



Sustainability Policy

Translation originally issued in Spanish and prepared in accordance with the regulatory applicable

In the event of a discrepancy, the Spanish-language version prevails

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MODIFICATION CONTROL

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1. Definitions

Some concepts used in this document are listed below:

- **VINCI:** VINCI, S.A., the parent company of the VINCI Group.
- **COBRA IS:** COBRA SERVICIOS, COMUNICACIONES Y ENERGÍA, S.L.U. or "the organisation", parent company of the COBRA IS Group, which is made up of the following management groups: COBRA INSTALACIONES Y SERVICIOS, S.A.U. ("COBRA"), CONTROL Y MONTAJES INDUSTRIALES CYMI, S.A.U. ("CYMI"), CYMI BRASIL, S.L.U. ("CYMI BRASIL"), DRAGADOS OFFSHORE, S.A. ("DRAGADOS OFFSHORE, ENCLAVAMIENTOS Y SEÑALIZACIÓN FERROVIARIA, S.A.U. ("ENYSE"), ELECTRONIC TRAFIC, S.A. ("ETRA"), IMESAPI, S.A. ("IMESAPI"), INTECSA INGENIERÍA INDUSTRIAL, S.A. ("INTECSA"), MAETEL INSTALACIONES Y SERVICIOS INDUSTRIALES, S.A. ("MAETEL"), MAKIBER, S.A. ("MAKIBER"), MANTENIMIENTO E MONTAJES INDUSTRIALES, S.A. ("MASA"), PROCME GESTÃO GLOBAL DE PROYECTOS, S.A. ("PROCME"), SOCIEDAD ESPAÑOLA DE MONTAJES INDUSTRIALES, S.A. ("SEMI"), SICE TECNOLOGÍAS Y SISTEMAS, S.A. ("SICE") and SYNEOX RAIL, S.L. ("SYNEOX").
- **Governing Body:** COBRA IS's board of directors, to the extent that it is assigned responsibility and fundamental authority for COBRA IS's activities, governance and policies.
- **Stakeholders:** natural or legal persons who, not being business partners or members of the organisation, may be affected or perceived as affected by a decision or activity of the organisation. In the case of COBRA IS, the stakeholders are mainly shareholders, courts, tribunals and public administrations.
- **Business partners:** any legal or natural person, except the members of the organisation, with whom it maintains or plans to establish some type of business relationship. By way of example, including but not limited to, external advisors hired by the organisation for the delivery of goods and/or provision of services, and joint business partners.
- **Members of the organisation:** governing body, directors, employees, volunteers and other people under hierarchical subordination to any of the above.

2. Introduction

2.1. COBRA IS

The COBRA IS organisation has 15 management groups (COBRA, CYMI, CYMI BRASIL, DRAGADOS OFFSHORE, ENYSE, ETRA, IMESAPI, INTECSA, MAETEL, MAKIBER, MASA, PROCME, SEMI, SICE and SYNEOX), whose activities focus on the development of industrial projects in sectors as diverse as energy, electricity, maintenance, mechanics, installations, industry, telecommunications, mobility and rail, among others. In this way, the corporate purpose of COBRA IS is aligned with the current global challenge of developing and managing infrastructures and facilities that promote Sustainability.

Various services are offered throughout the value chain of each project, which are integrated into the development of business activities and the management of the businesses of each of the companies, focused on maximising the value of the assets of the business partners.

Since the integration of COBRA IS as part of VINCI, its strategy has been strengthened by incorporating a sustainable approach to all its actions and incorporating the policies and protocols of the parent company into their own, such as: the Manifesto, the Code of Ethics and Behaviour, the Anti-Corruption Code of Conduct, the Human Rights Guide, the Environmental Guidelines and the Fundamental and Unavoidable Measures in the field of Health and Safety at Work, among others.

In line with the aforementioned documents and in order to strengthen its commitment to the members of the organisation and business partners, COBRA IS sets out below the general bases of its work in the field of sustainable development, defining the corporate purposes and the framework principles of action to achieve them.

2.2. Integration of Sustainability into corporate strategy

The great challenges of environmental emergency and social expectations that are currently being raised, changing situations and limited resources make stakeholders change their priorities and act differently, so COBRA IS has to adapt to meet their needs and, therefore, yours. This requires a change in the mindset and daily behaviours of all teams. From senior management to operational staff, every member of the company must know and understand the principles of Sustainability.

