Corporación promotes the use of recycled and/or certified materials, prioritising their use, and offering the client more efficient alternatives from an environmental point of view.

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

	2020	2019	2018
Concrete (m ³)	567,013.12	209,246.62	241,565.78
Paper (T)	Overall: 25.81 Spain: 16.66 (16.22% recycled)	Overall: 31.75 Spain: 23.59 (13.66 % recycled)	Overall: Data not available Spain: 25.65 (23.23% recycled)



Concreting works in the new Baleares quay of the Port of Tarragona (Spain)



SUSTAINABLE BIOMASS PROGRAM

In 2020, COMSA Renovables obtained the **Sustainable Biomass Program certificate**, which certifies that its supply of forest biomass is sustainable and is obtained from accredited farms.

Among other measures, this certification includes the carbon footprint of the entire process, from the forest to the final boiler.

BIRBALAS PROJECT

COMSA Corporación has been participating since 2019 in the BIRBALAS project, a project subsidised by the European Union, coordinated by Sidenor, together with the company Saitec.

The project aims to analyse the technical and market feasibility of using black slag from different steel mills in the Basque Country as railway ballast and sub-ballast, going deeper into the compliance of specifications that guarantee both the functional and environmental conformity of the product and facing the traditional market barriers that the material has historically had to face in other sectors.



ENVIRONMENTAL CONTRIBUTION

GENERATION OF WASTE

Efficient waste management is a particularly relevant issue for COMSA Corporación, given the nature and activities carried out by its business lines. For this reason, priority is given to recycling, reuse or other recovery operations rather than landfill, thus minimising the impact on the environment.

In 2020, 97% of the waste generated in Spain had been reused.

During 2020, a total of 1,215,838 tonnes of hazardous and non-hazardous waste was generated, a reduction of 12% compared to 2019. Most of the waste generated originates in the Construction business and the volume generated is directly related to the type of projects carried out.

On the other hand, of the total waste generated in 2020, 97% is treated for revaluation, which demonstrates the company's efforts to prioritise reuse or recycling over waste disposal.

Evolution of waste generated (T)

	2020	2019	2018
Hazardous Waste	398	335	217
Residue Non-Hazardous	1,215,440 (74.46% earth)	1,384,084 (86,69% earth)	826,691 (71,37% earth)



With regard to earth, which accounts for more than 70% of the materials considered as waste in the projects, the company prioritises the use of this, both within the same work from which it is extracted or mobilised, as well as in nearby projects, thus avoiding its consideration as waste, and at the same time reducing the need for new extractive materials for other projects.



OBJECTIVE

Obtaining Zero Waste Certification



Waste segregation pits, A-68 Motorway between El Burgo de Ebro and Fuentes de Ebro (Spain)



ENVIRONMENTAL CONTRIBUTION



PARTICIPATION IN THE EUROPEAN WEEK FOR WASTE REDUCTION

Under the slogan REORGAnicémonos (Let's reorganise ourselves), COMSA Corporación participated in the European Week for Waste Reduction 2020.

This year, the theme focused on invisible waste and COMSA Corporación launched a campaign to reduce the digital footprint.

SETMANA EUROPEA DE LA PREVENCIÓ DE RESIDUS 2020

GRÀCIES!

Amb la vostra participació heu contribuït a reduir la generació de residus

COMSA CORPORACIÓN

Josep Maria Tost i Borràs
Director de l'Agència de Residus de Catalunya

Throughout 2020, with the aim of eliminating the consumption of single-use plastic cups and under the slogan “Join us to drink without plastic”, different initiatives have been progressively launched:

- awareness-raising on the responsible consumption of resources and on the correct separation of waste for recycling.
- plastic cups at water fountains.
- vending machines to detect the presence of a cup or cup itself.
- distribution of more than 2,000 ceramic mugs as well as more than 3,000 glass and aluminium bottles to employees to help and facilitate their adaptation to the changes.

“ 83% reduction in plastic cup consumption in corporate offices.

With these actions, the company wants to reduce its environmental impact, while at the same time raising awareness among its employees so that they act responsibly, not only throughout their working day, but also in their everyday habits.

ENVIRONMENTAL CONTRIBUTION

EFICIENCIA EN EL USO DE RECURSOS

WATER CONSUMPTION AND MANAGEMENT

COMSA Corporación works to ensure efficient water management in each of its activities, taking into consideration the infrastructure and water availability in the area.

The activities carried out by COMSA Corporación are associated with a notable consumption of water, especially in the field of construction, and in 2020 the total figure for water consumption was 965,967 m³.

	2020	2019	2018
Mains water consumption (m ³)	49,329	55,420	33,291
Catchment water consumption (m ³)	912,535	719,857	72,162
Purchased water consumption (m ³)	4,103	14,151	25,209
Overall water consumption (m ³)	965,967	789,428	130,661

There has been a reduction in water consumption in offices compared to the previous year as a result of the effects of the Covid-19 pandemic, which has made it necessary to promote teleworking.

As with other environmental indicators, the growing trend in consumption in construction work is due to the type and phase of the project.



From the moment it is extracted to the moment it reaches the user, mains water is associated, among others, with processes of collection, purification and distribution, the treatment of which involves the emission of CO₂ into the atmosphere. The water footprint allows us to know the emissions associated with this process.

	2020	2019	2018
Emissions water Works (T CO ₂ /m ³)	18.55	20.22	11.59
Office water emissions (T CO ₂ /m ³)	0.93	1.67	1.56
Emisiones Globales agua (Tn CO₂/m³)	19.49	21.89	13.15

On the other hand, in addition to managing water resources responsibly, some businesses have specific initiatives to reduce water consumption.

It should also be noted that the quality of the water discharged into the natural environment is closely monitored to ensure that the discharges do not have a significant impact on the environment, always in compliance with the provisions of local legislation.



ENVIRONMENTAL CONTRIBUTION

ENERGY CONSUMPTION

Energy is one of the main resources used by the company and is a key element for the start-up and development of its activities. As part of the fight against climate change, COMSA Corporación is committed to promoting energy efficiency.

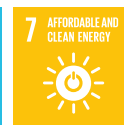
In this sense, COMSA Corporación has an Energy Efficiency Policy whose main objective is to reduce energy consumption through a commitment to continuous improvement, investing in innovation and promoting the use of alternative and renewable energies.



**Energy Efficiency Policy of
COMSA Corporación**

Consumption of electrical energy

	2020	2019	2018
Offices (GJ)	21,287	20,669	18,203
Works (GJ)	27,567	20,269	16,013
Total COMSA Corporación (GJ)	48,854	40,938	34,221



The activities associated with the highest energy consumption are the movement of the vehicle fleet, as well as the use of machinery and work activities.

Consumption of fuel

	2020	2019	2018
Fuel (GJ)	316,308	296,427	266,850

To minimise this consumption, the company develops policies for renting and leasing vehicles, prioritising those with lower consumption and limited greenhouse gas emissions.

COMSA Renovables has joined the **Platform Hidrògen Verd Catalunya Sud**, promoted by the Universitat Rovira i Virgili university to encourage the expansion of this fuel.

This platform is aimed at decarbonisation (no longer generating grey hydrogen from fossil fuels, thus reducing CO₂ emissions) and consolidate clean hydrogen as a key energy vector to face the climate challenge and activate a new green economy that generates prosperity.

ENVIRONMENTAL CONTRIBUTION

With regard to corporate centres, it is worth noting that 75% of them have energy certification.

“ 75% of corporate centres have energy certification.

Las principales acciones llevadas a cabo para reducir el consumo de energía eléctrica son:

- energy efficiency certifications in offices and projects.
- awareness-raising activities for the workforce, such as the course on good environmental practices.
- leed lighting and systems to control and optimise consumption.
- sensors on taps to reduce water consumption.
- of photovoltaic panels on building sites.
- of electric recharging points in corporate centres.
- promotion of renting and leasing vehicles, prioritising those with lower fuel consumption and greenhouse gas emissions.

2020	2019	2018
32 electric or LPG vehicles ¹	25 electric or LPG vehicles ¹	12 electric or LPG vehicles ¹

- Replacement of combustible machinery with light machinery and electric or battery-powered equipment.
- Use of energy efficiency software with the aim of proposing more efficient and sustainable alternative solutions to those of the project.

¹ LPG, liquefied petroleum gas, alternative fuel.



ENERGY MANAGEMENT SOFTWARE

As part of the modernisation process in the methodology for carrying out technical studies, and with the aim of optimising more environmentally friendly and economically favourable constructive solutions, COM-SA is committed to the use of energy efficiency programmes applied to building projects.

COVID-19 IMPACT ON ENERGY CONSUMPTION

- Although the use of offices, including construction and project offices, has been reduced significantly, consumption has not been reduced proportionally due to the increase in ventilation and air renewal needs.
- With regard to fuel, during the first phases of the health crisis, the use of vehicles for individual journeys doubled in many cases, on the one hand because of the decrease in collective transport options, less the number of trains and planes, on the one hand, and the ban on carpooling outside of sanitary bubbles, on the other.



ENVIRONMENTAL CONTRIBUTION

ENERGYPLUS PROGRAMME

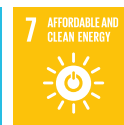
The EnergyPlus building energy simulation software has been the tool used in this study carried out in the *Maritime Station in the esplanade and commercial docks of the Botafoch dock in the Port of Ibiza* (Spain), with the aim of obtaining information about the energy consumption of the main areas of the infrastructure.

This tool allows the virtual model of the building to be created, defining geometries, construction parameters, parameters for the use of spaces, timetables, air conditioning equipment and, above all, the weather conditions at the construction site.

With the results obtained by the software, a total saving of approximately 152,000 kWh/year is achieved. This energy, considering an approximate energy cost of €7.5/kWh, means a saving of about 40 t/year of CO₂ and €9,000/year.



Work on the roof of the Maritime Station on the esplanade and the commercial docks sheltered by the Botafoch del Puerto dock, Ibiza (Spain)



COMSA Corporación offers within its service portfolio solutions for the improvement of energy efficiency of its clients, thus promoting a more efficient use of energy.

In addition to the hand of the **Renewable Energy Business Area**, it contributes to the development of the renewable sector, both in the design and construction phases, as well as in the management of various energy infrastructures, thus helping to guarantee universal access to sustainable energy.

“ In 2020, COMSA Renovables managed 230,900 MWh of energy from renewable sources, the equivalent of a municipality with 178,000 inhabitants.



Photovoltaic panels in thermosolar plant, Les Borges Blanques (Spain)



ENVIRONMENTAL CONTRIBUTION

CLIMATE CHANGE

COMSA Corporación, aware of the role it can play in the fight against climate change, has established among its strategic objectives the reduction of greenhouse gas emissions in its activities.

For this reason, it has a risk management system that integrates financial and non-financial risks, including risks associated with the environment.

One of COMSA Corporación's objectives for 2021 is to identify and evaluate the short, medium- and long-term risks and opportunities associated with climate change in accordance with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), and to incorporate them into the company's management risk matrix.



OBJECTIVE

Management of Risks and Opportunities related to Climate Change.

Within the Group's Strategic Plan, a series of objectives are established to achieve a reduction in emissions:

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



During 2020, COMSA Corporación has materialised its commitment to the fight against climate change, preparing and verifying its Greenhouse Gas (GHG) report for its Core Business. In addition, it has registered its carbon footprint in the National Registry of Carbon Footprint, Offsets and CO2 absorption projects, promoted by the Spanish Office for Climate Change (OECC) as a body under the Ministry for Ecological Transition (MITECO).



OBJECTIVE

Strategic Plan to Combat Climate Change 2021-2050.






ENVIRONMENTAL CONTRIBUTION

In order to monitor the commitment established by COMSA Corporación in relation to climate change, Greenhouse Gas (GHG) emissions are monitored.

In 2020, the impact of Covid-19 has led to a reduction in Scope 3 GHG emissions as a result of mobility restrictions that have led to a considerable reduction in business travel.

Company emissions (T CO₂eq)

	 Scope 1 <i>Fuels</i>	 Scope 2 <i>Electricity</i>	 Scope 3 <i>Corporate Travel and Water</i>	TOTAL
2020	20,097.84	2,660.06	898.26	23,656.16
2019	19,020.68	2,311.56	2,792.32	24,124.56
2018	17,158.02	2,809.21	2,219.66	22,186.89

Emission intensity in relation to turnover

	SCOPE 1	SCOPE 2	SCOPE 3	Total
2020	25.83	3.42	1.15	30.40
2019	24.48	2.97	3.59	31.05
2018	23.38	3.83	3.02	30.23

COMSA Corporación is working on the definition of ambitious objectives within the 2021-2025 strategic plan, aware of the current climate crisis.



Telecommunications tower of IPT Systems, Madrid (Spain)



ENVIRONMENTAL CONTRIBUTION

SUSTAINABLE CONSTRUCTION

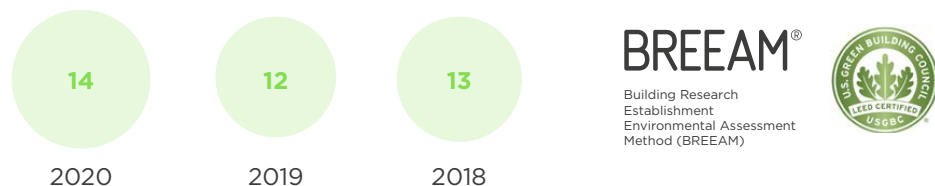
COMSA Corporación also contributes to mitigating the effects of greenhouse gas emissions by implementing policies related to the application, appointed by the general shareholders meeting and made up of **sustainable construction standards**.

In 2020, 14 projects have been implemented with energy efficiency certifications: LEED and BREEAM.

The construction of this type of sustainable infrastructure allows a reduction in greenhouse gas emissions, both in the construction phase and throughout the life cycle of the building. By promoting this type of building with energy certification, energy and water consumption is reduced compared to conventional buildings.

The number of projects with some type of sustainable certification continues to increase steadily, confirming the trend towards this type of construction. In 2020, 14 projects were implemented with energy efficiency certifications.

Evolution figure sustainable buildings

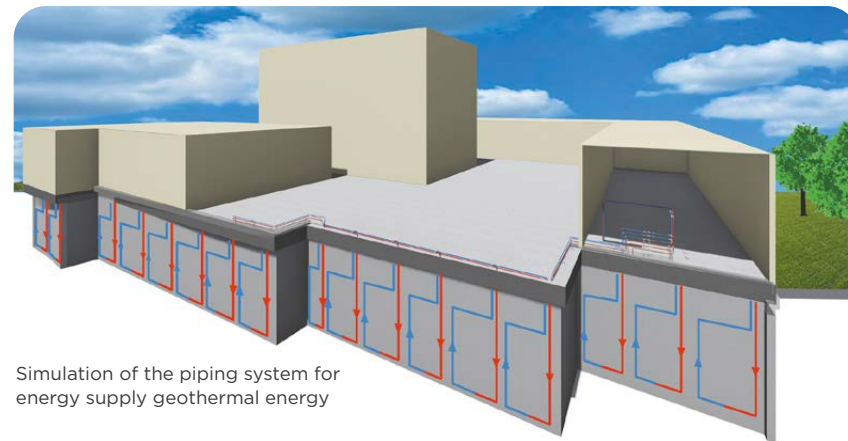


In addition, as mentioned above, one of the objectives of COMSA Corporación is to promote innovation projects linked to energy efficiency.

BIGEO (Building-Integrated GEOthermal systems)

BIGEO systems, as well as other geothermal renewable energy generation systems, harness the thermal energy stored in the form of heat beneath the earth's surface for applications such as building **climate control** (for both heating and cooling), **domestic hot water, industrial processes**, etc. Geothermal energy is a renewable, clean and efficient energy, **available 365 days a year and 24 hours a day**, as it does not depend on the availability of other fluctuating natural resources such as wind or solar irradiation.

