



DOMINION

Non Financial Information Statement 2019

www.dominion-global.com



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0

Basic Company Information



Basic Company Information

The information below is provided with reference to Law 11/2018 of 28 December 2018 and to Royal Decree-Law 18/2017 on transposition of the Non-Financial Reporting Directive and is part of the Directors' Report attached to the consolidated Annual Accounts of Global Dominion Access, S.A. (hereinafter Dominion) corresponding to financial year 2019.

In compliance with the aforementioned Law 11/2018, this report is the single, consolidated financial statement in relation to the group and those subsidiaries that, individually, in accordance with Law, meet the requirements that oblige them to report. Therefore, for the purpose of this document, "Company" refers to the Dominion group.

Company Information

Company details

Name	Global Dominion Access SA
Address	Cl. Ibañez de Bilbao, 28. Bilbao
Telephone no.	34.94.479.37.87
Website	www.dominion-global.com
Share capital	21,187,120.38 Euros
Number of shares	169,496,963
Nominal	0.125 Euros
Activity Listed	Provision of services and solutions to other companies in a wide range of sectors. Also the provision of services to individuals. Dominion combines expertise, technology and innovation to improve the efficiency of its customers' processes Spanish Continuous Market
Size of the company	In 2019 turnover was 1,149 million Euros, as opposed to 1,084 million Euros in 2018. Details of the number of employees are provided in section 7 hereof

1

Business Model

1.1 Business Activity. The Company's business environment

1.2 Company organisation and structure

1.3 Markets of operations¹

1.4 Objectives and strategies

1.5 Key factors and trends that could affect future growth





1.1

Business Activity. The Company's business environment

Dominion started out in 1999 in the telecommunications sector, an area characterised by deflation, high efficiency requirements (greater speed, greater quantity, cheaper) and considerable pressure on operating costs. With a track record of more than 15 years and a stable and committed team, the Company has been able to overcome a number of crises and to develop extensive knowledge of the sector.

Dominion is currently the global supplier of multi-technology services and solutions and specialist engineering. The Company's core expertise consists in offering customers solutions which will increase the efficiency of their business processes, either by undertaking the complete management of the process or through the application of specialist engineering solutions. The Company operates through two main segments:



MULTI-TECHNOLOGICAL SERVICES SEGMENT

Value-added services in which the Company offers customers the management of a complete business process by the recurrent outsourcing of the service by the customer. There are three different prominent subsegments in this segment:

- Services in the telecommunications and technology area.
- Industrial services, including activities related to industrial heat, electromechanical services, environmental services and other information technology related services.
- Commercial services in which the customer is the end consumer either related to logistics, wholesale or distribution activities required to make the sale possible.



SEGMENT OF SOLUTIONS AND SPECIALIST ENGINEERING

In this segment, "one-off" projects are performed in order to facilitate solutions or improve specific processes for customers, but in this case the processes are not managed directly.

Solution projects can be conducted in a wide range of sectors and geographical areas; the key and differentiating factor being the capacity to manage an EPC project. Dominion does not manufacture the products, but is responsible for the holistic management of its customers' projects with all that this entails: engineering, equipment purchasing, installation and assembly, seeking financing, etc.

In an environment marked by the speed of change and the disruption of business models, Dominion is noted for its technological dynamism; in other words its capacity to master all technologies and to apply the most suitable one at any given time in order to make its customers' production processes more efficient. Amongst all the technologies used, digitalization is, unquestionably, a core technology. Dominion therefore applies digitalization to its customers' production processes, supported by sensor systems and algorithms to update these processes and make them more efficient.

Dominion employs the "Dominion" brand in most of the services and solutions provided to its customers. However, in specific cases, different brands are used, solely for commercial reasons and normally in the B2C area. The key additional brands are: Phone House, Tiendas Conexión and Smart House.



1.2

Company organisation and structure

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

Dominion has a corporate governance system based on applicable law and international standards, directed at defining the powers of its governing bodies, promoting ethical behaviour through its Code of Conduct and regulating internal and third party relations through the various corporate rules and policies.

Specifically, and as extensively explained in the Annual Corporate Governance Report (ACGR), Dominion seeks to endorse the recommendations of the Code of Good Governance of listed companies.

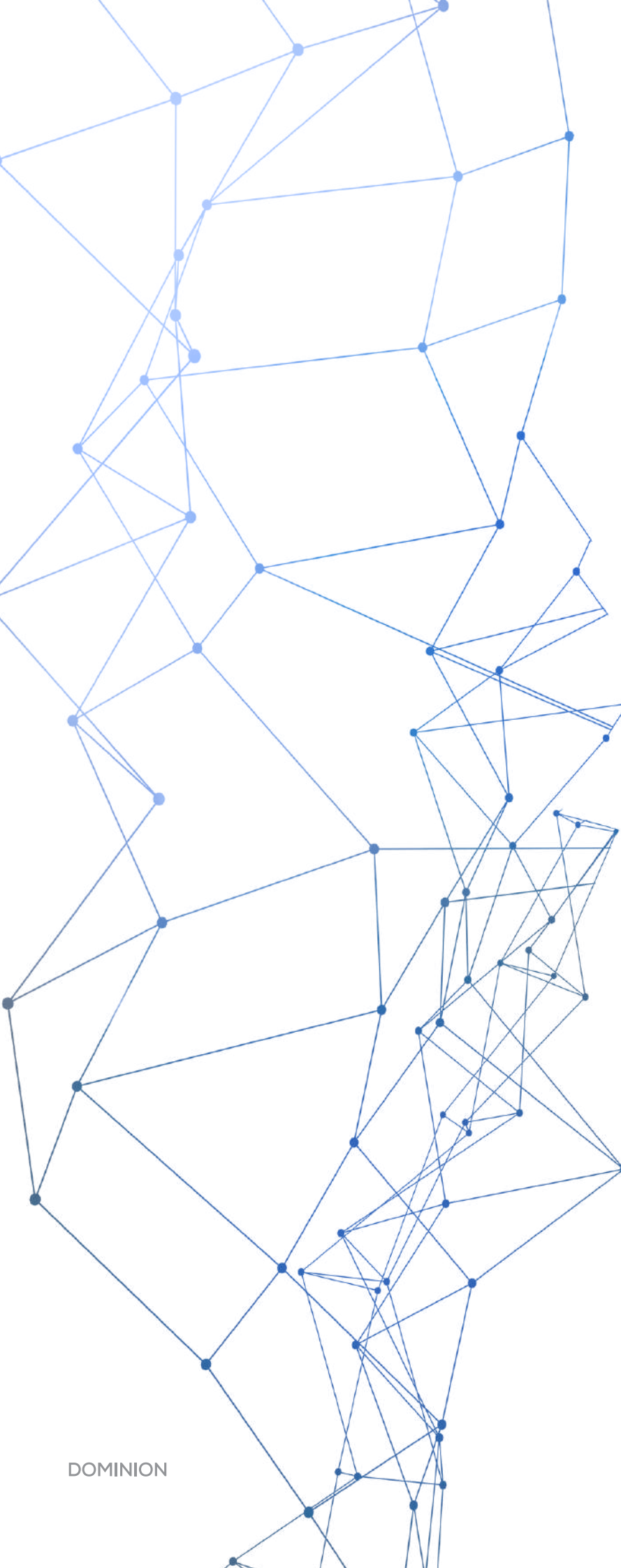
Transparency and efficiency are the hallmarks of a system that inspires confidence among investors, a system that strives to strike a balance between the demands and requirements of the different stakeholders. The Company considers it a priority to implement the principles of corporate governance, not only to boost the confidence of investors, but also to improve financial profitability and to

maintain sustained growth over time. In 2019, the Board of Dominion passed a compliance policy, which strengthens the role of this area in the entire Organisation.

Point A of the ACGR provides details of the ownership structure, comprising a wide range of shareholders, with no shareholder controlling the Company and with an estimated floating capital of 48.536%. Dominion holds an Annual General Meeting of Shareholders, based on the minimum requirements contemplated in the Corporate Enterprise Act (CEA).

The Company's principal governing bodies are the General Meeting of Shareholders, the Board of Directors and the Management Committee.

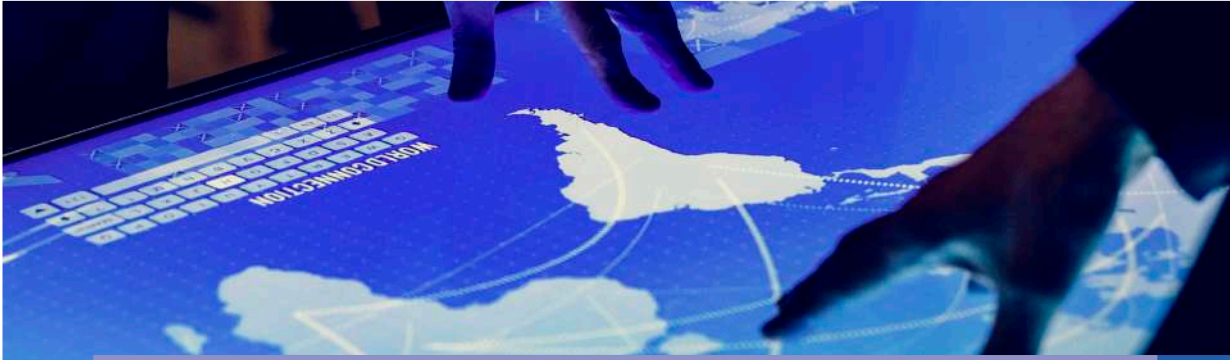
Dominion is managed by a 12-member Board of Directors, of which two are women. Two members are executive directors and four are independent directors.



In exercising its duties, the Board of Directors is supported by four committees: Audit and Compliance Committee, Appointments and Remuneration Committee, Corporate Social Responsibility Committee and Strategy Committee. Its duties and composition are fully described in the ACGR.

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

As of 31 December, the Management Committee comprised the five business directors, the three corporate management areas (Human Resources, Finances and Legal, and Strategy and Planning), as well as the CEO. One of the nine directors is a woman. Also, during financial year 2019, the Strategy and Planning Manager was appointed General Manager of the company. Reporting to the business directors are different business units. All are managed with business philosophy, that is, with autonomy and accountability for their income statement and for the net working capital.



1.3

Markets of operations

Dominion is present in a large number of countries, giving it a tremendous strategic advantage for its customers and providing a high level of diversification, thereby considerably limiting geographical risks, by avoiding high concentrations.

The company's presence is country-specific. Dominion has no production facilities that are replicated in each country. Instead, in each case, it offers different services and solutions, based on its customers' requirements.

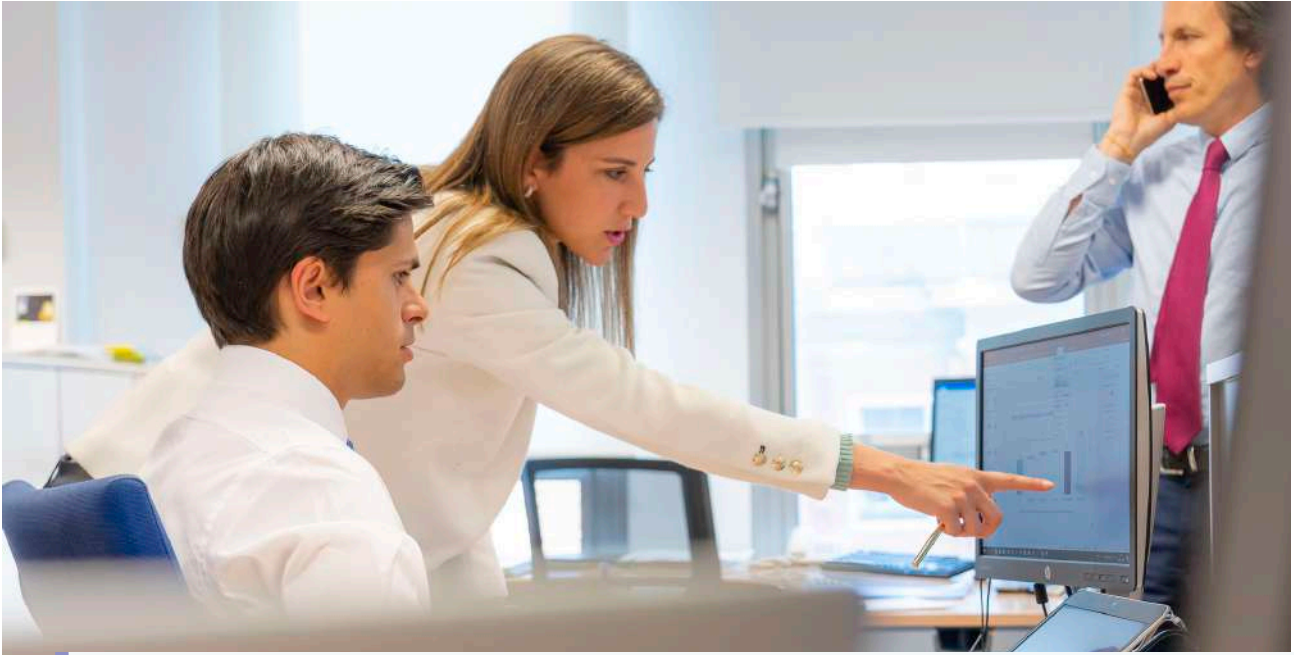
In the case of multi-technological services for the telecommunications sector, this activity is conducted in the company's own offices and in third party facilities, which can be private homes (installations or management of malfunctions) or customer facilities, with the support of a warehouse for the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

On the other hand, with regard to services in the industrial area, this activity is conducted at the company's own offices and, basically, at the customer's facilities, providing the various services offered by Dominion on a case by case basis, occasionally with the support of a warehouse for the supply of spare parts or any necessary materials. Geographically, these services are basically provided in Spain, as well as in other countries in Europe and Latin America. To a lesser extent, these services are also provided in countries in the Persian Gulf and Australia.

In the case of commercial services, the activity is provided at the company's own offices and shops, as well as through franchised shops, with the support of redistribution warehouses. This activity is solely performed in Spain.

The situation is very different in the field of specialist engineering and solutions. In the case of projects, these may be executed in practically any country in the world, according to opportunity and the customer's needs. In these cases, Dominion uses the minimum infrastructure necessary to execute the project; essentially offices, closing these down once the project is completed. Permanent offices are only established in those countries with significant repeatability or coincidence of Services, as is the case of Europe and some Latin American countries.

Point 7 lists the countries in which Dominion has employees at the end of 2019. This is a reasonable and verifiable criterion to understand the presence of Dominion. However, based on other criteria, as stated above, the company may have a greater presence.



1.4

Objectives and strategies

Mission

Dominion's mission is to help its customers streamline their production processes, by combining know-how, technology and innovation, either through outsourcing or by applying specialised engineering and solutions.

Dominion's commitments



Continuous improvement of in-house processes and those of the company's customers in order to help achieve more progressively digitalised and efficient management



Respect for the environment, working to minimize any impact.



Transparency, safety and quality in all their work.



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



Promoting participation, involvement and teamwork in a pleasant and safe environment.



Respect for others, for their capacity for initiative, creativity and innovation.



Dominion's culture

Dominion aims to:



Be a leader in quality, technology, innovation, design and service.



Seek management excellence.



Paradigm of a sustainable company, due to our commitment to people, the environment and value creation.



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

Strategy

Dominion achieves its business objectives through the implementation of a number of strategies directed at growing organically, undertaking its mergers and acquisitions policy and increasing its profitability.

Dominion presented a new 2019-2022 Strategic Plan in 2019. One of the main reasons for this was the need to set out new goals upon completion of the previous Plan, published when the company was listed on the stock exchange in 2016, together with significant changes in the scope and the expansion of activities undertaken during those years. Furthermore, disruption is becoming increasingly variable, faster and more ubiquitous in the framework in which Dominion operates, prompting the need to constantly review the Dominion model and the proposed goals.

Under this new Plan, the Company expects to organically grow at a rate of more than 5% per year in terms of sales and more than 10% in EBITA. Accordingly, the Company should double its net income in the timeframe of this Plan and allocate a dividend to its shareholders that is equivalent to one third of its net income. The Company also plans to continue its leading role in the sector's concentration process.

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

The Company will focus its efforts on five specific areas in order to implement this Plan:

› STRATEGIC AREAS

• Differential Value Proposals

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

In the case of B2C, the Company is convinced that we are currently witnessing a complete trade revolution, with emphasis on "customer ownership" constantly gaining ground. Accordingly, the Company is directing its efforts towards integrating all household services, thereby providing a unique proposal rooted in its strengths: a

large customer base, an across-the-board network, the capacity to develop platforms and to combine its own and third party services and brands.

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

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

• Value Proposition

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

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

• Diversification

Dominion plans to use further diversification as a critical tool, not only to create opportunities, but also to manage risks.

This plan will consist of two vectors. Firstly, a geographical approach, focusing on expanding activities to geographical areas where current presence is limited to a small number of activities, thereby creating important economies of scale and increasing the company's focus on specific areas, such as Asia and Africa. Secondly, expanding its focus on the three areas of activity it is most involved in: T&T, Industry and Energy, diversifying its offer horizontally and vertically, as the case requires.

