



# DOMINION

## CORPORATE SOCIAL RESPONSIBILITY POLICY

### CONTENTS

1. Purpose and scope of application.....	2
2. Basic principles.....	2
3. Systems to monitor the application of the principles, associated risks and management thereof .....	3
4. Channels of communication, participation and dialogue with interest groups .....	4
5. Responsible communication .....	4



## CORPORATE SOCIAL RESPONSIBILITY POLICY

Code:	CO CP PO 02
Review:	01
Page:	2 of 4

### 1. PURPOSE AND SCOPE OF APPLICATION

The purpose of the general policy in respect of Corporate Social Responsibility (hereinafter, "**CSR**") is to establish the basic principles and general framework to manage the CSR practices undertaken by Global Dominion Access, S.A. (hereinafter, either "**DOMINION**" or the "**Group**") and serve as a basis to integrate social responsibility into DOMINION's business model and strategy in order to create long-term value for all interest groups and society. The corporate website is used as the main instrument to channel relations with interest groups.

The general CSR policy applies to all companies within the DOMINION Group.

Until the establishment of the Audit and Compliance and Corporate Social Responsibility, its function will be performed by the Steering Committee of Global Dominion Access, S.A.

### 2. BASIC PRINCIPLES

DOMINION's CSR policy is based on global management of the impact of its activities and is supported by the following principles:

- | Foster the **best practices of corporate governance**, giving priority to transparency, ethical business management, fiscal responsibility in the areas in which the entity operates and appropriate risk management, ensuring that all data relevant to the Group's activity is made public.
- | **Create and maintain fluid, two-way communication with interest groups** in order to better understand their expectations and efficiently adapt the way the business operates in order to satisfy their requirements.
- | Ensure that **Human Rights** are complied with throughout the DOMINION value chain.
- | Foster a **general procurement policy** that involves a supply chain that complies with the principles of this policy.
- | Promote the **health and safety of both DOMINION personnel and individuals** working at DOMINION facilities.
- | Promote the **human and professional development of DOMINION personnel** by providing them with the means necessary (training, equality programmes and employee benefits) to improve their leadership, creativity and innovation capabilities and increase and strengthen participation and teamwork. DOMINION must also ensure that all personnel comply with the Group's Code of Conduct.
- | Contribute to efficiently, innovatively and effectively **improving the management of natural resources and the environment** by minimising the



## CORPORATE SOCIAL RESPONSIBILITY POLICY

Code:	CO CP PO 02
Review:	01
Page:	3 of 4

negative impact of our activities and complying with the policies and procedures established by environmental management systems.

The specific practices performed in order to comply with these principles are available on both the corporate website ([www.dominion-global.com](http://www.dominion-global.com)) and in DOMINION's Annual Sustainability Report.

### **3. SYSTEMS TO MONITOR THE APPLICATION OF THE PRINCIPLES, ASSOCIATED RISKS AND MANAGEMENT THEREOF**

The Corporate Social Responsibility Committee is responsible for reviewing the company's CSR policy. Within this body, there is a Cross Committee specifically dedicated to monitoring how well principles are applied. This Cross Committee has solely been set up to deal with DOMINION's CSR concerns and reports directly to the Corporate Social Responsibility Committee.

The application of these principles and the potential associated risks are outlined in DOMINION's Risk Management and Control Policy, which contains a Risk Map created in accordance with ISO 31000 (international standard for risk management) methodology that is annually updated by Senior Management and the Management Team.

This map includes as a minimum requirement a list of DOMINION's risks and an assessment of all the company's non-financial risks, including those of an operational, technological, legal, social and environmental nature, and those relating to policy or status. In order to ensure that risk responses are viable and efficient, a monitoring process is performed on an annual basis to obtain the following objectives:

- ✓ Ensure risks continue to be managed as provided for by Senior Management and the Management Team.
- ✓ Assess the efficiency of responses. Provide feedback to those responsible for said responses and implement action plans where necessary.
- ✓ Determine whether or not the Risk List anticipates and reflects potential changes to the expectations of interest groups.

In order to carry out this monitoring procedure, the Compliance department includes priority action plans in its annual review programme to check that risk responses are being implemented as provided for and that they are effectively mitigating the risks they are intended to combat. The individuals responsible for each individual risk within the corresponding business areas are also in charge of monitoring said risks.

In addition, the Compliance department must check whether or not a risk has occurred and, where applicable, indicate what measures need to be adopted in order to mitigate it.



## 4. CHANNELS OF COMMUNICATION, PARTICIPATION AND DIALOGUE WITH INTEREST GROUPS

DOMINION's basic official communication channel with interest groups is its corporate website ([www.dominion-global.com](http://www.dominion-global.com)), which is updated on an ongoing basis. The website features all the information that may impact on interest groups. DOMINION aims to make transparency its main priority in its relations with interest groups.

In addition to the corporate website, DOMINION also has a corporate intranet, which can be accessed by all individuals within the group, and two communication channels that can be used by different interest groups to discuss CSR matters:

- ✓ email: [rsc@dominion-global.com](mailto:rsc@dominion-global.com)
- ✓ By post, contact the CSR Cross Committee at the following address:
  - Ibañez de Bilbao 28, 8º A y B
  - C.P. 48009 Bilbao (Biscay), Spain.

Via its Cross Committee, DOMINION undertakes to treat the personal data of all individuals who communicate with it in strict confidence and in accordance with the purposes indicated in this section.

Furthermore, DOMINION will also adopt the technical and organisational measures necessary to ensure the security of such personal data and prevent it from being altered or lost or processed or accessed without permission, given the condition of the technology used, nature of the data stored and the risks to which it is exposed. All the above in compliance with legislation governing personal data protection.

## 5. RESPONSIBLE COMMUNICATION

In order to ensure that DOMINION effects responsible communications in respect of CSR with interest groups, all board members, executives, employees and workers of all DOMINION Group companies must comply with DOMINION's Code of Conduct, which includes guidelines on to avoid manipulating information and how to protect integrity and reputation.