In the GEOTECH project, co-financed by the European Commission within the Horizon2020 framework programme, **COMSA Corporación has continued its work on the development and optimisation of BiGEO technology** by implementing the system in two projects.



Simulation of the piping system for energy supply geothermal energy



ENVIRONMENTAL CONTRIBUTION

PROTECTION OF BIODIVERSITY

The activities carried out by COMSA Corporación may affect the natural environment where the works projects are executed. For this reason, the company works to minimise its impact on biodiversity and ecosystems and to protect the natural environment through management plans and compensation actions, especially when its activity takes place in protected areas or areas of high ecological value.

To this end, COMSA Corporación has established some basic principles of action for the protection of biodiversity:

- Assess the impacts on biodiversity for each of the projects and services carried out.
- Establish the necessary preventive measures to mitigate these impacts whenever they cannot be eliminated, through prevention and reduction actions.
- Develop and implement environmental monitoring plans to ensure compliance with the preventive measures established to reduce the impact of projects or services.
- Implement restoration, reforestation or compensation plans with the aim of restoring biodiversity in those activities that have had a significant impact.

Thus, the implementation of measures for the conservation of flora and fauna is one of the environmental principles applied in the planning of operations. These measures are based on physical protection, transplantation or transfer, as well as respect for the life cycles of the plant and animal species concerned.



COLLABORATION WITH IBERDROLA FOR THE INSTALLATION OF PROTECTIONS IN ELECTRICAL TOWERS

Participation of COMSA Industrial in the “Aleteo” project promoted by Iberdrola, with the aim of installing more than 10,000 protections on medium and high voltage pylons, in order to minimise the impact of overhead power lines on birds and thus protect them from collision and electrocution.

This project includes a series of actions on the supports depending on their configuration, including the lining of the different phases and connections, and increasing the safety distance by changing the insulators to lengthen the chain.



Installation of protections in medium voltage pylons, Salamanca (Spain)



ENVIRONMENTAL CONTRIBUTION

NOISE POLLUTION

COMSA Corporación is aware of the acoustic impact caused by its activities, especially by the use of heavy machinery in its projects.

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

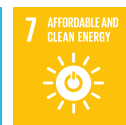
In order to minimise these impacts, various measures have been implemented, among which the following can be highlighted:

- Noise monitoring systems in urban areas or areas of special interest.
- Replacement of machinery with greater acoustic impact.
- Installation of acoustic screens in the areas with the highest emissions.
- Protection of workers with specific equipment.

ACUSTICAT 2020

COMSA Corporación participated in the Acusti.cat congress as a speaker on the challenge on 'Management and control of acoustic impact in public works'.

During the session the problem was discussed, different cases were addressed, as well as different solutions to deal with the noise generated during the execution of public works in densely populated environments.



LIGHT POLLUTION

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

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

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



ADIF infrastructure and track maintenance night work, Castellbisbal (Spain)



INNOVATION MANAGEMENT

INNOVATION MANAGEMENT

COMSA Corporación is committed to innovation throughout its value chain and activities. Thanks to internal and external entrepreneurship initiatives and other techniques and technologies, the company is able to lead change and develop innovative solutions.

In 2020, 14 projects have been implemented with energy efficiency certifications: LEED and BREEAM.

To carry out the various research projects, the company always seeks to find the greatest possible synergies in collaboration with public and private scientific institutions and entities and also in partnership with companies from industrial and technological sectors related and complementary to that of the company.

In 2020 COMSA Corporación invested more than **7 million euros** in R&D&I activities, supporting around thirty projects under development. The commitment to technology transfer applied to the construction and maintenance sectors is a priority for the company, which has established an Innovation Policy in which the organisational culture considers this element as a differential factor integrated into all its business units.

Currently, COMSA Corporación has ongoing **33 innovation projects**.



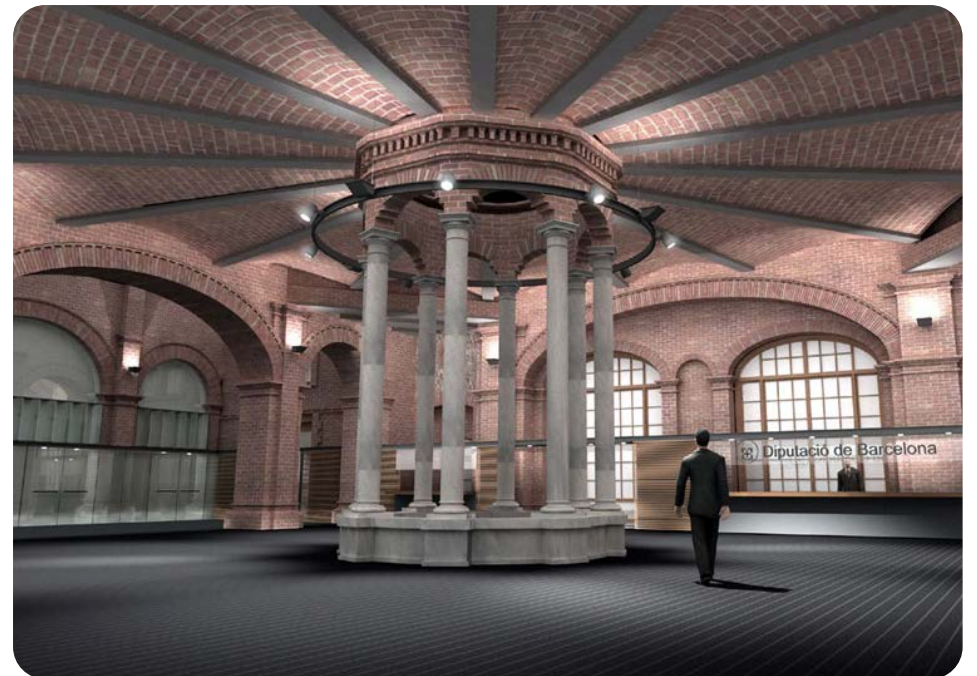
OBJECTIVE

Implement innovative digital technologies that improve processes in the business of COMSA Corporación.



The R&D&I projects in the development or launch phase pursue the following strategic lines:

- Efficiency in the construction and maintenance of infrastructures.
- Construction and Smart Building.
- Digitalisation.
- Energy transition.



Virtual image of the foyer of the Industrial School made using BIM technology, Barcelona (Spain)



INNOVATION MANAGEMENT

VALUE CREATION IN THE CONSTRUCTION AND MAINTENANCE OF INFRASTRUCTURES

At COMSA Corporación, innovation is the driving force in all business areas with the aim of anticipating future trends and seeking innovative solutions that can generate new business opportunities.

The future of mobility depends largely on connectivity, which is why COMSA Corporación is part of the consortium of companies in charge of the deployment of the **5GMED project** to ensure 5G connectivity in the railway network between Spain and the south of France. This project is part of the Horizon 2020 programme for research and innovation of the European Union.

In this context, the transport of people and goods is a fundamental necessity for society and the global economy. COMSA Corporación participates in the **Safe-4RAIL-3 project**, which aims to develop the technologies and devices for the next generation of the Train Control and Monitoring System (TCMS).

The results of Safe4RAIL-3 will increase the flexibility and reliability of TCMS communications, reduce development and maintenance costs and achieve new functionalities for trains, with special attention to manufacturers' interoperability.

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



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

RESILTRACK represents the new European approach to rail infrastructure maintenance, moving from a corrective format towards a more sustainable preventive format, in real time, and aligned with the S2R programme 3 "Cost efficient and reliable high-capacity infrastructure".



BIMTable in the framework of the RESILTRACK project, Barcelona (Spain)



INNOVATION MANAGEMENT

CONSTRUCTION AND SMART BUILDING

Another of the sector's main challenges is to make progress in terms of new technologies, always hand in hand with sustainability. In this way, what is known as smart building or intelligent buildings is born, buildings technologically adapted for a greater comfort of its tenants, as well as to achieve high energy savings.

The **LIFE BIPV** project aims to promote the use of innovative BIPV (Building-Integrated PhotoVoltaics) systems through a new façade that allows a substantial reduction of CO₂ emissions in new and existing buildings.

The main objectives of this project are to demonstrate a reduction in direct CO₂ emissions of 34% per building (on average) and to reduce the carbon footprint of solar collector technology by more than 50%. Two demonstrators will be used in two different buildings located in two different climatic regions of the European Union (Spain and Belgium).

Another of COMSA Corporación's strategic bets in the field of energy efficiency focuses on the integration of geothermal energy generation systems in the building. As part of this strategy, COMSA Corporación participates in the **GEOFIT** project, financed by the European Union's Horizon 2020 Programme, for the incorporation of geothermal solutions to the refurbishment of buildings.



DIGITALISATION

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

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

During 2020, 10 projects have been executed with BIM methodology.

CORPORATE VENTURING

In the field of corporate venturing, and as part of its commitment to digital transformation, COMSA Corporación is promoting the “The INNcom Challenge” programme designed to find emerging technologies in the field of construction, maintenance and facility management.



The company also collaborates with Mobile World Capital Barcelona's “The Collider” technology transfer program, which connects entrepreneurial and scientific talent to drive innovation.

The Group has also created the start-ups **SmartTower**, for the commercialisation of a remote inspection system for electrical towers and telecommunications based on an IoT (Internet of Things) platform, and **NEOBALLAST®**, to put on the market advanced ballast with extended durability that reduces noise and vibrations derived from train traffic.



INNOVATION MANAGEMENT



STRATEGIC ALLIANCES

COMSA Corporación has established a collaboration network with multiple centres of excellence in Spain and abroad, with which it participates in different R&D&I projects.

It should be noted that COMSA Corporación is a founding partner and member of the Board of Directors of **The Railway Innovation Hub Spain**, a cluster whose mission is to promote the international projection of the Spanish railway ecosystem.

Likewise, since 2019 it has been a member of the board of directors of the **European Construction Technology Platform (ECTP)** and collaborates with sectoral and other more specialised entities to promote the development of the sector, among which the following stand out:

- Spanish National Association of Construction Companies (SEOPAN).
- Spanish Railway Technology Platform (PTFE), integrated in the European Rail Research Advisory Council (ERRAC).
- Spanish Construction Technology Platform (PTEC).
- Energy Efficient Buildings (E2B).
- Catalonia Energy Efficiency Cluster (CE).

FORUM PARTICIPATION

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

- Infrastructure Week promoted by the Ministry of Transport, Mobility and Urban Agenda (MITMA) through a webinar on the contribution of the 5G-Picture and 5GMed projects to the digitisation of the railway sector.
- Railway Innovation Hub working group for the creation of the unique BIM classification for the railway sector.
- Conference on Innovation in the rehabilitation of degraded concrete structures, organised by the Association of Structural Consultants (ACE).
- Digital meeting organised by the newspaper Expansión in collaboration with Cellnex Telecom entitled “5GMED: The mobility of the future in the Mediterranean corridor”.
- Lecture at the conference “Geothermal energy, key to the decarbonisation of energy in cities and the fight against climate change”, organised by the Catalonia Energy Efficiency Cluster (CEEC), the Cartographic and Geological Institute of Catalonia (ICGC) and the Catalan Energy Institute (ICAEN).
- Webinar “IOT Wireless monitoring in the rail industry” organised by the company Worldsensing.
- Innovation day of the Energy Efficiency Cluster of Catalonia (CEEC). Launching of a challenge to develop solutions to improve facility management services.

SOCIAL SPHERE



COMSA CORPORACIÓN TEAM

For COMSA Corporación, its employees are a priority. The company shares and promotes values of respect, equal opportunity, diversity, gender balance and collaboration.

In this regard, the Group has a strong commitment to **SDG 8 - Decent Work and Economic Growth, as well as SDG 3 - Good Health and Well-being, SDG 4 - Quality Education, SDG 5 - Gender Equality and SDG 10 - Reduced Inequalities.**

Under this premise, the Group offers inclusive, safe, healthy and discrimination-free work environments, where everyone can grow and develop their professional career and work as part of a team, in an environment where talent, professionalism and the pursuit of excellence in performance are success factors.

COMSA Corporación expresses its commitment to its professionals in the **People Policy**. It is also committed to the success and professional development of its staff, investing permanently in fostering talent.

The Human Resources Strategic Plan 2018-2020 has continuity with the new **COMStruimos 2021-2022 Project** adapted to the current context, that is, to the increasing globalisation, the use of new technologies and new working methods. This translates into the need to place people at the centre of the processes and to continuously contribute to their professional development.

Within the framework of the *COMStruimos* Project, the Performance Evaluation model has been revised, strengthening it beyond a variable remuneration model and extending its application to the management, evaluation and development of people.



“Organising, informing, training, accompanying and evaluating are the keys to good management of our teams.”

Along these lines, a wide range of tools and processes have been made available to team managers to enable effective monitoring of the professional careers and performance of the workforce.



It should be noted that due to the health crisis caused by the Covid-19 pandemic, there have been some significant impacts on people management.

It should be taken into account that a large part of the activity carried out by COMSA Corporación has been considered an essential service, which has meant that most of the workers have remained in service during the period of confinement. As a result of the established health restrictions, it has also been necessary to activate measures such as teleworking, as well as other formulas, such as reduced working hours, which have made it possible to reconcile work and family life at times of high social demands. In this regard, telematic staff skills development platforms have been set up, which have enabled further progress to be made in the staff skills development processes, and teleworking has been facilitated for certain groups. In both cases, digitisation has played a key role in the success of the measures.



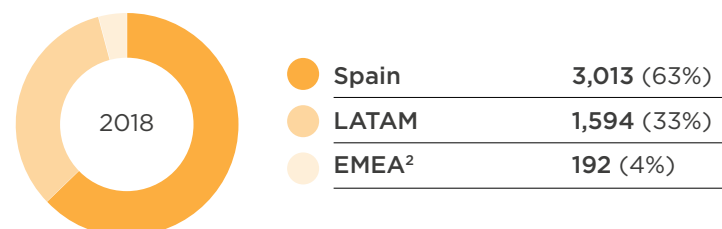
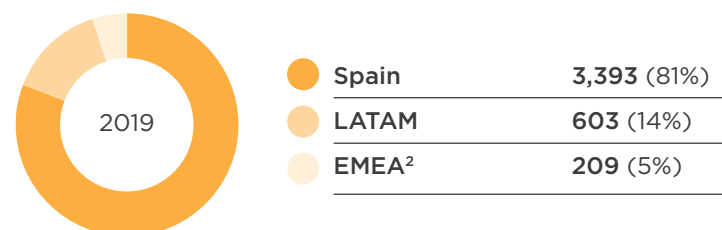
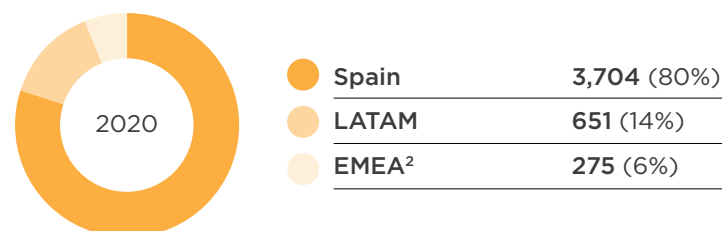
COMSA CORPORACIÓN TEAM

HUMAN CAPITAL MANAGEMENT¹

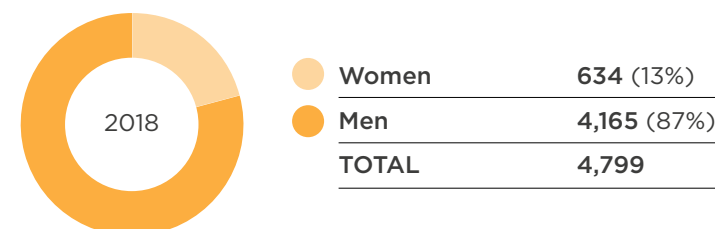
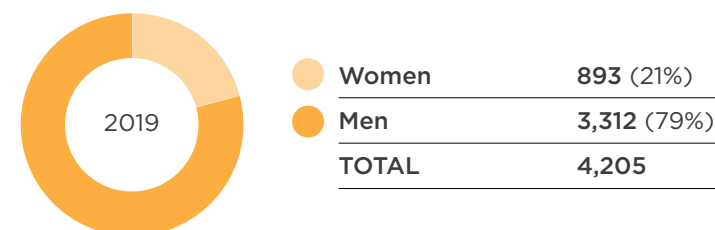
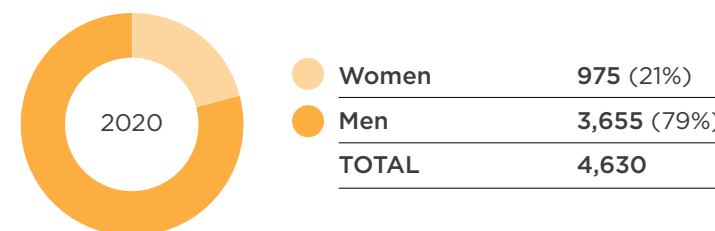
At the end of 2020, the global workforce totalled 4,630 people, 21% of whom were women. By countries, 92.6% are of local origin, with a total of 57 nationalities in the whole group.