- **Digitalisation**

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

- **Organisation**

The 2019-2022 Plan must include development of the accompanying organisational structure. The company requires an extremely flexible structure, capable not only of carrying out planned actions, but also of adapting to a constantly changing world, a world that demands immediate solutions to issues that have not yet been addressed. In turn, it must also ensure the continuity of its 4Ds model: digitalisation, diversification, decentralisation and financial discipline - all key aspects which define Dominion and which must apply to everyone in the organisation.

The Strategy Plan also addresses the need to adapt what kind of company Dominion is with a view towards adapting to a constantly evolving reality that also affects the various stakeholders it works with.

This framework includes the ESG strategy and its alignment with the Global Compact, explained below, which not only addresses minimising negative effects, but is also implemented for business purposes, and it is expected that Dominion's increasing presence in sectors and activities will have a positive impact, such as those sectors working with renewables and health.

This strategy also lays down the type of company that Dominion strives to be for its employees and sets out the main principles regarding the company's relationship with the community, placing emphasis on educational development.

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





1.5

Key factors and trends that could affect its future growth

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

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

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

These technological and business model changes are accompanied by demographic and geostrategic changes, which promote and reinforce them. On the one hand there are new types of consumers and workers, who have

different digital skills and consume in different ways, and on the other, the geostrategic focus of world development is changing and clearly moving towards Asia, where most of the world's population is based, and which has now fully embraced the digital wave.

Dominion was born and has evolved in a digital transformation environment. It sees disruption as an opportunity and devises its Strategy Plan to take full advantage of the opportunities it will bring with it. Accordingly, looking beyond short-term situations, it is safe to say that the Company will benefit from changes that will continuously affect all sectors more and more.

The other important factor to consider when analysing the risks which affect Dominion is the company's strong focus on diversification, interpreted in a number of different ways.



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



SERVICES AND SOLUTIONS

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



GEOGRAPHICAL

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



CUSTOMERS

With more than 1,000 B2B customers, with the main one accounting for less than 8% of the company's overall sales, giving the company both independence and negotiating power.



SECTORIAL

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



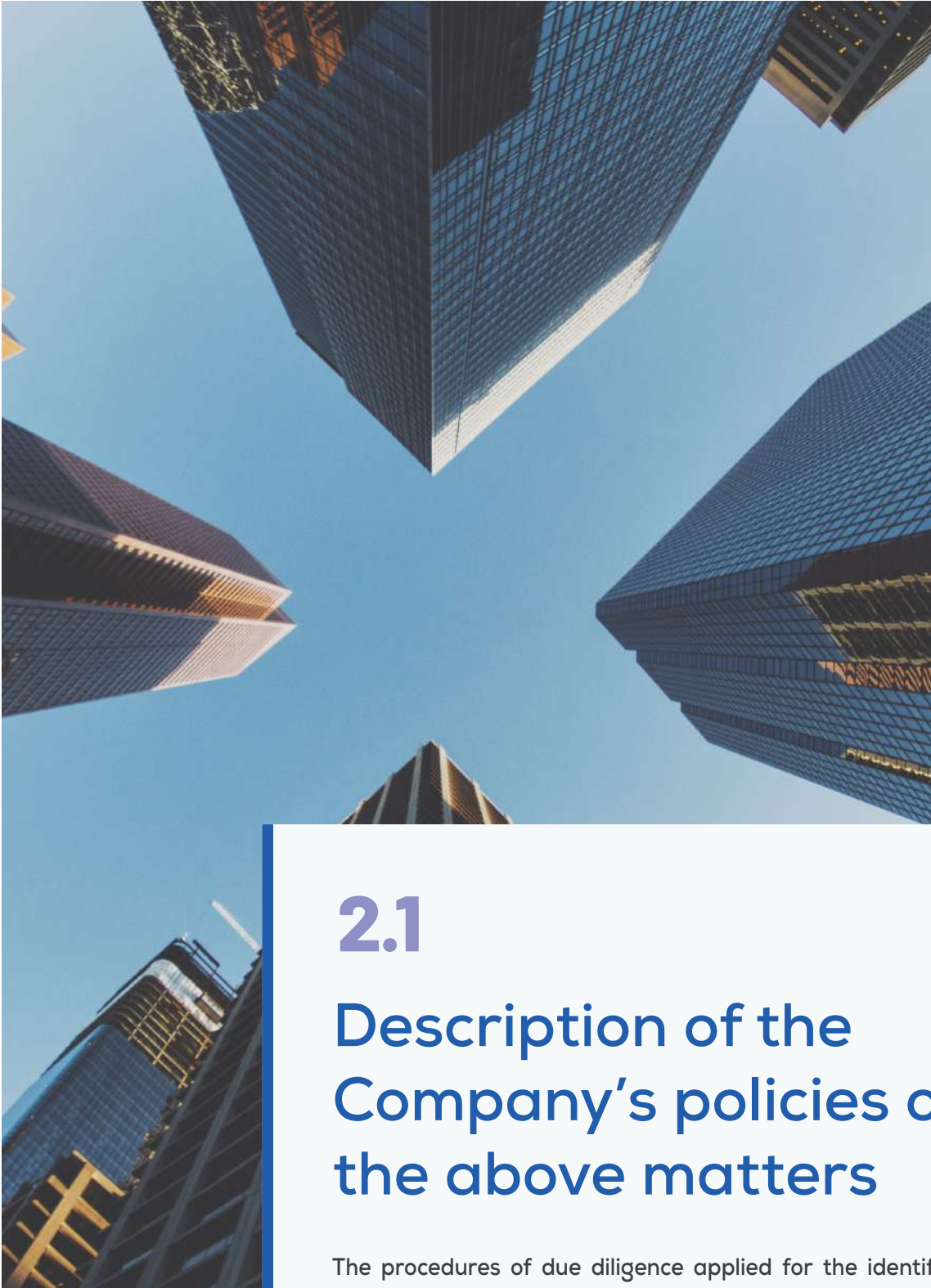
B2B/B2C

Having significant exposure to the B2C sector, performing in a very different manner than in the B2B sector and also creating many new business opportunities in the B2B2C trends framework.

2. Policies

2.1 Description of the Company's policies on the above matters





2.1

Description of the Company's policies on the above matters

The procedures of due diligence applied for the identification, assessment, prevention and mitigation of risks and significant impacts. Verification and control procedures, including which measures have been adopted.



MANAGEMENT APPROACH: CSR POLICY

The Company globally manages the impacts resulting from its business, based on the principles in its Corporate Social Responsibility Policy (CSR). This policy not only establishes the basic principles of business, but also the systems for monitoring performance, the associated risks and the channels for communication, participation and dialogue with stakeholders.

POSITION IN THE BOARD OF DIRECTORS

The Corporate Social Responsibility Committee is responsible for reviewing the CSR Policy, delegating the routine management to the Compliance Officer, who coordinates his work with the Human Resources Corporate Director and the Investor Relations Officer.

PERSPECTIVES FOR THE PARTICIPATION OF STAKEHOLDERS

As part of the Materiality Analysis mentioned in point 4 hereof, Dominion has assessed what its relationship is and with the different stakeholders and what it should be. A total of nine stakeholders have been identified, with these understood to be those individuals and groups that play a role in achieving the Company's corporate purposes or are affected by the Company's activities.

The Company aims to establish a relationship of trust and mutual collaboration with each stakeholder, so as to meet their expectations and protect their own reputation.

CSR APPROVALS

The relevance of Corporate Social Responsibility exceeds regulatory areas and is a growing aspect required by different Stakeholders, Customers in particular.

In this respect, Dominion actively responds to the different certification requirements put forward by customers, both internally (customer-supplier) and those managed by third-party certifying bodies, as is the case with Ecovadis. In the latest certificate, implemented in 2018, Dominion reached 54/100 points and it will be renewed in 2020.

ANNUAL REPORT

Dominion publishes an Annual Report that is structured to comprehensively contain different aspects of its Corporate Social Responsibility.

When preparing this report, Dominion endeavours to follow the best practices in this area, valuing transparency, commitment, significance and accessibility. The annual reports of listed companies are analysed in the Reporta Report. With regard to the 2018 Annual Report, the Reporta report published in 2019 indicates that Dominion was in 23rd place among all the companies listed on the Spanish stock exchange.



POLICIES AND CODE OF CONDUCT

The Code of Conduct takes pride of place above all other policies. This Code sets out Dominion's commitment to the principles of business ethics and transparency in all areas of operation, establishing a set of principles and guidelines for conduct to ensure the ethical and responsible behaviour of all professionals at Dominion when performing their duties.

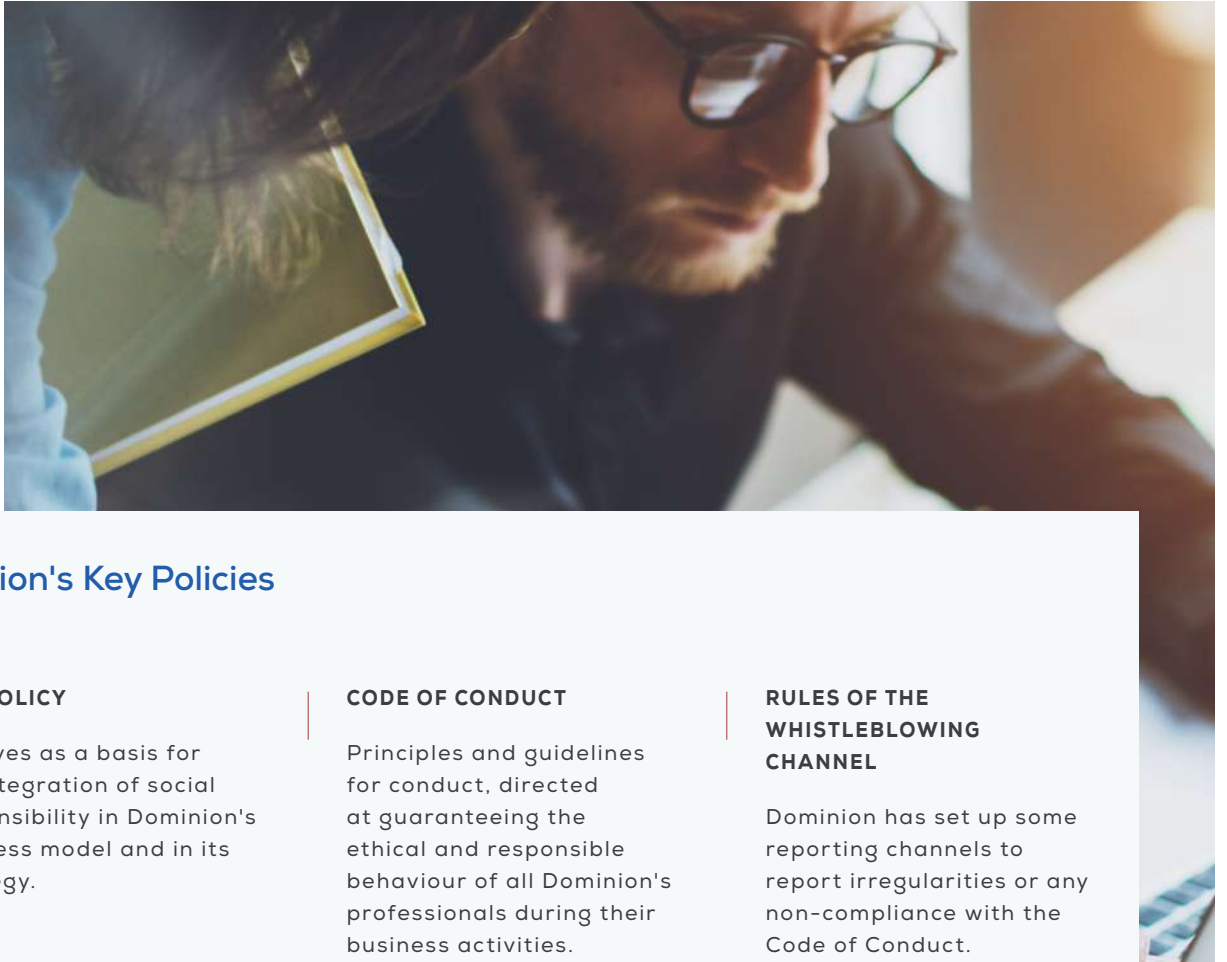
The Chairman and the CEO have both written to emphasise the importance of ensuring that all employees at Dominion are familiar with this Code and act accordingly. To this end, the Company has implemented a number of initiatives directed at making the Code known: a number of physical and digital dissemination channels have been set up, together with it being permanently published on the website.

As an additional measure, a specific course has been prepared for the Company's senior managers. The course includes a video with the contents of the Code of Conduct together with other significant contents, to provide them with further knowledge on the subject. Likewise, new hires are increasingly required to sign the Code, as a way of ensuring that employees are aware of and committed to the Code.

Moreover, the Company has also made a Whistleblowing channel available to employees and stakeholders as a way of reporting irregularities, queries, concerns or behaviour that does not comply with this Code. This channel can be accessed through different media and the notifications are appropriately managed according to the established procedure.

Other than the Code of Conduct, Dominion's activity is governed by a number of internal rules and protocols which, as well as complying with the law, must be in line with Company policies. These policies govern relations with the different stakeholders and are included in the action guide established by the Company regarding its employees actions.

The Standards Compliance Department and the Human Resources Department are responsible for implementing and updating these internal policies and procedures, always based on the Regulatory Framework.



Dominion's Key Policies

CSR POLICY

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

CORPORATE GOVERNANCE POLICY

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

DIVERSITY AND EQUAL OPPORTUNITIES POLICY

Directed at guaranteeing real and effective equal opportunities between men and women. This applies to all of Dominion's activities, anywhere in the world.

CODE OF CONDUCT

Principles and guidelines for conduct, directed at guaranteeing the ethical and responsible behaviour of all Dominion's professionals during their business activities.

HUMAN RIGHTS POLICY

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

RECRUITMENT AND SELECTION POLICY

It establishes the goals to be met when implementing the Recruitment and Selection process.

RULES OF THE WHISTLEBLOWING CHANNEL

Dominion has set up some reporting channels to report irregularities or any non-compliance with the Code of Conduct.

QUALITY AND ENVIRONMENTAL POLICY

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

OCCUPATIONAL HEALTH AND SAFETY POLICY

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

COMPLIANCE POLICY

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

ANTI-CORRUPTION AND FRAUD POLICY

The Company undertakes to fight corruption by establishing principles that must serve as guidelines for the behaviour of all the Company's employees.

SOCIAL ACTION POLICY

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

POLICY ON INFORMATION AND COMMUNICATION WITH SHAREHOLDERS AND MARKETS

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



3

Results of the KPI policies

3.1 Results of the KPI policies





3.1

Results of the KPI policies

Monitoring and assessment of progress which facilitates comparability between companies and sectors, in line with the national, European or international reference frameworks used for each matter.

The results of the Policies and the related KPIs are analysed in each of the points making up this document.

The Company has endeavoured to take account of the following principles when selecting the indicators included in this Report:

- > Comparability
- > Materiality
- > Relevance
- > Reliability

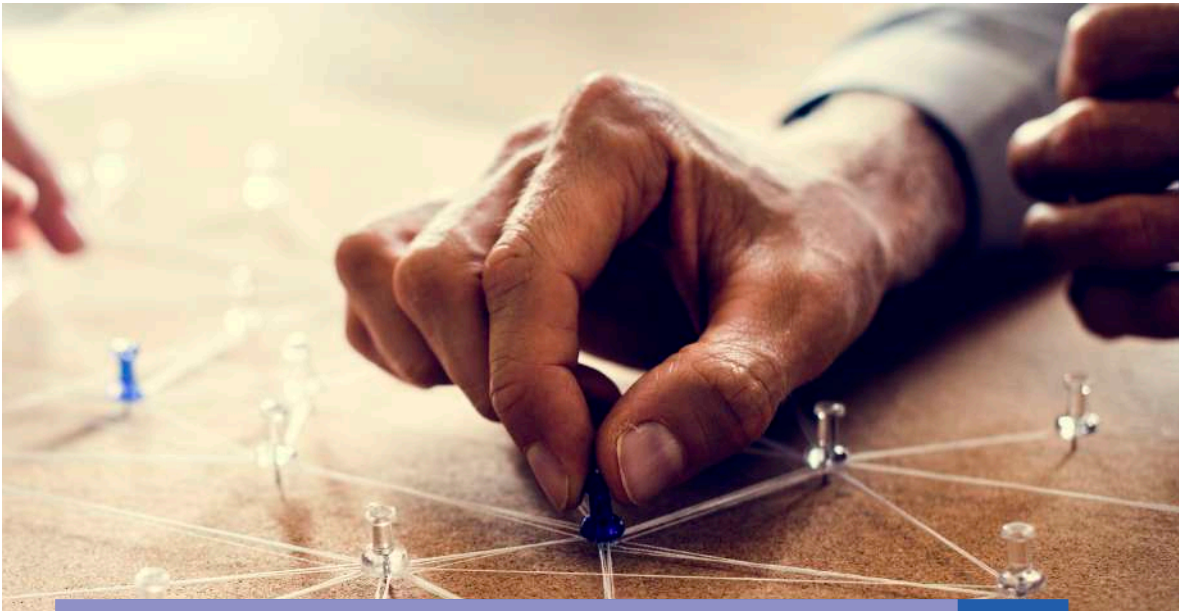
The Company has also made sure that the information included is accurate, comparable and can be verified. The calculation methods and the assumptions made for the calculation of the non-financial indicators are shown in each of the different points in which these indicators are included.