Continuous training, fostering commitment and promoting a sustainable work ethic are essential in order to achieve this goal. By making Sustainability an integral part of the corporate identity, COBRA IS ensures that its practices are maintained, evolve and thrive over time.

3. Purpose and scope of application

This Policy applies to COBRA IS in its capacity as parent company and to the subsidiaries of its group where it has effective control, to its members of the organisation and to business partners with whom there are business relationships.

COBRA IS contributes in a practical and operational way to sustainable development, with the firm conviction of overcoming the challenges of the energy transition, promoting good practices in its sectors of activity. In line with the previous concept, the aim of its work is to meet the current needs without compromising the possibilities of future generations to satisfy their own.

This Policy sets out the following objectives:

- To promote the achievement of strategic purposes through responsible business management.
- To provide the solutions required by each reality in a safe and appropriate way for society and the environment.
- To responsibly manage the risks and opportunities of activities, minimising their adverse impacts and enhancing the positive ones for the Environment and the value chain.
- To promote relationships with their stakeholders and the generation of mutual benefit.

In turn, the COBRA IS entities are responsible for their internal regulations, as well as for preparing and approving by their respective governing bodies the management procedures that allow the application of the provisions contained therein, with the strictly necessary adjustments, if any, that guarantee compliance with sectoral legislation, as well as local regulatory requirements and expectations.

4. Regulatory framework

COBRA IS's performance in terms of Sustainability takes into account, among other regulations, the following standards:

- Directive (EU) 2022/2464 on Corporate Sustainability Reporting (CSRD).
- Regulation (EU) 2020/852 on the European Environmental Taxonomy.
- Law 11/2018 on Non-Financial Information.
- The Paris Agreement entered into force on November 4, 2016.
- The United Nations Environment Programme (UNEP).
- The United Nations Climate Change Conference (COP26).
- The 10 Principles of the United Nations Global Compact.
- The Sustainable Development Goals (SDGs) and the 2030 Agenda.

5. Principles of action and commitments

- Promotion of inclusive growth by being a responsible employer and a partner in regional development, orienting its work to the benefit of communities, based on social dialogue.
- Preservation of natural environments and their biodiversity through the development of innovative solutions and resilient structures of high value for the Environment, accelerating the ecological transition of its business partners.
- Promotion of sustainable and lasting employment, contributing to the integration of young people and the long-term unemployed in an attractive and inclusive labour market, which is committed to vocational training.
- It is clearly committed to the health and safety of its workers, taking care of the physical integrity of those most exposed in risky works and exploitations, as a guarantee of success and a reflection of its good work.
- Sustainable use of natural resources (water, soil, minerals, among others) and optimisation of their use throughout the value chain thanks to the circular economy, recovering their waste wherever possible.
- Development of a culture of ethical behaviour and business transparency that ensures credibility and provides confidence both in the subsidiaries and in their respective stakeholders.
- Reduction of direct emissions by 40% from 2018 to 2030, within the framework of a carbon neutrality trajectory by 2050.
- Defence and support of citizen solidarity, promoting equal opportunities through the fight against exclusion through initiatives present throughout the world.
- Effective implementation of environmental, social and economic management systems in the contracting process with its business partners, ensuring a responsible supply chain.
- Sectoral leadership, developing renewable energy projects such as solar, solar thermal and photovoltaic, as well as hydroelectric and offshore wind among others, in order to achieve greater sustainability through the energy transition.

6. Governance, approval and validity

The governing body of COBRA IS will be responsible for approving any substantial change and/or revision of this Policy, which will remain in force from the moment it is formalised and as long as there is no modification to it, being in any case duly communicated and for the necessary purposes. Likewise, this governing body must supervise the application of this Policy and the commitments included in it.

In turn, the corporate Sustainability area will be in charge of its preparation, updating and review, to the extent necessary to adapt it to possible regulatory, social, economic and organisational changes.

7. Communication and transparency

This Policy will be the subject of internal and external communication. The following communication process is defined:

- Once the Policy or any of its subsequent modifications have been approved by the governing body of COBRA IS, the area responsible for it will be responsible for distributing it.
- The Policy will be published on the affiliates' internal network for the knowledge of the entire organisation.
- Externally, the Policy will be published on the COBRA IS corporate website, in the corresponding section.