COMSA Corporación's cross-cutting and global strategy requires a diverse team, made up of different professional profiles, which generate wealth and prosperity in all the geographies in which the company operates.

Number of staff by geographical area



Distribution of staff by gender



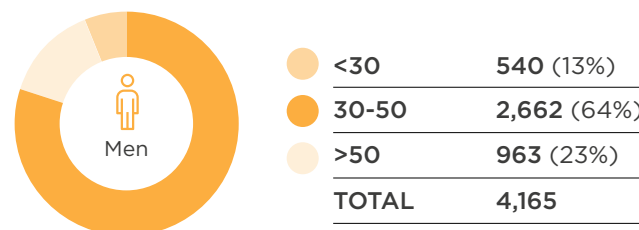
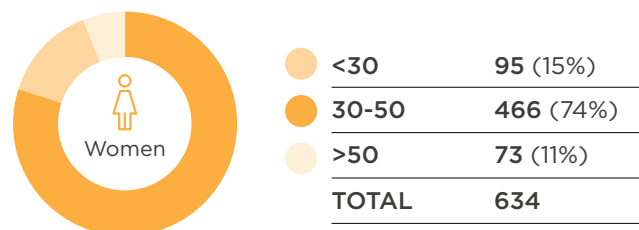
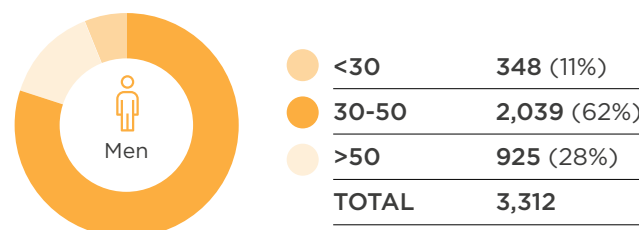
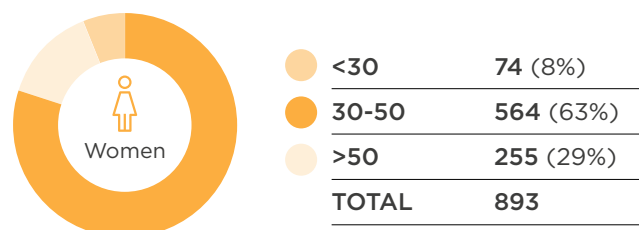
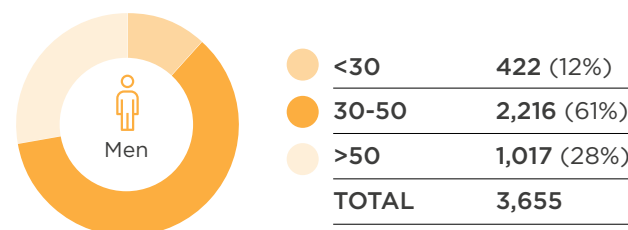
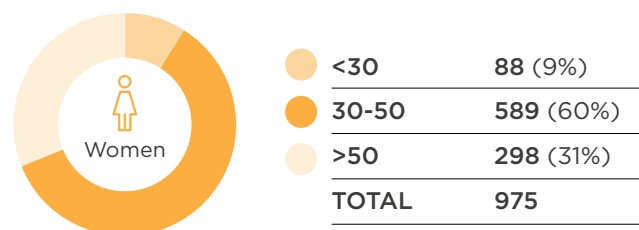
¹ Unless otherwise specified, all figures, tables and comparisons in this section refer to the countries and businesses included in the scope of this report.

² EMEA includes Europe, Middle East and Africa.



COMSA CORPORACIÓN TEAM

Distribution of staff by age



People management indicators reflect some of the characteristics of the construction and industrial engineering sector. One of them is the temporary nature of the projects and their relocation, understood as a productive model in a discontinuous geographical environment in the short term, which significantly conditions the form of job creation, both in terms of the hiring modality and its temporary duration, as well as significant differences in terms of the distribution of the workforce by gender. However, COMSA Corporación is committed to the creation of quality employment that contributes to the development of the communities in which it operates and, which is why, globally, in 2020, 73% of the contracts were permanent, and 89% of them were full-time.



COMSA CORPORACIÓN TEAM



RECRUITMENT, PROFESSIONAL DEVELOPMENT AND TRAINING

COMSA Corporación is aware that the success of the company depends to a great extent on the talent and training of its employees. For this reason, one of the objectives is to attract and retain the best professionals through training to promote their professional development.

In this sense, not only is it necessary to identify talent in the selection of new hires, but it is also fundamental to promote the growth and professional development of all the people who form part of the Group. The company has a professional development model that seeks to promote the talent of each employee.

To this end, in 2019 the company drew up the Skills Map, which helps to determine training needs and establish annual training plans specific to each position.

Along these lines, a total of **75,391 hours of training** were given in 2020, both in person and through the company's online platform.



2020

636,509 €
Total investment

75,391 h
Total training hours

Average training by
gender

 **13.1 h**  **17.1 h**

2019

590,391 €
Total investment

62,175 h
Total training hours

Average training by
gender

 **11.7 h**  **15.6 h**

2018

575,619 €
Total investment

89,185 h
Total training hours

Average training by
gender

 **19.1 h**  **18.5 h**



OBJECTIVE

Launch of the **On Boarding project**, the welcome programme for new recruits.

Training focused on the development of skills and competencies (Soft Skills), as well as specific training modules for the production line.



COMSA CORPORACIÓN TEAM

COMSA Corporación also collaborates with organisations specialising in matters of safety, health and risk prevention, and actively participates in the main congresses, conferences and forums organised at both national and international level, some examples of which are as follows:

- Training for Health and Safety inspectors in Construction Works, in collaboration with the Construction Labour Foundation.
- Training in technical and legal solutions for prevention technicians, in collaboration with AJP Asesoría Jurídica Y Prevención.
- Technical conference 'GeoEnergy in Catalonia'.
- Corporate Social Responsibility and Sustainability in Purchasing at the First Conference on Purchasing in Catalonia.
- Participation in Challenge 05. Management and control of acoustic impact in public works at the Acusticat Congress.
- Webinar organised by Worldsensing on wireless IoT monitoring in the railway industry.
- Participation in the National Infrastructure Congress of Colombia.

In addition, EOLIS has the **"Eolis University"** to promote the transfer of knowledge from experienced staff to new staff, thus also contributing to their training.

In 2020, COMSA Corporación participated in Talent Day20, organised by *Equipos y Talento*. During the conference, the latest developments in people management were discussed under the slogan **Reconnecting People & Reinventing Organisations**. The Group participated in the round table in which the integral management of human resources to boost business was addressed.



Gamified training for the development of the OnBoarding Project, Barcelona (Spain)

COMSA CORPORACIÓN TEAM



REMUNERATION MANAGEMENT

COMSA Corporación's remuneration model is based on a fixed remuneration that is complemented by a variable remuneration based on the results obtained, both individually and as a group.

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

COMSA Corporación's remuneration model is made up of:

- Fixed Salary. Corresponding to the professional category, the collective agreement and the country.
- Variable remuneration, which measures the result of group, area and individual objectives and makes up the variable remuneration payment.
- Evaluation of the individual performance of each employee on the basis of a competency assessment.

In 2020, 69%¹ of the workforce in Spain, Argentina, Brazil, France and Peru had this type of remuneration and their performance was formally assessed and reported, while in 2019 it was 74% of the workforce.

“ 95%² of the professionals subject to performance evaluation in Spain has been evaluated through Success Factors.

Likewise, the Flexible Remuneration Plan enables the Group's employees' salaries to be optimised. Depending on the country, employees can purchase certain products or services with advantages, which allow them to maximise their remuneration via tax benefits. This option provides access to transport bonuses, per diems, medical or life insurance, as well as access to childcare and training.

“COMSTRUIMOS” (“WE BUILD”) PEOPLE

During 2020, special emphasis has been placed on performance evaluation through Success Factors.

This process has been consolidated, for the second year running, as a global performance assessment tool, as it provides a complete view of internal talent and allows professional growth plans to be established according to the needs detected.

From the perspective of people management, the model focuses on two main areas:

- Setting Team Objectives and Results.
- People Development: Identification and evaluation of competencies.

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

The amount accrued during the financial year 2020 by the current members of the Board of Directors for all remuneration items (salaries, bonuses, allowances and remuneration in kind) amounted to 797 thousand euros, and 796 thousand euros in 2019.

¹ The performance appraisal is carried out for posts from Grade 4 and above: Technicians and clerical staff.

² The performance evaluation through Success Factors in 2020 has been carried out from Category 4: Technicians and clerical staff, for the businesses of COMSA Corporación de Infraestructuras S.L., COMSA, S.A.U. and COMSA Instalaciones y Sistemas Industriales, S.A.U.



COMSA CORPORACIÓN TEAM



COMSA Corporación is committed to achieving wage equality by gender in all its activities and countries in which it operates. For this purpose, a salary analysis is carried out to identify possible cases of pay differentials between male and female employees with identical jobs.

With this analysis, it is determined whether there is a gender pay gap in jobs of equal activity or whether the difference is due to other causes (seniority, results, etc.).

Average remuneration by country and gender

Country/gender	Women	Men
Argentina	-	17,002.42
Brazil	12,270.48	42,683.14
Colombia	10,883.68	11,904.79
Denmark	49,040.07	63,406.03
Spain	25,641.42	29,859.21
France	31,706.65	30,929.42
Mexico	8,603.76	7,698.30
Peru	9,276.27	31,085.54
Portugal	17,960.52	17,321.20
Sweden	37,139.28	48,286.14

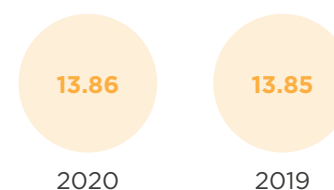
In 2020, the ratio between the salary received by the company's staff and the minimum wage in each of the countries in which the Group operates is 1.18 on average, compared to 1.43 in 2019.

Overall wage gap by category and age¹

Age (years)/ Professional category ²	2020			
	Category 1 y 2	Category 3	Category 4	Category 5
<30	-	-7.16%	-0.47%	-6.71%
30-50	11.43%	17.01%	12.12%	22.59%
>50	12.16%	24.23%	21.21%	27.41%

The calculation of the pay gap presents a similar problem to that of average salaries, since the presence of the Group in highly differentiated geographical areas makes the results obtained unrepresentative.

The annual compensation ratio for 2020 is derived from the annual gross fixed salary plus variable compensation.

Overall annual compensation ratio³

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

² The categories include: 1 Senior Managers; 2 Delegates, Managers, Area Managers and Department Heads; 3 Site Managers and Unit Managers; 4 Technicians and Clerical Staff; and 5 Operators.

³ In 2019 the figure for Spain was published, for 2020 both periods are reported globally.



COMSA CORPORACIÓN TEAM



STAFF SATISFACTION AND COMMITMENT

The satisfaction, loyalty and commitment of people are the main attributes of the relationship model that COMSA Corporación aims to maintain with its workers.

For this reason, since 2019, follow-up interviews have been carried out for new recruits, as well as exit interviews, which consist of the completion of a questionnaire and a subsequent interview with Human Resources by the person who leaves the Group voluntarily.

Number of additions by gender and age

Age (years)	<30		30-50		>50		Total Additions
Gender	W	M	W	M	W	M	
2020	101	323	207	757	95	227	1,710
2019	81	293	168	723	61	178	1,504
2018	89	612	122	1,068	9	236	2,136

Number of departures per year

	Dismissal	Voluntary Termination	End of contract	Retirement	Total Departures
2020	171 (14.1%)	376 (30.9%)	634 (52.2%)	34 (2.8%)	1,215
2019	170 (7.5%)	819 (35.9%)	1,261 (55.3%)	30 (1.3%)	2,280
2018	112 (7.5%)	553 (37.2%)	798 (53.7%)	24 (1.6%)	1,487

In order to adapt to the productive and organisational reality of the different projects in each region or country, the company adjusts the hiring of specialised personnel to the needs in each phase of the work.

Thus, staff turnover is conditioned by two fundamental factors:

- Firstly, many of the projects are carried out in dispersed geographical areas, which means that at the end of these projects the continuity of a large number of the staff assigned to the contract is highly conditioned by contracts ending. The impact of this type of leave on the workforce, for the Group as a whole, translated into 634 people leaving the Group, 52.2% of the total number of staff who left in 2020.
- Secondly, some types of service contracts mean that, in order to guarantee clients the best conditions and continuity of the service, the Group subrogates personnel with extensive experience and knowledge of the type of work to be carried out. This same process, in the opposite direction, occurs in cases where one of the Group companies ceases to provide a contract of this type, and the personnel assigned to it is subrogated by COMSA Corporación which takes over the service.



COMSA CORPORACIÓN TEAM



DIVERSITY, EQUALITY AND INCLUSION

Among the basic principles included in COMSA Corporación's Code of Ethics are equal opportunities, non-discrimination and respect for human and labour rights, which are also determining factors when promoting the professional and personal development of the entire workforce.

The company rejects discrimination on any grounds and, in particular, on the grounds of age, gender, religion, race, sexual orientation, nationality or disability.

Likewise, during the year 2020, different actions have continued to be carried out in this line, the purpose of which is to implement and develop the commitment to diversity and inclusion.

In addition to integrating these commitments into its day-to-day operations, the company has taken a further step towards complying with these principles and the objectives derived from them by joining the **Target Gender Equality** programme of the United Nations Global Compact, through which it aims to **accelerate the representation and leadership of women in companies**.

The **2019-2023 Equality Plan** is the instrument used by the Group to guarantee equality between women and men, including enforceable and applicable measures, in line with **SDG 5 - Gender Equality**. This document sets out the measures carried out to promote the progressive increase of the number of women in the Group.

Among them, one measure stands out, which establishes that, in the face of equal conditions between candidates, priority should be given to the recruitment or promotion of women.

However, the gender distribution in most professional categories is strongly masculinised due to the strong link to physical strength that has historically prevailed in the sector. The incorporation of women into the construction and engineering sector has taken place, above all, in recent years, although, as shown in the breakdowns presented below, it continues to be unequal.