4

Short, Medium & Long Term Risks

4.1 LAW: Risks in the Short, Medium and Long Term



4.1

LAW: Short, Med. & Long Term Risks

The main risks related to these matters and linked to the Company's activities, including, where relevant and proportional, its commercial relations, products or services that could have negative effects in these areas, and:

- How the Company manages such risks,
- Explaining the procedures used to detect and assess them, in line with the national, European or international reference frameworks for each matter.
- Information must be included on any impacts detected, itemising the same, in particular the main risks in the short, medium and long term.

To identify the most relevant matters in terms of non-financial information, in December 2019 Dominion reviewed and updated its materiality analysis, conducted by an outside expert. This will serve as the basis for guiding the focus of the actions to be undertaken by Dominion over the course of the next few years, aimed towards controlling the most significant risks.

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

As explained in the various points of this analysis, the conclusions reached position Dominion's materiality in the field of human capital management and regulatory compliance.

Materiality analysis criteria used

Two assessment axes were taken into account for the materiality matrix:

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

Analysed aspects

Aspects analysed in the business context

Economic and social context	<ul style="list-style-type: none">• Welfare state progress in developing countries• The evolution of public expenditure in developed countries• Investment in infrastructures• Investment in Public Healthcare• Recovery of economies
Sectoral context	<ul style="list-style-type: none">• Volatility of gas and oil prices• Overcapacity of the industrial sector• 4.0 industry / Digital revolution• Telecommunications and information systems concentration processes
Regulation	<ul style="list-style-type: none">• Regulatory changes• Cybersecurity and the LOPD (Spanish Data Protection Law)• Taxation
Customer relations	<ul style="list-style-type: none">• Customer categorization• Dependence on important customers / partners• Customer relations in B2C divisions
Inverters	<ul style="list-style-type: none">• Investor relations

Aspects analysed in the environmental context

Direct environmental impact	<ul style="list-style-type: none"> • Business related emissions • Indirect emissions • Use of renewable energies • Water and energy consumption • Waste management
Customer environmental impact	<ul style="list-style-type: none"> • Customer environmental impact management • Customer water consumption and energy improvement innovation

Aspects analysed in the social and Human Rights Context

Personnel relations	<ul style="list-style-type: none"> • Attracting and retaining talent • Training • Diversity • Remuneration • Subcontractors • Franchises
Community	<ul style="list-style-type: none"> • Developed and/or managed infrastructures • Volunteer work and cooperation • Social action projects
Health and safety	<ul style="list-style-type: none"> • Dominion team health and safety • Suppliers and subcontractors health and safety
Suppliers	<ul style="list-style-type: none"> • Support for locally-based suppliers • Supply-chain management

Aspect analysed in the governance context

Corporate governance	<ul style="list-style-type: none"> • Structure of corporate governance • Relations with majority shareholders • Corporate risk management • Code of conduct • Bribery and Corruption • Reporting
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Risk assessment and management

Further to the identification and assessment process, Dominion obtained a risk matrix that, as mentioned above, served as the basis for guiding the actions Dominion had to implement over the course of 2019, so as to mitigate the most significant risks.

Given the resulting matrix, Dominion focused its analysis and efforts on the quadrant with the highest score on both axes, as this makes up the essential matters for the Company:

:ZOOM SIGNIFICANT IMPORTANCE TO THE BUSINESS AND TO THE COMPANY



Explanation of the main risks included in the matrix above

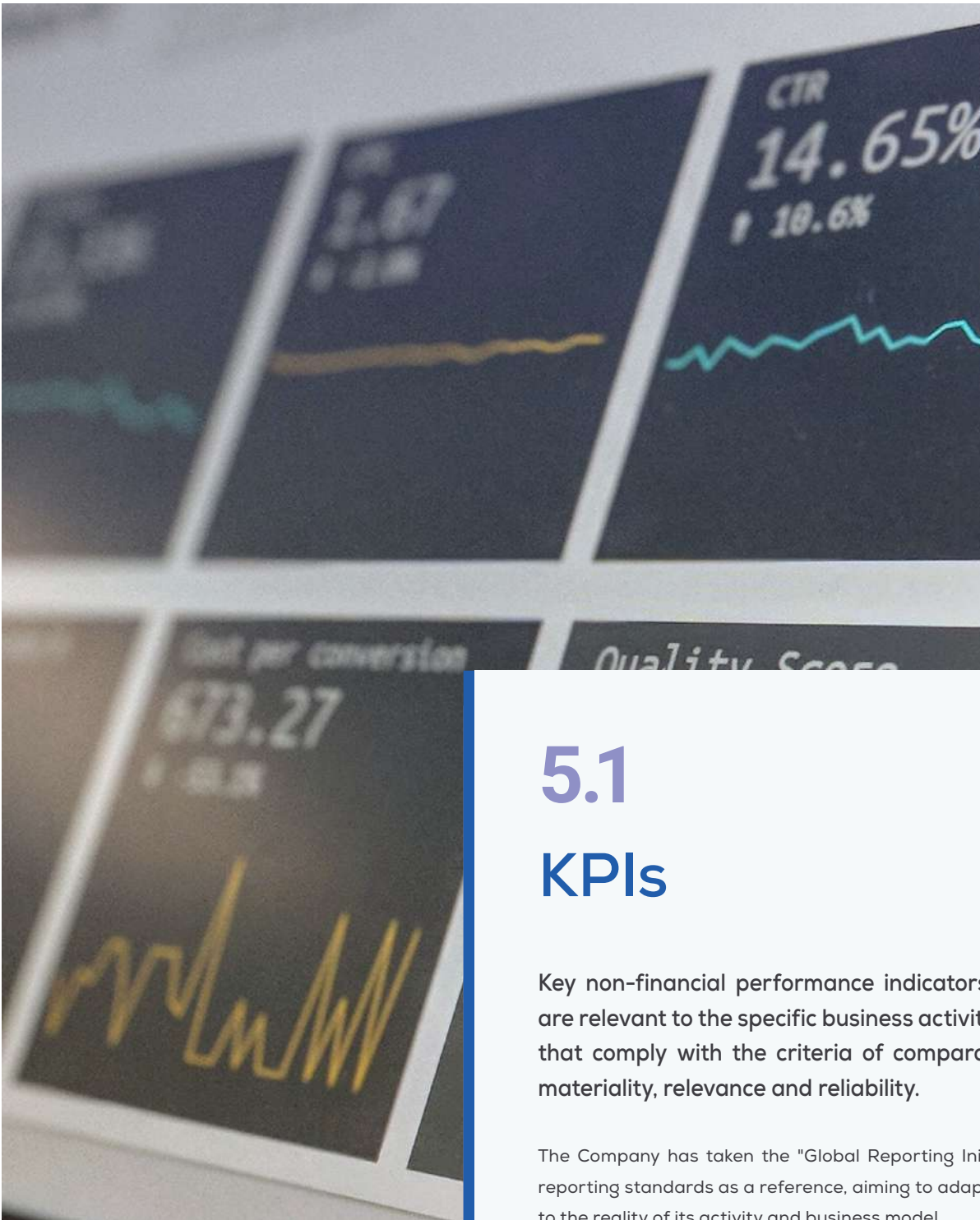
Risk	Explanation
Attracting and retaining talent	Counting on the right people to realize the Company's objectives
Code of conduct	Set of principles and guidelines for conduct, with a view towards guaranteeing the ethical and responsible behaviour of all the Company's professionals during their business activities.
Diversity	Equal opportunities at all Company levels
4.0 industry / Digital revolution	Maintenance of appropriate technological dynamism in the digitalization field
Cybersecurity and the LOPD (Spanish Data Protection Law)	Taking appropriate measures to guarantee data protection and system security
Spanish economy	Special attention to the evolution of the Spanish economy
Dominion team health and safety	Maintaining high safety standards for all Dominion's employees
Bribery and Corruption	Take suitable measures to eliminate compromising circumstances and to mitigate any risk of undue actions.
Opportunities for new business	Having an organisation that can take appropriate advantage of the opportunities arising from disrupted business models and society's growing demand for sustainability

The company has a procedure for the ongoing monitoring, review and re-assessment of these risks.

5 KPIs

5.1 Key indicators for non-financial results





5.1 KPIs

Key non-financial performance indicators that are relevant to the specific business activity and that comply with the criteria of comparability, materiality, relevance and reliability.

The Company has taken the "Global Reporting Initiative" reporting standards as a reference, aiming to adapt these to the reality of its activity and business model.

As indicated in point 3 hereof, the results of the Policies and related KPIs are analysed in each of the different sections that this document is divided into.

6

Environmental issues

6.1 Global Environment

6.2 Pollution

6.3 Circular economy and the prevention and management of waste

6.4 Sustainable use of resources

6.5 Climate change

6.6 Protection of biodiversity





6.1

Global Environment

Detailed information regarding current and foreseeable effects of the Company's activities on the environment and, where applicable, on health and safety and environmental certification or appraisal procedures.

The resources devoted to preventing environmental risks.

Application of the precautionary principle, the amount of provisions and guarantees for environmental risks. (e.g. from the law on environmental responsibility).

MANAGEMENT APPROACH

As a member of the United Nations Global Compact, Dominion takes on the following principles as their own: 8 "Businesses should undertake initiatives to promote greater environmental responsibility" and 9 "Businesses should encourage the development and diffusion of environmentally friendly technologies." Dominion's commitment is in line with those stipulated in the Code of Conduct and in the Quality and Environmental Policy.

The company is of the opinion that Dominion has an extremely limited, insignificant environmental impact, for the following reasons:

- Firstly, most of Dominion's activities have no direct impact on the environment. It has virtually no industrial activity, providing solutions and services with a minimum environmental impact.
- Secondly, much of Dominion's business specifically involves offering its customers solutions which improve both their energy efficiency and their impact on the environment.

However, Dominion is committed to protecting the environment and works towards minimising any direct negative effects caused by its activities. To this end, its activities are performed ensuring a minimum environmental impact, in line with its Quality and Environmental Policy.

The services and solutions provided at a customer's facilities are subject to the management parameters that are determined and managed by that customer. Accordingly, any existing effects must be included in the customer's measurements.

The only relevant exception can be found in the context of large projects known as "360" projects, which, given their scale, complexity and multiannual nature, mean that the company carries out one or two projects at the same time. For this type of projects, depending on the project's nature and the customer's requirements, Dominion can perform complex environmental and social impact assessment (ESIA: Environmental and Social Impact Assessment), normally carried out under the IFC environmental standards of the International Finance Corporation which operates under the World Bank, as well as relevant monitoring reports regarding the implementation of the approved measures (ESMP: Environmental Social Management Plan).

The "360" projects undertaken in 2019 consisted of the "Upper Aguan River Valley Irrigation Project in Honduras" and the "Laúca-Bita High Voltage Transmission Line Project in Angola". Their impact is analysed in the following points.

As a result, it can be said that the most significant potential impact of Dominion's activity is at the Company's offices and warehouses in relation to electricity used for lighting, running water and the generation of waste (essentially paper, batteries and toners), and also related to employee travel, essentially by plane.

To manage impacts which could occur there and to try to promote a culture of environmental responsibility in all activities, Dominion has an office guide which contains all recommendations and obligations for the Company's offices and warehouses. It also includes parameters to facilitate how the quantified value of these impacts must be reported, so that this information may be included for monitoring purposes, together with information on how to pass on this information to employees.





Having said this, it is important to remember that the offices and warehouses are not typically owned by the Company, but are in fact rented. This results in extremely different types of consumption, and these are not always comparable given the fact that sometimes the owner provides some of the supplies while, other times, Dominion is responsible for the control.

Dominion has a Quality Department that deals with any certification requests made by the Company's customers. This team is also in charge of obtaining any environmental certificates that may be required (ISO14000 essential), on a case-by-case basis.

PRECAUTIONARY PRINCIPLE

As a member of the United Nations Global Compact, Dominion takes on the following principles as their own: 7 "Businesses should undertake initiatives to promote greater environmental responsibility" and applies it

to the management of all its solutions and services, according to the management approach detailed in the point above.

SUBSIDIES AND DISPUTES. PROVISIONS AND GUARANTEES

In 2019, there were no claims or lawsuits worth mentioning, and neither has the Company obtained subsidies or tax deductions for environmental reasons. Neither are there any provisions or guarantees for environmental risks.



6.2 Pollution

Measures to prevent, reduce or correct carbon emissions that have a serious impact on the environment.

Considering any kind of activity-specific atmospheric pollution, including both noise and light pollution.

MANAGEMENT APPROACH

As explained in the previous point, Dominion has no production activity and has a limited impact on the environment.

With regards to emissions, their volume is deemed insignificant.

Notwithstanding, in line with the company's commitment to controlling and reducing the impact caused by the Company's offices and warehouses, it now encourages reducing the number of business trips and using alternative means of communication, such as video conferences and other digital means, as explained in Section 6.5.

Dominion impact on atmospheric pollution is also virtually insignificant, and this is also the case with noise and light pollution. Specifically in the case of noise, Dominion helps its customers reduce this impact at their production facilities near to residential areas by implementing noise reduction systems on tall structures (chimneys and other items).



6.3

Circular economy and the prevention and management of waste

Measures to prevent, reduce or correct carbon emissions that have a serious impact on the environment.

Considering any kind of activity-specific atmospheric pollution, including both noise and light pollution.

6.3.1 Circular economy

Dominion mainly purchases finished products, essentially from global leaders in their different business areas. These purchases are often made either as a partner of the producer in question or by purchasing these products from the distribution channel set up by the manufacturer. It should also be mentioned that there is very little repeat purchasing in the solutions and specialised engineering sector due to the wide range of projects the company works on. Finally, an almost insignificant amount of raw materials is purchased and these are often purchased from generalist distributors.

However, there are a significant number of times when the customers themselves supply the products used for solutions and services provided by Dominion.

Accordingly, the Company does not consider this matter to be of significance.

Subcontracting is addressed in detail in point 10.2.

6.3.2 Waste: Measures of prevention, recycling, reuse and other types of waste recovery and disposal

MANAGEMENT APPROACH

As explained in section 6.1, Dominion has an office guide that contains the obligations and recommendations to be followed, while also providing instructions on how to quantify these impacts so that this information can be controlled and included for monitoring purposes. This guide provides instructions on which types of materials can be recycled.

Also, and only very marginally for Dominion as a whole, it is worth mentioning that Phone House recycles mobile phones according to the following parameters:

- › **Electronic components:** these are parts that have been replaced in customer equipment and can be divided into two groups
 - Those which can be reused and have a second operating life which are sold to third parties.
 - Those which are sent directly for recycling. This is the responsibility of an outside company, which issues a certificate.
- › **Aerosols:** these are recycled by an authorised waste manager.
- › **Paper, cardboard and plastics:** these are waste products which are generated on a daily basis. They are sorted into paper and cardboard on the one hand, and plastic and wood on the other.

In the case of the "360" projects, it is important to point out that the Angola project involves specific monitoring of the waste generated during the installation of the high voltage towers along the line the project concerns.

6.3.3 Actions to prevent food wastage

The Company's activities are practically unrelated to food so no actions are foreseen in this area.





6.4 Sustainable use of resources

6.4.1 Water consumption and water supply according to local constraints.

As Dominion's production processes do not involve water, mention only need be made of the running water used at its offices and warehouses, although this supply is often provided by the owner of the property.

Accordingly, the Company does not consider this matter to be of significance.

However, the analysis performed for the Honduras project pays particular attention to monitoring the flow rate of the aquifers affected by the irrigation project.

6.4.2 Consumption of raw materials and the measures adopted for a more efficient use of the same

As explained in section 6.1, Dominion consumes an insignificant amount of raw materials.

6.4.3 Direct or indirect consumption of energy and the measures adopted to improve energy efficiency and the use of renewable energy.

MANAGEMENT APPROACH

An insignificant amount of energy is used for Dominion's services and solutions and it is usually provided by the customer where the work is being performed.

However, Dominion plays an active role in quantifying the energy consumed at its offices and warehouses, controlling consumption and recommending initiatives directed at reducing this, such as the use of LED lights. To this regard, it should be noted that Dominion

conducted energy audits at its central offices - carried out by third parties - to verify the progress the Company has made in this field.

Likewise, Dominion also plays an active role in controlling "district heating" consumption on the few occasions when one of Dominion's offices has used this supply.

On today's date, Dominion had not taken out contracts with any suppliers whose invoices include a percentage of renewable energy in the mix supplied to the Company

Electricity consumption	2019	2018
Electricity consumption kw/h	15,205,018	18,256,340





6.5 Climate change

6.5.1 The important components of greenhouse gas emissions generated by the Company's activities, including the use of the goods and services that it produces.

6.5.2 The measures adopted to adapt to the consequences of climate change.

6.5.3 The voluntarily-established medium and long term reduction goals aimed towards reducing greenhouse gas emissions and the resources used to achieve this purpose.

MANAGEMENT APPROACH

In the case of Dominion, direct emissions are not significant as the Company has no production activity.

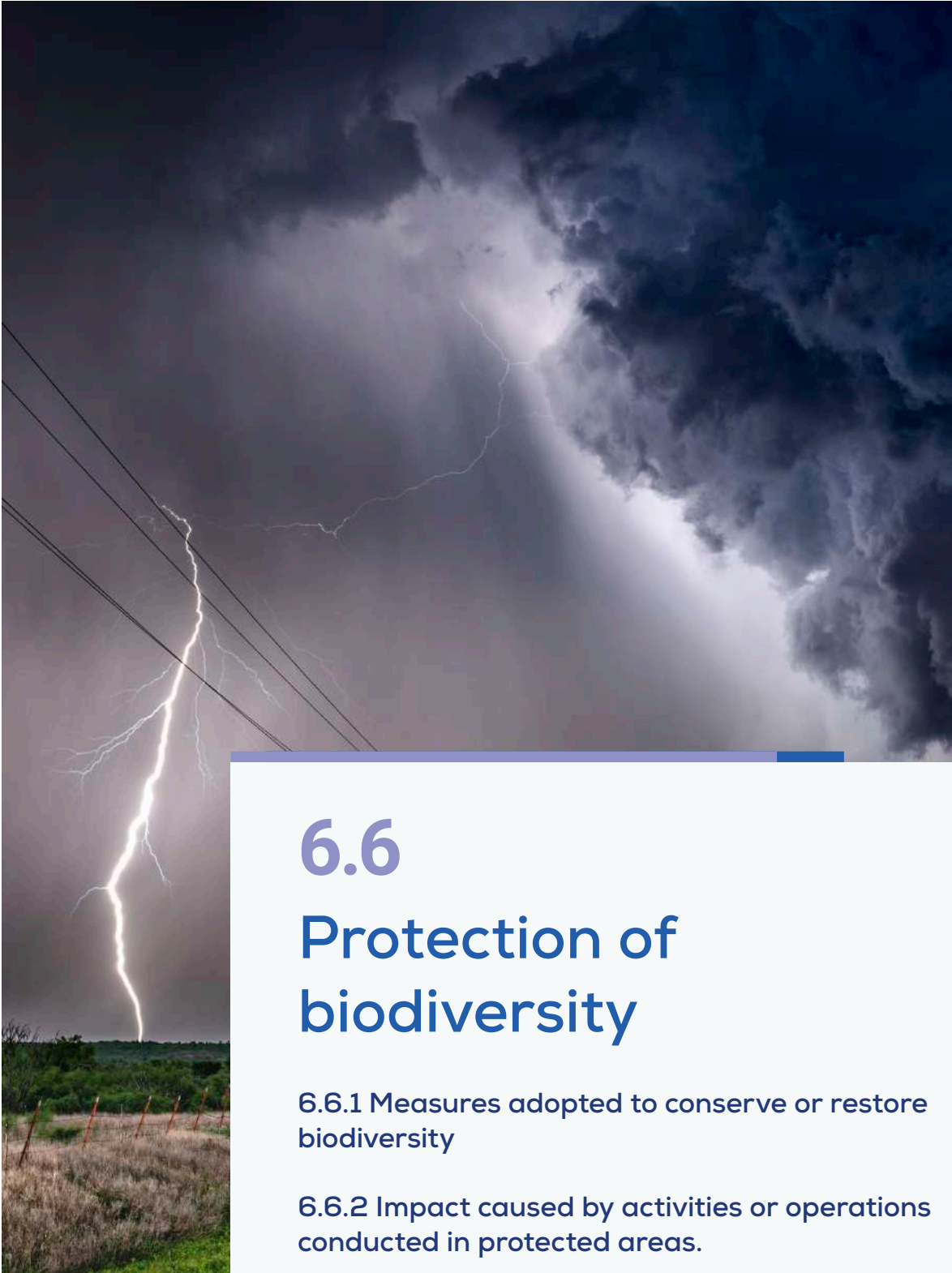
On the other hand, Dominion's commitment to the environment has resulted in the Company encouraging lower energy consumption (as far as is possible) and a reduction in the number of business trips so as to reduce their impact (in Spain in 2019, this consumption accounted for 1,888,042 Kg of CO₂, compared to 938,487 Kg of CO₂ in 2018).

Among other examples, mention should be made of the 2053 licences taken out with SkyProfessional and 2053 E1 and E3 licences to facilitate long-distance meetings. Likewise, the Company has held many video-conferences over the course of 2019.

It must also be noted that the photovoltaic energy projects which Dominion conducted in Mexico and the Dominican Republic have had a significant impact in terms of less CO₂ released into the atmosphere. The energy generated in 2019 amounted to 43,961,437 kWh, which is equivalent to* 18,024,189 Kg of CO₂.

* Applying the mix factor of retailers without Guarantees of Origin 2018 (Department of Ecological Transition)

Finally, Dominion helps its customers to reduce emissions and to adapt to increasingly strict regulations. Accordingly, in terms of tall structures, Dominion conducts engineering investigations and implements filtering and ventilation systems to denitrogenise and desulphurise emissions.



6.6 Protection of biodiversity

6.6.1 Measures adopted to conserve or restore biodiversity

6.6.2 Impact caused by activities or operations conducted in protected areas.

The Company is of the understanding that its activity does not have a direct effect on biodiversity, as it is provided at its customers' facilities or at its own offices or warehouses.

With regard to the Honduras project, and in line with the investigation performed, the impact on the protected wildlife living near to the irrigation area established in the project is monitored.

7

Social Issues and Human Resources

7.1 Employment

7.2 Work organisation

7.3 Health and safety

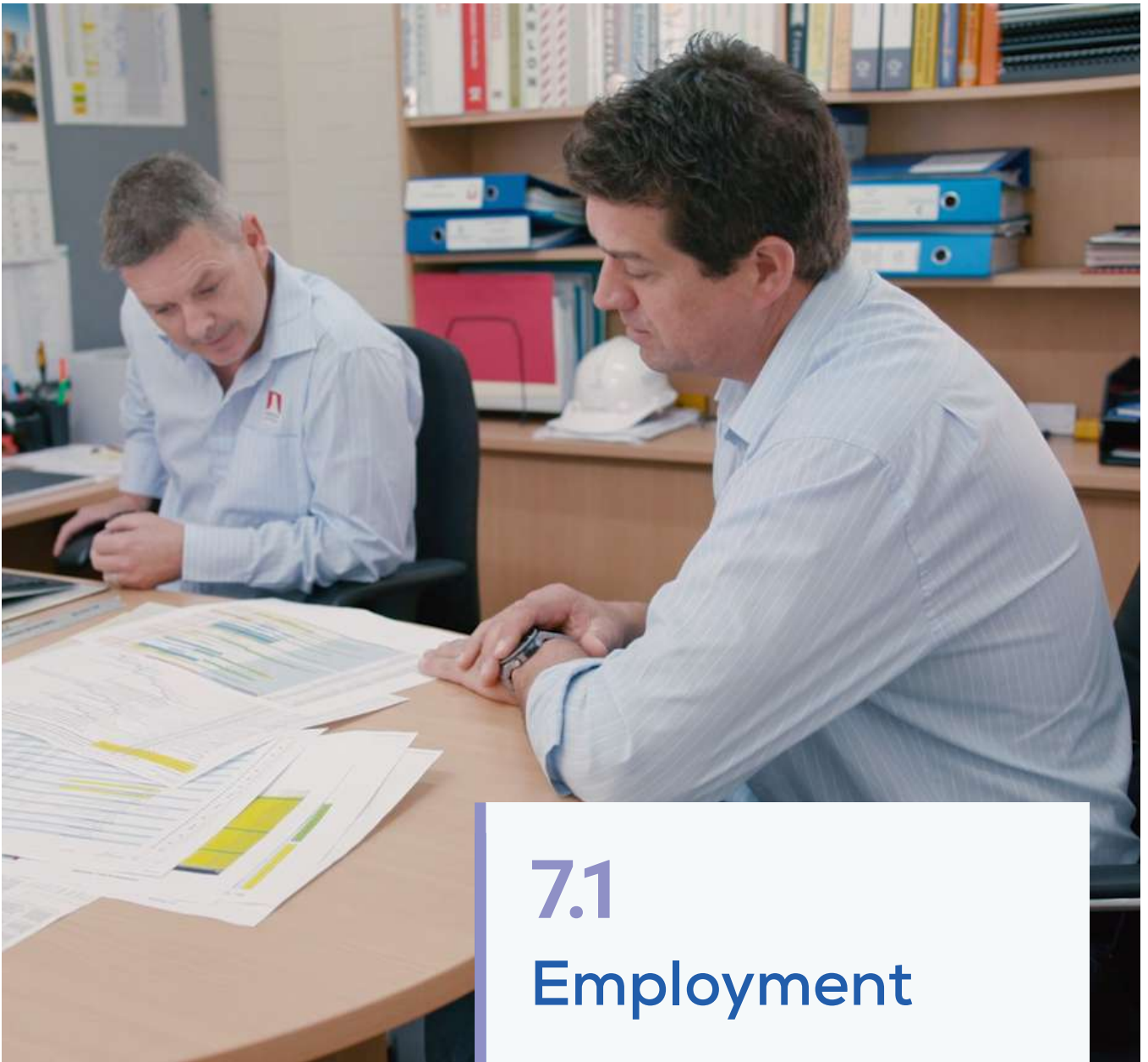
7.4 Social relationships

7.5 Training

7.6 Universal accessibility for people with disabilities

7.7 Equality





7.1 Employment

MANAGEMENT APPROACH

Human resource management takes on particular significance in a global company such as Dominion. Accordingly, Dominion sees its professionals as a strategic asset and it has designed and implemented a human resources management framework that promotes corporate efficiency and purposes by conveying the corporate culture, values and policies as they appear in the Fundamental Principles of Human Rights.

This framework comprises a number of aspects:

A | Dominion's aforementioned Commitment, and which serves as a guide for the Company's employees in the performance of their work. Of these, particular mention should be made of the following: "Responsibility and integrity of individuals in their commitment to work well done" and "Transparency, safety and quality in all their work". Services in the telecommunications and technology area.

C | Also, as mentioned in point 2 hereof, there are a number of principles and policies that apply to all the personnel working for the Company. Of these, particular mention should be made of the Human Resources Principles, the Selection policy and the Human Rights policy, the latter approved by the Board of Directors and completely compliant with the Code of Conduct. Employees and external collaborators can access these on Dominion's website.

E | Finally, analysis of the materiality explained in section 4 hereof must be included in this section. In this analysis, Human Resources are defined as one of the significant areas for Dominion in terms of materiality.

B | Another significant factor of this commitment is the fact that Dominion is a member of the United Nations Global Compact and fully assumes the 10 Principles, set out in the various declarations made by the United Nations regarding human rights, labour, the environment and anti-corruption, which enjoy universal consensus. Specifically, as a member of the United National Global Compact, Dominion fully assumes principle 4 "Businesses must support the steps to eradicate forced work or that carried out under coercion".

D | Dominion's Principles and Policies are always based on the framework of the fundamental labour rights set out in the conventions of the International Labour Organisation (ILO) which covers, amongst other aspects, respect for trade unions and labour legislation, non-discrimination, occupational health and safety and also training.

In line with the above, human resources management is governed by respect for diversity, equal opportunities and non-discrimination, advocating decent, quality employment, rejecting child and forced labour, respecting the freedom of association and collective bargaining, and by aligning professional interests with the Company's strategic goals.

Dominion's continuous growth and internationalisation involve challenges in terms of culture, organisation and management: ongoing adaptation of the Company's structure, workforce sizing, process standardisation, developing skills in new activities and technologies, and fostering a specific corporate culture. Over the course of 2019, Dominion has continued to focus on these fundamental aspects, always advocating its commitment to the aforementioned principles.

Dominion's business model is supported on four pillars known as "Dominion's 4 Ds": Decentralisation, Diversification, Digitalisation

and Financial Discipline. Diversity is included as a cornerstone for Human Resources.

Decentralisation refers to business units with a high degree of autonomy and responsibility over their profit and loss account. The corporate teams also safeguard culture and ensure compliance with the policies of the various divisions and countries, striving to support business.

Accordingly, each country where Dominion operates has a team that is responsible for corporate functions and for ensuring that these functions take account of the specific local characteristics. This ensures that Dominion's business is in line with the legislation of each country. Moreover, these corporate teams report to the highest ranking representatives of each corporate function, responsible for establishing the comprehensive rules and policies, thereby giving coherence to Dominion's culture and commitments.

7.1.1 Total number and distribution of employees by gender, age, country and job category

OUR HUMAN CAPITAL

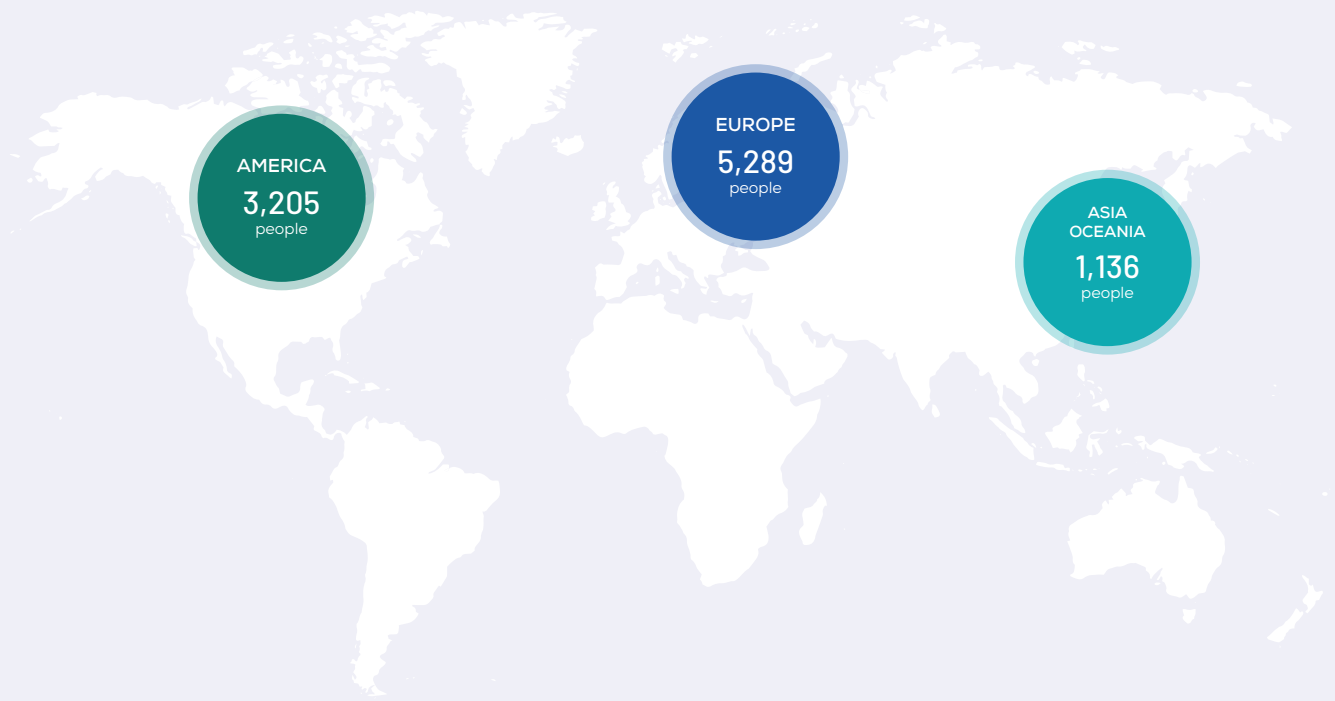
Dominion works to provide Solutions and Services with a wide range of activities, boasting international presence in Human Resources.