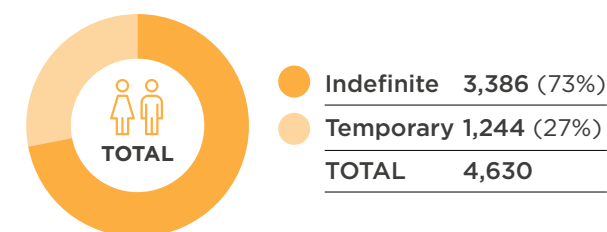
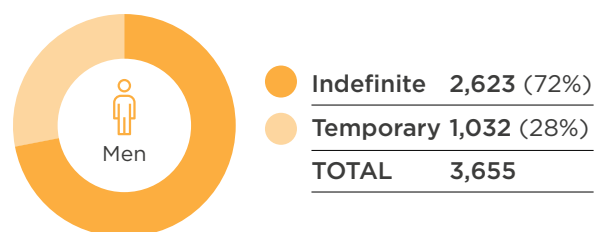
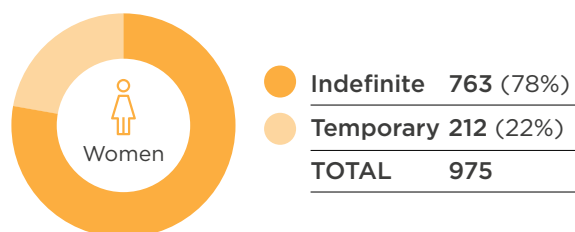
Poster for the dissemination of the Gender Awareness Campaign



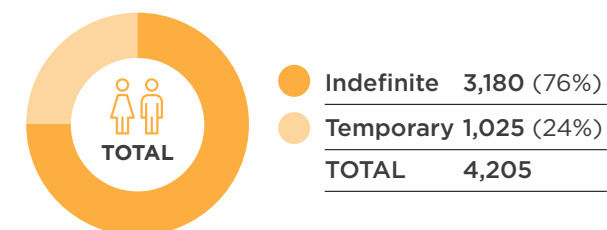
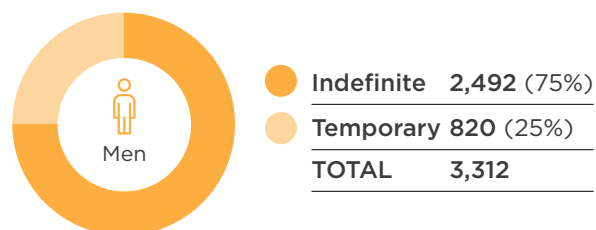
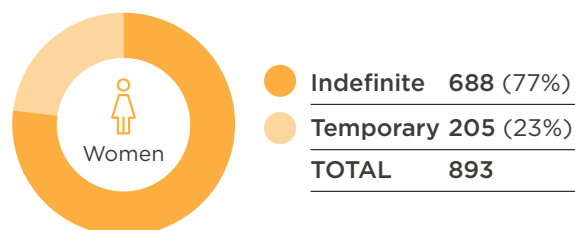
COMSA CORPORACIÓN TEAM

Type of contract by gender

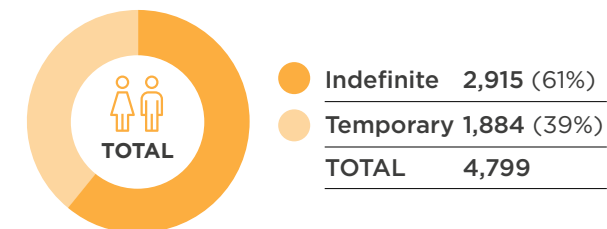
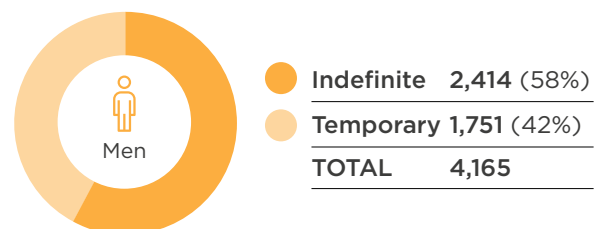
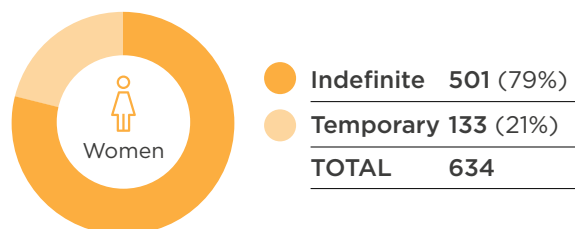
2020



2019



2018

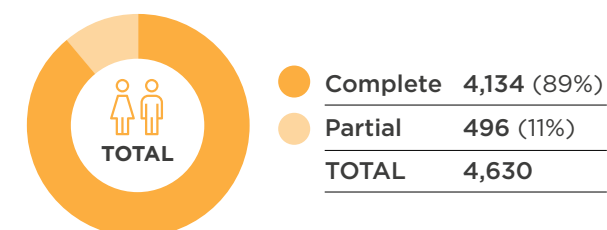
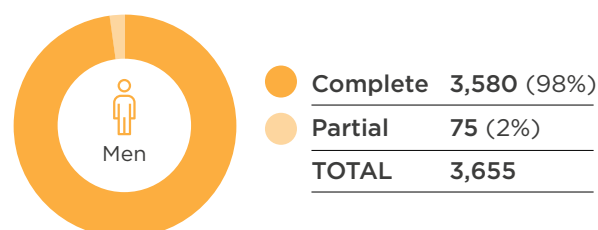
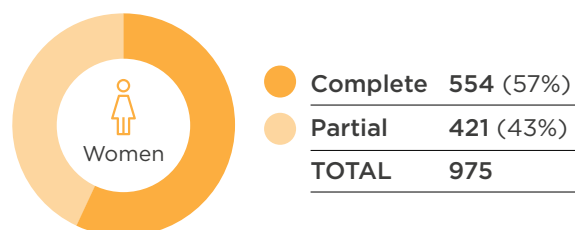




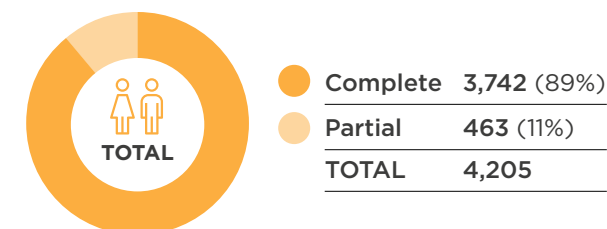
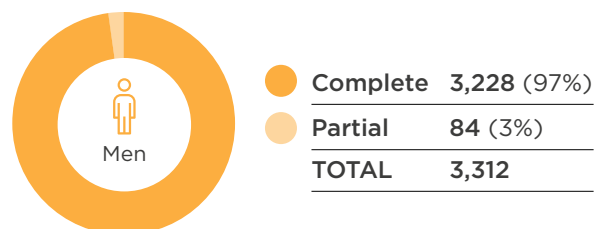
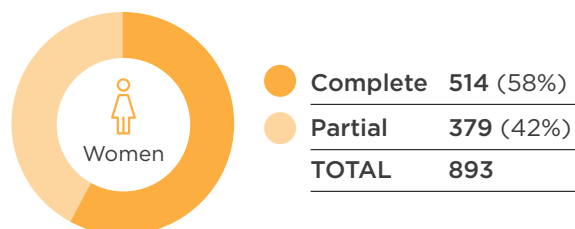
COMSA CORPORACIÓN TEAM

Type of contract by type of workday and gender

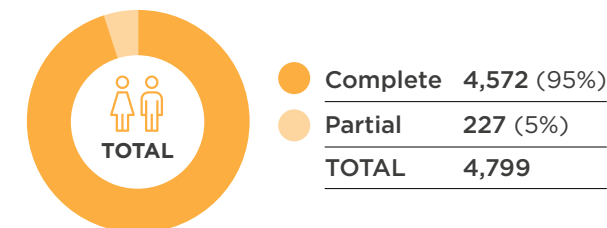
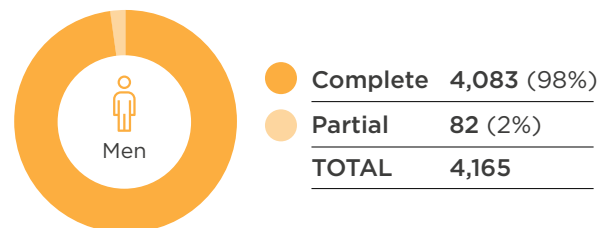
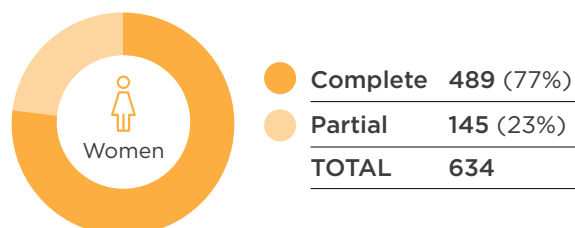
2020



2019



2018





COMSA CORPORACIÓN TEAM



On the other hand, during 2020, the **Protocol for the prevention of harassment and other discriminatory conduct** was reviewed and updated, the aim of which is to prevent and, where appropriate, punish all conduct that violates the dignity, equality and moral and sexual freedom of any person forming part of the Group. This protocol establishes the complaint channels, guaranteeing confidentiality throughout the process. During 2020, 3 complaints have been registered in this area.

GENDER EQUALITY AWARENESS TRAINING

During the year, a highlight was the organisation of gender equality awareness training for 959 of the company's employees nationwide. The aim of this training was to get to know the current context in the framework of equal treatment and opportunities between women and men, and why it is important to ensure equal opportunities in companies.

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

In this sense, COMSA Corporación has established policies and actions that favour work-life balance, flexibility and disconnection, in the context of the different realities and organisational needs of the different work centres. Some examples of these measures adopted in Spain are:

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



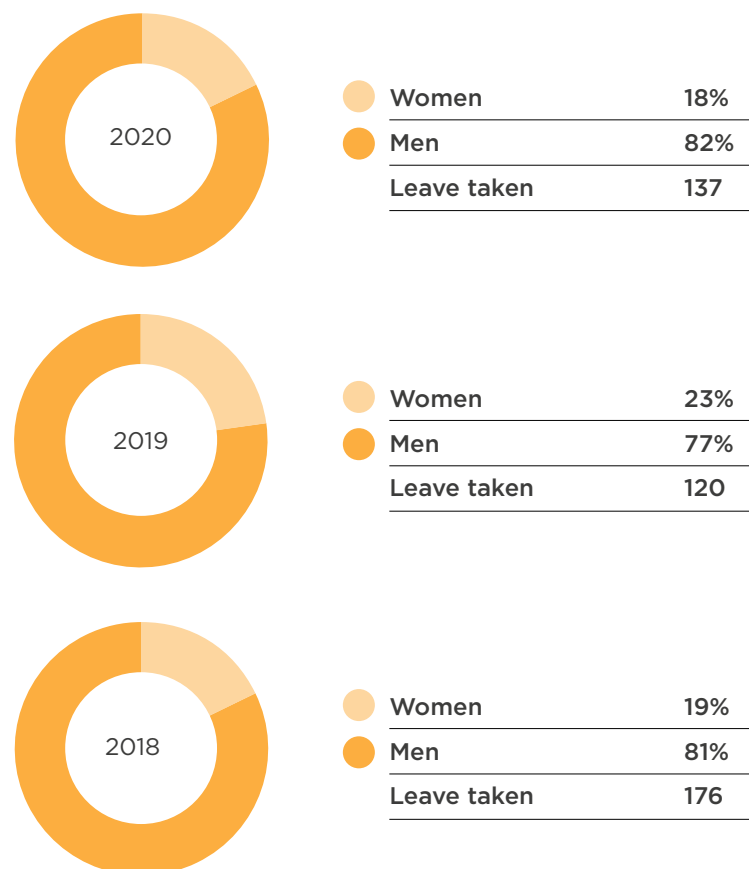
Training day for the prevention of sexual and gender-based harassment in the project to modify the route of the railway lines on the left bank, Port of Avilés (Spain)



COMSA CORPORACIÓN TEAM



Paternity or maternity leave taken



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

The reconciliation policies established have made it possible that, by 2020, all men and women who have requested this type of leave in the different countries will have returned to their respective jobs after taking it.

COMSA Corporación also understands the importance of local roots and sensitivity to the particularities of each territory for the success of the company. For this reason, it promotes the direct hiring of local employees and managers.

In 2020, local staff accounted for 94% of the total of COMSA Corporación, compared to 93% in 2019, and these percentages were also maintained for senior management¹, with 94% local in 2020 and 93% in 2019.

The company is strongly committed to the integration of diverse people in the workplace, so in addition to the 57 nationalities that make up the Group, it also works on the integration of different profiles, including those with difficulties in accessing the world of work, such as vulnerable groups from different areas.

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

¹ Senior management refers to: Delegates, Managers, Area Heads and Department Heads.



COMSA CORPORACIÓN TEAM



CORPORATE DIALOGUE

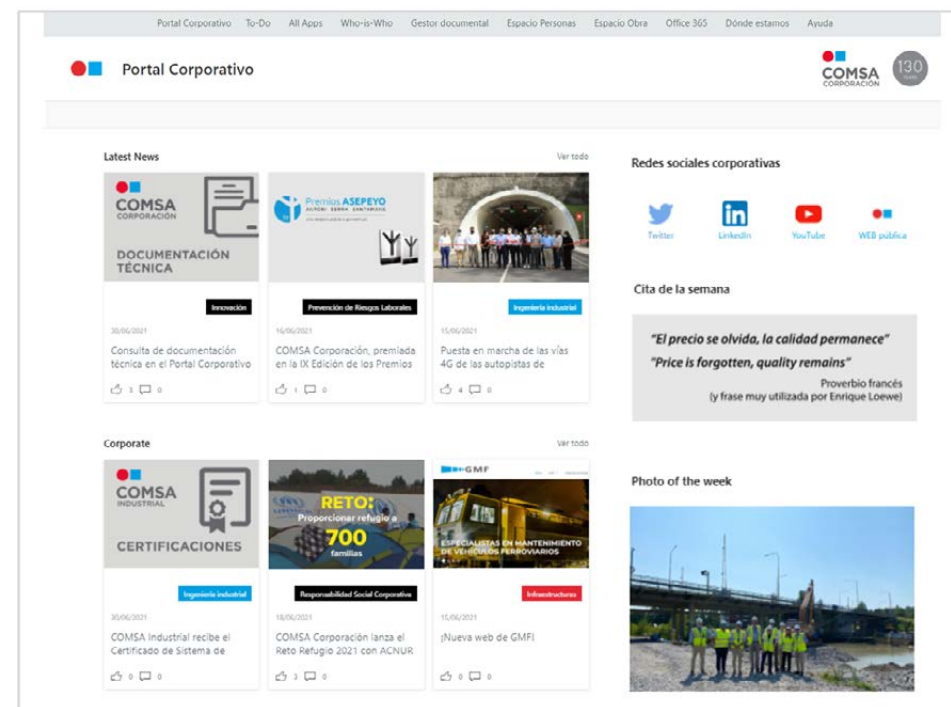
COMSA Corporación offers formal dialogue channels for the relationship with workers, such as the ethics channel.

To guarantee this aspect, there are various channels, such as formal and informal meetings, works councils, e-mail, website, intranet or corporate portal. Some of these channels are used on a regular basis and others are used when events considered relevant for the staff take place.

The **Corporate Portal or Employee Portal**, an internal communication channel where specific content and information is published for the workforce, was renewed in 2020 with the aim of becoming a space for collaboration between the company's staff.

The Group has company committees by business and by area, with equal representation of workers and the company, in which different aspects related to Occupational Risk Prevention are dealt with. In this line, specific meetings are also held by subject, such as the meetings of Health and Safety Committee.

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



Home screen of the new Corporate Portal, operational from the end of 2020



COMSA CORPORACIÓN TEAM

HEALTH AND SAFETY

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

Within this framework, throughout 2020, the Group has concluded the process of transitioning its Occupational **Health and Safety Management System**, initially from the requirements of OHSAS 18001 to ISO 45001. In this way, in addition to exceeding the legal requirements in this area, strategic precepts are incorporated in line with the principles of decent work of the International Labour Organization, and with the goals of SDG3 - Good Health and Well-being, of the Sustainable Development Goals promoted by the United Nations.

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



In 2020, 76% of COMSA Corporación's sales are executed under the guidelines of the international standard ISO 45001 for occupational health and safety.

HEALTH AND SAFETY POLICY

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

It should be noted that this Health and Safety Policy and the Environmental Policy, both of which are cross-cutting in nature, are closely related as they are worked on in an integrated manner by the Prevention, Quality and Environment Area, which has three divisions:



Joint Prevention
Service



Prevention, Quality
and National
and International
Environment



Internal audit



COMSA CORPORACIÓN TEAM



PREVENTION PLANNING

The central axis of Health and Safety management at COMSA Corporación is preventive planning, which is why the Group has specialised technicians who rely on specialised services, such as Occupational Medicine, to provide coverage and a global vision of occupational risks in the organisation.

To this end, the Group carries out an identification of the hazards in the field of health and safety, both at a general level for recurrent activities, and at a particular level for each project. The risks identified are evaluated based on proven and documented procedures, which use criteria of probability of occurrence and severity of damage in the event of materialisation. On the basis of this information, prevention measures are planned and implemented at source to eliminate the risks or, if this is not possible, to reduce them to a level that makes the degree of risk moderate. COMSA Corporación's Health and Safety Policy does not allow, in any case, processes involving high or very high levels of risk.

As a complement to the Occupational **Health and Safety Management System**, the Group facilitates the access and participation of the staff in different activities and actions that contribute to promoting the health and well-being of the professionals through healthy lifestyle habits, such as:

- Take out health insurance under more beneficial conditions through the Flexible Compensation Plan.
- Discounts in gyms near the offices.
- Participation in races.

IMPLEMENTATION AND CONTROL OF WORKING CONDITIONS

COMSA Corporación has an external Prevention Service responsible for Health Surveillance, which, among other functions, is responsible for carrying out periodic examinations of the workforce, respecting the confidentiality of all this information at all times.

The Group also documents preventive planning, both at a general level and at a project-specific level, following criteria of the highest standards worldwide and implementing different types of measures:

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

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



COMSA CORPORACIÓN TEAM



TRAINING AS A BASIS FOR PREVENTION

The Group has an **annual Health and Safety training plan** that includes specific preventive training for each job. Along these lines, in the case of works, the Group also carries out talks at the beginning of the works, both to its own personnel and to subcontractors, where it stresses the risks and specific preventive measures for each project. In this area, the implementation of the Group's on-line training platform has enabled many of the training courses to continue to be carried out despite the difficulties caused by the health emergency.

Another relevant factor has been the renewal of the approval of its own centres, according to AENOR's TELCO standard for matters relating to electrical risk in Madrid and Seville.

Given the importance of training, information and awareness-raising for society and future professionals in the sector, the Group collaborates assiduously with prestigious entities in the field of prevention, giving different seminars, including the Training for Health and Safety Inspectors in Construction Works of the Construction Labour Foundation, among others.



TELCO training on electrical risk, El Prat de Llobregat (Spain)

CONSULTATION AND PARTICIPATION

The focus on continuous improvement in the preventive field involves the systemic review of the management system, for which the Group has stable communication channels, as well as the Health and Safety Committees, joint company-worker representation bodies that facilitate the participation of the workforce. Periodically, these Committees analyse the different indicators and the actions undertaken, so that the workers' representatives can make proposals for improvement that complement the actions established by the company. Since 2018, all COMSA Corporación's staff have been provided with tools for consultation and participation in Occupational Health and Safety matters.

All the people involved in the Group's different projects are covered by the Health and Safety System. In addition, this system establishes the obligation to hold periodic coordination meetings within each project, with the participation of the representatives of the workers of the collaborating companies, with the aim of sharing the different risks detected and planning new preventive actions.



Participatory meeting in the Pacific 1 highway project, Amagá (Colombia)



COMSA CORPORACIÓN TEAM

EVOLUTION OF THE ACCIDENT RATE

The evolution of the different accident rates for own personnel for the last 3 years is shown below:

	2020	2019	2018
Frequency rate ¹	21.39	20.66	20.29
Severity rate ²	0.43	0.48	0.40
Incidence rate ³	44.92	38.91	40.78

The accident rate data for the year 2020 show a predominance of minor accidents, since, despite the slight increase in the frequency, the severity rate has been significantly reduced. The increase in the frequency and incidence rates is mainly due to two factors: on the one hand, the uncertainty generated by the exceptional nature of Covid-19 and its impact on the Group's activities which, in most cases, are essential activities that have involved greater complexity, and on the other hand, the increase in personnel subrogated to new contracts which, on occasions, require time to adapt to the company's preventive culture.

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

² Severity rate: Days lost per thousand hours worked.

³ Incidence rate: Number of accidents per thousand workers.



Training on the use of electrical voltage detectors, Málaga (Spain)



COMSA CORPORACIÓN TEAM

In relation to the accident rate presented, its distribution in relation to different parameters is shown below:

Distribution of accidents by type:

Tipología de accidentes	2020	2019	2018
Falls to the same level / Sprains	8.7%	16.0%	7.1%
Hitting or colliding with an object	12.0%	15.9%	32%
Electrical contact	1.1%	1.5%	4.1%
Projections / Splashes	-	1.5%	5.6%
Cutting agent contact	13.7%	5.3%	5.1%
Falls from heights	-	-	0.5%
Falls to different levels	-	-	5.1%
Crushing / Trapping	7.7%	1.5%	7.1%
Insect bite	-	1.5%	0.5%
Overexertion (MSD)	41.0%	37.1%	32.5%
Other	15.8%	19.6%	0.4%

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

With regard to occupational diseases, one case was detected in 2020 and another in 2019, both with sick leave, while none was detected in 2018. On the other hand, there were no fatal accidents in 2020 or 2019, while, unfortunately, there was one in 2018.

Gender distribution of accidents

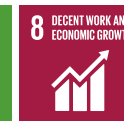
	2020	2019	2018
Women	4%	5%	7%
Men	96%	95%	93%

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

Absenteeism

Absenteeism data for 2020 for COMSA Corporación in Spain as a whole are very similar to those of the previous year and show 56,961 lost working days, with the following absenteeism rates:

	2020	2019	2018
Absence due to common contingencies	4.03%	3.72%	3.72%
Absenteeism due to accidents at work	0.27%	0.61%	0.54%



COMSA CORPORACIÓN TEAM

COMMITMENT TO CONTINUOUS IMPROVEMENT

COMSA Corporación carries out different initiatives, agreed with the workers' representatives and aligned with SDG 3 - Good health and well-being, with the aim of reducing both the number and the seriousness of the main types of accidents. Among these initiatives are the following:

- The Mobility Plan to reduce commuting accidents.
- The installation of defibrillators in corporate headquarters, with the respective training of personnel, in the main logistics centres in Spain, turning them into cardio-protected centres.
- The alcohol and drug prevention campaign.
- The implementation of the Protocol for the Prevention and Detection of Stress through which the systematic review of psychosocial risks is carried out.

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

ERGONOMICS ACTION PLAN

With a special focus on the prevention of musculoskeletal disorders, one of the main causes of accidents, the company has launched the Ergonomics Action Plan, focused on different risk groups, but with the intention of reaching the entire workforce in the long term. This project seeks to improve the ergonomic conditions of specific groups of professionals in two ways. On the one hand, through the application of digital tools, to identify more quickly all those processes that could pose a risk to health and, on the other hand, by conducting practical workshops on ergonomics and with the staff, thus implementing specific preventive measures for each type of activity.



Monitoring with sensors of the areas of greatest vertebral compression in the framework of the Ergonomics Action Plan in El Prat de Llobregat (Spain)



EXTERNAL COLLABORATORS

COMSA Corporación places the appropriate management of its value chain at the centre of the Group's decision-making, as it is considered a strategic area for guaranteeing the Group's competitiveness. In this regard, in 2020 the company's Procurement Committee carried out a review of the Procurement Model established at corporate level, the aim of which is to ensure transparency at all times in the contracting processes, favour free competition and detect risk situations, while reinforcing the Group's ethical commitment, established in the new Compliance model, which includes matters relating to competition, the contracting of business partners and the acceptance of gifts and donations, as well as the new General Purchasing Procedure, which streamlines workflows and optimises the procurement of strategic materials and services.

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



Ethical Principles

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



Social and environmental principles

In order to ensure that the entire value chain adapts as quickly as possible to the growing expectations of the different stakeholders, and in addition to the requirements established in the selection of suppliers, the Group has begun to work with some of those who offer cross-cutting services, to promote the development of solutions in the field of sustainability within their organisations. In this area, for example, the integration of groups, purchases from local suppliers or the increase in actions to reduce the environmental impact of its facilities are encouraged.



Maintenance works in the Singelo tunnel of Line 4 of the Sao Paulo Metro (Brazil)

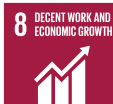


EXTERNAL COLLABORATORS

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

The Group's supply chain is made up of more than 18,000 suppliers, encouraging the hiring of local suppliers and supporting the generation of positive social impact through the creation of wealth and investment in the countries where it is present.

Due to the global situation in 2020 as a result of the pandemic, relations with some suppliers have changed: in some cases, due to the lack of raw materials, prices and delivery times for some essential goods have increased exponentially. An example of this would be those experienced by suppliers of personal protective equipment during the first months of the year, while in other cases, such as suppliers of office or travel services, as a result of mobility restrictions and teleworking, their turnover has decreased significantly. In any case, it is worth highlighting the great capacity for resilience of the entire value chain of the Group, based on stable and long-term relationships, which have made it possible to overcome the most critical months, with a high degree of continuity in the Group's main operations.



More than **98% of the suppliers are of local origin**, contributing to generate value in the territory



Over

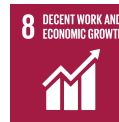
€522M

monetary value destined to the payment of suppliers



93.72%

of purchases made from local suppliers





EXTERNAL COLLABORATORS

SELECTION AND APPROVAL OF SUPPLIERS

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

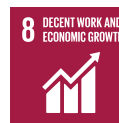
The main criteria used for the approval of suppliers are:



With the formalisation of the contract, the supplier companies undertake to respect with the requirements regulations of and legal the country, as well as to adopt COMSA Corporación's Code of Ethics in the performance of their activity. In this sense, in order to facilitate two-way communication, the COMSA Corporación Ethics Channel mailbox is available to suppliers, as well as to third parties who are or have been in contact with the Group, through which they can report any type of irregularity in good faith. In this regard, in the last 3 years, no complaint has been received regarding behaviour that could be considered contrary to the principles of the Code of Ethics of COMSA Corporación.



Corrective maintenance of FM broadcasting antennas, Pic de Carroi (Andorra)



EXTERNAL COLLABORATORS

MONITORING AND EVALUATION

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



In 2020, more than 1,400 suppliers were evaluated in Spain, considered critical due the type of supply or the volume of billing. The result of the evaluation process allows to classify suppliers into advisable suppliers, all those that can be ordered from, and non-advisable suppliers. Among the latter, there are three categories: with incidents, which means that orders can be placed, but their evolution must be analysed during the life of the contract; undesirable, for which only orders previously approved by management can be placed; and blocked, with which no contractual relationship can be established.

In the event that a supplier presents a negative performance in the evaluations, a specific action plan is developed. In 2020, no supplier has been identified that presents significant negative environmental impacts, either real or potential, but with regard to criteria related to prevention, where a case of potential risk to health and safety has been detected. In view of this situation, an on-site audit to verify that the irregularities detected have been rectified has been established as a prerequisite for re-hiring their services. With regard to other social aspects, such as respect for human rights, these are expressly included in the Group's Code of Ethics and are therefore mandatory in order to establish a contractual relationship. With the exception of specific cases, the supplier evaluation process does not include on-site audits.



EXTERNAL COLLABORATORS



DIGITALISATION

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

- 1 **New Purchasing Planning** tool for large projects, which allows to improve the purchasing forecast, as well as to speed up and optimise the search for materials and services.
- 2 Optimisation of the **materials database**, where, thanks to the provision of broader categories of materials and services, it is easier for the user to choose the one that best suits their needs. Similarly, in the case of strategic materials, specific parameters have been defined on the basis of which better purchasing decisions can be made.
- 3 **Centralisation of purchasing and contracting** from the purchasing area for large-scale projects.
- 4 Approval of purchases as early as the quotation comparison phase.
- 5 **Purchasing Approval Application** that allows to speed up the invoice approval processes and consequently the rest of the related procedures.
- 6 Signing of the contracts by the person in charge of the acquisition.

Within the purchasing area, some tools are being developed to optimise the processes and the dialogue with external collaborators:



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



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

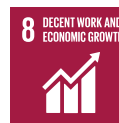


Approvals Portal: It will allow the pre-registration in an autonomous way of new suppliers to collaborate with. Each interested supplier can upload business information and specific requirements to the platform according to their type of supply, and based on this information, their incorporation or maintenance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



New internal shopping portal (E-Cart): It will offer a new interface much more agile and intuitive for users.

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



EXTERNAL COLLABORATORS

PREVENTIVE CULTURE IN THE VALUE CHAIN

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

Overall accident rates:

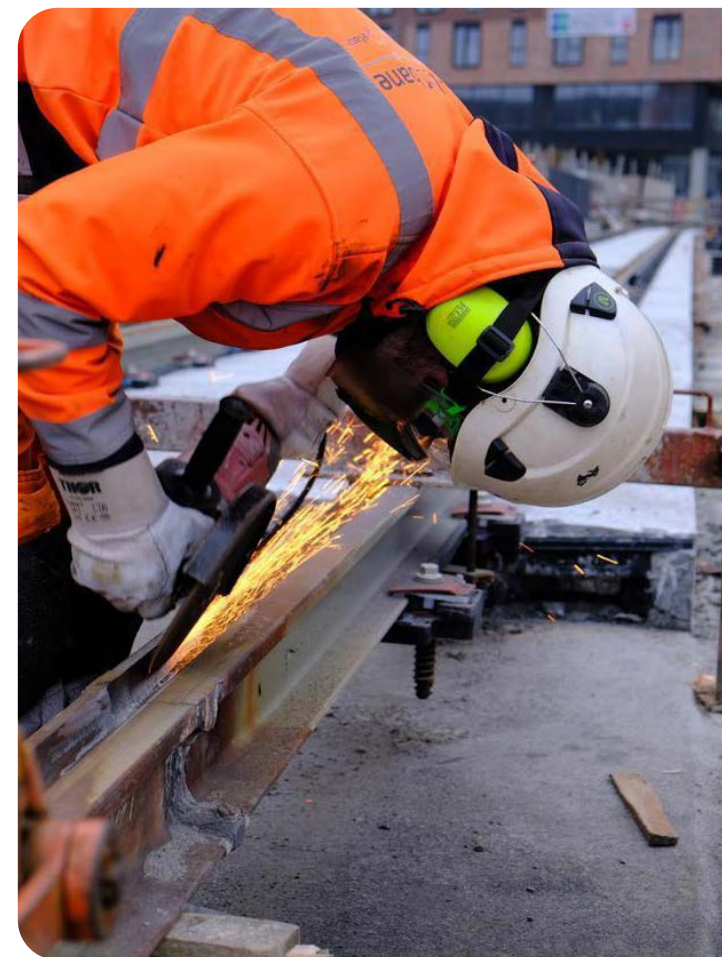
	2020	2019	2018
Frequency rate ¹	21.91	19.37	20.03
Severity rate ²	0.31	0.40	0.41
Incidence rate ³	42.55	30.01	30.29

As is the case for own staff, the data for 2020 show a predominance of minor accidents, since, despite the slight increase in frequency, the severity rate has been significantly reduced. The increase in the frequency and incidence rates is fundamentally due to the impact of Covid-19 on the activities, most of them considered essential and, consequently, with a high degree of continuity, even intensification, at times of greater complexity due to the pandemic, which, in addition, increased staff turnover rates.