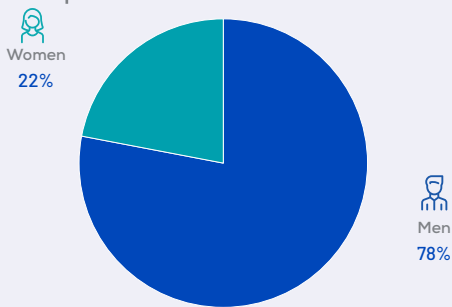
Our personnel 2019

Total Workforce

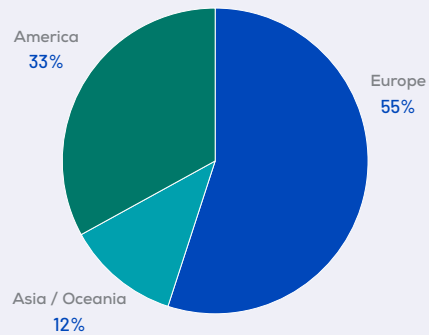
9,630



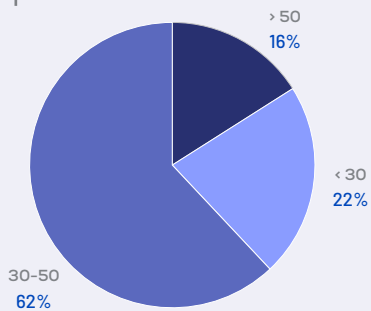
DISTRIBUTION OF THE WORKFORCE ACC. TO GENDER



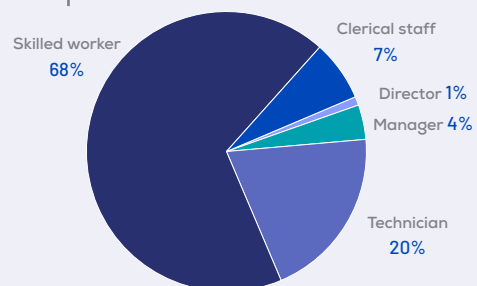
DISTRIBUTION OF THE WORKFORCE ACC. TO GEOGRAPHICAL AREA



DISTRIBUTION OF THE WORKFORCE ACC. TO AGE



DISTRIBUTION OF THE WORKFORCE ACC. TO ACTIVITY



2019

Country	Director		Manager/ Officer in Charge		Technician		Skilled worker		Clerical staff		Total
	M	W	M	W	M	W	M	W	M	W	
Germany	2		10	2	68	24	266	1	2	8	383
Saudi Arabia	1		9		24		396		30	18	478
Argentina			12	4	28	5	242	1	8	3	303
Australia	1		9	2		1	80			9	102
Bahrain					5		20				25
Chile	2		6	1	238	28	572	10	29	22	908
Columbia	1		2	1	9	2	10				25
Denmark	2		5	1	18	12	58		1	6	93
United Arab Emirates	1		5		23		112		1	3	145
Slovakia			1		18	2	34		2	4	61
Spain	41	10	98	47	568	248	1,955	1,154	76	208	4,405
United States of America	3		8		33	6	96	1		8	155
France			11	2	38	2	75	1	1	10	140
India	3		37	1	83		65		116	5	310
Indonesia					18	3	24		1	4	50
Italy	2		6		15	4	23			2	52
Mexico	5		32	7	141	24	217	16	16	12	470
Oman			1				1		1		3
Peru	2		12	2	236	29	936	76	19	32	1,344
Poland			6	4	9	1	67			4	91
Portugal					1		49			3	53
United Kingdom			5		2		4				11
Vietnam			1		9	4	9				23
Overall total	66	10	276	74	1,584	385	5,311	1,260	303	361	9,630

2018

Country	Director		Manager/ Officer in Charge		Technician		Skilled worker		Clerical staff		Total
	M	W	M	W	M	W	M	W	M	W	
Germany	2		3	1	70	16	258	2	10	14	376
Saudi Arabia	1		10		33	12	407	1	5	3	472
Argentina			4		54	8	115	1	1	5	188
Australia	1		1		9	3	79	1		8	102
Bahrain					4		10				14
Brazil			11	8	10	5	98		2	21	155
Chile			5		88	27	351	13	9	4	497
Columbia			1	1	8	2	5		1		18
Denmark	1				27	7	55		2	1	93
United Arab Emirates	2		4		8		57		1		72
Slovakia					13	2	37		3	2	57
Spain	29	5	65	33	710	270	2,210	1,352	121	136	4,931
United States of America	1		14	2	36	14	118	2		2	189
France			1	1	33		89	14	1		139
Indonesia					35		6	8		1	50
Italy	2		7		17	4	26			1	57
Mexico	5				198	47	142	5		8	405
Oman					2		1				3
Peru	1		5	2	52	20	231	25		6	342
Poland			4	3	5		59			5	76
Portugal					2		78			3	83
United Kingdom			1		8		5				14
Vietnam					6	4	3			1	14
Overall total	45	5	136	51	1,428	441	4,440	1,424	156	221	8,347

	2019			2018		
	Age groups			Age groups		
Country	< 30	30-50	> 50	30	30-50	> 50
Germany	57	179	147	55	175	156
Saudi Arabia	103	342	33	100	331	41
Argentina	77	186	40	38	108	42
Australia	14	54	34	12	50	40
Bahrain	5	19	1	1	12	1
Brazil				28	111	16
Chile	211	523	174	171	265	61
Columbia	5	19	1	5	13	
Denmark	16	51	26	11	51	31
United Arab Emirates	41	98	6	18	52	2
Slovakia	11	38	12	10	35	12
Spain	919	2,833	653	1,019	3,170	742
United States of America	14	74	67	18	86	85
France	19	65	56	16	63	60
India	75	206	29			
Indonesia	21	24	5	20	26	4
Italy	5	25	22	7	20	30
Mexico	144	285	41	121	240	44
Oman		2	1	1	1	1
Peru	360	864	120	106	216	20
Poland	10	50	31	8	39	29
Portugal	12	30	11	24	44	15
United Kingdom		5	6	1	5	8
Vietnam	9	11	3	5	8	1
Overall total	2,128	5,983	1,519	1,795	5,111	1,441

Dominion's multi-cultural and diverse workforce is distributed in the countries figuring in the table above.

Dominion's workforce has grown in line with its strategy in 2019, experiencing a 15.3% increase on the 2018 year-end figure.

The inclusion of India in February 2019, with a workforce of 310 at the end of the year, and the significant net growth of 1002 people in Peru and 411 people in Chile are particularly noteworthy.

WORKFORCE PROFILE AND DISTRIBUTION

The geographical distribution of Dominion's workforce is in line with the geographical activities carried out by the various businesses.

Dominion considers diversity as a cornerstone for Human Resources. This diversity and internationalisation creates a competitive advantage over other companies in the sector, whereby it can appeal to and retain the best professionals.

- **Diversity of nationalities:**

Dominion has direct staff in 23 countries, with representation across 73 nations, all of which contributes added value in a multi-cultural environment.

- **Gender diversity:**

Dominion's commitment to promoting women in managerial positions increased by 50% in 2019. This is a noteworthy achievement in light of the masculinisation associated with the sectors that Dominion works in and the gender bias in those countries where it boasts the most presence.

- **Generational diversity:**

Dominion is a fine example of generational diversity, meaning that, at present, four generations of professionals are working together, naturally integrated into the group and contributing according to their level of experience.

Diversity brings with it diverse skills and this results in a greater focus when it comes to addressing problems, making innovations and developing new projects.

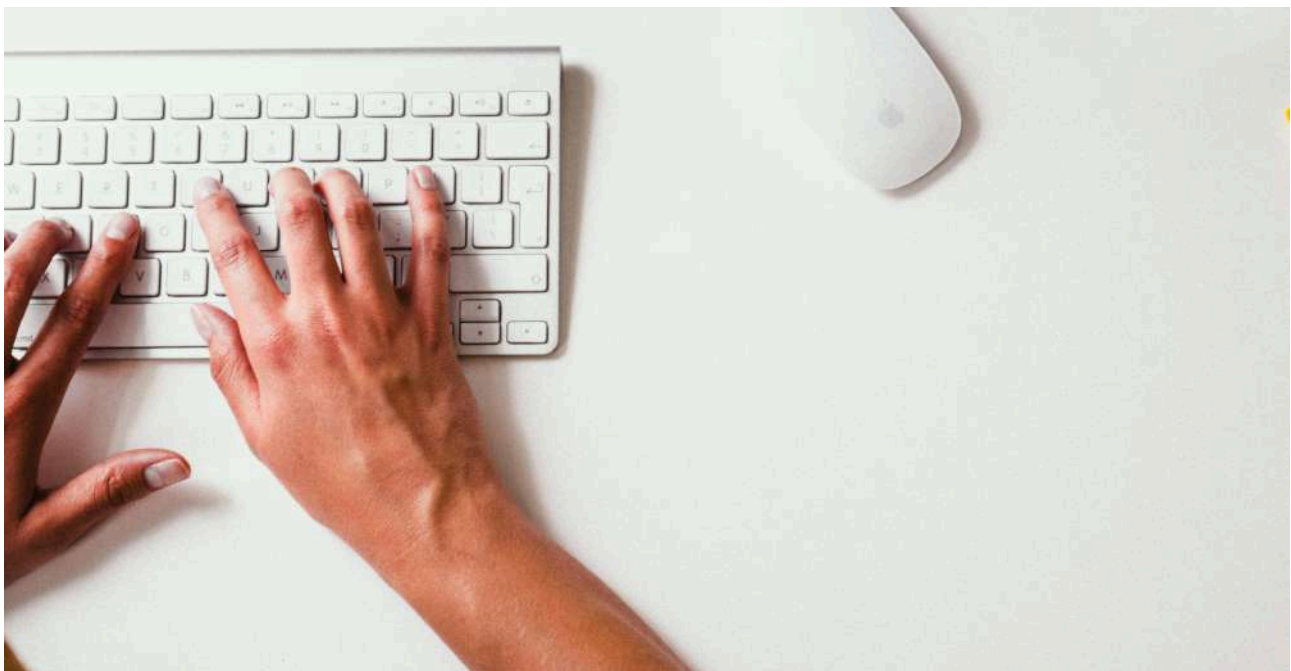
Older generations contribute to and teach younger generations with their experience in the form of *mentoring* schemes. The younger generations contribute in the fact that they are better prepared for entrepreneurialism and digitalisation. In 2019, 22.24% of the total workforce was under the age of 30, which is more than the figure for the previous year.

DIGITAL TRANSFORMATION

One of the key principles of Dominion's 4 "Ds" is Digitalisation. Accordingly, with regard to People and Culture the company is committed to attracting and recruiting technological professionals, which is a step towards achieving both future growth and development for Dominion.

In 2019, Dominion significantly increased these profiles in the various sectors, making headway in the digital community.

In response to this transformation and meeting the generational requirements, the *DominonRecrue* international recruitment project was launched, with the first stage now implemented in 8 countries. Candidate experience stands at 81% satisfaction, thereby promoting the Dominion employer brand.



7.1.2 Total number and distribution of types of employment contract

7.1.3 Indefinite contracts, temporary contracts and part-time contracts by gender, age and job category.

Dominion advocates the creation of steady and quality employment. With more than 51% of the company's international contracts being permanent this reflects the sectors it works in.

Distribution of types of contract at 31.12.2019

	Age	Indefinite		Temporary		Work placement	
		Full time	Part time	Full time	Part time	Full time	Part time
Men	< 30	579	172	727	33	25	14
	30-50	2,510	125	1,897	63	4	
	< 50	890	33	443	25		
Women	< 30	174	207	137	48	8	4
	30-50	686	488	157	50	3	
	< 50	86	23	12	7		
Overall total		4,925	1,048	3,373	226	40	18

Distribution of types of contract at 31.12.2018

	Age	Indefinite		Temporary		Work placement	
		Full time	Part time	Full time	Part time	Full time	Part time
Men	< 30	510	195	447	39	28	20
	30-50	2,343	150	1,108	58	5	
	< 50	957	9	283	52	1	
Women	< 30	156	228	99	48	16	9
	30-50	740	493	139	74		1
	> 50	105	18	7	9		
Overall total		4,811	1,093	2,083	280	50	30

7.1.4 Number of unfair dismissals according to gender, age and job category

		Director		Manager/ Officer in Charge		Technician		Skilled worker		Clerical staff	
		2019	2018	2019	2018	2019	2018	2019	2018	2019	2018
Men	< 30					2	7	45	46	6	
	30-50	1	3	8	2	40	38	123	130	20	1
	> 50	2	2	1	2	15	6	36	30	4	
Women	< 30					2	7	5	21	4	1
	30-50			4	3	13	19	47	113	12	3
	> 50			2	1	4	1	1	2	1	
Total		3	5	15	8	76	78	257	342	47	5



7.1.5 Average remunerations and their growth, disaggregated by gender, age, job category and job seniority

As stipulated in the Human Resources Principles, Dominion is obliged to provide full compensation schemes for its staff, based on equal opportunities, with no discrimination of any kind:

- Guaranteeing external competition and internal equality.
- Promoting variable remuneration based on the contribution made by each professional.
- Adapting Human Resources Principles in relation to the current legislation in each country, taking employees' interests into account. An example of this is flexible payment in Spain whereby employees can choose products and services such as health insurance, nursery vouchers, meal vouchers, etc., which result in tax savings.

Average Remunerations (Fixed Salary) for the Dominion Group and Pay Difference at 31.12.2019

Category	Mean male remuneration	Mean female remuneration	Pay Difference
Director	€ 103,760.71	€ 94,025.76	0.91
Officer in Charge	€ 47,046.81	€ 43,385.46	0.92
Technician	€ 24,122.44	€ 26,645.09	1.10
Skilled worker	€ 16,533.16	€ 17,568.46	1.06
Clerical staff	€ 11,352.92	€ 19,140.46	1.69
Total	€ 19,799.81	€ 20,791.92	1.05

Distribution by age	Mean male remuneration	Mean female remuneration	Pay Difference
< 30	€ 13,084.96	€ 15,858.79	1.21
30-50	€ 19,218.34	€ 21,858.29	1.14
> 50	€ 29,204.73	€ 31,537.88	1.08
Total	€ 19,799.81	€ 20,791.92	1.05

Note: annual fixed salary for full-time contracts for the workforce at 31.12.2019

Average Remunerations (Fixed Salary) for the Dominion Group and Pay Difference at 31.12.2018

Category	Mean male remuneration	Mean female remuneration	Pay Difference
Director	€ 112,732.87	€ 118,449.40	1.05
Officer in Charge	€ 61,252.88	€ 49,414.55	0.81
Technician	€ 30,367.48	€ 26,294.42	0.87
Skilled worker	€ 18,566.57	€ 14,594.22	0.79
Clerical staff	€ 15,802.39	€ 17,932.25	1.13
Total	€ 23,211.46	€ 20,484.55	0.88

Distribution by age	Mean male remuneration	Mean female remuneration	Pay Difference
< 30	€ 13,873.94	€ 13,957.35	1.01
30-50	€ 21,791.63	€ 20,829.38	0.96
> 50	€ 34,576.80	€ 33,571.79	0.97
Total	€ 23,211.46	€ 20,484.55	0.88

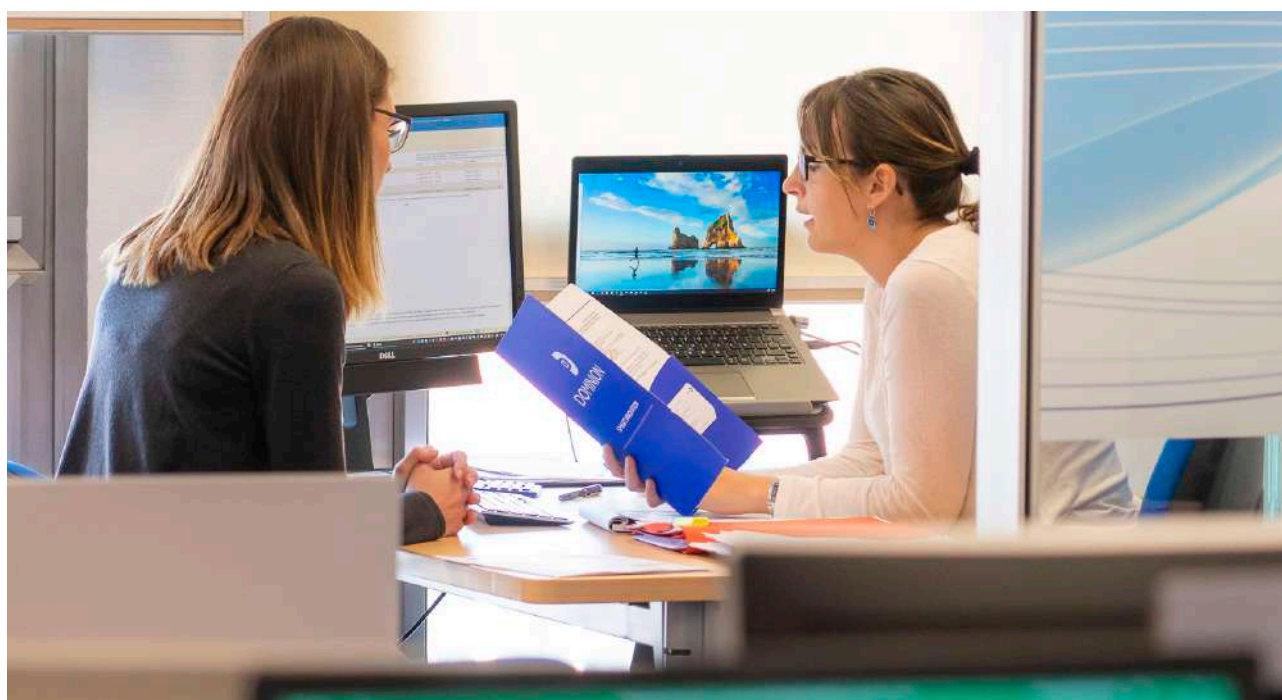
Note: annual fixed salary for full-time contracts for the workforce at 31.12.2018