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

² Severity rate: Days lost per thousand hours worked.

³ Incidence rate: Number of accidents per thousand workers.



Construction work on the tramway in front of the Odense Bane-gard Center, Odense (Denmark)



CLIENTES

Throughout its 130 years of history, COMSA Corporación has become one of the benchmark groups in the sector, largely thanks to the leading role it gives to clients in the development of projects, where through active listening, it not only responds to their current needs, but also anticipates future expectations.

To ensure this, the Group promotes the following aspects:



Professionalism of the human team: In today's increasingly demanding and changing environments, the agile search for solutions, as well as the fluid treatment with the client, are essential to face the challenges of the day to day.



Commitment to innovation and technological development: The new solutions developed by the company make it possible to optimise performance in the different projects, even exceeding the client's expectations. In this area, the company is immersed in a comprehensive digitalisation process to speed up the collection of performance indicators in different areas of the business:

- Automated reporting of information and indicators that allows centralised control of the different business units.
- Obtaining indicators of different types that can be broken down by project, business unit or country according to needs.
- Application of new technologies during project inspections to streamline processes.



Incentive of the global vision: Thanks to the diversity of businesses that make up the Group, there is a wide range of resources available to offer integrated solutions based on internal synergies, providing added value to the client.



Commitment to quality: Thanks to the rigorous planning of each phase and strict compliance with the commitments made, quality is one of the hallmarks of COMSA Corporación.



Enhancement of organisational learning: The continuous improvement systems that make up the organisation allow for the detection of new opportunities in the development of the projects.

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



The basis of the Quality Management System, audited internally and externally, guarantees continuous improvement through the establishment of ambitious objectives.



CLIENTS

The quality management system aims to ensure compliance with and control of the parameters established by ISO 9001 certification. This procedure is closely linked to sales, so variations can be seen when comparing different periods:

	2020	2019	2018
% of sales with ISO 9001 certification	80%	80%	86%

In all projects a Quality Plan is developed which includes:

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

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



Quality Policy



Cleaning and disinfection of the CEM Claror, a sports centre set up as a health pavilion to support the Sant Pau Hospital for patients with Covid-19, Barcelona (Spain)

CLIENTES

CLIENT SATISFACTION

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

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

Stages established within the framework of the Quality Management System:

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

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

Once analysed, if it is considered that additional competences to those of COMSA Corporación are required, partnerships are established with partners and consultants of proven experience and with affinity in corporate principles and values, especially regarding ethical and honest behaviour.

Satisfaction is evaluated on the basis of satisfaction surveys, whose criteria are periodically reviewed and weighted to adapt to client needs.

Thanks to the digitilisation process in which the Group is immersed, the number of surveys carried out through digital platforms is increasing, which allows not only a more agile response from the client, but also a greater capacity to respond to proposals for improvement.



Maintenance services carried out by COMSA Service at the Collserola Tower, Barcelona (Spain)



CLIENTS

Main evaluation criteria in satisfaction surveys:

- ✓ Technical capacity of the teams
- ✓ Compliance with deadlines and commitments
- ✓ Ability to respond to unforeseen events
- ✓ Fluent communication skills
- ✓ Final quality of the project
- ✓ Final quality of the project
- ✓ Environmental management

Analysis of surveys received:



2020

509

Surveys sent

61%

Response rate

8,34 / 10

Average score

2019

556

Surveys sent

73%

Response rate

8,23 / 10

Average score

2018

563

Surveys sent

54%

Response rate

8,18 / 10

Average score

In a year marked by the difficulties imposed by the restrictions and in which preserving the safety of all has been fundamental in the development of the projects, having increased the valuation obtained by the different clients is a great recognition of the effort made by all the professionals who make up COMSA Corporación.



Excavation, support and lining of tunnels belonging to the Pacifico 1 highway, Amagá (Colombia)



CONTRIBUCIÓN SOCIAL

In 2020 COMSA Corporación made donations in various areas to the value of €316,200.

COMSA Corporación's family nature makes it especially sensitive to the environment in which it carries on its activity and to the people who are part of it. This particularity can be seen in the Group's philosophy "We take care of people just as we take care of our projects" and is materialised through different actions in the different territories in which the Group is present.

The main objective of COMSA Corporación is to create value in the territory by supporting local development, as well as to maintain active relations with the community by attending to its needs. To this end, it establishes collaborations with entities with different scope, both on a global scale, such as the Global Compact or MIESES Global, which seek the achievement of the main sustainability goals covered in the 2030 Agenda, and on a local scale, with membership of the #PorElClima (for the climate) communities or the Barcelona+Sostenible (sustainable) network.

17 PARTNERSHIPS FOR THE GOALS

In 2020, the company has strengthened its relations with different territorial entities by maintaining or intensifying its collaborations, such as by joining different accelerator programmes in the case of the Global Compact.



SOCIAL ACTION MANAGEMENT

The social action in COMSA Corporación has two main focuses:

- Focus collaboration with **entities that are related to the business**, either because of their mission or their presence in the territory.
- **Prioritise the participation of the staff**, with the aim of generating awareness and thus being able to spread positive values, both inside and outside the company.

OBJECTIVE

Establish a standardised methodology that, regardless of the location and type of action developed, allows the positive impact of the alliances generated in the social sphere to be quantified.



SOCIAL CONTRIBUTION

PARTNERSHIP WITH UNHCR - SALARY SOLIDARITY PROGRAMME

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

This collaboration is being materialised through the Salary Solidarity Programme, through which staff who so wish can make monthly contributions to the UNHCR from their salary, with the commitment that COMSA Corporación will match their contribution on a simultaneous basis.

In 2020, when the World Health Organization declared a global pandemic, the company carried out different campaigns to raise awareness of the situation in the refugee camps, where the most basic measures to prevent contagion, such as keeping a safe distance or recurrent hand washing, were a great challenge due to the high concentration of people living in the refugee camps, as well as the difficulty of accessing basic resources such as water. In this scenario, throughout 2020, thanks to the solidarity of the employees and the matching by the company, UNHCR has guaranteed shelter to 436 families, through:

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



Thanks to the solidarity of the employees and the matching made by COMSA Corporación, the UNHCR guaranteed shelter for 436 families in 2020.



Salary Solidarity Programme with UNHCR to provide shelter support



SOCIAL CONTRIBUTION

ACTIONS 2020

SPAIN

In 2020, support was maintained for entities that make culture and sport accessible to the public, such as the long-term collaboration that the Group maintains with the Gran Teatre del Liceu, as well as the consolidation of sponsorships for sports entities rooted in the territory in Lleida and the Basque Country.

On the other hand, support has also been given to entities of social interest that work for the integration of people at risk of social exclusion into the workplace, such as the Multiple Sclerosis Foundation, and others such as the Olof Palme Foundation that ensure respect for human rights.

PERU

Within the scope of the Peru projects, we have contributed to the less developed areas close to the projects by delivering food parcels at Christmas to various families.



Donation of food as part of the project of the Vial Ancash (Peru)



SOCIAL CONTRIBUTION

ACTIONS 2020

BRAZIL

Once again this year, the various campaigns that have been carried out since the company has been present in the territory have been consolidated. On the one hand, the sponsorship of children during the Christmas campaign and, on the other, the programme for young apprentices has been strengthened with the aim of increasing the employability of this population.

MEXICO

In the social sphere, collaboration with the Food Bank of Mexico has been strengthened, in a context where its mission has become even more necessary, and in the area of biodiversity, the reforestation project started in 2018 has been extended, while work has been done to increase the environmental awareness of the company's youngest employees, through the national children's drawing competition "Let's paint a tree", organised by the National Forestry Commission of Mexico.

COLOMBIA

As part of the actions carried out to alleviate the consequences of the pandemic, in the vicinity of the municipality of Amagá, the company has delivered 55 food parcels to more than 40 vulnerable families who during the first months of the pandemic had not been able to receive assistance from the authorities.



Sponsorship of minors in the Christmas campaign, São Paulo (Brazil)



Drawings selected for the contest "Let's paint a tree" at the headquarters of the National Forestry Commission (CONAFOR), Mexico City (Mexico)

ABOUT THE REPORT





ABOUT THE REPORT

SCOPE AND COVERAGE

In keeping with the commitment initiated in 2017 in relation to the reporting of sustainability information through the Corporate Social Responsibility Reports, COMSA Corporación de Infraestructuras, S.L., referred to throughout this report as “COMSA Corporación” or “the Group”, redoubles its efforts in terms of transparency with the publication of this third Report, which responds to the requirements established in **Spanish Law 11/2018, of 29 December, on non-financial information and diversity**, which includes environmental, social and governance aspects, also known by its acronym ESG.

Starting with this 2020 report, documents and nomenclatures will be unified, so that instead of publishing the “Non-Financial Information Report” or “Non-Financial Information Statement”, which complies with the aforementioned Law, and in parallel the “Corporate Social Responsibility Report”, with a greater focus on stakeholders, a single document will be published, called the “Sustainability Report”. With this unification, not only will it be much simpler for stakeholders to review it by having a single verified document, but it also incorporates the trend observed in the sector to call these ESG aspects under the concept of sustainability, recognising in turn the repercussion that all these aspects have in the financial sphere.

This document shows the information and data corresponding to the financial year ended 31 December 2020 of COMSA Corporación and its subsidiaries. In this regard, this report focuses on the business area activities of the following Spanish companies:

- COMSA Corporación de Infraestructuras, S.L.
- COMSA, S.A.U.
- COMSA Instalaciones y Sistemas Industriales, S.A.U.
- COMSA Service Facility Management, S.A.U.
- COMSA Renovables, S.A.U.
- Gestión Medioambiental de Neumáticos, S.L.
- VILLOLDO SOLAR, SL
- Generación de Energías Sostenibles, S.L.
- COMSA Auxiliary Solutions, S.L.
- COMSA Security Service, S.L.U.
- NORTUNEL, S.A

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



Preparation of the ramp for the execution of the false tunnel in the Galindo storm tank project, between Barakaldo and Sestao (Spain).



ABOUT THE REPORT

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

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

2019 scope: As a result of the change in the perimeter of the financial audit, this year's figures do not include information on the Trakcja Group. In addition, with regard to sustainability figures, the following companies have been added: COMSA Auxiliary Solutions, S.L. and COMSA Security Service, S.L.U.

2020 scope: The company NORTUNEL, S.A. has also been added to the scope established in 2019 due to its turnover and the relevance of the business in the Group as a whole. On the other hand, it is worth mentioning that the activity of TFM Energía Solar Fotovoltaica, S.A. has been integrated into the business of COMSA Service Facility Management, S.A.U.

This Sustainability Report forms part of the Consolidated Management Report of the COMSA Corporación de Infraestructuras, S.L. Group and Subsidiaries and has been prepared based on the Global Reporting Initiative (GRI) standards, regarding to the definition of the content and the inclusion of the different stakeholders, the context of sustainability, materiality and completeness, as well as with regard to the quality of the information, taking into account the principles of accuracy, balance, clarity, comparability, reliability and timeliness, as well as meeting the goals established by the **2030 Agenda in the various Sustainable Development Goals (SDGs)**. Therefore, in order to respond to the different requirements, and with the aim of facilitating the traceability of the information, different annexes have been included:

- ANNEX I. GRI TABLE OF CONTENTS
- ANNEX II. SDG TABLE OF CONTENTS



Construction of the slab over the execution area of the cut-and-cover tunnel in the Galindo storm tank project, between Barakaldo and Sestao (Spain)



ABOUT THE REPORT

MATERIAL ISSUES RELATED TO SUSTAINABILITY

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



OBJECTIVE

Throughout 2021, it is planned to resume the current materiality analysis of the Group in order to ascertain the new concerns and expectations of the Group's different stakeholders.

Material topics identified:



CORPORATE GOVERNANCE

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



ECONOMY

- * Competitiveness
- * Fiscal responsibility



ENVIRONMENT

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



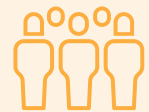
LABOUR

- * Equality and diversity
- * Attraction and retention of talent
- * Health and safety



SUPPLY CHAIN

- * Supply chain risks
- * Human Rights
- * Quality of service
- * Client satisfaction



SOCIAL

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

As a sign of the Group's commitment to ethical and responsible management, the planning of activities for 2020 contemplated the updating of this materiality analysis, but due to the new situation caused by Covid-19, it has not been possible.

ABOUT THE REPORT

COMMUNICATION WITH STAKEHOLDERS

As a key aspect of the business model, the Group is committed to maintaining stable and transparent relations with its various stakeholders.

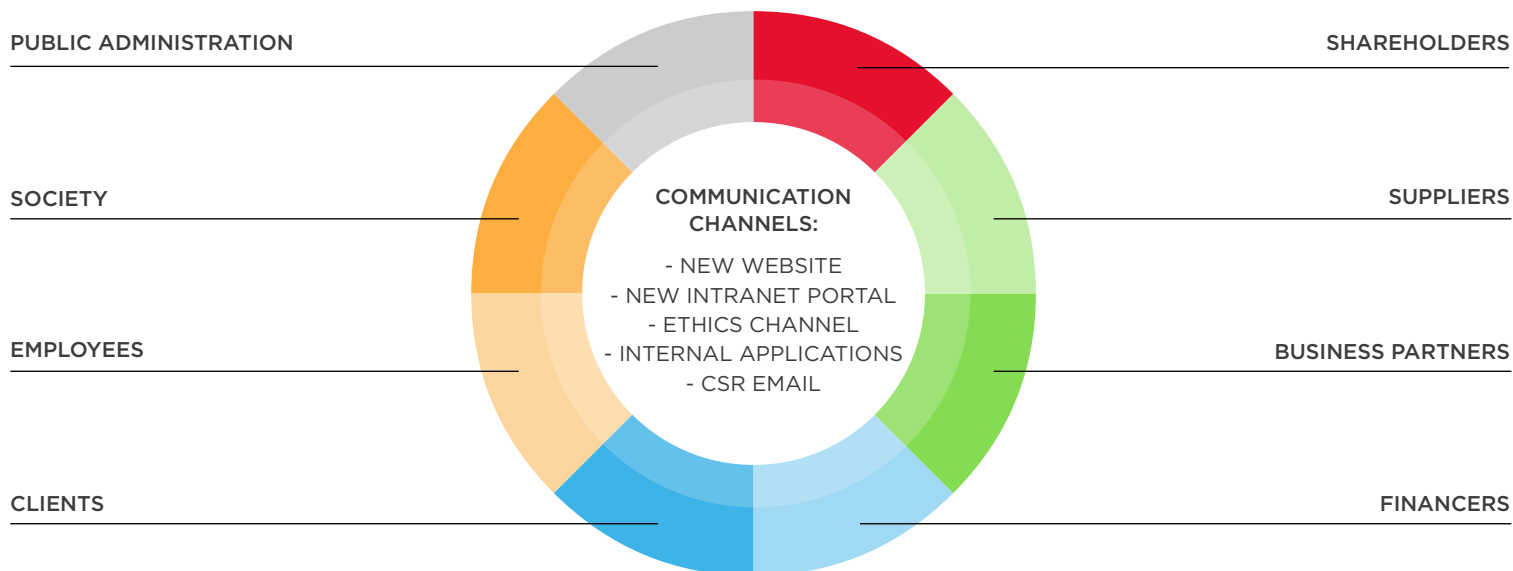
To this end, COMSA Corporación makes different internal and external communication channels available to them, enabling them to communicate their concerns and expectations with the aim of integrating them into the Group's strategy.