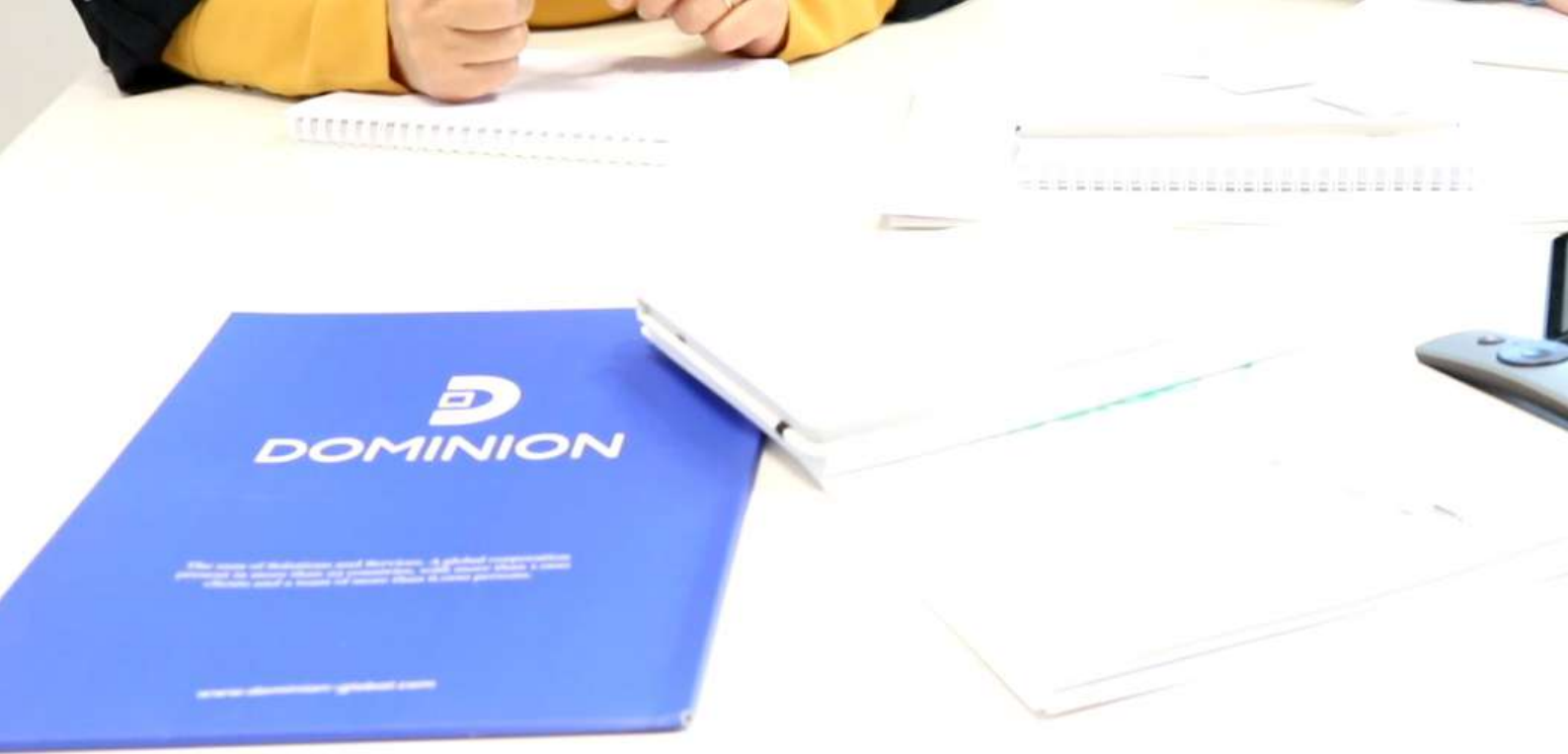
Average Remuneration (Fixed and Variable Salary) for Spain and Pay Difference at 31.12.2019

Category	Mean male remuneration	Mean female remuneration	Pay Difference
Director	€ 107,476.76	€ 107,620.85	1.00
Officer in Charge	€ 50,678.26	€ 45,452.32	0.90
Technician	€ 31,576.64	€ 27,442.51	0.87
Skilled worker	€ 21,523.06	€ 18,666.45	0.87
Clerical staff	€ 20,767.99	€ 19,954.83	0.96
Total	€ 25,739.25	€ 21,421.66	0.83

Distribution by age	Mean male remuneration	Mean female remuneration	Pay Difference
< 30	€ 20,104.60	€ 17,875.29	0.89
30-50	€ 26,123.32	€ 22,511.97	0.86
> 50	€ 29,415.22	€ 24,887.18	0.85
Total	€ 25,739.25	€ 21,421.66	0.83

Note: fixed + variable salary for full-time contracts for the Spanish workforce at 31.12.2019





Average Remunerations (Fixed and Variable Salary) for Spain and Pay Difference at 31.12.2018

Category	Mean male remuneration	Mean female remuneration	Pay Difference
Director	€ 118,212.36	€ 119,958.91	1.01
Officer in Charge	€ 63,968.68	€ 55,971.12	0.87
Technician	€ 31,858.30	€ 28,957.60	0.91
Skilled worker	€ 20,197.09	€ 17,480.42	0.87
Clerical staff	€ 14,976.22	€ 18,611.45	1.24
Total	€ 24,438.87	€ 20,239.48	0.83

Distribution by age	Mean male remuneration	Mean female remuneration	Pay Difference
< 30	€ 17,989.06	€ 18,029.18	1.00
30-50	€ 24,564.53	€ 20,738.09	0.84
> 50	€ 29,630.43	€ 24,640.50	0.83
Total	€ 24,438.87	€ 20,239.48	0.83

Note: fixed + variable salary for full-time contracts for the Spanish workforce at 31.12.2018

Note: The average salary tables are broken down by category and age group by gender, stressing Dominion's situation and its Generational Diversity

The pay difference is calculated by dividing the mean salary of women by the mean salary of men.

7.1.6 Pay difference, remuneration for the same job or the average in the company.

In terms of Dominion as a whole, the mean salary data based on gender indicates a salary difference of 1.05 in favour of women.

These figures are subject to how employees are distributed in different countries, with there being very little female employment in some of them. We must take into account of the effect of the workforce increase in Peru, Chile and India, which are mostly male employees with average salaries less than the Dominion mean value.

The mean salary percentage for women in Spain compared to men in Dominion as a whole around the world is 1.08 in favour of women.

With regard to the mean salary for the ">50" age group, in some categories this may be affected by the retirement processes, according to country-specific legislation.

The promotion of 18 people to Managerial positions, 6 of whom were women - which represents 33.3% - is worth noting, with the conclusion being that salary parity exists between men and women in this category.

7.1.7 The average salary for board members and directors, including variable salaries, expenses, severance payments, payments to long-term savings plans and any other item by gender

The Board of Directors and directors who answer to the CEO and are members of the Management Committee, receive a salary that is commensurate with their contribution to the Company, in line with the company's market positioning in comparison with other companies of a similar size or activity and pursuant to the Rules of the Board of Directors.

The Appointment and Remunerations Committee is responsible for proposing to the Board of Directors the remuneration policy to be applied to this group.

The information relating to this matter is set out in the Annual Corporate Governance Report and in the Annual Report on Directors' Remuneration which form an integral part of these annual accounts.

7.1.8 Implementation of work disconnecting policies

As established by the Human Resources Principles, Dominion is governed by the country-specific labour legislation and by the principles of the United Nations Global Compact. Dominion strives to consolidate decent, steady and quality jobs. It is therefore promoting measures to achieve a favourable environment that facilitates the reconciliation of work and family life, observing the legislation in force in each country and following the best international practices.

The company is committed to flexible working hours, provided that the business in question so allows. In some countries, such as Denmark and Germany, employees have what is known as an "Hour Bank" to take time off.

7.1.9 Disabled employees

As a member of the United Nations Global Compact, Dominion assumes principle 6 "*Businesses should uphold the eradication of discrimination in respect of employment and occupation*".

Dominion assumes the explanation of this principle of the United National Global Compact that states that discrimination in respect of employment and occupation is: "any distinction, exclusion or preference which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation", and is made on the basis of "race, colour, sex, religion, political opinion, nationality or social origin." Discrimination may also be in relation to physical or mental disability.

Dominion is committed to integrating disabled persons in the workplace, pursuant to the applicable regulations in those countries with applicable legislation to this regard. There were a total of 45 employees with a disability recognised under current legislation at 31 December 2019, compared to 48 the year before.

In the case of Spain, this commitment is accompanied by an investment in the purchase of goods and services produced or provided by Special Employment Centres. In 2019 this amounted to 1,260,953 Euros compared to 780,141 Euros in 2018.



7.2 Work organisation

7.2.1 Organisation of working time

Dominion is a proponent of Decentralisation, something which results in straightforward and flexible structures which are specifically designed to encourage collaboration and responsible management with an "entrepreneurial mindset."

This straightforward structure is accompanied by the announcement of the Company's annual strategy in a "Kick off" meeting with Dominion's top tier, the TOP100. This allows for transparent and unambiguous communication, as this process must run concurrently through all the different company departments.

On the other hand, the Company values a work-life balance and endeavours to make this possible through the application of a number of flexibility and reconciliation measures, adapted to each activity and geographical area. These measures include:

- Almost all employees who took maternity or paternity leave returned to work. A shorter working day for childcare can be enjoyed upon request.
- Recommendation not to hold meetings one hour before the end of the working day.
- Taking all holidays, with no possible compensation for not doing so, even in countries where financial compensation for those holidays not taken is permitted.

7.2.2 Number of hours of absenteeism

The percentage of work absenteeism amounts to 4.29% from the Group in 2019, with improvement measures taken.

7.2.3 Measures directed at making work-life reconciliation easier and encouraging both parents to share this measure.

RECONCILIATION OF WORK AND FAMILY LIFE

Within a framework of respect and compliance with the legislation in force in each country, Dominion strives to improve local policies with flexitime to support work and family life reconciliation in line with the type of business in question.





7.3 Health and safety

7.3.1 Occupational health and safety conditions

One of the key human resource management tasks is occupational risk prevention. Through its own Occupational Health and Safety Policy, Dominion's Management assumed responsibility to implement and manage our Occupational Health and Safety System. Accordingly, the e-learning "ORP Management Training" course was promoted in 2019.

The Occupational Health and Safety Policy is directed at achieving a safe and healthy workplace, and sets out the basic principles which govern the actions taken by Dominion's companies in this area.

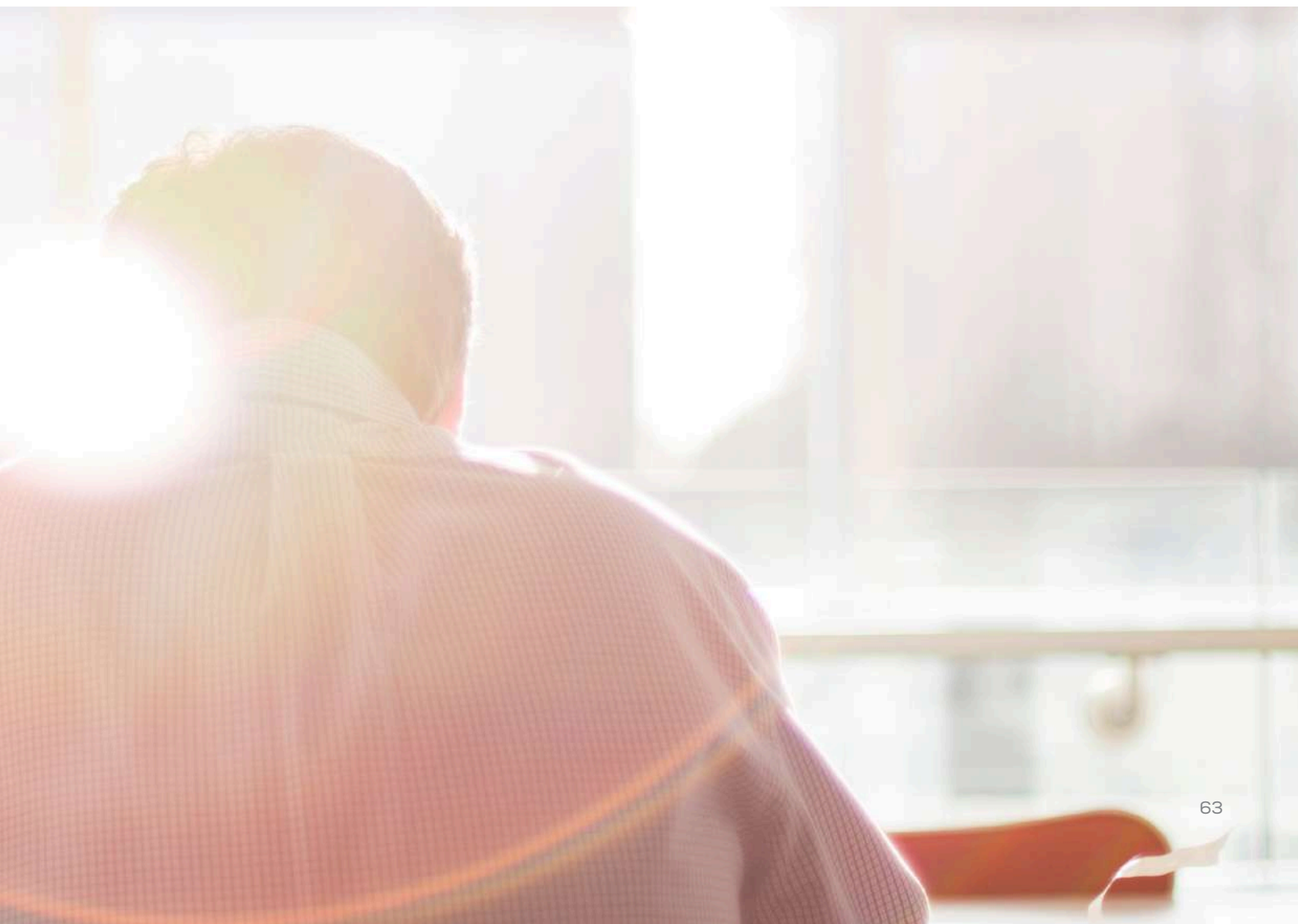
Dominion is committed to the health, safety and well-being of its employees, in order to minimise the accident rate, by ensuring compliance with the work legislation in force for this area and in each geographical area, the implementation of training plans in line with the job and the workplace, fostering preventive culture and ensuring the necessary human and technical means to guarantee preventive planning implementation, fostering personal health promotion and monitoring for its employees.

7.3.2 Work-related accidents, particularly their frequency and seriousness, Occupational illnesses, by gender

Of the 122 accidents that occurred in 2019, one resulted in the unfortunate death of one member of our staff. A case of occupational illness was also confirmed, with male staff affected in both cases.

	2019			2018		
	Total	Men	Women	Total	Men	Women
Accidents	122	98	24	98	97	1
Frequency rate	6.3	7.2	2.6	22.1	22.1	0
Severity rate	0.4	0.4	0.2	0.88	0.9	0
Accident rate during the working day	1,135	1,168	537	3,705	3,705	0

Note: information relating to Spain





7.4

Social relationships

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

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

As a signatory of the United National Global Compact, Dominion considers that freedom of association refers to the right of businessmen and workers to form associations and unions based on their requirements. It therefore upholds that it should not interfere in an employee's decision on his/her right to join a trade union and neither should the employee be discriminated against for doing so.

Dominion labour relations are managed pursuant to the applicable legislation in each geographical area, in a framework of ongoing, constructive dialogue.

7.4.2 Percentage of employees covered by collective agreements by country

Dominion adheres to the collective agreements that are applicable according to the labour legislation in force in each country. On the other hand, based on Dominion's remuneration guidelines, the Company endeavours to improve conditions wherever possible, according to the contribution level associated to the job.

7.4.3 An appraisal of collective agreements, particularly regarding occupational health and safety

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





7.5 Training

7.5.1 Policies implemented for training purposes

7.5.2 The total number of training hours according to job category

Dominion is rooted in its employees' values and professional skills. For this reason, the Company fosters continuous learning schemes and the creation of knowledge spaces at all stages of the value chain. Dominion's culture prefers predominantly practical training. For this reason, professionals are basically trained "on the job", guaranteeing the basic skills for their roles.

With regards to this task, Dominion also receives support from an on-line university, initially implemented for commercial services and which has since been implemented for use with regards to compliance and the prevention of corruption and other criminal offences.

Training hours by country

Country	Accumulated hours 2019	Accumulated hours 2018
Argentina	896	14,940
Australia	522	
Chile	2,649	3,180
Columbia	208	
Denmark	200	
Spain	38,952	174,781
France	917	
Germany	4,489	2,250
India	298	
Indonesia	220	
Italy	1,838	
Mexico	1,627	5,537
Peru	14,046	3,163
Brazil		960
Poland	814	
Portugal	224	400
Saudi Arabia	168	
Slovakia	80	
United Arab Emirates	144	
United Kingdom	153	238
United States	1,922	
Vietnam	285	
Overall total	70,652	205,449

Training hours in Spain by category

Training hours by category (Spain)		
Category	2019	2018
Director	478	198
Officer in Charge	1,221	121
Technician, Clerical Staff, Skilled Worker	37,264	174,462

The reduction in the number of Technical, Clerical Staff and Skilled Worker category working hours in Spain was the result of a special training plan for store personnel and equivalent level staff which was implemented in 2018.



7.6

Universal accessibility for disabled people

As part of the framework aimed towards preventing any type of discrimination and, specifically, with the support of those measures which allow for less favoured groups of society to be integrated in the workforce, Dominion promotes actions which remove any physical barriers in its buildings, understanding accessibility as the possibility of having access to, entrance to and movement within the buildings with no restriction whatsoever as a result of impairments, disabilities or handicaps.

Accordingly, Dominion has issued the following recommendations for all its facilities:

- Facilitate access to buildings by removing any possible architectural barriers therein.
- Adapt entrances with ramps with no steep slopes, allowing access to wheelchair users.
- Use of approved elevators, where applicable.
- Prioritise the use of doors with easy to open and close mechanisms.
- Promote the provision of disabled-friendly toilets.
- Include disability in the Prevention Plans.



7.7

Equality

7.7.1 Measures adopted to promote equal treatment and opportunities between men and women

7.7.2 Equality plans, measures adopted to promote employment, protocols against sexual harassment and sex discrimination

7.7.3 The policy against all kinds of discrimination and, where appropriate, the management of diversity

MANAGEMENT APPROACH

As a member of the United Nations Global Compact, Dominion assumes principle 6 "Businesses should uphold the abolishment of discriminatory practices in employment and occupation". Dominion is of the understanding that private sector companies and organisations must be committed as socially responsible organisations and assume their commitment to consolidating and developing policies that guarantee equal opportunities and to encouraging initiatives that favour non-discrimination by reason of any personal condition, integrating diversity into the corporate culture as a source of growth and innovation.

Dominion's commitment is included in both the Code of Conduct and the Human Resources Principles. Furthermore, the Company has implemented a specific policy to emphasise the importance of guaranteeing diversity and equality in its operations.

In December 2019, Dominion signed the **Diversity Charter** with the Alares Foundation as an endeavour to raise awareness for equal opportunities and respect for diversity amongst its employees, to make progress towards creating a diverse workforce, and to promote inclusion in its organisation, to take diversity into account in all human resource management policies, to promote the reconciliation of work, family and leisure time, to recognise customer diversity, and to provide notice of this commitment to the Diversity Charter to employees, suppliers and other stakeholders.

Dominion has adopted an Equality Plan based around the following principles:

RAISING AWARENESS

Equal opportunities and respect for diversity must form part of the company's values and also be conveyed to employees.

MAKING PROGRESS TOWARDS CREATING A DIVERSE WORKFORCE

The Company must encourage integrating people with different profiles (regardless of gender, sexual orientation, race, nationality, ethnicity, religion, beliefs, age, disability, etc.).

PROMOTING INCLUSION

Integration must be effective, avoiding any type of (direct or indirect) discrimination at the workplace.

CONSIDERING DIVERSITY IN ALL HUMAN RESOURCE MANAGEMENT POLICIES

Diversity management should not be just another human resource practice, but rather a cross-cutting factor which serves as a basis for all decisions taken to this regard.

ENCOURAGE RECONCILIATION BY BALANCING WORK, FAMILY AND LEISURE TIME.

Organisations must establish mechanisms by which it is possible to balance all workers' (ethnicity, religion, beliefs, age, disability, etc.) working life with family and personal life.

RECOGNISING THE DIVERSITY OF CUSTOMERS.

Organisations must recognise the profiles of customers, acknowledging that their diversity is also a source of innovation and progress.

PROMOTING AND TRANSMITTING THE COMMITMENT TO ITS EMPLOYEES

The commitment undertaken on signing the Diversity Charter must be shared across the entire Company.

Dominion has also defined a Harassment Protocol directed at defining the guidelines via which moral or sexual harassment can be identified so as to deal with discriminatory situations and minimise their consequences, guaranteeing individual rights.

The procedures for taking action must be implemented according to the principles of speed, confidentiality, credibility and they must guarantee and protect the privacy and dignity of those individuals subject to harassment. Furthermore, the rights of any individuals who are reported shall be guaranteed and respected. To this end, Dominion has established a typology for two types of harassment which the company must control, should such an event occur: moral harassment and sexual harassment.

With this aim in mind, the Company has established a procedure for taking action, comprising the following stages:

› STAGE 1

Any complaints and allegations received through the various channels made available by the Company shall be sent to the Corporate Director of Human Resources.

› STAGE 2

Investigation of the incident. The Corporate Director of Human Resources shall be responsible for interviewing the persons concerned, either in person or over the phone (if necessary, a person may be appointed for this purpose), recording the conversations with the consent of the interviewee and they may hold meetings with the alleged harasser and/or, should it be absolutely necessary, with both parties. This is all for the purpose of clarifying the situation of harassment and reaching a solution.

- **Informal Procedure:** A report shall be prepared within a period of 10 days, as of the date on which the complaint was made, presenting the decisions to be taken and the implementation deadlines.
- **Formal Procedure:** The formal procedure shall apply whenever the informal procedure is not successful or is not appropriate for the resolution of the matter in question. The investigation shall conclude with a report, prepared within a maximum period of thirty days.



> STAGES 3 AND 4

Findings of the investigation and decision making:

- a. If there is harassment, then the appropriate corrective and punitive measures shall be taken, based on the disciplinary rules that are applicable to the harasser.
- b. If there is no evidence of harassment, or it is not possible to confirm the incident, then the case shall be filed.
- c. Claims, false allegations or statements shown to be dishonest or malicious may also be considered to merit disciplinary action.

Some preventive measures have also been established which the Human Resources Management fosters:



COMMUNICATION

- Guaranteeing the dissemination of this protocol to all Company levels, together with the workers' representatives.
- Fostering regular departmental meetings where both male and female workers actively attend and also receive sufficient information regarding duties, responsibilities, working methods, etc.
- Keeping all levels of communication channels - horizontally, bottom-up and top-down - so that everyone's opinions can be heard.



RESPONSIBILITY

- All employees shall be responsible for helping to guarantee that dignity is respected within the workplace environment: managers are held specifically responsible for guaranteeing and preventing harassment in their areas.
- Promote "good conduct" in order to maintain personal dignity at all times. With this aim in mind, personnel should avoid comments on private life, appearance, sexuality, etc.



TRAINING

- Committed to preventing harassment, this matter will be included in training programmes. These programmes will be specifically directed at all those persons in charge of personnel. This training is designed to improve the Company's "listening level" and to provide tools to address possible harassment situations. In short, to allow these situations to be resolved in an informed way.

8

Human Rights

8.1 Application of due diligence procedures with regard to human rights

8.2 Human rights violation risk prevention and, whenever appropriate, measures to mitigate, manage and resolve possible cases of abuse.

8.3 Formal complaints for cases of the violation of human rights

8.4 Promotion of and compliance with the provisions of the core International Labour Organisation conventions regarding respect for freedom of association and the right to collective bargaining

8.5 The eradication of discrimination in respect of employment and occupation

8.6 The eradication of forced or compulsory labour





8.1

Application of due diligence procedures with regard to human rights

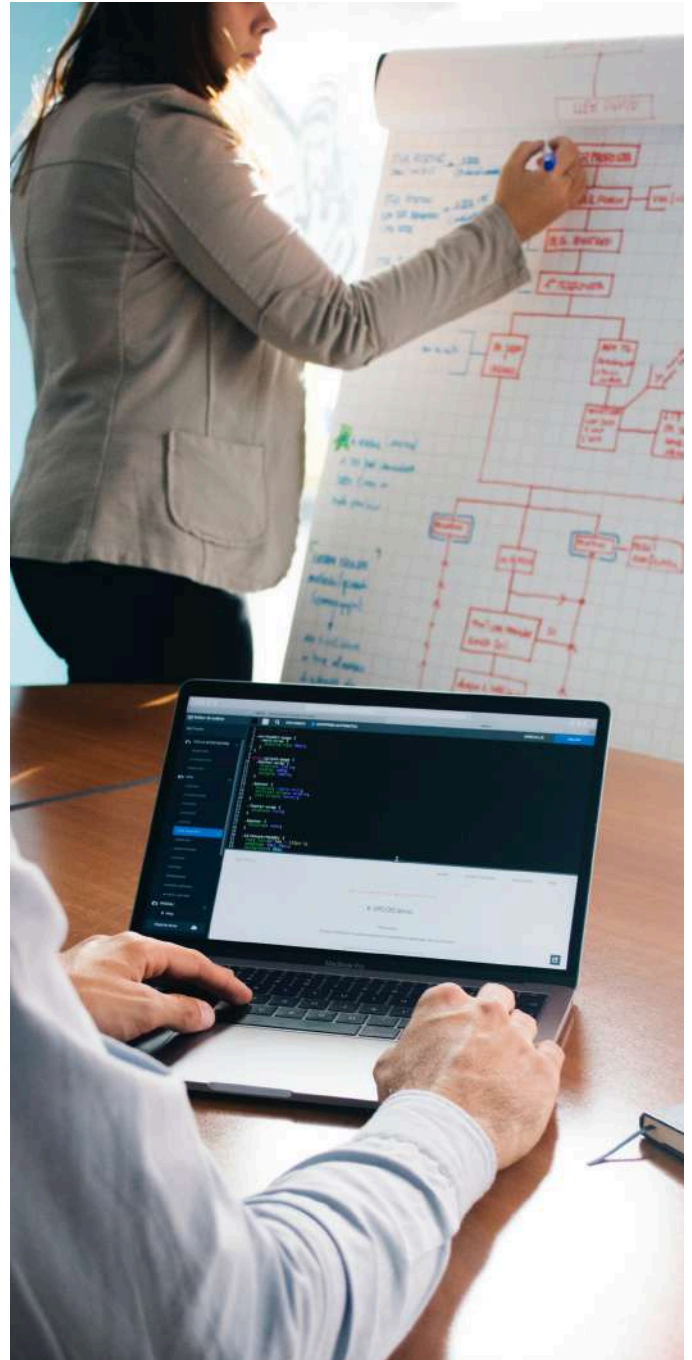
MANAGEMENT APPROACH

Dominion actively works towards complying with the current legislation in each territory it operates in. The Company is committed to respecting internationally recognised human rights, covering the rights stipulated in the International Human Rights Charter and those principles regarding the rights established in the Declaration of the International Labour Organisation.

Playing a key role in this commitment, Dominion is a member of the United Nations Global Compact and is fully committed to its 10 Principles. These are set out in the various declarations made by the United Nations regarding human rights, labour, the environment and anti-corruption, all of which enjoy universal consensus.

Specifically regarding Human Rights, Dominion's Board of Directors passed a Human Rights Policy which is completely in line with the company's Code of Conduct. Employees and stakeholders can read this Policy on Dominion's website. It covers a series of commitments that are in line with the principles and values set out in point 1.4 (Dominion's Objectives and Strategy):

- **Avoid discriminatory practices:** Dominion undertakes to ensure a working environment where there is no gender, race, religion, age, sexual orientation, nationality, marital status or socio-economic status discrimination.
- **Reject forced and child labour:** Dominion is committed to ensuring that none of its activities involve forced or child labour. It is also committed to complying with the labour laws in the countries it operates in and to taking any necessary remedial actions.
- **Offering decent employment:** Dominion undertakes to pay its employees a fair salary in line with their skills and knowledge. Dominion also undertakes to comply with the labour laws in all the locations where it operates and, insofar as is possible, to establish measures geared towards flexitime.
- **Protect human health:** Dominion undertakes to offer its employees a safe and healthy workplace environment, strictly complying with any applicable legal requirements.
- **Facilitate collective bargaining and freedom of association:** Dominion respects its employees' right to freedom of trade union association and collective bargaining. As far as possible, the Company will facilitate employee meetings to freely discuss relevant matters relating to their jobs.
- **Foster a culture of respect for human rights and raise awareness among** Dominion's employees regarding this matter. Particularly where fulfilling these rights is most at risk.
- **Foster commitment to human rights on the entire value chain:** Dominion undertakes to distribute this policy to suppliers, contractors, partner companies and customers by promoting and encouraging the different members of the value chain to develop their own related policies.
- With regards to those people who make up the organisation, human resource management is governed by respect for diversity, equal opportunities and non-discrimination and by aligning employees' interests with the Company's strategic objectives. This matter is explained in detail in section 7 and also in section 8.4 onwards.





8.2

Human rights violation risk prevention and, whenever appropriate, measures to mitigate, manage and resolve possible cases of abuse

MANAGEMENT APPROACH

Dominion undertakes to uphold ethical practices in all its activities, governed by basic values of conduct, reflected in the company's outlook and culture and in its in-house regulations, with emphasis on the Code of Conduct and the aforementioned Human Rights Policy.

The Code of Conduct is a complete guide on how to act and is directed at all Company members (members of the board, directors, employees and workers from all companies). It establishes the guidelines to be followed when performing their work.

Dominion uses different media to ensure that the Company's employees are familiar with this Code. Non-compliance with the Code of Conduct regulations could result in penalties.

DISSEMINATION

To disseminate Human Rights amongst its employees and specifically the Code of Conduct, Dominion publishes this on its website with copies kept at the Company's offices with its signing being increasingly requested from those who join Dominion.

Dominion has also set up its Online University which is used to train the Company's main executives in various areas of regulatory compliance. They must watch a video that addresses the Companies values and principles, complete a course on potential criminal offences and pass a test on this subject as well as read and then sign the Code of Conduct.



8.3

Formal complaints for cases of the violation of human rights

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

The Audit and Compliance Committee is responsible for the whistleblowing channel which, in turn, entrusts this responsibility to the Criminal Defence Body Advisory Panel, formed by four members. The Company has established some rules of procedure for analysing any complaints received and reporting these to the Audit and Compliance Committee.

A total of 3 reports were filed in 2019. In one case, the report was treated as a complaint, as the content related to this type of claim. Additional enquiries were made regarding the other two cases, which resulted in both cases eventually being shelved.

None of the aforementioned reports were related to violations of Human Rights.



8.4 Promotion and fulfilment of agreement provisions

MANAGEMENT APPROACH

We refer to section 7, and specifically 7.4 for Dominion's management approach to social relations.

As explained in section 7 above, the International Labour Organisation's fundamental conventions are one of the benchmarks that Dominion bases its management approach on.



8.5 The eradication of discrimination in respect of employment and occupation

MANAGEMENT APPROACH

Human resource management takes on particular significance in a global company such as Dominion. Accordingly, Dominion sees its professionals as a strategic asset and it has designed and implemented a human resources management framework that promotes corporate efficiency and purposes by conveying the corporate culture, values and policies as they appear in the Fundamental Principles of Human Rights.



8.6

The eradication of forced and compulsory labour

As a member of the United Nations Global Compact, Dominion rejects any type of forced or child labour and assumes principle 4 "Businesses should uphold the eradication of all types of forced and compulsory labour". This is a commitment made by Dominion and set out in the Code of Conduct and in the Human Rights Policy.

As explained in section 7.1, Dominion strictly adheres to its Human Resources principles and the standards in place in each country. Accordingly, no operations pose a significant risk of forced or compulsory labour.

With regard to suppliers, as explained in section 6.3.1, most are major international corporations in developed countries. Therefore, nor are there any significant risks in this respect.



8.7 Effective abolition of child labour

As a member of the United Nations Global Compact, Dominion rejects any type of forced child labour and assumes principle 5 "Businesses should uphold the eradication of child labour." This is a commitment made by Dominion and set out in the Code of Conduct and in the Human Rights Policy.

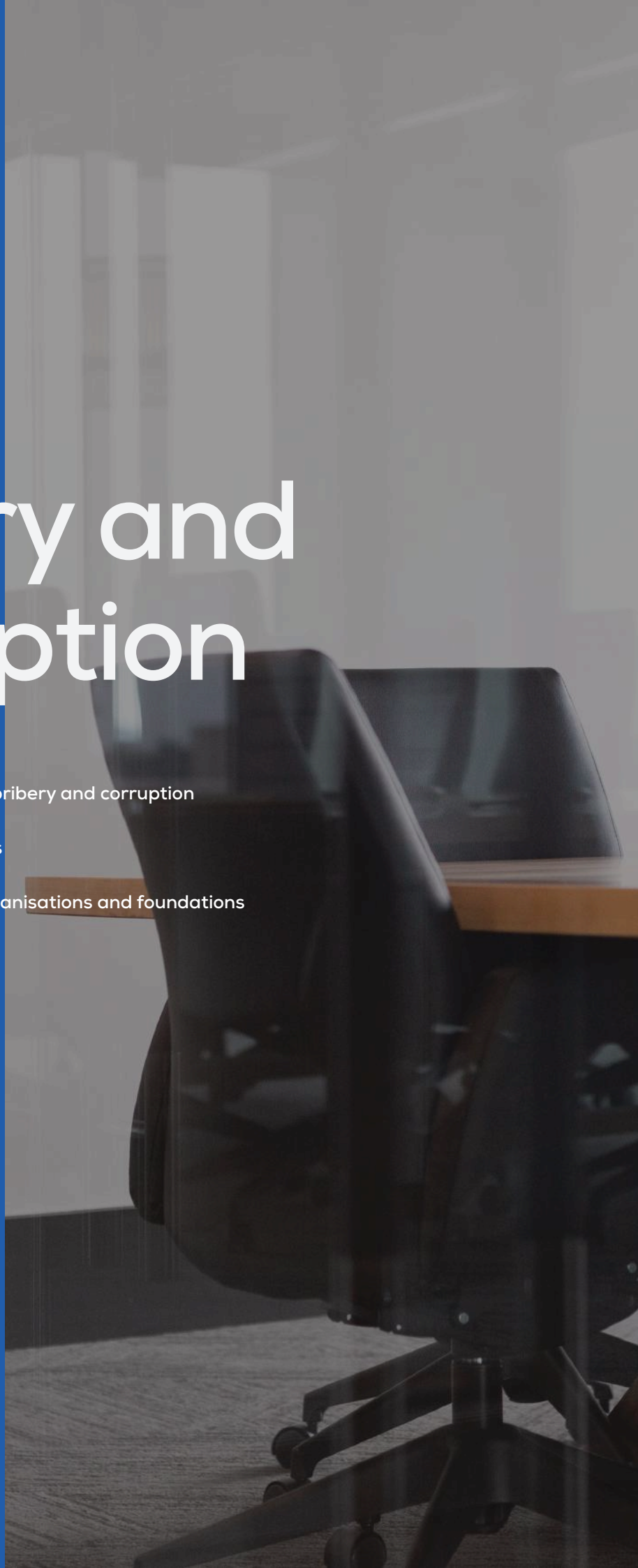
9

Bribery and Corruption

9.1 Measures adopted to prevent bribery and corruption

9.2 Anti-money laundering policies

9.3 Contributions to non-profit organisations and foundations





9.1

Measures adopted to prevent bribery and corruption

As signatory of the United Nations Global Compact, Dominion has assumed Principle No. 10: "Businesses should work against corruption in all its forms, including extortion and bribery" and has developed a framework that includes its Code of Conduct, Criminal offence prevention model and its Anti-corruption and Fraud Policy.

Dominion's Board of Directors approved this Policy as part of an initiative to raise sufficient awareness amongst all of its employees and particularly amongst its executives. This includes a series of commitments which are consistent with the principles and values in section 1.4 (Dominion's Objectives and Strategies) and with the Code of Conduct.

Specifically, point 3.6 of the Code of Conduct stipulates that:

- Dominion expressly forbids any conduct or practice of corruption, bribery or influence trafficking in relation to customers, suppliers, trading partners and civil servants or public, national or international institutions.
- Therefore, in their relations with third parties, Dominion's employees must not offer or accept gifts or hospitality that go beyond something that is purely symbolical or that may be interpreted as an attempt to unduly influence commercial, professional or administrative relations.
- This prohibition does not include the expenses or courtesies that may be considered normal or usual in the market, in reasonable amounts, considering their nature, frequency and amount. These must always be authorised by the person responsible for the unit in question.

- Nor can gifts, courtesies or benefits be given to public representatives either directly or through third parties with a view towards influencing them in Dominion's favour. As such, it is completely prohibited to avail of a personal relationship with the objective of unduly influencing a public authority or civil servant.

MODEL FOR THE PREVENTION OF CRIMINAL OFFENCES

The Company has developed a model to prevent criminal offences that has allowed it to identify associated risks and to propose controls and measures by which to reduce these risks. Based on the work done in this area, the Company is pursuing the creation of an international framework to cover all aspects and to consider the different markets in which it operates.



ANTI-CORRUPTION AND FRAUD POLICY

Both in its relations with the Administration, and those it enjoys with other companies and institutions, Dominion expressly forbids any conduct or practice of corruption, bribery or influence trafficking in relation to customers, suppliers, trading partners and civil servants or public, national or international institutions.

The Company has verbalised its commitment in this area by way of its Anti-corruption and Fraud Policy which establishes the guiding principles for the performance of all of the company's staff. Moreover, as already indicated, and in order to reinforce this Policy, a process is underway aimed at ensuring that all new employees are obliged to formally sign the Company's Code of Conduct.

It contains the following principles:

- Dominion neither tolerates, permits nor engages in any form of corruption, extortion or bribery when carrying out its activities, in both the public and private sector.
- Dominion is committed to a prevention culture based on non-tolerance of any form of business corruption, as well as other illegal actions and fraudulent practices, and on implementing ethical and responsible professional principles of conduct, regardless of seniority and country of operation.
- Relations between their professional staff with any public administration, authorities, state officials and other individuals involved in public administration, as well as political parties and similar organisations, shall all be governed by principles of cooperation, transparency and integrity
- Training programmes are in place to ensure employees are kept up-to-date on this matter. In particular, Dominion professional staff will receive and sign the Code of Conduct to prevent any allegations of fraud, corruption or bribery.
- Dominion encourages a transparent environment and facilitates enquiries and reporting irregularities or breaches which are unethical, lack integrity or violate the principles set out in the Code of Conduct, by means of the Whistleblowing Channel. Reports and enquiries will be reviewed and processed confidentially and pursuant to current legislation. These enquiries can be made employees, suppliers, third parties and shareholders who can report fraudulent practices or any professional who has acted in violation of the Law or the standards of conduct set forth in the Code of Conduct. Dominion undertakes not to engage in any direct or indirect retaliation against anyone who reports irregularities.



- Any risks related to fraud, corruption and bribery will be appropriately addressed by all internal procedures; particularly in all processes that Dominion is involved in.
- Dominion's relations with its suppliers is based on compliance with the Law, efficiency and transparency. Ethical and responsible behaviour is central to Dominion's business practices and its suppliers must comply with all policies, standards and procedures established to prevent corruption, bribery and extortion. Suppliers will never directly or indirectly offer or grant public administrators, third parties or employees (in the context of the business activities conducted for or on behalf of the latter) gifts, handouts or other unauthorised privileges, be they in cash or otherwise, used to induce preferential treatment with respect to the awarding or continuation of contracts or for personal gain or profits for the supplier.

DISSEMINATION

Both the Anti-Corruption and Fraud Policy and the Code of Conduct are on the website which can be accessed by employees and stakeholders. Also, as already explained in section 8.2, Dominion has made an in-house video to communicate the Code of Conduct amongst its Executive. This covers the values and principles which govern the Company and also how to use the whistleblowing channel.

CASES REPORTED

There were no whistleblowing or reports of corruption or bribery cases in 2019.



9.2

Anti-money laundering policies

Given its current range of solutions and services, Dominion is not bound by money laundering regulations and so is not subject to them.

Dominion does, however, play an active role in preventing dangerous related operations. It essentially does so in two ways:

- B2C Transactions: for transactions involving a relationship with the end customer, Dominion has established a series of in-house rules directed at fraudulent cash payment.
- This is achieved by remaining in constant contact with its financial managers in countries where it operates, sharing the guidelines to prevent the use of tax havens, the use of blacklisted banks, cyber-security, etc.
- Money laundering is one of the offences analysed in the Model for the Prevention of Criminal Offences and, as such, its impact is regularly reviewed.



9.3

Contributions to non-profit organisations and foundations

MANAGEMENT APPROACH

This item is properly discussed in section 10.1.

It is worth highlighting that, with the Social Action Policy created by the Company and, in particular, with the centralisation of this process, an answer is given to a relevant issue which is that of exercising control over the contributions made in a centralised way in order to prevent unsuitable destinations of funds.



10 _ Social Responsibility

10.1 The Company's commitment to sustainable development

10.2 Subcontractors and suppliers

10.3 Consumers

10.4 Tax Matters



10.1

The Company's commitment to sustainable development

10.1.1 Impact of the company's activity on local employment and development

10.1.2 Impact of the company's activity on regional communities and the country

10.1.3 The relations held with regional community stakeholders and procedures for engaging in dialogue with them

10.1.4 Partnership of sponsorship actions

MANAGEMENT APPROACH

Dominion's activity is a clear driving force for economic and social development and wealth. As a signatory to the United Nations Global Compact, Dominion endeavours play an active role in the 17 Sustainable Development Objective and, in particular, those relating to commitment to the company's sustainable development.

These commitments come into play in a number of ways which are explained below:

- **SOCIAL ACTION**

Dominion has a Social Action Policy in which it sets forth its commitment to the community and the operating principles that it must pursue in its projects by setting three objectives: contributing to improving the communities where it operates, increasing employees' satisfaction and improving corporate reputation.

In 2019, further progress was made on the decision already taken in 2018 to primarily focus social action on education, thereby responding to the Corporate Social Responsibility Committee's instructions. This approach has allowed for a more consistent and Company-related form of social action, giving rise to a wide range of potential forms of interaction and .

Social Action contributions in 2019 totalled € 115,960, compared to € 99,505 in 2018.

- **COMMUNITY RELATIONS: PUBLIC ADMINISTRATIONS AND ASSOCIATIONS**

At Dominion, relations with the Public Administration must be conducted in a framework of the strictest laws, transparency and collaboration, both for obtaining permits and for bidding on public projects.

Either directly or through its subsidiaries, the Company is a member of a number of associations, which protect its interests as well as providing access to other training activities, discussion forums, business opportunities, R&D&I, news coverage, etc.

- **PROJECTS WHICH IMPROVE THE QUALITY OF LIFE OF COMMUNITIES**

It should also be noted that Dominion's activities include developing solutions and services which improve the quality of life of community members. By way of example:



SOCIAL PROTECTION

- > Platforms for coordinating prevention actions and responding to catastrophes:
 - Meteorological networks of Honduras and Venezuela
 - Tsunami protection in Chile
 - Upper Aguan River Valley Irrigation Project in Honduras



HEALTH

- > Improvement in hospital treatment:
 - Construction of the Hospital de Antofagasta (Chile)
 - Solutions for improvement in the management of hospital dietetics
 - Hospital pharmacy comprehensive management tools



INFRASTRUCTURES

- > Improvement in safety in the railway sector
 - Use of video content analytics for accident prevention at level crossings
- > Accessibility to energy
 - Laúca-Bita High Voltage Transmission Line Project in Angola



10.2

Subcontractors and suppliers

10.2.1 The inclusion of social issues, gender equality and the environment in the purchasing policy. In relations with suppliers and subcontractors taking into account their social and environmental responsibility

MANAGEMENT APPROACH

As already explained in section 6.3.1, Dominion mainly purchases finished products, primarily from international market leaders in their different activity sectors. These purchases are often made either as a partner of the producer in question or by purchasing these products from the distribution channel set up by the manufacturer. It is also worth noting that there is very limited repeat purchases in the solutions sector, given the wide variety of projects committed to. Finally, an almost insignificant amount of raw materials is purchased and these are often purchased from generalist distributors.

As a result, the Company sees this aspect to be of little significance.

Whatever the case, Dominion pays particular attention to its supply chain. As such, the relationships with suppliers are based on mutual trust and the professionals who work in the Purchasing Department in each division act according to Dominion's Code of Conduct, the Purchasing Policy and the Anti-corruption and Fraud Policy.

In financial year 2019, Dominion continued to take important steps in standardising relationships with suppliers, particularly in relation to the social and environmental values of the supply chain. Along these lines, has made progress in divulging its Purchasing Policy, creating a standard document for General Purchasing Conditions and establishing a requirement for suppliers to sign a Social Responsibility Commitment.

PURCHASING POLICY SUPPLY CHAIN

The Purchasing Policy aims to make ground in ensuring that the Company has a sound base of suppliers in line with universally recognised ethical, labour, social and environmental principles and based on which the Company directs its activity.

There is a Whistleblowing Channel which can be used by suppliers to report irregular conduct. No reports were filed to this effect in 2019.

Specifically regarding outsourcing, it is worth pointing out that Dominion uses this alternative for a number of specific activities, helping it to address peaks in activity, primarily in Spain. The quality and safety requirements are the same as Dominion's, thereby guaranteeing a sustainable and responsible chain.

10.2.2 Supervision systems and audits and their results

As explained previously in sections 6.3.1 and 10.2.1 above, and notwithstanding the Company's efforts to make progress on this matter, purchases made from suppliers are non-material in terms of a social and environmental perspective.

On the contrary, there is indeed periodic and detailed monitoring of subcontractors.

Supported by an IT tool, the requested information is continuously updated and will depend on the type of activity carried out, existing regulations, requirements dictated by the end customer and requirements that Dominion dictates to its suppliers, including those relating to social and environmental matters. Should an incident occur - which is easily detectable using the tool - the subcontractor is contacted quickly resolve it.





10.3

Consumers

10.3.1 Measures for the health and safety of consumers

MANAGEMENT APPROACH

Dominion provides Services and Solutions to more than one thousand companies around the world to allow them to focus on their core business, reduce costs and improve their efficiency. Its backlog essentially comprises the leading companies in its sector and it is extremely diverse both by sector and by geographical area.

In the B2C sector, primarily through the Phone House, Dominion sells Solutions and Services with an to millions of end customers using an omni-channel approach. In its virtually 500 shops, platforms and its websites, Phone House sells terminals, connections and other services for households and individuals, putting the customer at the heart of its strategy.

Most sales are made through Phone House professionals who inform customers about the: contracts to operators (mobile, landline phones and data), mobiles free of subscriptions, accessories, new household services, etc. The vast network of retail outlets, characterised by customer proximity, consists of both its own stores and franchises.

Given that the customer is placed at the heart of all business, Phone House surveys them to measure their satisfaction after having visited a store and having the made a purchase or not. To this end, research referred to as NPS (Net Promote Score) is conducted on buyers. A few days after the customer has visited the store, they are contacted over the phone and asked if they would recommend their experience at Phone House.

Also, Phone House stores are designed particularly making sure that the facilities meet all accessibility and security requirements for both customers and employees.

10.3.2 Complaints systems, complaints received and their solution

As part of its commitment to the customer, Dominion's B2C companies are subject to a strict complaint management system. The main details regarding this system for 2019 are as follows. Over the course of this financial year, 1,472 complaints were lodged and dealt with at Phone House stores, 198 complaints lodged at Conexión stores and 362 complaints lodged at Alterna.

It is also important to note that the Company is well aware of regulations concerning the disclosure of personal information, particularly regarding customers and employees. Throughout 2019, Dominion has continued working on the adaptation of the new Data Protection Regulation; particularly with regards to new business it has begun working on.



10.4

Tax Matters

10.4.1 Earnings by country Tax on Profit paid

MANAGEMENT APPROACH

Dominion's activity contributes to the economic dynamism of communities it operates in by paying taxes, creating jobs and hiring suppliers.

To this regard, Dominion's Tax Policy and the Code of Conduct stress the importance of satisfying tax obligations in accordance with current legislation. These standards specifically prohibit avoiding payments or receiving illicit profit at the expense of the Tax authorities or Social Security.

Pre-tax profits earned by Dominion in 2019 are detailed in the following table:

Country	2019	2018
	Profit/(loss) before corporate tax (thousands of €)	Profit/(loss) before corporate tax (thousands of €)
Germany	-2,817	-4,326
Arabia	1,979	1,216
Argentina	997	-345
Australia	1,970	1,828
Bahrain	120	112
Brazil	0	-8,979
Canada	-14	1,353
Chile	1,837	-43
Columbia	21	100
Denmark	39	-627
UAE	-520	-61
Slovakia	769	-305
Spain	13,091	16,979
France	674	1,219
India	3,095	-343
Italy	5,890	11,319
Mexico	-675	2,711
Qatar	2	
Oman	612	-159
Peru	-422	-2,488
Poland	518	-1,245
South Africa	1	-15
UK	-12	-24
USA	2,143	-1,120
TOTAL	29,300	16,757

The details of the amounts paid in 2019 are provided in the table below:

Country	2019	2018
	Corporate Tax paid (cash settlement system) (thousands of €)	Corporate Tax paid (cash settlement system) (thousands of €)
Germany	66	334
Arabia	0	400
Argentina	113	50
Spain	1,045	814
France	165	137
Italy	2,931	517
Mexico	903	14
Poland	2	46
Others (*)	1,312	0
	6,537	2,312

*Others includes the following countries: Australia, Chile, Columbia, Slovakia, India, Peru and USA.

As regards both tables, it should be pointed out that there is no direct relationship between them because there is no time correlation between them and because there are tax loss carryforwards from previous financial years that could have been offset.

10.4.2 Public subsidies received

In keeping with its technological vitality approach, Dominion's various units always review their offers based on all the different technological innovations available so as to provide a timely solution or service offer that best suits the customer's requirements.

Accordingly, Dominion actively presents its R&D&i projects to funding programs backed by public bodies. During financial year

2019 the amount received in this respect amounted to € 652,186 compared to € 592,607 the previous year. The above was received exclusively in Spain. Additionally, other subsidies were received, not related to R&D&i, for € 105,040, compared to € 71,138 previously.

A hand is pointing at the screen of a laptop. The laptop is open, and the screen displays some text. The background is dark. On the left side, there is a solid blue vertical bar. The text is white and centered on the blue bar.

Annex I. Traceability between Law and GRI

Traceability between Law and GRI

Business model	GRI [102-1; 102-2; 102-3; 102-4; 102-6; 102-7; 102-14]
Policies	GRI [103]
Results of the policies; KPIs	GRI [103]
Risks in the Short, Medium and Long Term	GRI [102-15]
KPIs	GRI [102-54]
Environmental issues <ul style="list-style-type: none"> • Global Environment • Pollution • Circular economy and the prevention and management of waste • Sustainable use of resources • Climate change • Protection of biodiversity 	GRI [103; 102-11] GRI [103] GRI [103] GRI [103; 302-1] GRI [103; 304-2]
Social Issues and Human Resources <ul style="list-style-type: none"> • Employment • Work organisation • Health and safety • Social relationships • Training • Universal accessibility for disabled people • Equality 	GRI [102-8; 103; 401-1; 405-1; 405-2] GRI [103; 403-2] GRI [103; 403-2; 403-3] GRI [102-41; 103; 403-4] GRI [103; 404-1] GRI [103] GRI [103]
Human Rights	GRI [102-16; 102-17; 103; 406-1; 407-1; 408-1; 409-1; 412-2]
Bribery and Corruption	GRI [102-16; 102-17; 103; 205-2; 413-1]
Social Responsibility <ul style="list-style-type: none"> • The company's commitment to sustainable development • Subcontractors and Suppliers • Consumers • Tax Matters 	GRI [102-12; 102-13; 102-43; 103; 203-1; 203-2; 413-1; 413-2] GRI [102-9; 103; 308-1; 414-1] GRI [103] GRI [103; 201-4]



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