OBJECTIVE

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

COMSA Corporación stakeholders and communication channels established





ABOUT THE REPORT

CONCORDANCE WITH OTHER DOCUMENTS

This document has been prepared in an exhaustive manner, taking into account the context of COMSA Corporación's sustainability, its material issues and their repercussions on the main stakeholders of the Group. Much of the data presented here complements and expands on the [Annual Summary 2020](#) published in March 2021, available on the Group's website. In the event of divergence of information between the two documents, the information in this document prevails as it has been verified by an independent verification service provider, within the framework of the application of Spanish Law 22/2018.

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

RELEVANT FACTS

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

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

- Business Model: A Committee was created to reduce the impact on the business and guarantee the continuity of operations.
- Continuity of operations: The Group has established specific working groups and procedures to monitor and manage the evolution of its operations at all times, in order to minimise their impact on projects.
- Environmental issues: The impact in this area is closely linked to the activity carried out, so that in some areas such as indirect emissions, linked to corporate travel, have been significantly reduced as a result of the mobility restrictions experienced in the different geographies and the promotion of teleworking, other aspects such as the generation of waste or materials, linked to the type and phase of each project, have been maintained or increased.
- Personnel issues: This new situation has allowed the implementation of mechanisms such as remote work or teleworking, which have not only made possible, to a large extent, the continuity of support operations to the core business, but have also meant a step forward in the development of new formulas for work-life balance and flexibility for the workforce. At the same time, as a result of changes in the business, the Group has also been forced to resort to employment regulation practices.
- Health and safety issues: Since the beginning of the crisis, the Group has taken the necessary measures to ensure the health and safety of employees and clients at all times.
- Supply chain issues: The global supply of some goods has been affected by the initial shutdown of some activities, this has had consequences on the supply of some materials and/or services, which are still latent in 2021.



ADDITIONAL INFORMATION

Distribution of the workforce by professional category

	2020		2019		2018	
Professional category ¹	% Women ²	% Men	% Women	% Men	% Women	% Men
Category 1	4 (0.4%)	19 (0.5%)	3 (0.3%)	15 (0.5%)	3 (0.5 %)	18 (0.4 %)
Category 2	16 (1.6%)	109 (3.0%)	16 (1.8%)	102 (3.1%)	14 (2.2 %)	109 (26 %)
Category 3	89 (9.1%)	300 (8.2%)	73 (8.2%)	291 (8.8%)	66 (10.4 %)	277 (6.7 %)
Category 4	519 (53.2%)	686 (18.8%)	495 (55.4%)	660 (19.9%)	518 (81.7 %)	811 (19.5 %)
Category 5	347 (35.6%)	2,541 (69.5%)	306 (34.3%)	2,244 (67.7%)	33 (5.2 %)	2,950 (70.8%)
Total	975	3,655	893	3,312	634	4,165

Distribution of the workforce by gender, age and professional category Spain 2020

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

¹ Categories include: 1 Executives; 2 Delegates, Managers, Area Heads and Department Heads; 3 Project Managers and Unit Managers; 4 Technical and Administrative, and 5 Operators.

² The% of Women and Men has been calculated in relation to the category and not to 100% of the workforce.



ADDITIONAL INFORMATION

Distribution of the workforce by gender, age and professional category Spain 2019

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

Type of contract by gender

	2020			2019			2018		
Gender	Indefinite	Temporary	Total	Indefinite	Temporary	Total	Indefinite	Temporary	Total
Women	763 (78%)	212 (22%)	975	688 (77%)	205 (23%)	893	501 (79%)	133 (21%)	634
Men	2,623 (72%)	1,032 (28%)	3,655	2,492 (75%)	820 (25%)	3,312	2,414 (58%)	1,751 (42%)	4,165
Total	3,386 (73%)	1,244 (27%)	4,630	3,180 (76%)	1,025 (24%)	4,205	2,915 (61%)	1,884 (39%)	4,799

Type of contract by type of working day and gender

	2020			2019			2018		
Gender	Full time	Part time	Total	Full time	Part time	Total	Full time	Part time	Total
Women	554 (57%)	421 (43%)	975	514 (58%)	379 (42%)	893	489 (77%)	145 (23%)	634
Men	3,580 (98%)	75 (2%)	3,655	3,228 (97%)	84 (3%)	3,312	4,083 (98%)	82 (2%)	4,165
Total	4,134 (89%)	496 (11%)	4,630	3,742 (89%)	463 (11%)	4,205	4,572 (95%)	227 (5%)	4,799



ADDITIONAL INFORMATION

Distribution of the workforce by country

Country	Personal 2020	Personal 2019	Personal 2018
Argentina	4 (0.1%)	7 (0.17%)	182 (3.79%)
Brazil	20 (0.4%)	30 (0.71%)	26 (0.54%)
Colombia	65 (1.4%)	39 (0.93%)	32 (0.67%)
Denmark	27 (0.6%)	20 (0.48%)	13 (0.27%)
Spain	3,704 (80.0%)	3,393 (80.69%)	3,013 (62.76%)
France	54 (1.2%)	57 (1.36%)	74 (1.54%)
Mexico	549 (11.9%)	451 (10.73%)	362 (7.54%)
Peru	13 (0.3%)	76 (1.81%)	992 (20.66%)
Portugal	168 (3.6%)	120 (2.85%)	104 (2.17%)
Sweden	26 (0.6%)	12 (0.29%)	1 (0.02%)
Total	4,630	4,205	4,799

Average training by professional category and gender¹

Year	Gender	Category 1	Category 2	Category 3	Category 4	Category 5
2020	Women	34	38	25	19	0
	Men	21	30	26	28	13
2019	Women	65	49	26	15	1
	Men	74	33	19	26	11

¹ Categories include: 1 Executives; 2 Delegates, Managers, Area Heads and Department Heads; 3 Project Managers and Unit Managers; 4 Technical and Administrative, and 5 Operators.



ADDITIONAL INFORMATION

Average remuneration by country and gender

	2020		2019		2018	
País	Women	Men	Women	Men	Women	Men
Argentina	-	17,002.42	-	17,680.52	10,418.29	9,954.95
Brazil	12,270.48	42,683.14	15,048.33	32,361.21	15,030.75	27,484.14
Colombia	10,883.68	11,904.79	12,026.95	13,560.39	10,942.90	9,426.21
Denmark	49,040.07	63,406.03	51,091.51	72,700.99	42,384.8	75,957.84
Spain	25,641.42	29,859.21	25,578.06	23,318.63	28,311.38	27,334.54
France	31,706.65	30,929.42	28,728.30	32,690.16	28,265.92	32,339.53
Mexico	8,603.76	7,698.30	10,039.36	9,381.54	8,759.97	8,858.63
Peru	9,276.27	31,085.54	7,583.47	14,507.42	7,930.89	7,532.75
Portugal	17,960.52	17,321.20	18,861.11	14,141.29	17,355.14	12,666.61
Sweden	37,139.28	48,286.14	40,892.91	47,423.95	-	-



ADDITIONAL INFORMATION

Average remuneration by country and age

	<30			30-50			>50		
País	2020	2019	2018	2020	2019	2018	2020	2019	2018
Argentina	-	12,043.55	7,964.23	-	21,893.88	10,524.10	-	16,574.33	12,783.05
Brazil	23,254.23	16,410.91	16,489.79	29,728.69	31,121.58	24,815.46	44,516.01	16,826.08	24,247.09
Colombia	8,473.94	7,169.72	4,982.02	12,306.18	14,410.65	11,434.29	11,239.57	13,622.25	9,620.10
Denmark	50,425.94	53,893.85	61,334.08	67,442.53	67,202.03	60,242.66	47,485.38	56,213.61	93,608.13
Spain	22,503.43	21,858.02	21,466.90	29,051.80	28,771.37	27,135.90	30,115.25	29,198.14	29,716.48
France	33,290.00	31,483.33	25,245.98	30,283.43	30,174.43	32,027.57	32,693.31	35,179.27	34,597.68
Mexico	4,654.08	5,464.38	5,386.88	8,429.86	10,107.14	9,411.15	12,576.26	14,553.39	13,939.97
Peru	10,924.67	8,876.36	6,521.11	23,894.78	12,175.57	7,802.83	-	24,601.64	8,266.13
Portugal	9,882.53	9,420.60	9,048.56	17,445.24	14,387.48	13,333.45	22,185.11	19,076.91	16,861.73
Sweden	40,859.85	40,778.04	-	47,105.80	47,351.02	-	-	-	-



ADDITIONAL INFORMATION

Average remuneration by country and category: 2020¹

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

¹ Categories include: 1 Executives; 2 Delegates, Managers, Area Heads and Department Heads; 3 Project Managers and Unit Managers; 4.2 Technicians; 4.1 Administrative and 5 Operators.



ADDITIONAL INFORMATION

Average remuneration by country and category: 2019¹

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

Average remuneration by country and category: 2018¹

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

¹ Categories include: 1 Executives; 2 Delegates, Managers, Area Heads and Department Heads; 3 Project Managers and Unit Managers; 4.2 Technicians; 4.1 Administrative and 5 Operators.



ADDITIONAL INFORMATION

Number of departures by gender and age

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

Number of departures by gender and age 2019

		Dismissals	Voluntary departures	End of contracts	Retirements	Total
<30	Women	4	36	0	0	96
	Men	29	152	280	0	461
30-50	Women	16	55	76	0	147
	Men	81	474	665	1	1,221
>50	Women	6	10	23	4	43
	Men	34	92	158	25	309
Total by type		170	819	1,261	30	2,280
% by type		7.5%	35.9%	55.3%	1.3%	100%



ADDITIONAL INFORMATION

Number of departures by gender and age 2019

		Dismissals	Voluntary departures	End of contracts	Retirements	Total
<30	Women	2	17	35	0	54
	Men	23	147	194	0	367
30-50	Women	16	32	24	0	72
	Men	53	312	197	0	367
>50	Women	2	3	1	0	6
	Men	16	42	87	798	24
Total by type		112	553	798	24	1,487
% by type		7.5%	37.2%	53.7%	1.6%	100%



ADDITIONAL INFORMATION

Number of departures by country and typology

País	Dismissals			Voluntary departures			End of contracts			Retirements		
	2020	2019	2018	2020	2019	2018	2020	2019	2018	2020	2019	2018
Argentina	0	32	12	1	12	18	0	148	3	0	1	0
Brazil	0	2	0	2	1	1	9	0	97	0	0	1
Colombia	11	15	1	6	8	2	5	2	2	0	0	0
Denmark	2	0	0	6	5	1	3	0	0	0	0	0
Spain	145	76	78	220	246	220	413	353	307	29	22	18
France	1	0	6	4	0	4	2	0	13	0	0	1
Mexico	7	42	13	125	57	52	146	92	56	5	6	2
Peru	0	0	1	0	481	230	53	662	311	0	0	2
Portugal	4	3	1	10	8	23	2	4	9	0	1	0
Sweden	1	0	0	2	1	2	1	0	0	0	0	0
Total	171	170	112	376	819	553	634	1,261	798	34	30	24



ADDITIONAL INFORMATION

Number of hires by country

Country	2020		2019		2018	
	Number of hires	% hires	Number of hires	% hires	Number of hires	% hires
Argentina	1	0.06%	17	1.13%	144	6.74%
Brazil	3	0.18%	7	0.47%	30	1.40%
Colombia	30	1.75%	47	3.13%	37	1.73%
Denmark	18	1.05%	13	0.86%	10	0.47%
Spain	1,214	70.99%	912	60.64%	935	43.77%
France	4	0.23%	7	0.47%	24	1.12%
Mexico	336	19.65%	257	17.09%	105	4.92%
Peru	22	1.29%	205	13.63%	793	37.13%
Portugal	63	3.68%	29	1.93%	57	2.67%
Sweden	19	1.11%	10	0.66%	1	0.05%
Total	1,710	100%	1,504	100%	2,136	100%

Percentage of employees covered by collective agreement by country

Country	2020		2019		2018	
	Women	Men	Women	Men	Women	Men
Argentina	0%	25%	0%	17%	50%	89%
Brazil	100%	100%	100%	100%	100%	74%
Colombia	-	-	-	-	-	-
Denmark	100%	100%	100%	100%	100%	100%
Spain	99%	99%	99%	99%	98%	99%
France	100%	100%	100%	100%	100%	100%
Mexico	0%	33%	0%	43%	0%	41%
Peru	-	-	-	-	-	-
Portugal	100%	100%	100%	100%	100%	100%
Sweden	100%	100%	100%	100%	100%	100%

¹ Only the data of the company EOLIS AMERICA LATINA SAPI CV for Mexico are included, since the data of the other companies are not available.



ANNEX I: GRI TABLE OF CONTENTS

This report has been prepared in accordance with the Global Reporting Initiative (GRI) Standards in its essential version. Below is a summary table with all the GRI indicators discussed throughout this report to facilitate their identification.

GRI Standard	Name of the indicator	Page number or explanation
GRI 101	FOUNDATION	
GRI 101	Principles	
GRI 102	GENERAL DISCLOSURES	
	Organizational profile	
GRI 102-01	Name of the organization	COMSA Corporación de Infraestructuras S.L.
GRI 102-02	Activities, brands, products and services	27-29
GRI 102-03	Location of headquarters	España C/ Viriato, 47, 08014, Barcelona.
GRI 102-04	Locations of operations	27-33
GRI 102-05	Ownership and legal form	Limited Society
GRI 102-06	Markets served	27
GRI 102-07	Scale of the organization	33-35
GRI 102-08	Information on employees and other workers	33-35 , 57-58 , 96-97
GRI 102-09	Supply chain	76
GRI 102-10	Significant changes to the organization and its supply chain	32 , 92
GRI 102-11	Precautionary principle or approach	20 , 25 , 30 , 37 , 49-50 , 67 , 69-75
GRI 102-12	External initiatives	25 , 38-39 , 41 , 43 , 48-50 , 52-54 , 60 , 64 , 86-89
GRI 102-13	Memberships of associations	13 , 86 , 54
	Strategy	
GRI 102-14	Statement from senior decision-maker	6-7
GRI 102-15	Key impacts, risks and opportunities	30-31



ANNEX I: GRI TABLE OF CONTENTS

GRI Standard	Name of the indicator	Page number or explanation
Ethics and integrity		
GRI 102-16	Values, principles, standards and norms of behaviour	9-10
GRI 102-17	Mechanisms for advice and concerns about ethics and integrity	19, 22-23
Governance		
GRI 102-18	Governance structure	14-15
GRI 102-19	Delegating authority	14-18
GRI 102-20	Executive level responsibility for economic, environmental and social topics	14-17
GRI 102-21	Consulting stakeholders on economic, environmental and social topics	16
GRI 102-22	Composition of the highest governance body and its committees	15, 17-18
GRI 102-23	Chair of the highest governance body	14
GRI 102-24	Nominating and selecting the highest governance body	14
GRI 102-25	Conflicts of interest	16, 19-20
GRI 102-26	Role of the highest governance body in setting purpose, values and strategy	16
GRI 102-27	Collective knowledge of the highest governance body	14-16
GRI 102-28	Evaluating the highest governance body's performance	16
GRI 102-29	Identifying and managing economic, environmental and social impacts	30-32, 46, 71, 76, 84
GRI 102-30	Effectiveness of risk management processes	31
GRI 102-31	Review of economic, environmental and social topics	16
GRI 102-32	Highest governance body's role in sustainability reporting	17
GRI 102-33	Communication of critical concerns	14-18
GRI 102-34	Number and nature of critical concerns	The main critical issue managed during 2020 has been the impact of Covid-19 on the business.



ANNEX I: GRI TABLE OF CONTENTS

GRI Standard	Name of the indicator	Page number or explanation
GRI 102-35	Remuneration policies	61
GRI 102-36	Process for the determination of the remuneration	61
GRI 102-37	Stakeholders' involvement in remuneration	Stakeholders are not involved in the retribution
GRI 102-38	Annual total compensation ratio	62
GRI 102-39	Percentage increase in annual total compensation ratio	In 2020 it has increased by 7%.
Stakeholder engagement		
GRI 102-40	List of stakeholder groups	94
GRI 102-41	Collective bargaining agreements	69 , 106
GRI 102-42	Identifying and selecting stakeholders	94
GRI 102-43	Approach to stakeholder engagement	94
GRI 102-44	Key topics and concerns raised	93
Reporting practices		
GRI 102-45	Entities included in the consolidated financial statements	91
GRI 102-46	Defining report content and topic boundaries	91
GRI 102-47	List of material topics	93
GRI 102-48	Restatements of information	91
GRI 102-49	Changes in reporting	92
GRI 102-50	Reporting period	From January 1 to December 31, 2020.
GRI 102-51	Date of most recent report	July 2020.
GRI 102-52	Reporting cycle	Annual.
GRI 102-53	Contact point for questions regarding the report	sostenibilidad@comsa.com



ANNEX I: GRI TABLE OF CONTENTS

GRI Standard	Name of the indicator	Page number or explanation
GRI 102-54	Claims of reporting in accordance with the GRI Standards	This report has been prepared in accordance with the GRI standards: Essential option
GRI 102-55	GRI content index	107
GRI 103	MANAGEMENT APPROACH	
GRI 103-01	Explanation of the material topic and its boundaries	Introduction of the different sections
GRI 103-02	Management approach and its components	Introduction of the different sections
GRI 103-03	Evaluation of management approach	Introduction of the different sections



ANNEX I: GRI TABLE OF CONTENTS

ECONOMIC MATERIAL TOPIC

GRI Standard	Name of the indicator	Page number or explanation
GRI 201	ECONOMIC PERFORMANCE	
GRI 201-1	Direct economic value generated and distributed	33-35
GRI 201-2	Financial implications and other risks and opportunities due to climate change	Not reported
GRI 201-3	Defined benefit plan obligations and other retirement plans	The company does not carry out this type of compensation.
GRI 202	MARKET PRESENCE	
GRI 202-1	Ratio of standard entry level wage by gender compared with local minimum wage	62
GRI 202-2	Proportion of senior management hired from the local community	68
GRI 203	INDIRECT ECONOMIC IMPACTS	
GRI 203-1	Investment in infrastructure and services of support	35, 51
GRI 203-2	Significant indirect economic impacts	34, 95
GRI 204	PROCUREMENT PRACTICES	
GRI 204-1	Proportion of spending on local suppliers	77
GRI 205	ANTI-CORRUPTION	
GRI 205-1	Proportion of spending on local suppliers	20-21
GRI 205-2	Communication and training on anti-corruption policies and procedures	24
GRI 205-3	Confirmed cases of corruption and actions taken	21



ANNEX I: GRI TABLE OF CONTENTS

GRI Standard	Name of the indicator	Page number or explanation
GRI 206	ANTI-COMPETITIVE BEHAVIOUR	
GRI 206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	One case related to COMSA Instalaciones y Sistemas Industriales, S.A.U., one case related to Fergrupo Construções e Técnicas Ferroviárias, S.A. and two cases related to ADASA Sistemas, S.A.U. (a company that at the date of this report was no longer part of the Group). Fines were imposed in all the proceedings, but in all cases the companies affected disagree with the resolution and have filed or intend to file the appropriate contentious-administrative appeals in which, additionally, the adoption of precautionary measures consisting of the judicial suspension of the execution of the payment obligations, if applicable, has been or will be requested.
GRI 207-1	Fiscal approach	The Group has a Tax Policy and a Tax Strategy approved by the Board of Directors and applicable in all the countries in which it operates. The objective of this policy is to minimise risks in the tax area, and to this end it has a Protocol for the prevention, control and management of tax and Social Security risks that guarantees compliance with the principles of transparency, integrity, efficiency and prudence in this area.



ANNEX I: GRI TABLE OF CONTENTS

GRI Standard	Name of the indicator	Page number or explanation
GRI 206	ANTI-COMPETITIVE BEHAVIOUR	
GRI 207-2	Fiscal governance, control and risk management	COMSA Corporación is aware that its tax contribution is a significant part of the development of the communities in which it operates, so the rigorous regulatory compliance in this area, included in the company's risk map, is framed within the Group's compliance model, with the Tax Department, supervised by the Group's Finance Department, being responsible for complying with the Tax Policy.
GRI 207-3	Stakeholder Engagement and Concerns Management in Tax Matters	Internally, tax compliance awareness, as part of the Group's compliance model, is essential, especially for positions potentially exposed to tax risks. In this regard, communication with the Corporate Tax Department, in terms of consultation and coordination, is essential, both nationally and internationally. With regard to external stakeholders, there are various channels of communication that allow any type of concern or suggestion to be collected, including those of a tax nature due to their special sensitivity. In relation to external business partners, temporary joint ventures, joint ventures or other similar forms of collaboration, a transparent relationship is encouraged, with a rigorous analysis of the taxation of any project in any geographical area.



ANNEX I: GRI TABLE OF CONTENTS

ENVIRONMENTAL MATERIAL TOPIC

GRI Standard	Name of the indicator	Page number or explanation						
GRI 301	MATERIALS							
GRI 301-1	Materials used by weight or volume	39						
GRI 301-2	Recycled input materials used	39, 40						
GRI 301-3	Reclaimed products and their packaging materials	38, 40-41						
GRI 302	ENERGY							
GRI 302-1	Energy consumption within the organization	43						
GRI 302-2	Energy consumption outside the organization	45						
GRI 302-3	Energy intensity	Energy used (electricity and fuel) compared to global sales: <table> <tr> <th>2020</th><th>2019</th><th>2018</th></tr> <tr> <td>469.36</td><td>434.19</td><td>410.17</td></tr> </table>	2020	2019	2018	469.36	434.19	410.17
2020	2019	2018						
469.36	434.19	410.17						
GRI 302-4	Reduction of energy consumption	44-45						
GRI 302-5	Reductions in energy requirements of products and services	48, 53						
GRI 303	WATER							
GRI 303-1	Interactions with water as a shared resource	42						
GRI 303-2	Management of water discharge related impacts	42						
GRI 303-3	Water withdrawal	42						
GRI 303-4	Water discharge	Not reported						
GRI 303-5	Water consumption	42						



ANNEX I: GRI TABLE OF CONTENTS

GRI Standard	Name of the indicator	Page number or explanation
GRI 304	BIODIVERSITY	
GRI 304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Not reported
GRI 304-2	Significant impacts of activities, products, and services on biodiversity	49
GRI 304-3	Protected or restored habitats	49
GRI 304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	Not reported
GRI 305	EMISSIONS	
GRI 305-1	Direct (Scope 1) GHG emissions	47
GRI 305-2	Energy indirect (Scope 2) GHG emissions	47
GRI 305-3	Other indirect (Scope 3) GHG emissions	47
GRI 305-4	GHG emissions intensity	47
GRI 305-5	Reduction of GHG emissions	44-46
GRI 305-6	Emissions of ozone-depleting substances (ODS)	Not reported
GRI 305-7	Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions	Not reported
GRI 306	WASTE	
GRI 306-1	Waste generation and significant waste-related impacts	38-41
GRI 306-2	Management of significant waste-related impacts	38-41, 76
GRI 306-3	Waste generated	40
GRI 306-4	Waste not destined for disposal	40
GRI 306-5	Waste for disposal	40



ANNEX I: GRI TABLE OF CONTENTS

GRI Standard	Name of the indicator	Page number or explanation
GRI 307	ENVIRONMENTAL COMPLIANCE	
GRI 307-1	Non-compliance with environmental laws and regulations	In 2020 there was an unauthorised discharge of wastewater from the high-speed train works into the basin (penalty of €50,000)
GRI 308	SUPPLIER ENVIRONMENTAL ASSESSMENT	
GRI 308-1	New suppliers that were screened using environmental criteria	78
GRI 308-2	Negative environmental impacts in the supply chain and actions taken	79



ANNEX I: GRI TABLE OF CONTENTS

SOCIAL MATERIAL TOPIC

GRI Standard	Name of the indicator	Page number or explanation
GRI 401	EMPLOYMENT	
GRI 401-1	New employee hires and employee turnover	63, 103-106
GRI 401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	61, 71
GRI 401-3	Parental leave	68
GRI 402	LABOUR RELATIONS	
GRI 402-1	Minimum notice periods regarding operational changes	Established by collective agreement
GRI 403	OCCUPATIONAL HEALTH AND SAFETY 2018	
GRI 403-01	ORP management system	70
GRI 403-02	Risk identification and incident investigation	31, 70-71
GRI 403-03	Occupational health services: description and mechanisms to ensure quality of the service	71
GRI 403-04	Employee participation in ORP	71-72
GRI 403-05	Employee training in ORP	72
GRI 403-06	Occupational health promotion	71, 75
GRI 403-07	Prevention and mitigation of health impacts related to labour relations	71-72
GRI 403-08	Employees covered by ORP management systems	72
GRI 403-09	Work-related accidents	73-74, 81
GRI 403-10	Work-related ill health	74



ANNEX I: GRI TABLE OF CONTENTS

GRI Standard	Name of the indicator	Page number or explanation
GRI 404	TRAINING AND EDUCATION	
GRI 404-1	Average hours of training per year per employee	59, 98
GRI 404-2	Programmes for upgrading employee skills and transition assistance programmes	59-60, 67, 73
GRI 404-3	Percentage of employees receiving regular performance and career development reviews	61
GRI 405	DIVERSITY AND EQUAL OPPORTUNITY	
GRI 405-1	Diversity of governance bodies and employees	57-58, 96-97
GRI 405-2	Ratio of basic salary and remuneration of women to men	62
GRI 406	NON-DISCRIMINATION	
GRI 406-1	Incidents of discrimination and corrective actions taken	In 2020, 1 case of harassment and 2 cases of unequal treatment were handled.
GRI 407	FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING	
GRI 407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	76, 78 They have not been detected.



ANNEX I: GRI TABLE OF CONTENTS

GRI Standard	Name of the indicator	Page number or explanation
GRI 408	CHILD LABOUR	
GRI 408-1	Operations and suppliers at significant risk for incidents of child labour	76
GRI 409	FORCED OR COMPULSORY LABOUR	
GRI 409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	76
GRI 410	SECURITY PRACTICES	
GRI 410-1	Security personnel trained in human rights policies or procedures	76
GRI 411	RIGHTS OF INDIGENOUS PEOPLES	
GRI 411	Cases of violations of the rights of indigenous peoples	Since 2018 there is no record of cases
GRI 412	HUMAN RIGHTS ASSESSMENT	
GRI 412-1	Operations that have been subject to human rights reviews or impact assessments	The company has not identified situations in which there is a risk of human rights violations
GRI 412-2	Employee training on human rights policies or procedures	24
GRI 412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	76, 78
GRI 413	LOCAL COMMUNITIES	
GRI 413-1	Operations with local community engagement, impact assessments, and development programmes	34, 85, 87-89
GRI 413-2	Operations with significant actual and potential negative impacts on local communities	49-50, 85
GRI 414	SOCIAL EVALUATION OF PROVIDERS	
GRI 414-1	New suppliers that have passed selection filters according to social criteria	76-78
GRI 414-2	Negative social impacts in the supply chain and actions taken	79



ANNEX I: GRI TABLE OF CONTENTS



GRI Standard	Name of the indicator	Page number or explanation
GRI 415	PUBLIC POLICY	
GRI 415-1	Political contributions	They have not been carried out in 2020.
GRI 416	CUSTOMER HEALTH AND SAFETY	
GRI 416-1	Evaluation of the impacts on health and safety of the products and services	82
GRI 416-2	Assessment of the health and safety impacts of product and service categories	Since 2018 there is no record of claims in this area
GRI 417	MARKETING AND LABELLING	
GRI 417-1	Requirements for product and service information and labelling	Does not apply
GRI 417-2	Incidents of non-compliance concerning product and service information and labelling	Does not apply
GRI 417-3	Incidents of non-compliance concerning marketing communications	Does not apply
GRI 418	CUSTOMER PRIVACY	
GRI 418-1	Substantiated complaints regarding concerning breaches of customer privacy and losses of customer data	Since 2018 there is no record of claims in this area
GRI 419	SOCIOECONOMIC COMPLIANCE	
GRI 419-1	Non-compliance with laws and regulations in the social and economic area	In 2020, a mild sanction was received regarding risk prevention in Spain (€ 2,400).



ANNEX II: SDG TABLE OF CONTENTS

Below are the sections in which you can find more information on COMSA Corporación's contribution to each of the objectives introduced in the "Commitment to the United Nations SDGs" section of this report, as well as some SDGs to which it contributes indirectly:

SDG	Implication	Page
 1 NO POVERTY	End poverty in all its forms everywhere	12 , 86 , 87 , 88 , 89
 2 ZERO HUNGER	End hunger, achieve food security and improved nutrition and promote sustainable agriculture	12 , 86 , 87 , 88 , 89
 3 GOOD HEALTH AND WELL-BEING	Ensure healthy lives and promote well-being for all at all ages	12 , 19 , 56 , 70-75 , 81 , 86
 4 QUALITY EDUCATION	Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all	5 , 12 , 59 , 60 , 89
 5 GENDER EQUALITY	Achieve gender equality and empower all women and girls	5 , 12 , 25 , 56 , 62 , 64 , 67 , 93
 6 CLEAN WATER AND SANITATION	Ensure availability and sustainable management of water and sanitation for all	12 , 37 , 42 , 44 , 47 , 48 , 87
 7 AFFORDABLE AND CLEAN ENERGY	Ensure access to affordable, reliable, sustainable and modern energy for all	5 , 12 , 43 , 45 , 48 , 53
 8 DECENT WORK AND ECONOMIC GROWTH	Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all	12 , 25 , 34 , 56 , 62 , 67 , 70 , 71 , 76 , 86
 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation	8 , 11 , 28 , 38 , 48 , 52

SDG	Implication	Page
 10 REDUCED INEQUALITIES	Reduce inequality within and among countries	12 , 56 , 87
 11 SUSTAINABLE CITIES AND COMMUNITIES	Make cities and human settlements inclusive, safe, resilient and sustainable	11 , 44 , 48 , 51 , 53
 12 RESPONSIBLE CONSUMPTION AND PRODUCTION	Ensure sustainable consumption and production patterns	5 , 12 , 38 , 39 , 40 , 41 , 42 , 43 , 44 , 45 , 46 , 48
 13 CLIMATE ACTION	Take urgent action to combat climate change and its impacts by regulating emissions and promoting developments in renewable energy	5 , 11 , 34 , 37 , 43 , 45 , 46 , 47 , 48 , 52 , 53 , 86
 14 LIFE BELOW WATER	Conserve and sustainably use the oceans, seas and marine resources for sustainable development	Out of scope due to company activity
 15 LIFE ON LAND	Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss	12 , 49 , 89
 16 PEACE, JUSTICE AND STRONG INSTITUTIONS	Promote peaceful and inclusive societies for sustainable development	19
 17 PARTNERSHIPS FOR THE GOALS	Strengthen the means of implementation and revitalize the global partnership for sustainable	4 , 5 , 12 , 38 , 41 , 43 , 49 , 53 , 54 , 60 , 86 , 87 , 88 , 89



www.comsa.com
sostenibilidad@comsa.com

HEADQUARTERS

Numancia Building 1
47 Viriato Street
Barcelona, Spain 08014
T +34 933 662 100

6A Julián Camarillo
Street, 2nd floor
Madrid, Spain 28037
T +34 913 532 120

For more information:

