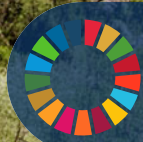


# 2025 Sustainability *report*

Consolidated Non-Financial  
Statement



Globalvia supports  
the Sustainable  
Development Goals

## Performance in 2025

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## Performance in 2025

<p><b>12</b> COUNTRIES</p>	<p><b>97/100</b> GRESB SCORE</p>
<p><b>91%</b> QUALITY ISO 9001</p>	<p><b>82%</b> ENVIRONMENT ISO 14001</p>
<p><b>82%</b> HEALTH AND SAFETY ISO 45001</p>	<p><b>14%</b> REDUCTION IN SCOPE 1&amp;2 EMISSIONS (SBTi) vs. 2024</p>
<p><b>22%</b> DECREASE IN WATER CONSUMPTION vs. 2024</p>	<p><b>77%</b> ELECTRICITY FROM RENEWABLE SOURCES</p>
<p><b>3.9/5</b> EMPLOYEE SATISFACTION</p>	<p><b>27,055</b> HOURS OF TRAINING</p>
<p><b>94%</b> INDEFINITE-TERM CONTRACTS</p>	<p><b>43%</b> DECREASE IN NUMBER OF COMPLAINTS (Highways) vs. 2024</p>
<p><b>594,270</b> EUROS IN SOCIAL CONTRIBUTIONS</p>	<p><b>91%</b> LOCAL PURCHASING</p>

## Message of Management

### GRI 2-22

Across Globalvia, 2025 has been a year of determined progress in safety, sustainability and operational excellence. This Sustainability Report reflects our continued commitment to responsible management, long-term value creation and the positive impact of our activity on the societies and environments in which we operate.

Across our geographies, we have continued to strengthen our concession companies as benchmarks in these areas. In Highways, In Costa Rica and Chile, we have further consolidated our businesses and obtained new, highly relevant international certifications, reinforcing our leadership in safety and sustainability. Ruta Portuaria (Colombia) has completed major bridge and pavement renewal works, enhancing safety and efficiency, while making a significant effort to electrify its patrol fleet using self-generated electricity, resulting in a substantial reduction in its carbon footprint. In the United States, Pocahontas Parkway has continued to advance in innovation and energy management, with initiatives such as the upgrade of lighting systems to LED technology.

In Portugal, our concessions remain a benchmark in road safety and technology, as demonstrated by the development of the digital twin of the Corgo Viaduct. In Ireland, we have continued to deliver the highest levels of service, with a strong focus on sustainability through emission reductions achieved via specific paving works.

In trains, Metro de Sevilla C.J.A., S.A. has once again broken passenger records. During the year, we approved the acquisition of five new trains to continue improving service quality and user experience.

From a climate changing perspective, 2025 has been a year of important milestones for the Group. We successfully revalidated our Science Based Targets initiative (SBTi) emission reduction objectives, reaffirming our commitment to reduce absolute Scope 1 and 2 greenhouse gas emissions by 76.78% by 2035 compared to the 2019 base year, and to reduce absolute Scope 3 emissions by 40% over the same period. In parallel, we undertook a comprehensive review of our Decarbonisation Plan, ensuring its alignment with our long-term climate ambition. All these achievements are guided by our vision of sustainability and solidarity, reflected in the ESG programs implemented across our concessions and our commitment to the communities we serve.

The year has also included particularly sensitive moments, as we reached the end of important projects such as Autopista del Itata, Autopista del Aconcagua and disposed M-407. We would like to express our sincere thanks to all the teams involved for their valuable legacy they leave at Globalvia. Looking ahead, we know that challenges will continue. However, 2025 has once again shown that our true strength lies in facing them together, with commitment and a shared vision. Kind regards,

**Lucas Martínez Vuillier**<sup>(\*)</sup>  
Chief Financial Officer



**José Gómez de Barreda Tous de Monsalve**<sup>(\*)</sup>  
General Counsel



(\*) Acting jointly under power of attorney

# 1. About us

## 1.1 Mission, vision and values

### GRI 3-3, 2-1

Global Vía Infraestructuras, S.A. (“Globalvia”), incorporated in 2007, places transport infrastructure and mobility solutions at the service of people, thus contributing to creating societies that are better connected, and more cooperative and sustainable.

With a presence in 12 countries and three continents; Europe, America and Asia, and more than 28,000 employees<sup>1</sup> (including all the subsidiaries in which we hold a majority or minority ownership interest), we are leaders in the management of transport infrastructure and mobility service concessions designed to foster the sustainable development of the communities in which we operate.

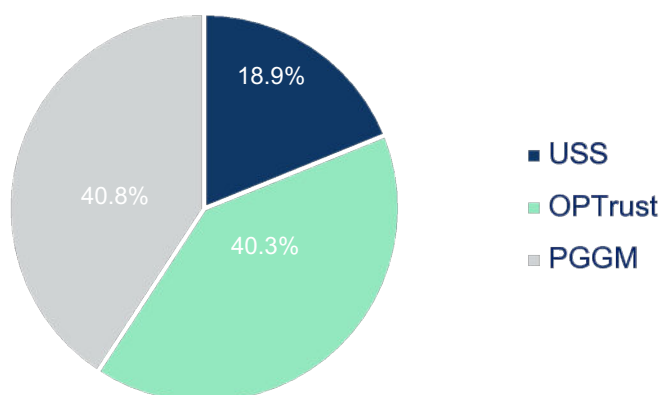
Our mission is to create long-term value for our stakeholders by operating and investing in sustainable transport infrastructure and mobility services.

For that purpose, we move forward day by day inspired by our vision to improve mobility globally for the well-being of society. Our values are commitment, solutions, excellence and passion.

- **Commitment:** our actions are aligned with our goals.
- **Solutions:** we find solutions that add value through our activity, with the will to succeed and the attitude required to exceed expectations.
- **Excellence:** we promote the sharing of knowledge as a guide for learning and growth.
- **Passion:** we work with optimism to meet the needs of our users and customers.

### Breakdown of the shareholding structure

The pension funds Stichting Depository PGGM Infrastructure Funds (“PGGM”), Canuck Capital Limited<sup>1F2</sup> (“OPTrust”) and USS Nero Limited (“USS”) have owned all of our shares since 2016.



<sup>1</sup> Global figures for the subsidiaries in the business group, including people at the companies in which Globalvia holds majority and minority ownership interests. The individual companies in the Group included in the scope of this Sustainability Report are detailed in Chapter 2.1, “Basis for the preparation of the report”.

<sup>2</sup> On 2 December 2022, the shares of OPTrust were sold to Canuck Capital Limited (CCL), which is a subsidiary of OPTrust.

## 1.2 Sectoral and sustainability macro trends

In the year 2025, the global context has been marked by persistent geopolitical tensions, changes in political cycles across major economies and increasing pressure from climate-related impacts. Prolonged conflicts, together with the reconfiguration of industrial and energy policies, have significantly influenced global trade flows and investment decisions.

In this context, extreme weather events have recurrently affected infrastructure and transport systems, highlighting the need for more resilient assets better adapted to physical climate risks. From an economic perspective, the global economy has maintained a moderate and stable growth path despite a restrictive financial environment and, according to the International Monetary Fund (IMF), global growth has stood at around 3.2% in 2025, with medium-term prospects pointing to a slowdown.

### 1.2.1 Sectoral trends

The infrastructure and transportation industry continues to be affected by major global trends, giving rise to a variety of impacts in different geographical areas. Nevertheless, the following industry trends across geographies can be identified:

- **Investment reorientation:** Public and private investment has increasingly been directed towards projects that have enhanced resilience, operational efficiency and decarbonisation, with a stronger role for public-private partnership models.
- **Climate resilience and adaptation:** Climate adaptation criteria have increasingly been integrated into the design, construction and operation of infrastructure, with a focus on service continuity.
- **Digitalisation and efficiency:** The deployment of intelligent systems, data analytics and predictive maintenance has driven improvements in efficiency, safety and service quality.
- **Regulatory evolution:** Regulatory and contractual frameworks have progressively incorporated environmental, social and governance requirements, raising expectations for monitoring and performance.

### 1.2.2 Sustainability trends

Sustainability continues to be a significant matter on the agendas of large international companies in all industries. Recent trends have seen companies increasingly focus on the integration of ESG criteria into core business strategies.

- **Climate change risks:** Physical and transition risks related to climate change have continued to be among the main challenges for infrastructure and transport management.
- **Low-emission vehicles:** The gradual integration of electric and alternative-fuel vehicles has advanced, requiring infrastructure adaptation through new charging points and specialised services.
- **Biodiversity decline and natural capital:** The progressive decline of biodiversity and the degradation of natural capital are emerging as key strategic considerations. Infrastructure assets are increasingly expected to assess their impacts and dependencies on ecosystems, land use and ecosystem services, incorporating nature-related risks into planning and decision-making processes.

- Intelligent systems and impact reduction: The deployment of advanced tolling, free-flow systems and intelligent management solutions has contributed to reducing emissions, noise and resource consumption.
- Supply chain transparency: Requirements for transparency on environmental, social and governance practices across the entire value chain have increased, particularly in complex international supply chains.

## 1.3 The response of Globalvia

### GRI 3-3

As the infrastructure and transportation sector continues to evolve, at Globalvia we respond to emerging challenges through clear commitments and a broad set of solutions embedded in our activities. Changing investment priorities, growing climate risks, digital transformation and evolving regulatory expectations are shaping how infrastructure is designed, operated and managed. Our approach reflects this shift by supporting more resilient, efficient and lower-impact infrastructure across markets.

This strategic direction continues to be reinforced by the results of our double materiality assessment. The analysis reaffirms the continued importance of proactively managing climate-related matters, with a focus on energy efficiency, decarbonisation and climate resilience, as well as ESG integration across the value chain and resilience to macro-economic and socio-political changes, all of which are closely aligned with the key trends shaping the infrastructure sector. At the same time, it underscores the sustained relevance of health, safety and employee well-being, together with our contribution to local and social development, recognising these as fundamental priorities for our stakeholders. Together, these insights guide our strategic focus and inform the decisions and actions we take across the business.

Our approach to integrating sustainability across the business is articulated through our strategic plan, “SustainMobility 2027”. The plan brings together a comprehensive set of objectives and action areas covering user-centred mobility, climate-resilient infrastructure, support for people, communities and diversity, strengthened governance practices, and the use of data, reporting and automation to enable sustainable change. Following a full revision of the plan and an increase in our level of ambition, this framework now underpins a wide range of initiatives that collectively form the backbone of our sustainability and decarbonisation efforts.

In parallel, and in response to increasing regulatory expectations, investor scrutiny and the growing recognition of climate change and biodiversity loss as systemic risks, we continue to evolve our broader sustainability approach by aligning with recognised frameworks and strengthening the way we identify and manage climate-related risks and opportunities, and the Taskforce on Nature-related Financial Disclosures (TNFD), enhancing our understanding of nature-related risks, dependencies and impacts.

This Report reflects our commitment to openness and dialogue with stakeholders at a time when transparency has become both an expectation and a responsibility. It brings together the actions and initiatives carried out in 2025, the impacts generated by our activities, and the challenges and opportunities we have navigated, while also marking our continued steps towards aligning with the new sustainability reporting standards.

Our commitment to innovation is driven by the Globalvia Innovation Framework, which aims to boost mobility asset management and ESG innovation across Globalvia through artificial intelligence, strategic collaborations and a focus on incremental value creation. It also seeks to respond to the transformation of the infrastructure industry and the evolving demands of users, cities, public authorities, and society. Our purpose and objectives in relation to infrastructure innovation and infrastructure digitalisation are outlined in the Diginnovate Plan.

## 1.4 Partnerships and recognition for sustainable development

One of the main means of achieving a more sustainable society is through the [collaboration with other stakeholders](#), which is why we are proud to be part of a selected group of partnerships, including the following:

### United Nations Global Compact



Since 2012 we have formed part of this Compact, which supports and promotes the achievement of ten universal principles relating to human rights, labour standards, the environment and anti-corruption. As signatories, we are committed to including these principles in the Organisation's strategy, culture and activities, and to reporting on our progress.



### Science Based Targets Initiative

Since 2020, we have participated in the SBT initiative through our commitment to setting science-based emission reduction targets, thus contributing to the transition towards a low-carbon economy.



### Agenda 2030 - Sustainable Development Goals (SDGs)

Our Sustainability Strategy is aligned with the achievement of the SDGs. Further information is in Chapter 2.4.1.2, "[Agenda 2030 - Contribution to the SDGs](#)".



### The Business Network for LGBTI Diversity and Inclusion (REDI)

REDI is the first ecosystem of companies and professionals in Spain that works to promote safe and respectful work environments for all people, regardless of their identity, sexual characteristics, gender expression or sexual orientation. At Globalvia we are proud to be members of this network to continue promoting diversity and inclusion.



### GRESB | Global ESG Benchmark for Real Assets

We participated for the tenth consecutive year in the GRESB sustainability index. In 2025 we were awarded 97 points out of 100.

## 1.4.1 Recognition

- **Ruta 27**

For the second year in a row, Ruta 27 was recognised by Summa magazine as one of the **thirty most sustainable companies in Costa Rica**. This ranking, based on surveys conducted among business leaders in Central America and the Caribbean, highlights the concession's efforts in environmental protection, its positive contribution to society and the high quality standards applied in its day-to-day operations. In addition, the Ruta 27 team was recognised by the Asociación para el Liderazgo y Ascenso Social (ALAS) during the "Noche Magenta" event for its commitment to gender equality, further reflecting its dedication to inclusive and responsible management practices.

- **M45 Conservación**

Our M45 Conservación team was recognised by the Community of Madrid with a **Special Mention at the VII Occupational Risk Prevention Awards**, especially for its good practices in the management of psychosocial risks in the workplace. The integral project active since 2017 is focused on promoting mental, emotional and physical well-being, including pioneering training on post-traumatic shock for first responders and the implementation of the "Canal Alerta", an anonymous reporting channel for workplace harassment.

- **Globalvia Chile**

Globalvia Chile was awarded the **PRO Seal by the Chilean Chamber of Construction**, achieving the Advanced level following a rigorous evaluation process. Our motorway concessions in Chile stood out for their outstanding performance in two key pillars: Occupational Health and Safety, and Innovation and Productivity, positioning Globalvia Chile above the sector average and validating its commitment to high standards in labour management and continuous improvement.

- **Metro de Sevilla C.J.A., S.A.**

The Wayfinding project at Metro de Sevilla C.J.A., S.A. received a Special Mention in the category **"Most Improved System"** at the Global Light Rail Awards 2025, held in London, which highlighted innovation and best practices within the light rail transport industry. The award recognised the performance of the Concession through its Wayfinding project implemented on Line 1, which has improved orientation, accessibility and passenger flows.

## 1.4.2 Participation at events

- In May, Bluenest by Globalvia launched a **pioneering pilot project for the transport of medical tests by drone in La Gomera** (Canary Islands, Spain), in collaboration with the Island Council of La Gomera, Proexca and the La Gomera Health Authority. The initiative marked a significant milestone in the development of sustainable and efficient advanced air mobility solutions applied to healthcare logistics and was presented to local and regional authorities, as well as the media.
- Furthermore, in the same month, we **participated once again in the ASECAP Information and Study Days**, a benchmark event for the European road infrastructure and transport sector held in Madrid. Several Globalvia professionals took part as speakers, sharing insights on topics such as digital twins, cybersecurity and toll digitalisation, thereby reinforcing our Organisation's role in innovation and sector dialogue.
- In July, **we participated in the UK Light Rail Conference**, a forum for urban and metropolitan mobility focused on light rail, where the Head of Communication and

Customer Relations at Metro de Sevilla C.J.A., S.A. presented Metro de Sevilla C.J.A., S.A.'s new Wayfinding and signage strategy, designed to facilitate passenger orientation and optimise passenger flows throughout the facilities.

- In September, within the framework of the European U-ELCOM project and coinciding with the European Mobility Week, Bluenest by Globalvia successfully **carried out a new demonstration flight of a logistics drone** between Carlos III Hospital and La Paz University Hospital in Madrid. The event, organised together with the Regional Government of Madrid and La Paz University Hospital, showcased the potential of advanced air mobility for intra-hospital medical logistics in urban environments.
- Along the year we were present as well in several relevant sectorial events such as: **Rail Live**, that brings together leading players in innovation, investment and transformation within the rail sector; **Investestructuras**, which has become a benchmark in the infrastructure, investment and mobility sector, gathering leading public and private experts; and the **IBTTA Global Tolling Summit**, a dedicated forum to explore and dig in latest innovation and operational trends in the tolling sector.

## 2. General information

### 2.1 Basis for reporting

#### 2.1.1 General basis for the preparation of the Sustainability Report

GRI 2-2, 2-3, 2-14

This report contains the non-financial information of Global Via Infraestructuras, S.A. for 2025, encompassing the period from 1 January to 31 December 2025. The information included is consolidated and refers to all the activities in which Globalvia has a majority ownership interest and control, which corresponds to the scope of consolidation for accounting purposes.

The report details the scope of the sustainability information through a list of the entities included, as well as those that have been excluded. This scope allows for a clear and precise understanding of the data considered, ensuring the transparency and relevance of the analysis presented. Thus, the entities included in the Report are as follows:

- GLOBAL VIA INFRAESTRUCTURAS, S.A.
- GLOBALVIA INVERSIONES, S.A.U
- CONCESIONES DE MADRID, S.A.
- COMPAÑÍA CONCESIONARIA TÚNEL SÓLLER, S.A.
- RUTA DE LOS PANTANOS, S.A.
- PROMOTORA DE INFRAESTRUCTURAS, S.A.
- AUTOPISTAS DEL SOL, S.A. (Ruta 27)
- TACEL INVERSIONES, S.A.
- AUTOPISTA CENTRAL GALLEGA, S.A. (ACEGA)
- METRO BARAJAS SOCIEDAD CONCESIONARIA, S.A.
- OPERALIA INFRAESTRUCTURAS, S.A.
- DALIBOR INFRAESTRUCTURAS, S.L.
- GVI IRLANDA LTM
- GVI US CORPORACIÓN
- CHILENA DE GLOBAL VÍA, S.A.
- GLOBAL VÍA INFRAESTRUCTURAS CHILE, S.A.
- SOCIEDAD DE INVERSIÓN GLOBAL VÍA CHILE, S.A.
- S.C. ACONCAGUA, S.A.
- S. C. ITATA, S.A.
- OPERESTRADAS XXI, S.A.
- AUTOESTRADA XXI-SU.TRANS, S.A.
- SCUTVÍAS AUTOESTRADAS BEIRA INTERIOR, S.A.
- MANUTENÇÃO RODOVIAS NACIONAIS, S.A.
- GLOBAL RAÍL, S.A.
- PORTVIAS-PORTAGEM DA VIAS, S.A.
- GLOBALVIA INVERSIONES PORTUGAL, S.A.U.
- METRO DE SEVILLA C.J.A., S.A.
- SOLAR COCHERAS, S.L.
- SOLAR GUADAIRA, S.L.
- TALLERES HUERTO SOLAR, S.L.

- PETROTRANS-GASOLINEIRA DE LAMARES, U. LDA.
- POCAHONTAS PARKWAY OPERATIONS, LLC
- GLOBALVIA INVERSIONES HOLDINGS, LLC
- MAGNOLIA OPERATIONS HOLDINGS, LLC
- GVI OPERATIONS USA, LLC
- MAGNOLIA OPERATIONS HOLDINGS II, LLC
- INTEVIAS-SERVIÇOS DE GESTAO, S.A.
- GLOBAL RAIL CATALUNYA, S.L.U.
- GLOBALVIA GVIT, S.L.U.
- S.C.A. COSTA ARAUCO, S.A.
- GLOBALVIA CHILE SPA
- GLOBALVIA SUR, S.L.
- GLOBALVIA JONS, LTD
- EAGLE RAIL, S.A.
- OPENVIA MOBILITY, S.L.
- OPENVIA MOBILITY USA, LLC
- GLOBALVIA LICITACIONES E INFRA CHILE SPA
- OPENMOBI PORTUGAL UNIPessoal LDA (Openvia Portugal)
- OPENVIA AIR S.L.U. (Bluenest by Globalvia)
- GALAPA HOLDINGS S.A.S.
- SF CONVIAS S.A.S. (Ruta Portuaria)
- EXPROESTRADAS XXI-AE TRANSMONTANA, S.A.

In the case of quantitative information relating to the environment, data is reported only for those subsidiaries that have a work centre and/or whose activity generates an environmental impact (consumption of resources, generation of waste and/or emissions). In the cases in which there are variances with respect to this scope, this will be indicated along with the corresponding information. The non-concession operators include Openvia Mobility, S.L., Openvia Mobility USA, LLC, Openvia Portugal, and Bluenest by Globalvia. Moreover, Ruta de los Pantanos, S.A., S.C. Aconcagua, S.A. and S.C. Itata, S.A. remain within the consolidation perimeter until their definitive exit but are no longer operating entities. Consequently, certain operational information is not available for the period following the cessation of operations. In the case of S.C. Aconcagua, S.A. and S.C. Itata, S.A., which exited in March 2025, the quantitative information includes the portion corresponding to the first quarter of the year.

Lastly, it should be noted that this document is submitted for approval by the Board of Directors in a formal session, where it is addressed as a specific and independent item on the agenda, following the same criteria for approval, registration and publication as the consolidated financial statements. The point of contact for queries regarding this report is [einf@globalvia.com](mailto:einf@globalvia.com).

## 2.1.2 Information on specific circumstances

### GRI 2-4

This document addresses the non-financial and diversity information requirements established by Spanish Law 11/2018, of 28 December. Furthermore, we prepared the information presented with reference to the GRI (Global Reporting Initiative) Standards. Accordingly, the main non-financial performance indicators have been developed in accordance with current corporate law provisions and with the international GRI Standards, the international reporting framework

provided for in the new Article 49.6.e) of the Spanish Commercial Code introduced by Law 11/2018.

In line with this approach, the principles established by law have been applied in the preparation of the report, while maintaining alignment with GRI 1 – Foundation 2021: the Comparability, Reliability, and Relevance principles.

Furthermore, in accordance with GRI 1 – Foundation 2021 in the sustainability context (“The Organisation shall report information about its impacts in the wider context of sustainable development”), the Materiality principle has also been applied.

Moreover, in 2024 we began work on analysing and implementing the requirements of the CSRD. Although its application was not mandatory in 2024, we directed our efforts towards complying with it, in order to position the Organisation as a benchmark in reporting and permit it to align itself with the new sustainability dynamics. In this way, in 2025 we have continued to maintain the efforts made in 2024, gradually implementing the CSRD Directive.

Similarly, it is important to note that the additions by reference made in the Report refer to subsidies received and the remuneration of directors indicated in Notes 14.c and 22.b, respectively, to the financial statements.

Lastly, as can be seen in Appendix VII [Assurance Report](#) to this Report, external assurance providers verified the information.

## 2.2 Stakeholder engagement and participation

### GRI 2-29

#### 2.2.1 Identification and description of stakeholders

We acknowledge that our activity is linked directly to our stakeholders. According to our Integrated Management System (IMS), one of the key elements is to work to serve such parties, guaranteeing their satisfaction, protecting the environment, and ensuring the safety and health of employees. Furthermore, one of the cornerstones of our SustainMobility Sustainability Strategy 2025-2027, is to strengthen good governance in our relationships, placing particular focus on generating trust among the stakeholders.

For all these reasons, we have created communication channels to identify their needs and expectations and offer optimal responses. This relationship is regulated through the [Stakeholder Communication Policy](#), the principal objective of which is to establish the general guidelines for ensuring fluent communications with our stakeholders, with special attention paid to the transparent management of our activities.

Description of the principal stakeholders

Internal Stakeholders	Employees	Shareholders	Globalvia Group subsidiaries	Openvia	Corporation
<b>Description</b>	Persons who have an employment relationship with any Globalvia company based on the description included in the "Globalvia subsidiaries" section below.	Owners of part of the share capital of Globalvia. In 2025: OPTrust, PGGM and USS.	Companies in which we hold an ownership interest of more than 50%.	Globalvia technology platform.	Relating to Globalvia Inversiones, S.A.U.'s corporate headquarters.
<b>Interaction channel</b>	<ul style="list-style-type: none"> <li>Satisfaction surveys</li> <li>Meetings</li> </ul>	<ul style="list-style-type: none"> <li>Committee meetings</li> <li>Meetings</li> </ul>	<ul style="list-style-type: none"> <li>Conferences</li> <li>Meetings</li> </ul>	<ul style="list-style-type: none"> <li>Conferences</li> <li>Meetings</li> </ul>	<ul style="list-style-type: none"> <li>Conferences</li> <li>Meetings</li> </ul>
<b>Principal expectations</b>	<ul style="list-style-type: none"> <li>Professional development</li> <li>Improved salary</li> <li>Work-life balance and remote working</li> <li>Good work environment</li> </ul>	<ul style="list-style-type: none"> <li>Increased demand</li> <li>Improved health and safety conditions (own staff, external staff and users)</li> <li>Contribution to a low-carbon economy</li> <li>Social and environmental impact</li> <li>Transparency and complete information</li> <li>ESG data quality for decision-making</li> </ul>	<ul style="list-style-type: none"> <li>Sharing knowledge and information</li> <li>Collaboration on projects</li> <li>Sharing supply chain information (synergies)</li> </ul>	<ul style="list-style-type: none"> <li>Projects and cooperation that promote innovation, digitalisation and sustainability</li> </ul>	<ul style="list-style-type: none"> <li>Proactivity in projects</li> <li>Sharing of good practices and news</li> </ul>

External Stakeholders	Grantors	Users	Suppliers	Banks	Shareholders
<b>Description</b>	Public administration body or institution that grants an administrative concession.	Person who benefits directly and in common with other persons from public infrastructure or the provision of a service derived from a public-private partnership project.	Natural or legal persons who provide goods, services or resources to a company so that it can carry on its operations.	Intermediary for transactions in the financial area.	Legal or natural persons, entities or organisations with which a company maintains commercial, strategic or collaborative relationships so that it can carry on its activities or fulfil its company object.
<b>Interaction channel</b>	<ul style="list-style-type: none"> <li>Meetings</li> <li>Satisfaction surveys</li> </ul>	<ul style="list-style-type: none"> <li>Suggestions</li> <li>Claims</li> <li>Customer Experience</li> <li>Satisfaction survey</li> <li>Mystery shopper</li> </ul>	<ul style="list-style-type: none"> <li>Meetings</li> <li>Satisfaction surveys</li> </ul>	<ul style="list-style-type: none"> <li>Meetings</li> </ul>	<ul style="list-style-type: none"> <li>Meetings</li> <li>Satisfaction surveys</li> </ul>
<b>Principal expectations</b>	<ul style="list-style-type: none"> <li>Positive impact of the asset on the social, environmental and economic environment</li> <li>Improvement of contractual agreements</li> <li>Responsible, efficient and safe management</li> </ul>	<ul style="list-style-type: none"> <li>Approachable and attentive staff</li> <li>Fast and effective management of incidents</li> <li>Good environmental practices</li> <li>Information (real time/rapid)</li> </ul>	<ul style="list-style-type: none"> <li>Improvement of economic conditions</li> <li>Continuation of the working relationship</li> <li>Receipt of up-to-date information on health and safety</li> <li>Good environmental practices</li> </ul>	<ul style="list-style-type: none"> <li>Trust</li> <li>Lasting relationship</li> <li>Financial strength</li> </ul>	<ul style="list-style-type: none"> <li>Win-to-win relationship</li> <li>New projects</li> </ul>

External Stakeholders	External prevention service and mutual insurance company	Emergency and law enforcement services	Educational centres	Associations and non-profit entities	Local communities
<b>Description</b>	Specialised companies whose objective is to support other companies in order to guarantee adequate protection of the safety and health of workers.	Specialised agencies that have specific responsibilities and objectives to serve and protect people and property in emergency situations.	Institution dedicated to education.	Non-profit organisations that work for the benefit of the community.	People who live or work in areas close to the operations carried on by Globalvia, such as neighbourhoods, towns or cities.
<b>Interaction channel</b>	<ul style="list-style-type: none"> <li>Meetings</li> </ul>	<ul style="list-style-type: none"> <li>Meetings</li> <li>Drills</li> </ul>	<ul style="list-style-type: none"> <li>Suggestions</li> <li>Forums</li> </ul>	<ul style="list-style-type: none"> <li>Meetings</li> </ul>	<ul style="list-style-type: none"> <li>Meetings</li> </ul>
<b>Principal expectations</b>	<ul style="list-style-type: none"> <li>Cooperation for the development of collaborative work</li> <li>Application of the best health and safety practices</li> </ul>	<ul style="list-style-type: none"> <li>Improvement of the security of citizens</li> <li>Collaboration and cooperation</li> <li>Fluid relationship</li> </ul>	<ul style="list-style-type: none"> <li>Collaboration on initiatives</li> <li>Educational visits</li> <li>Reception of students on internships</li> </ul>	<ul style="list-style-type: none"> <li>Positive impact on the community and on environmental or social issues</li> <li>Collaboration and commitment in joint initiatives</li> </ul>	<ul style="list-style-type: none"> <li>Collaboration and local initiatives</li> <li>Positive impact on local social/employment and environmental areas</li> <li>Promotion of local commerce and trade</li> </ul>

External stakeholders	Media	Insurance companies
<b>Description</b>	Communication channels and instruments that make it possible to exchange information.	Entity specialised in Financial Risk management through the sale of insurance policies.
<b>Interaction channel</b>	<ul style="list-style-type: none"> <li>Specialised agency that acts as an intermediary. When a specific corporate event or milestone occurs, the agency transmits to the media the messages agreed upon by Globalvia. Editorial opportunities and participation in events for prominent profiles of the Organisation are proactively sought.</li> <li>Meetings</li> </ul>	<ul style="list-style-type: none"> <li>Meetings</li> </ul>
<b>Principal expectations</b>	<ul style="list-style-type: none"> <li>Transparency</li> <li>Collaboration on initiatives or projects</li> <li>Increase in reputational value</li> </ul>	<ul style="list-style-type: none"> <li>Implementation of best practices and compliance controls – Environment, Occupational Health and Safety, Data Protection, Information Security.</li> </ul>

## 2.2.2 Relationship and communication with stakeholders

We foster a close relationship with our stakeholders through the interaction channels listed in the previous section.

Communication and general engagement relate to matters corresponding to our operational development at Globalvia and with our objectives, and are managed mainly through operational channels integrated into daily tasks.

## 2.2.3 Management and addressing of stakeholder expectations

### Consideration of expectations

The interests and expectations of stakeholders play a crucial role in the evolution of our Organisation's strategy and business model. Through ongoing dialogue with shareholders, employees, customers, suppliers and other key stakeholders, we consider their needs, priorities and concerns to inform our decisions and define our strategic focus. These interactions enable us to identify opportunities to adapt our transport infrastructure solutions and strengthen our internal practices. By integrating these perspectives, we ensure that our strategy and business model remain relevant, resilient and sustainable, aligned with stakeholder expectations and long-term environmental and social trends.

### Governance

The Board of Directors of Globalvia, together with its entities and companies, is committed to communicating in a balanced manner and on a regular basis the relevant issues related to the Organisation, ensuring that all stakeholders receive clear and objective information. Regarding transparency, the information provided needs to be sufficient, accurate, timely and equitable, using the appropriate communication channels to facilitate direct and effective contact between the issuer and the recipients of the information, while also allowing interaction between the parties involved.

## 2.3 Double materiality assessment

### 2.3.1 Description of the process for the determination and assessment of material impacts, risks and opportunities.

#### GRI 3-1, 3-2

In 2023, we carried out the double materiality assessment in accordance with the provisions of Corporate Sustainability Reporting Directive 2022/2464 (CSRD), as well as the standards established by EFRAG (the European Financial Reporting Advisory Group).

This assessment requires viewing materiality from two perspectives: on the one hand, impact materiality, which consists of an inside-out view (i.e., the positive and negative impacts that the Company can have on the environment and society); and, on the other, financial materiality, which adopts an outside-in view (the financial risk or opportunity that could affect the Company).

The phases of the double materiality assessment carried out consisted of the following components:

- Analysis of the context and similar companies in the sector
- Identification of Impacts, Risks and Opportunities (IROs)
- Prioritisation of material topics
- Consolidation of results in a materiality matrix

### **i. Analysis of the context and companies in the sector**

This analysis allowed us to identify the main trends in the sector and, in a preliminary manner, the potentially material topics and subtopics pursuant to European Sustainability Reporting Standard (ESRS) 1, "General Principles".

The main objective was to examine both the internal and external environment of Globalvia, in order to obtain the information required to identify the IROs in relation to the natural and socioeconomic environment in which we operate.

To do so, we considered different lines of our business, including highways, railways, innovation and our participation in Go-Ahead Group, specialised in bus and railway transport at a global level, as well as taking into account our values and corporate strategy.

The analysis of the external context was carried out based on the current regulatory framework on ESG topics, sector trends and a comparative analysis of the best practices of our competitors within the sector.

### **ii. Identification of Impacts, Risks and Opportunities (IROs)**

At Globalvia we have carried out previous materiality assessments that have made it possible to identify the key IROs. In the reporting period of 2023, we performed an impact materiality assessment in accordance with the guidelines set forth in GRI standard "GRI 3: Material topics" and the results of this analysis were considered as another source of information in the identification of IROs.

In addition, an internal and external consultation process was conducted, together with the analysis of the context, making it possible to qualitatively and quantitatively characterise the material topics and their associated IROs.

### **iii. Prioritisation of material topics**

The prioritisation of topics was carried out by evaluating their corresponding IROs.

- A sustainability matter is material from an impact perspective when it is related to positive or negative, actual or potential impacts on people or the environment in the short, medium or long term.
- The financial materiality of a sustainability matter is established if it triggers, or could trigger, effects on financial performance.

We assessed the materiality of these risks and opportunities based on a combination of the likelihood of occurrence and the potential magnitude of the financial effects. We also included material risks and opportunities attributable to business relationships beyond the scope of consolidation used in the financial statements.

The variables used were as follows:

Materiality	Type of IRO		Variables considered
Impact materiality	Positive impact	Actual	(Scale + Scope) x 1.5
		Potential	(Scale + Scope) x 1.5 Likelihood
	Negative impact	Actual	Scale + Scope + Irremediable character
		Potential	(Scale + Scope + Irremediable character) x Likelihood
Financial materiality	Risk		Scale x Likelihood
	Opportunity		Scale x Likelihood

To determine the value of each IRO, we therefore analysed its scale, scope, likelihood, irremediable character and time horizon:

- **Scale:** level of importance attributed to each IRO. This was obtained by aggregating global data from surveys involving different stakeholders. At these meetings, participants classified, from their perspective, the level of importance of the distinct topics for Globalvia on a scale of one to five, where one represented the lowest importance and five the greatest.
- **Scope:** classified as global, medium or limited.
- **Likelihood:** possibility of an IRO occurring.
- **Irremediable character:** the irremediable character measures an organisation's ability to counteract or make good the adverse effects of that impact.

Level of scope		Definition
5	Global	This refers to IROs that have a significant effect both on the population (affecting all of humanity, all company assets and its workers) and on the geography (impacting an entire ecosystem, whether aquatic, terrestrial or aerial, with the ability to spread and increase physically).
3	Medium	This refers to specific geographic areas (province, autonomous community/state, country), specific population groups (company workers, customers, suppliers throughout the entire supply chain) or specific assets.
1	Limited	This refers to a specific sector, environment or topic within the general scope of analysis, with defined geographic boundaries (city, local community) and specific population groups (a specific type of asset, workers at an office, customers for a service, suppliers of specific materials or products, etc.).

Probability		Definition
1	Very likely	More than 75% likely to occur
0.85	Likely	More than 50% likely to occur
0.7	Unlikely	More than 25% likely to occur
0.6	Very unlikely	Less than 25% likely to occur

Irremediable character		Definition
5	<b>Irremediable</b>	Impact that cannot be counteracted, characterised by the impossibility of implementing effective corrective actions within a reasonable period of time.
4	<b>Very difficult</b>	Requires an action that extends over a period of more than five years, involving resources from several areas of the company and with a periodic budget allocation.
3	<b>Difficult</b>	Requires an action that extends over a period of between two and five years, involving resources from several areas of the company and with a single budget allocation.
2	<b>With efforts</b>	Requires an action that extends over a period of less than two years, with resource allocations specific to the area involved and a single budget allocation.
1	<b>Easy</b>	Requires an action that extends over a period of less than one year and without significant resources (neither financial nor human).

#### iv. Consolidation of results in a materiality matrix

We analysed and interpreted the results of the IRO assessment to determine the materiality of the subtopics examined, considering the following factors:

- Impact materiality and financial materiality are managed within the same scale.
- The materiality range was defined for both, considering the maximum established values.
- The materiality of certain topics is determined based on expert criteria, taking into account feedback from stakeholders and sector expectations.

We consolidated the results into three matrices that present the impact and financial materialities both in a differentiated and joint manner.

The double materiality assessment yields the following results, divided by topics and subtopics around three axes: environmental, social and governance.

ESG	Topic	Ranking	Subtopic
E	Energy and emission reduction	10	Energy efficiency and energy consumption
		2	Carbon emissions
	Climate change adaptation	11	Climate change adaptation
S	Own workforce	4	Health, safety, and employee well-being
		13	Talent retention, equal treatment, and opportunities for all
		12	Human rights, fundamental freedoms, and democratic principles
	Responsible supply chain	5	Safety, health, and well-being in the value chain
		14	Equality, human rights, and social justice in the value chain
		15	ESG criteria in the supply chain
	Affected communities	7	Contribution to local and social development
User	8	User experience	
	9	User health and road and rail safety	
G	Ethics, transparency, and business conduct	1	Prevention of corruption, money laundering, and bribery
	Business management	3	Resilience to macro-economic and sociopolitical changes
	Cybersecurity	6	Cybersecurity

### 2.3.2 Disclosure requirements established in the ESRS covered by the Sustainability Report

In order to comply with the disclosure requirements, [Appendix I, “Table of contents pursuant to Spanish Non-Financial Information and Diversity Law 11/2018”](#) shows the links between the requirements of this Law and the different sections of our Sustainability Report. Furthermore, [Appendix II, “GRI \(Global Reporting Initiative\) table of contents”](#) includes the tables that present the correlation between the chapters of the Sustainability Report and their alignment with other applicable European regulations and the GRI standards. Lastly, following the requirements of IRO-2, a table is presented in [Appendix III, “CSRD table of contents”](#), that details the requirements addressed in the preparation of the Report, including the reference to the sections where the relevant information can be found.

## 2.4 Strategy

### 2.4.1 Strategy, business model and value chain

#### GRI 2-6

Since 2007 we have engaged in the development of sustainable, climate change-resilient transport infrastructure and mobility services, offering solutions that promote connectivity, sustainability and social development.

The main activities that we carry on at Globalvia are:

- **Highways:** we manage 14 highways in seven countries (Spain, Chile, Portugal, the United States, Ireland, Costa Rica and Colombia), which together represent more than 960 km of road infrastructure. Our work includes the construction, repair, maintenance and operation of these roads, guaranteeing their efficient, safe and sustainable operation.

The operating activities include most notably the management of toll systems and the provision of roadside assistance services. Maintenance is a fundamental pillar, covering both preventive and corrective work to ensure the quality of the infrastructure. In addition, we prioritise investment in continuous improvement, through modernisation and expansion projects, which reinforce our commitment to stakeholders.

- **Railways:** Globalvia is the leader in Spain in the private management of passenger rail transport, managing more than 75 km of track distributed across six railway infrastructures in three Spanish cities. In addition, since September 2022, we have been strategic partners in the consortium formed together with Air Nostrum and Trenitalia, holding 24% of the shares of iryo, a private high-speed operator in Spain. Our work includes the design, construction, financing, operation and maintenance of tracks, stations and associated systems. All of this is carried out under safety regulations and with a commitment to promoting rail transport as an efficient, sustainable and environmentally-friendly option.
- **Go-Ahead Group:** this is the leading operator of bus services in the United Kingdom, Ireland, Sweden, Singapore and Australia. It also operates railways in the United Kingdom and Norway. We acquired this platform in 2022 together with Kinetic, the operator of the largest bus network in Australia and New Zealand.
- **Innovation - Openvia:** this is our technological platform that was created in 2020, with the mission of developing new services and business models geared towards the mobility of the future.

All of our activities are made possible by a team of more than 28,000 professionals, including those from subsidiaries in which we hold majority and minority ownership interests. Of these professionals, 762 are part of our direct management. The geographical distribution of our team and additional information are detailed in chapter [4.1. "Our workforce"](#).

#### 2.4.1.1 SustaiMobility Strategic Plan 2027

In 2020 we reached a turning point marked by the numerous global challenges and events we faced. Acknowledging the growing importance of international trends and ESG criteria, we developed our Sustainability Strategy, which includes the SustaiMobility Strategic Plan. The first phase of the plan covered the period 2021–2024 and was successfully completed in 2024. To build on this progress, a new phase, SustaiMobility 2027, was developed and approved in 2025. The new plan was devised considering the Company's global context, the needs and expectations of our stakeholders, market trends and regulatory requirements. All of this is aligned with our mission to generate long-term value by operating and investing in sustainable transport infrastructure and mobility services.

The four strategic pillars initiated during the first phase of the plan were reviewed and refined based on our level of ambition and the progress achieved. In addition, a fifth strategic pillar —“ESG Analytics: Data reporting and automation for sustainable change”—was introduced. Overall, the plan comprises five strategic lines encompassing a total of 15 main goals.

## Our strategic lines

Strategic line	Ambition 2025-2027	Commitments
<b>Mobility centered on our users</b>	Enhance our users' safety and customer experience by implementing best practices and the latest available technology.	<ul style="list-style-type: none"> <li>• Increase users' safety by implementing Road Safety best practices.</li> <li>• Promote sustainable logistics.</li> <li>• Improve Customer Relationship Management.</li> </ul>
<b>Infrastructure to mitigate climate change</b>	Foster our contribution to climate change mitigation and adaptation by strengthening the resilience of the infrastructure we operate.	<ul style="list-style-type: none"> <li>• Renovate SBTi validated decarbonisation target and plans.</li> <li>• Maximise energy efficiency by implementing Energy Management Systems.</li> <li>• Promote sustainable pavement practices.</li> <li>• Consolidate Globalvia's Climate Change Strategy and Climate risk analysis.</li> <li>• Strengthen the resilience of the infrastructure by developing Adaptation plans.</li> <li>• Preserve our surrounding Natural Capital.</li> </ul>
<b>CSR to support people, communities and diversity</b>	Reinforce our commitment to a safe, equal, and growth-oriented workplace and have a positive impact on people and society.	<ul style="list-style-type: none"> <li>• Cultivate an inclusive and growth-oriented workplace.</li> <li>• Enhance Globalvia's employer brand and employee engagement.</li> <li>• Develop meaningful and impactful CSR initiatives.</li> <li>• Promote a safe and equal work environment.</li> </ul>
<b>Enforcing good governance</b>	Anchor compliance into Globalvia Culture and reinforce stakeholder trust.	<ul style="list-style-type: none"> <li>• Achieve sustainability alignment in all subsidiaries.</li> <li>• Consolidate Globalvia's compliance approach.</li> <li>• Upgrade asset management by implementing ISO 55001 certification.</li> <li>• Enhance cybersecurity in our supply chain.</li> </ul>
<b>Data reporting &amp; automation for sustainable change</b>	Boost ESG data analysis and disclosure processes enhancing transparency.	<ul style="list-style-type: none"> <li>• Strengthen our reporting and disclosure process.</li> <li>• Upgrade ESG data management and analysis.</li> <li>• Reinforce Internal Control over Sustainability Reporting.</li> </ul>

**1. Mobility centered on our users:** mobility is a cornerstone of modern life, enabling access to essential goods, services, and opportunities. Economies rely on efficient transport systems to function and grow, yet it is becoming increasingly clear that simply expanding existing models will not meet the rising global demand for mobility. At Globalvia we have the potential to improve the quality of life in the cities and regions where we operate by offering innovative and efficient mobility services to accelerate the transition towards more sustainable and circular development.

This strategic line is driven by three major objectives:

- **Sustainable mobility:** we promote sustainable, circular and resilient infrastructures propelling mobility in its sustainable dimension.

- **User safety:** we aim to strengthen infrastructure safety by implementing best practices and digitalization technologies at the same time that we rise awareness among users and communities.
  - **User-centric approach maximising quality:** we want to provide the best possible service and improve user experience by achieving excellence in our operations.
- 2. Infrastructure to mitigate climate change:** at Globalvia we are committed to combating climate change. We aim to proactively manage the risks and opportunities it presents by enhancing the resilience of our infrastructure and actively contributing to both mitigation and adaptation efforts. We aspire to actively contribute to the transition to a low-carbon economy by implementing ambitious climate objectives and actions and maximising excellence in the environmental management of our operations.

This strategic line is driven by three major objectives:

- **Climate action plan:** we want to position ourselves as a company taking ambitious action against climate change by setting science based emission reduction targets.
  - **Environmental management excellence:** we are committed to implementing best environmental practises and minimizing our impacts to natural capital.
  - **Climate-resilient infrastructure:** we attempt to improve company resilience by integrating climate risk and opportunities into risk management processes.
- 3. CSR to support people, communities and diversity:** we seek to make a positive contribution to people and communities by promoting diversity and inclusion in our operations, supply chain and society. Our goal is to offer an excellent workplace that promotes safety and health, justice and equal opportunities, professional development and work-life balance. We are also committed to strengthening our supply chain, ensuring it is ethical and sustainable while ensuring fair treatment and responsible purchasing and sourcing practices.

This strategic line is driven by three major objectives:

- **A great place to work:** we want to provide a positive work environment, one where employees learn and grow, have pride in what they do and maintain a healthy life-work balance.
  - **Contribution to society:** we aim to have a positive impact on society and contribute to the sustainable development of local communities where we are present.
  - **Fair and equal workplace:** we guarantee a workplace that is diverse and inclusive, with equal treatment and opportunities for all.
- 4. Enforcing Good governance in our relationships:** at Globalvia we work to fully integrate sustainability into our governance structure and strengthen the trust of our stakeholders. To do this, we reinforce transparency and the disclosure of ESG criteria, linking organisational performance with sustainability and establishing it as a strategic priority in our operations and relationships.

This strategic line is driven by three major objectives:

- **Compliance, Ethics and Integrity:** we maintain a solid organisational governance by continuously monitor, update and improve the compliance management system.
- **Good governance:** strengthen our code of good governance and anchor sustainability to our governance structure. We reviewed the code of good

governance, with the aim of strengthening governance practices at the Company. We also incorporated ESG criteria into management objectives and incentive schemes, in order to align sustainability with corporate performance and business values.

- **Building stakeholder trust:** enhance transparency across all our relationships and operations by applying the highest standards in ESG disclosure and in the Sustainability Reports.
5. **ESG Analytics: Data reporting and automation for sustainable change:** at Globalvia we aim to effectively gather, manage, and integrate ESG data by automating and implementing tech-based tools and platforms that provide the reliability, accuracy, and transparency needed for sustainable change. ESG data and sustainability information have become a strategic asset of our Organisation.

This strategic line is driven by three major objectives:

- **Automating reporting and disclosure:** integrate ESG metrics systems and automate reporting processes in order to accomplish our corporate responsibility of disclosing accurate and reliable sustainability information.
- **Data insights for sustainable change:** manage and utilize vast amounts of information effectively with the objective to maintain and further develop our sustainability ambition and drive innovation.
- **ESG accuracy and reliability:** integrate a well-designed internal control system to streamline processes and workflows, leading to improved operational efficiency and information accuracy and reliability.

Chapter 2.4.2, "[Material impacts, risks and opportunities and their interaction with strategy and business model](#)", analyses the link between our Organisation's strategy and its material subtopics.

With the launch of the SustainMobility 2027, our ambition is to build on and give continuity to the initiatives implemented during the first phase, while further strengthening our commitments. This renewed framework reinforces our long-term vision, consolidates the progress achieved to date, and enhances our capacity to address emerging environmental, social, and governance challenges in a structured, ambitious, and measurable manner.

### 2.4.1.2 Agenda 2030: contribution to SDGs

It is important to highlight that Globalvia's Sustainability Strategy is aligned with our commitment and contribution to the Sustainable Development Goals (SDGs), within the framework of the UN's Agenda 2030.

Our activity contributes to, and impacts, five priority objectives.

Priority SDG	Main working areas	2025 Initiatives
<p><b>5 GENDER EQUALITY</b></p>	<ul style="list-style-type: none"> <li>Labour standards and working conditions</li> <li>Inclusion and diversity</li> </ul>	<ul style="list-style-type: none"> <li>Equal opportunity plans</li> <li>Equal opportunities and diversity policy</li> <li>DEI portal</li> </ul>
<p><b>8 DECENT WORK AND ECONOMIC GROWTH</b></p>	<ul style="list-style-type: none"> <li>Forced or compulsory labour</li> <li>Freedom of association</li> <li>Labour standards and working conditions</li> <li>Worker health, safety and well-being</li> <li>Talent development</li> <li>Development of the community</li> <li>Local employment</li> </ul>	<ul style="list-style-type: none"> <li>Training on Code of Ethics and Conduct</li> <li>Collective bargaining</li> <li>Occupational health and safety management systems (OHS)</li> <li>Protocol for the prevention and action against conduct affecting sexual freedom and moral integrity in the workplace</li> </ul>
<p><b>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</b></p>	<ul style="list-style-type: none"> <li>Development of the community</li> <li>Local employment</li> <li>Sustainable, digital and climate-resilient infrastructure</li> </ul>	<ul style="list-style-type: none"> <li>Globalvia Chile PRO Seal Award</li> <li>Metro de Sevilla C.J.A., S.A. Global Light Rail Award</li> <li>Ruta Portuaria promoting community dialogue forums in Colombia</li> </ul>
<p><b>11 SUSTAINABLE CITIES AND COMMUNITIES</b></p>	<ul style="list-style-type: none"> <li>Development of the community</li> <li>Promotion of sustainable mobility</li> </ul>	<ul style="list-style-type: none"> <li>Initiatives within the SustaiMobility Plan 2027</li> <li>Bluenest by Globalvia</li> <li>CSR and social projects (European Mobility Week)</li> <li>Emergency services coordination agreements</li> </ul>
<p><b>13 CLIMATE ACTION</b></p>	<ul style="list-style-type: none"> <li>Pollution</li> <li>Energy efficiency</li> <li>GHG emissions</li> <li>Climate-related risks and opportunities</li> </ul>	<ul style="list-style-type: none"> <li>Review and approval of SBTi targets</li> <li>Actualisation of all Decarbonisation Plans</li> <li>Integrated Management System (IMS)</li> <li>SustaiMobility Plan 2027.</li> </ul>

## 2.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model

GRI 3-3, 3-2, 2-25

We identified the impacts, risks and opportunities (IROs) by means of the double materiality assessment, the methodology for which is described in detail in chapter 2.3 "[Double materiality assessment](#)". The assessment was based on a combination of information sources including, among others, the external context in which the Company operates and relevant industry reports and studies. This comprehensive approach allowed us to obtain an in-depth view both of the external factors that can have an impact on Globalvia and of the repercussions of our activity on the environment and society.

Thanks to this process we were able to identify the material IROs based on the specific circumstances surrounding our business model and our strategy. It is important to point out that the impact on the environment and on people is implicit in the description of each of the IROs. This is due to the fact that the double materiality assessment includes these two factors across the board as key components of the assessment.

This report includes information on all the material topics and subtopics identified for Globalvia, in accordance with the requirements of the CSRD. However, the subtopic "Cybersecurity", although not explicitly forming part of the European Sustainability Reporting Standards (ESRS), was identified as key strategic matter for the Company.

Our strategic pillars are directly informed by the material topics identified as most relevant to the Company and its stakeholders, ensuring that these priorities are appropriately reflected in our strategic framework and overall business approach. The full breakdown of our sustainability strategic lines and their related commitments can be found in chapter 2.4.1.1, "[SustainMobility Strategic Plan 2027](#)".

## 2.5 Corporate governance

### 2.5.1 The role of the administrative, management and supervisory bodies

GRI 2-9, 2-10, 2-11, 2-12, 2-17, 2-18

Our principles of governance build on the foundations defined by the OECD, the recommendations of the Code of Good Governance of the Spanish National Securities Market Commission (CNMV), and the legal framework applicable to our Company, as well as the requirements of the regulatory bodies of the countries in which we have a presence.

Several internal control mechanisms are in place to supervise and verify the proper functioning of all our processes at the different Globalvia subsidiaries:

- The Governance bodies, through application of the relevant standards and guidelines.
- The Risk Management System.
- The Internal Audit area.
- The Compliance area.
- The Internal Control position embodied in the Financial Area.

The three cornerstones of corporate good governance at Globalvia are our bylaws, policies and procedures, and also our governing bodies.

- The bylaws govern the rights and obligations of Globalvia's members, and how the Organisation functions vis-à-vis third parties, including the bylaws of each of the companies, which are based on those of the Globalvia Group.
- The policies and procedures formalising the corporate decisions that guide the Organisation's activity at all levels.
- The governing bodies, comprising the General Meeting, the Board of Directors, the Executive Committees (Nomination and Remuneration Committee and Audit and Risk Committee) and, lastly, the Steering Committee.

### 2.5.1.1 Corporate governance bodies

#### General Meeting

The General Meeting is the highest corporate governance body at Globalvia. Six meetings were held in 2025, with an attendance quorum of 100%, at which the shareholders debated and decided upon matters within their purview, including the approval of the financial statements, the appointment and dismissal of directors, and the distribution of dividends.

#### Board of Directors

The Board of Directors is the most senior representative body of Globalvia, outranked only by the General Meeting. It appoints between five and 15 members, in conformity with the applicable bylaws and regulations. The Board's functions are to direct, administer and represent the Company and, to this end, it meets on a bi-monthly basis. It is also the body responsible for ratifying the Company's mission and values and its Sustainability Strategy.

Each year, both the Board and its executive committees undergo internal evaluation. Every three years this evaluation is conducted by an external, independent entity. The most recent internal evaluation was completed in 2025, with an external evaluation scheduled for 2026.

#### Executive Committees of the Board of Directors

##### **Nomination and Remuneration Committee**

The purpose of this committee is to oversee the independence, diversity and balanced skill-set of the members of the Board of Directors. It comprises four members, appointed by the Board of Directors, representing each of the Company's shareholders, with all of them being non-executive directors of Globalvia. Eight meetings were held in 2025, with an attendance quorum of 100%.

The remuneration of the Steering Committee is disclosed in Note 22.b to the Consolidated Financial Statements of Global Via Infraestructuras.

##### **Audit and Risk Committee**

The Audit and Risk Committee encompasses the functions relating to the Companies' risk management, internal control, regulatory compliance and financial and sustainability reporting. Its members are appointed by the Board of Directors. In 2025, the committee met on six occasions, with an attendance quorum of 100%.

### **Steering Committee**

The Steering Committee, which consisted of eight members in 2025, is responsible for managing and evaluating the Company's situation on a regular basis, to which end it analyses and takes decisions on any situations that are strategic and critical for the Organisation.

## **2.5.2 Integration of sustainability-related performance in incentive schemes**

At Globalvia we have a Performance Review Procedure which establishes that all persons at the Management Level - including Corporate, Regional Offices and the first and second level of concessions - have, as part of the targets set for them, corporate objectives. These quantitative objectives are defined each year by the Board of Directors, upon proposal by the Nomination and Remuneration Committee (NRC). Subsequently, the results are also approved by the Board of Directors.

As part of our commitment, each year at least one of these objectives must be linked to sustainability. In 2025 we fulfilled this commitment through the inclusion of a specific objective, applicable at the management level, that is tied to the achievement of the emission reduction percentages we are committed to; this objective accounts for 20% of the total corporate variable remuneration.

## **2.5.3 Statement on due diligence**

**GRI 2-23, 2-24**

At Globalvia we have a Due Diligence Procedure in place with regard to third parties, which was reviewed and updated accordingly in 2025, expanding its scope to include additional third parties, such as suppliers and customers. The Procedure includes the measures required for registering and approving the players with which we have, or intend to enter into, a business relationship. These measures are adopted both before the relationship with the third party is formalised and for as long as the relationship lasts, the aim being to have at our disposal complete and appropriate information for the assessment and mitigation of any potential compliance risks associated with that third party (corruption, money-laundering, unlawful acts in tax matters, etc.). This procedure applies to all members of the Organisation, regardless of the position they hold or the geographical area in which they are located, when in discharging their duties, they enter into relationships with third parties. Furthermore, with respect to those companies or business associations over which we do not exercise control or at which we are not responsible for the management of operations, our representatives in the governing and management bodies will promote the adoption of the criteria established in our Due Diligence Procedure.

The updated Due Diligence Procedure comprises the seven following phases:

1. Need for Due Diligence Analysis
2. Determination of the Third-Party Risk Level
3. Application of Due Diligence Measures
4. Outcome of Due Diligence Measures
5. Recording and Validity of the Due Diligence Analysis
6. Monitoring of Due Diligence Measures

## 7. Documentation and Safekeeping

The update of the Due Diligence Procedure aims to strengthen risk management and reinforce ethical, compliance, and sustainability standards across our relationships.

### 2.5.4 Risk management and internal controls over sustainability reporting

To ensure the quality and reliability of sustainability disclosures, Globalvia has implemented an Internal Control System for Sustainability Reporting (ICSR). This system includes an organisational and methodological structure designed to manage, supervise, and guarantee the completeness, confidentiality, and availability of the entity's sustainability-related data. The system focuses on safeguarding critical and sensitive information, which, although not directly related to the economic sphere, is crucial to the Organisation's functioning and decision-making process.

In 2025, we launched the first self-assessment campaign of risks associated with the ICSR through SAP GRC, the Group's corporate risk management tool. This self-assessment marks a key milestone and strengthens the sustainability risk management framework.

#### 2.5.4.1 Scope, main features and components

The scope of this internal control system covers all Globalvia subsidiaries, requiring action both at the corporate level and locally within each subsidiary. This ensures that all activities and processes associated with Globalvia's business operations are consistently aligned in managing risks related to non-financial information.

As regards the content of the system, we follow the recommendations of the COSO internal control over sustainability (ICSR) model, by applying the five components and the 17 principles described in the ICIF-2013, as set forth below:

Components	Principles
<b>Control environment</b>	<ul style="list-style-type: none"> <li>Principle 1: Demonstrates commitment to integrity and ethical values</li> <li>Principle 2: Exercises oversight responsibility</li> <li>Principle 3: Establishes structure, authority and responsibility</li> <li>Principle 4: Demonstrates commitment to competence</li> <li>Principle 5: Enforces accountability</li> </ul>
<b>Risk assessment</b>	<ul style="list-style-type: none"> <li>Principle 6: Specifies suitable objectives</li> <li>Principle 7: Identifies and analyses the risk of not achieving sustainability goals</li> <li>Principle 8: Assesses fraud risk</li> <li>Principle 9: Identifies and analyses significant change and emerging trends</li> </ul>
<b>Control activities</b>	<ul style="list-style-type: none"> <li>Principle 10: Selects and develops control activities</li> <li>Principle 11: Selects and develops general controls over technology</li> <li>Principle 12: Deploys oversight through policies and procedures</li> <li>Principle 13: Uses relevant information</li> </ul>
<b>Monitoring of the control system</b>	<ul style="list-style-type: none"> <li>Principle 14: Communicates internally</li> <li>Principle 15: Communicates externally</li> <li>Principle 16: Conducts ongoing and/or separate evaluations</li> <li>Principle 17: Evaluates and communicates deficiencies</li> </ul>

### 2.5.4.2 Risk assessment approach

The Sustainability Risks Analysis Model, the main document relating to the ICSR, comprises the relevant impact, risk and opportunity matrices, as well as a control matrix. The Sustainability and Climate Change Department is responsible for defining these matrices on the basis of the results of the double materiality assessment and the scope defined in the Sustainability Manual (MPSU).

The Sustainability Risks Analysis Model therefore reflects all topics that are material for Globalvia and, consequently, those over which control must be applied and which must be included in non-financial reporting. These topics are defined based on the results of the double materiality assessment. Subtopics identified as material are selected, and their corresponding IROs, along with the scores for each, are recorded.

### 2.5.4.3 Periodic reporting of findings and monitoring of the control system

The Sustainability Committee requests the regular review of procedures, including those of the ICSR. Specifically, the Sustainability and Climate Change Department submits certain documents to the Sustainability Committee for their review and approval. In the case of the Sustainability Risks Analysis Model and the matrices composing it, these are reviewed at least once a year.

The Sustainability and Climate Change Department is also responsible for monitoring any developments in current legislation, as well as any changes in the industry or the Company, that may affect both materiality and the ICSR itself, and it notifies the Sustainability Committee of the adjustments required for the roll-out and implementation, where necessary, of such developments and change.

Should any specific goals for the improvement of the ICSR arise, they will be included as part of the Integrated Management System (IMS) objectives. If in the course of this monitoring process any training needs were to be identified, the Talent Department would proceed, as indicated in the Human Resources Manual, to analyse them and include them in the annual training plans.

## 2.6 Enterprise Risk Management

### GRI 2-13, 205-1

The Enterprise Risk Management (ERM) model in place at Globalvia is aligned with the main international reference frameworks, such as the Committee of Sponsoring Organisations of the Treadway Commission (COSO), and considers recognised risk management best practices. In addition, we maintain a Risk Management Policy that defines the framework for the identification, management and control of the risks which Globalvia operations are exposed to. This policy is subject to review, update, and approval by the Board of Directors regularly.

While risk management is a cross-cutting responsibility that applies across Globalvia's global operations, the associated governance system is formally defined and clearly articulated.

- The Board of Directors is ultimately responsible for supervising and overseeing risk management and for approving the corresponding Policy.
- The Audit and Risk Committee has been delegated the task of supporting the Board in monitoring risk management activities.
- The CEO and the Steering Committee are responsible for the implementation of the Risk Management Policy across all levels of the Organisation.

- The Risk Department oversees and monitors the main strategic, financial, operational, compliance and strategic risks, and promotes a strong risk awareness and control culture throughout the Organisation.
- Finally, the Internal Audit Department provides independent assurance that the risk management model and its components are functioning effectively.

**Risk identification, assessment and management**

At Globalvia we apply a structured and periodic approach to risk identification, assessment and management across the Group, covering all the Company’s processes and activities.

Risk identification is supported by a common risk taxonomy applicable to all Group-controlled companies, complemented by specific taxonomies for particular domains where required. In 2025, the risk taxonomy underwent a comprehensive update, significantly broadening its scope and refining its structure.

Risk assessments combine quantitative and qualitative approaches. The core exercise is the quantification of the Group’s risk profile, which is performed at least annually. This assessment is based on scenario analysis and evaluates risks under three reference scenarios: a moderate scenario (P50), an adverse scenario (P95) and a highly adverse scenario (P99).

Additionally, we conduct an annual qualitative assessment of risk perception across GVI subsidiaries and corporate areas through the use of risk maps, which help to identify and prioritise the risks considered most relevant from a business perspective. The outputs of these qualitative assessments are used as an input for the quantitative risk analysis.

Emerging risks are addressed through dedicated exercises involving both corporate functions and concession entities. These exercises are supported by internal workshops and discussions, as well as by external sources of information on emerging risks, such as publications from the World Economic Forum (WEF).

The results of both quantitative and qualitative risk assessments are reported on a regular basis to the governing bodies. Risk management actions include mitigation through control measures and, where appropriate, risk transfer through the insurance market, with the objective of keeping risks within acceptable levels.

Risk category	Type of risk	Main mitigation strategies
<b>Strategic risks</b>	Risks related to the definition and execution of the Group’s strategy, including strategic planning, portfolio composition, business model design, governance, long-term growth, and the ability to adapt to changes in the external environment. This category also includes ESG risks related to climate change and sustainability.	<ul style="list-style-type: none"> <li>• Portfolio diversification by geography, currency, business line and revenue mechanism</li> <li>• Comprehensive investment and bidding studies, including sensitivity and stress analyses</li> <li>• Market analysis and selective presence in strategic geographies</li> <li>• Internal innovation strategy and selective investments</li> </ul>
<b>Operational risks</b>	Risks of direct or indirect economic loss resulting from inadequate or failed internal processes, systems, human resources, or from external events affecting operations, including technical failures, cybersecurity incidents, supplier or subcontractor issues, and business continuity disruptions.	<ul style="list-style-type: none"> <li>• Ongoing operational monitoring</li> <li>• Internal Control System</li> <li>• Business continuity and crisis management systems</li> <li>• Insurance programmes for operational and natural catastrophe risks</li> <li>• Cybersecurity controls and insurance strategy</li> <li>• Procurement, supplier approval and performance management processes</li> <li>• Long-term supply contracts</li> </ul>

<p><b>Financial risks</b></p>	<p>Exposure of the Group's results, cash flows and net value to adverse movements in financial markets, including interest rates, foreign exchange, inflation and liquidity risks, as well as financing and refinancing risks.</p>	<ul style="list-style-type: none"> <li>• Long-term project finance structures</li> <li>• Debt hedging strategies (interest rate and, where appropriate, FX)</li> <li>• Portfolio diversification</li> <li>• Cash and liquidity management policies</li> </ul>
<p><b>Regulatory &amp; Compliance risks</b></p>	<p>Risks arising from non-compliance with applicable laws, regulations and contractual obligations, including the possibility of sanctions, fines or reputational damage, as well as risks derived from unethical conduct, fraud or breaches of internal policies by employees or third parties.</p>	<ul style="list-style-type: none"> <li>• Criminal Compliance System</li> <li>• Tax Compliance System</li> <li>• Data Protection and privacy framework</li> <li>• Internal Financial Reporting Control System (ICFR)</li> <li>• Continuous monitoring of regulatory developments</li> <li>• Ethics and whistleblowing channel</li> </ul>

ESG risks are embedded within Globalvia's existing risk categories and may arise from the Group's external context, its own operations or those of contractors and third parties. These risks are identified, assessed and managed through the Sustainability and Climate Change Risk Matrix, under the oversight of the Sustainability Committee and in coordination with the Group's risk management framework.

**Risk Appetite**

Globalvia Risk Appetite framework establishes the level and type of risk the Group is willing to accept in pursuit of its strategic objectives. The Risk Appetite provides a common reference for decision-making across the Organisation and supports a consistent approach to risk-taking, balancing value creation with risk exposure.

**Risk events**

Globalvia risk management framework also count with an established process to identify, record and monitor risk events that occur across the Organisation. Risk events are analysed to assess their root causes, impacts and lessons learned, and to determine whether additional controls or mitigation measures are required. Information on risk events is periodically reported to the governing bodies and used to strengthen the risk management framework, enhance controls and support continuous improvement in risk awareness and operational resilience.

**Key improvements in Risk Management**

During the reporting period, Globalvia continued to enhance the maturity and integration of its risk management framework through a set of coordinated initiatives aimed at strengthening governance, improving risk quantification and reinforcing data reliability. Collectively, these actions represent a significant step forward in embedding a more robust, data-driven and governance-aligned risk management approach across the Group.

## 2.7 Our Integrated Management System

GRI 2-23, 2-24

At Globalvia we have an Integrated Management System (IMS) in place, formalised through a proprietary policy, that includes the commitments and operational principles applied at all the concessions in which we hold a majority stake. This system describes the Organisation's processes, based on a set of internationally recognised rules and standards. It also allows us to plan and control, in a centralised and effective manner, the management of Globalvia's different

concessions, and in doing so apply a continuous improvement cycle to overcome challenges and optimise performance.

The implementation and updating of the IMS are the responsibility of a corporate team and of designated professionals at each company, thus guaranteeing its proper functioning.

The Integrated Management System has been implemented in accordance with the following standards:

- ISO 9001 (Quality)
- ISO 14001 (Environment)
- ISO 45001 (Occupational Health and Safety)
- ISO 37301 (Compliance Management Systems)
- UNE-EN 13816 (Public Passenger Transport)
- ISO 39001 (Road Safety)
- ISO 50001 (Energy Management)
- AENOR Standard for Railway Operational Safety

Key elements of the IMS	
<b>Efficiency</b>	Application of the Deming continuous improvement cycle (PDCA) to all processes in order to achieve continuous improvement.
<b>Compliance</b>	Guaranteeing regulatory and legal compliance and ensuring that other requirements subscribed to by the Organisation are met.
<b>Multi-site system</b>	Certification model that allows for the sharing of practices and knowledge at the Company.
<b>Focus on stakeholders</b>	Commitment to stakeholder satisfaction, environmental protection and worker health and safety.
Main operational tools	
<b>Workspace</b>	Document management platform serving as the backbone of the Integrated Management System. It contains the Company's document structure and records.
<b>iMetrics</b>	Tool for managing non-conformities and reporting indicators to measure company performance.
<b>Globalvia Project Management</b>	Online project management software, providing visibility and total control of tasks.
<b>Globalvia Legal</b>	We use a platform to ensure legal compliance by Globalvia in environmental and health and safety matters. Customised identification and evaluation of legal requirements.
<b>Globalvia CAE</b>	We use a platform to manage coordination of company activities in the sphere of occupational risk prevention. It includes other aspects of regulatory compliance defined by Globalvia.

In 2025, as is the case every year, the Spanish certification body AENOR conducted an external audit of the Integrated Management System (IMS), encompassing the following standards: ISO 9001 (Quality), ISO 14001 (Environment), ISO 45001 (Occupational Health and Safety), ISO 50001 (Energy Management), ISO 39001 (Road Safety), UNE-EN 13816 (Public Passenger Transport) and Railway Operational Safety.

82% of Globalvia concessions (highways and railways) are certified by AENOR under the international standard ISO 14001 “Environmental Management Systems”. This allows us to ensure that we identify and comply with the applicable legal regulations in all countries in which we operate and to pass this onto our entire supply chain.

We are also making progress in obtaining additional environmental sustainability certifications within the Integrated Management System. In this context, for instance, Ruta 27 achieved a certification in accordance with the UNE-EN ISO 50001 energy management standard in 2025, following implementation work carried out throughout 2024.

### 3. Environmental information

#### 3.1 Environmental management

GRI 2-24, 2-25, 2-27

At Globalvia we promote responsible and efficient management of our operations, identifying, evaluating, and managing the environmental impacts of our activities in order to work on their prevention, elimination, reduction, and mitigation.

Environmental operational control procedures and technical instructions are developed, establishing the guidelines and measures required so that processes can be performed under controlled conditions and in accordance with both the Organisation's internal regulations and the legislation in force in the countries in which we operate.

Environmental impacts may give rise to penalties for breaching laws or regulations in this area. However, as in previous years, we did not receive any significant environmental penalties in 2025.

##### 3.1.1 Mitigation of environmental risks and impacts

GRI 3-3, 2-13

We have implemented the following measures to manage potential environmental risks and mitigate their impacts:

- Specific process for handling complaints and claims.
- Identification and assessment of environmental aspects of our activity.
- Environmental emergency plans.
- Employee and supplier surveys.
- Management system monitoring activities (non-conformities, audits, management reviews, etc.).

Moreover, the following resources further help us in the management of the environmental impacts:

Sustainability and Climate Change Department	Sustainability Committee
<ul style="list-style-type: none"> <li>• Multidisciplinary team of 23 professionals dedicated to the management of the environmental aspects and impacts arising in the Organisation and carrying out Environmental Risk protection. It is distributed among Globalvia subsidiaries in order to ensure continuous improvement in all the business lines and countries in which we operate.</li> </ul>	<ul style="list-style-type: none"> <li>• Multidisciplinary body that meets at least every six months and reports directly to the Board's Audit and Risk Committee and to the Board.</li> </ul>

### 3.1.2 Environmental investments

In 2025 we had an environmental insurance policy providing EUR 20,000,000 of cover. Moreover, in Costa Rica, the company Ruta 27 had environmental guarantees in place amounting to more than USD 2,300,000.

The need for new resources is analysed every year to ensure that all Environmental Risks are properly managed.

### 3.1.3 Environmental communication and dissemination

#### GRI 2-13

We extend our environmental policies and commitments to all our partners and suppliers. We monitor their performance to ensure it is aligned with our environmental management standards and complies with the legislation in force. Our [Integrated Management System Policy](#) delivers information to employees and other stakeholders through different channels, such as the intranet, noticeboards, and the corporate website, among others.

The Organisation has assigned responsibility for meeting its environmental commitments to the Sustainability and Climate Change Department, which coordinates the Integrated Management System supervisors responsible for these matters across each company.

We have different mechanisms in place to convey our commitments to all stakeholders.

- **Policies, procedures, and good practices** that are shared with our suppliers, such as those for procurement or supplier evaluation and approval, and which include environmental management as an evaluation criterion to comply with.
- **Awareness-raising actions** at concessions, environmental volunteering, and other engagement initiatives.
- **Environmental communications** to ensure that employees are kept abreast of the initiatives undertaken and how to act accordingly.
- **Specific training** on environment and sustainability.

#### 2025 Milestones

- Ruta 27 organised an environmental volunteering day at San Lucas Island, removing around 381 kg of waste from Cocos Beach as part of its ongoing efforts to contribute to environmental protection and promote environmental awareness among its employees and neighbouring communities.
- Ruta 27 received the 2025 Global Preventico Award Environmental Management category for the installation of the first multi-vehicle fast-charging station in Central America.
- Ruta 27 was awarded the Blue Flag in 2025 for the ninth consecutive year, achieving 100 points and receiving five white stars, one green, one silver and one orange star.
- S.C.A. Costa Arauco, S.A. joined the fight against animal abandonment through an awareness-raising campaign on the consequences of abandoning animals on roads, in collaboration with the Lota Municipality Veterinary Centre and the Perreros de Lota association.

- S.C.A. Costa Arauco, S.A. took part in an environmental volunteering day in October to clean the wetland and Arauco Beach, removing approximately 3 tonnes of waste and 200 kg of glass.
- Between 24 June and 31 August, Metro de Sevilla C.J.A., S.A. hosted an exhibition in the Puerta de Jerez lobby, developed in collaboration with the Museum of Illusions of Seville and the Seville School of Art and Higher Design, featuring three pieces that reinterpret “The Image in Motion” and highlighting sustainability and the role of public transport as an agent of social transformation.
- We participated in the celebration of European Mobility Week by organising a school visit for a group of 60 children at the Metro de Sevilla C.J.A., S.A. facilities, during which we raised awareness about the positive environmental impact of using the metro as a sustainable public transport mode for urban and interurban journeys.

## 3.2 Climate change

### GRI 3-3

### 3.2.1 Integration of sustainability-related performance in incentive schemes

#### GRI 2-19, 2-20

At Globalvia we include our climate commitment in the variable remuneration system for the Company's managers. This is materialised by the inclusion of a specific goal tied to the achievement of the emission reduction our Organisation has committed to make, and which represents 20% of the Group's total variable remuneration.

### 3.2.2 Transition plan to mitigate climate change

Climate change is a core priority of our Sustainability Strategy, as reflected in the strategic line “Infrastructure to mitigate climate change.” We have been a part of the International Science Based Targets Initiative (SBTi) since 2020 and we are committed to complying with the Sustainable Development Goals (SDGs) that form part of the UN 2030 Agenda for Sustainable Development.

To advance this climate commitment, we have established a climate transition plan which includes the following elements.

- a) Establishment of science-based targets
- b) Decarbonisation of Globalvia's business
- c) Process of preparation and review of the Decarbonisation Plan
- d) Commitment to net-zero emissions

#### a) Science Based Targets Initiative (SBTi)

In line with our commitment to regularly review the ambition and robustness of our targets, in 2025 we undertook a comprehensive revision and updated our science-based emission reduction targets. The revised targets were successfully validated by the Science Based Targets initiative (SBTi) in September.

Under the revised targets, we are committed to reducing absolute Scope 1 and 2 emissions by 76.78% by 2035, and absolute Scope 3 emissions by 40% by 2035, compared to a 2019 baseline.

We aim to actively contribute to the transition toward a low-carbon economy by supporting efforts to keep the global average temperature increase well below 2°C and, where possible, limit it to 1.5°C, in line with the Paris Climate Agreement. In doing so, we reinforce our commitment to delivering sustainable, circular, and climate-resilient transport infrastructure and mobility services.

The progress towards our SBTi emissions target can be consulted in chapter 3.2.7, [“Targets related to climate change mitigation and adaptation”](#).

## **b) Decarbonisation of Globalvia's business**

Our Decarbonisation Plan is aligned with the Paris Agreement, as it is based on the implementation of a validated science-based target. The plan establishes a ten-year time horizon and includes quantified GHG emissions-reduction objectives, specific measures, and allocated resources to achieve these goals in the medium and long term. It is consistent with the transition to a sustainable economy and with the EU strategy to become climate-neutral by 2050.

The Decarbonisation Plan is a dynamic document that is periodically updated and subjected to a rigorous process of review, reporting, and auditing. It brings together all Globalvia concession-level plans developed to achieve the SBTi target, using 2019 as the baseline year for carbon-footprint data and aiming to reach the emissions-reduction goal by 2035.

The detailed analysis of our greenhouse gas footprint has enabled us to identify the key levers to advancing our decarbonisation targets. These levers include the transition to renewable electricity, the electrification of our vehicle fleet, the adoption of refrigerant gases with low GWP and ODP, the consolidation and engagement of our supplier base, the promotion of sustainable business travel, the reduction of waste generation and the integration of climate criteria in new investments. Further information on the specific decarbonisation actions associated with each lever can be found in section 3.2.6, [“Actions and resources in relation to climate change policies”](#).

In 2025, we continued to progress in the implementation of our Decarbonisation Plan at all Globalvia subsidiaries, with significant advances and a consequent reduction in carbon emissions, the full overview of which can be found in the chapter 3.2.9, [Gross Scope 1, 2, 3 and total GHG emissions](#).

## **c) Process of implementation and review of the Decarbonisation Plan**

The concessions' decarbonisation plans are periodically updated, with the latest review and actualisation having taken place in 2025. The resulting changes were included in Globalvia's Decarbonisation Plan by the Sustainability and Climate Change Department, which also reviews the degree of implementation of all the initiatives and the decarbonisation trajectory.

The latest revision involved adapting the plans to the updated SBTi target, assessing the effectiveness of the initiatives implemented during the plan's first strategic cycle and introducing new initiatives. The summarised version of the fully updated action catalogue can be found in the chapter 3.2.6, [Actions and resources related to climate change policies](#).

Quantitative information for emission reductions stemming from the decarbonisation actions can be found in the section 3.2.9, [Gross Scope 1, 2, 3 and total GHG emissions](#).

### d) Commitment to net-zero emissions

As part of the European Green Deal and in line with the goals established in the Paris Climate Agreement, at Globalvia we are committed to actively contributing to attaining Net-Zero emissions by 2050.

Our short-term SBTi targets define how we will reduce our emissions in the coming years. They guide the actions needed to achieve significant emission reductions by 2035 and represent the first step toward our ambition of reaching net-zero emissions by 2050.

## 3.2.3 Material impacts, risks and opportunities and their interaction with the strategy and business model

### GRI 201-2

We aim to proactively address the challenges and risks posed by climate change. To achieve this, we contribute to the transition to a low-carbon economy, advance our mitigation and adaptation targets, and strengthen the resilience of the infrastructure we operate.

As indicated in section 2.4.1.1, "[SustainMobility Strategic Plan 2027](#)", we have a strategic line named "Infrastructure to mitigate climate change", which includes actions to minimise and compensate our environmental impacts and reduce our emissions. The commitments undertaken are as follows:

### Infrastructure to mitigate climate change

Climate action plan	Environmental management excellence	Climate resilient infrastructure
<p>We want to position ourselves as a company taking ambitious action against climate change by setting science based emission reduction targets.</p>	<p>We are committed to implementing best environmental practises and minimizing our impacts to natural capital.</p>	<p>We attempt to improve company resilience by integrating climate risk and opportunities into risk management processes.</p>
<p>&gt; Renovate our Science based emission reduction commitment and Decarbonization Plan.</p>	<p>&gt; Implement Energy Management Systems (EnMS).</p>	<p>&gt; Consolidate Globalvia's Climate Change Strategy and framework.</p>
	<p>&gt; Implement sustainable pavement practices.</p>	<p>&gt; Manage Globalvia's Climate Change risks and build our Adaptation and Resilience Plan.</p>
	<p>&gt; Preserve our surrounding natural capital.</p>	<p>&gt; Integrate Climate Change Analysis for investment decisions.</p>

In line with the approach described in chapter 2.4.2, the material climate-related topics for Globalvia include energy and emission reduction (covering energy efficiency, energy consumption, and carbon emissions) and climate change adaptation (covering adaptation measures and infrastructure sustainability/resilience); further details on the subtopics and the methodology used to assess them are provided in chapter 3.2.4.

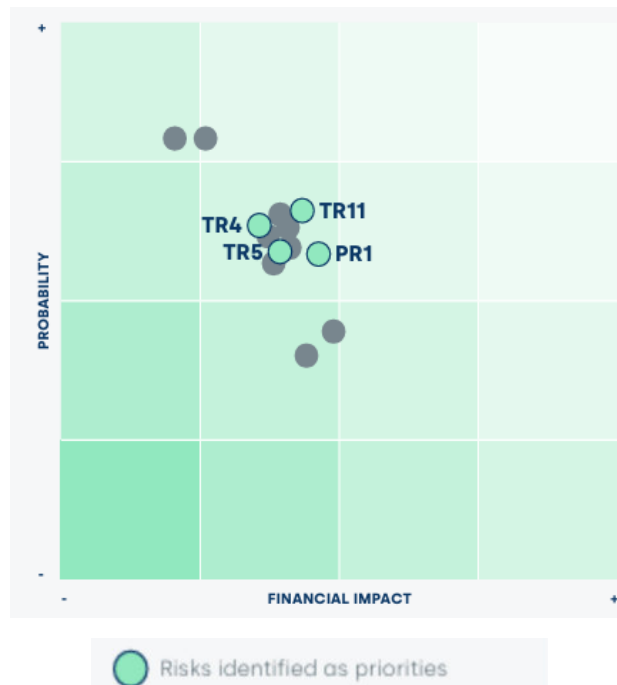
In addition, in 2022, we prepared our first report aligned with the recommendations of the Task Force on Climate Related Financial Disclosures (TCFD) with the aim of strengthening the management of Climate Risks and ensuring the integration of opportunities arising from emerging technologies, climate-related legislation and climate change mitigation and adaptation strategies.

During the process, the impacts on Globalvia's business were analysed in terms of both the Transition Risks and the Physical Risks derived from climate change, which are defined as follows:

- **Transition Risks (TR):** risks associated with the transition to a low-carbon economy in response to climate change, resulting from regulatory changes, market trends, technological evolution, etc.
- **Physical Risks (PR):** risks associated with an increased frequency and severity of extreme weather events or long-term climate changes that could cause physical damage to commercial assets, interruptions in the supply chain or increased operating costs.

To assess Globalvia's resilience to climate change risks, we conducted an evaluation and prioritisation process to identify those that are the most significant. The methodology used is explained in chapter 3.2.4, "[Description of the processes to identify and assess material climate-related impacts, risks and opportunities](#)". To carry out this analysis, several time periods and climate scenarios were considered, as detailed in chapter 3.2.4. The scope of this study included the concessions where Globalvia held more than 50% of operations at the reporting date.

As a result of this exercise, we elaborated a Climate Change Risk matrix that prioritises and summarises the climate-related risks the Organisation faces.



The table below summarises the risks that have been identified as priority:

PR1	<b>Chronic Physical Risk</b>	The changes in precipitation patterns and extreme climate variability give rise to the inability to predict and anticipate unexpected meteorological events that cause damage to assets, prevent service or proper functioning, and increase operating and maintenance costs.
TR4	<b>Technological Transition Risk</b>	Replacement or adaptation of existing facilities, vehicles and equipment with emerging technologies intended to support the global transition to lower carbon emissions.
TR5	<b>Technological Transition Risk</b>	Migration to new business models and integration of technologies in assets that facilitate the transition towards decarbonisation.
TR11	<b>Market Transition Risk</b>	Abrupt and unexpected changes in the prices and availability of energy and key raw materials.

With the aid of the climate risk assessment, we also identified the Company's capacity to adjust and adapt both our strategy and business model to climate change at the short, medium and long term (detailed information is available in the section 3.2.6, "[Actions and resources in relation to climate change policies](#)"). Lastly, we ensured that the SustainMobility Strategic Plan 2027 incorporates measures to capitalise on the main climate-related opportunities identified.

### 3.2.4 Description of the processes to identify and assess material climate-related impacts, risks and opportunities

#### GRI 201-2

As stated, climate change is one of the key matters for Globalvia, based on our analysis of double materiality. For further information on the methodological detail, please consult section 2.3.1, "[Description of the processes for the determination and assessment of material impacts, risks and opportunities](#)" of this report.

The analysis of the Group's resilience to identified climate risks was performed following the recommendations on climate-related financial disclosures of the Task Force on Climate Related Financial Disclosures (TCFD). Accordingly, regard was had to:

- **Transition Risks:** risks associated with the transition to a low-carbon economy in response to climate change, resulting from changes in legislation, the market, stakeholders, etc. to mitigate and address climate-change requirements. Specifically, 14 transition risks were considered, which are divided into the following types: policy and legal risks, technology risks, market risks and reputational risks.

These climate related transition risks, in the context of Globalvia's activities, could give rise to significant effects related to changes in market trends and customer behaviour (need to invest in new technologies, reduction in revenue due to a fall in the use of private transport, changes in users' demand patterns, etc.), changes in the availability of certain raw materials (abrupt disruptions to supply chains), changes in consumers' preferences regarding Globalvia's services (damage to the brand image because stakeholders' climate expectations are not satisfied), increase in marketing-related costs to increase the visibility of Globalvia's climate efforts or face investment exclusions arising from prohibitions for the sectors of the highest impact.

For this part of the analysis, Net-Zero (NZE) climate change scenarios were considered, which envisage different decarbonisation goals for the transport industry, as well as the Stated Policies Scenario (STEPS) and the Sustainable Development Scenario (SDS).

- **Physical Risks:** risks arising from climate change that might give rise to an increase in the frequency and severity of extreme weather events or long-term climate changes that could cause physical damage to business assets, interruptions in the supply chain or increased costs to deal with them. Specifically, 10 physical climate risks were considered, both chronic (changes in weather and precipitation patterns, extreme temperatures, frequent fires, rising sea levels, cold waves and droughts) and acute (different types of floods and storms).

These physical climate risks may cause damage to our physical assets, cause disruptions to operations of transport, suppliers and distribution, interrupt services to be provided, raise insurance costs or provoke mass displacement of potential users of services provided.

For this part of the analysis, we considered climate scenarios RCP 2.6 and RCP 8.5, both of which relate to radioactive concentration projections that lead to different global warming situations.

As regards the time horizons used for the analysis, the following were included:

- **Short term (2021-2030):** This time horizon is included in our Strategic Sustainability Plan - SustainMobility 2027. In addition, it is aligned with the initial SBTi targets and their original time horizon.
- **Medium term (2031-2040):** This time horizon is in line with the recommendations the SBTi initiative sets in relation to climate risk analysis and similarly it is aligned with the national strategy. It also allows the targets to be revised and adjusted after the end of Globalvia's Decarbonisation Plan in 2035.
- **Long term (2041-2050):** This time horizon was defined in line with the long-term development strategies to reduce greenhouse gases. Furthermore, it is a national policy instrument that directs national, sectoral and territorial actions to build a climate-resilient future in several countries. It represents long-term planning that demonstrates the country's international commitment to contributing to achieving the global goals laid down in the Paris Climate Agreement.

As regards the analysis of climate opportunities, which is also performed on the basis of the TCFD recommendations, we took into account the opportunities that arise mainly in the transition to a low-carbon economy, comprising the possibility of the creation of new market niches to be fostered or developed. This includes opportunities related to resource efficiency, the use of alternative energy sources, new products or services, markets and climate resilience.

### 3.2.5 Policies related to climate change mitigation and adaptation

#### GRI 2-23, 2-24

Since 2016 we uphold a Risk Management Policy, updated in 2022 by the Board of Directors, that establishes the framework for the identification, management and control of the risks to which Globalvia's activity is exposed. This policy includes climate-related risks as part of the strategic risks. It addresses areas described in previous subsections such as climate change mitigation through the Decarbonisation Plan, circular economy, efficient management of resources, energy efficiency and renewable energy. Moreover, this report contains information on natural capital, as well as the management of water and waste.

In 2023 we prepared and established the first internal procedure to define the framework and the guidelines to guide Globalvia's climate transition, entitled Climate Transition Guidelines.

Similarly, we also maintain a procedure that ensures the correct management of the amounts consumed by our operations, as well as a series of reduction plans for each subsidiary aligned with the carbon emission reduction goals established on the basis of our commitment to the SBTi initiative.

### 3.2.6 Actions and resources related to climate change policies

GRI 2-25, 302-4, 305-5, 305-6, 308, 306-2

In the framework of our Decarbonisation Plan to mitigate climate change risk, we identified a series of decarbonisation enablers, specific actions that are articulated around the decarbonisation levers described in the Climate Transition Guidelines procedure.

#### Efficiency and renewable electricity

We reduced our scope 2 emissions through the progressive efficiency improvements of our operations and the transition to renewable electricity sources. As of this year, renewable energy accounts for 77.4% of the electricity used in our Organisation. The key actions to drive outcomes in this area include:

- Install electric vehicle chargers to ensure internal electricity demand is met.
- Implement efficiency measures, including but not limited to monitoring of energy consumption and the replacement of conventional lighting with LED technology, inter alia.

In those countries in which the access to electricity from renewable sources is limited, such as Chile or Colombia, we also contribute to the development of these energy sources through the acquisition of renewable energy certificates (RECs and I-RECs). The main aim of these certificates is to provide a transparent and reliable system that facilitates the verification and monitoring of the generation of renewable energy, enabling companies and consumers to demonstrate that they use clean energy and meet sustainability goals.

#### Electrification of the vehicle fleet

In relation to combustion emissions, the Plan prioritises the electrification and optimisation of the vehicle fleet, alongside efficiency improvements and the use of alternative fuels. Key actions include:

- Progressive substitution of traditional combustion vehicles with hybrid and electric vehicles, as well as promoting eco-driving measures.
- Machinery optimisation through the acquisition of more efficient equipment, supported by operational measures.
- Use of alternative fuels, particularly the substitution of diesel with biofuels in vehicles, generators, and machinery.

#### Replacement of refrigerant gas

Regarding fugitive emissions, the Plan focuses on preventive maintenance and the gradual replacement of refrigerant systems to minimise climate impact. Actions in this area include:

- Renovation of outdated equipment.
- Substitution of refrigerant gases with alternatives that have a lower global warming potential.

### **Supplier commitment plan**

We are actively building a solid supplier base that contributes to our carbon-reduction objectives by strengthening climate-related capabilities across our value chain. This includes measures to reduce water consumption; changes to procurement processes to integrate CO<sub>2</sub>-related criteria; the development of contractual requirements linked to CO<sub>2</sub> performance; and the implementation of supply-chain collaboration projects. In parallel, we are advancing specific initiatives such as the digitalisation of transport tickets through tap-and-go solutions, the development of sustainable pavements to reduce the use of raw materials, and plastic circular-economy projects aimed at minimising raw-material consumption.

### **Encouragement of sustainable travel**

We develop travel policies that prioritise forms of interaction with a smaller carbon footprint, such as videoconferences or transport systems with lower carbon emissions, prioritising the use of trains in domestic travel and reducing the number of travellers in the same business trip.

### **Reduction of waste generation**

We encourage circularity initiatives and the search for best waste disposal options in our operations. Actions in this domain include improving final waste treatment and implementing circular economy projects to reduce plastic and raw material use. Moreover, we have a specific focus on implementing sustainable pavement practices which incorporate Reclaimed Asphalt Pavement (RAP).

### **Climate Criteria in investments**

We consider factors such as renewable electricity availability, low-carbon technologies, and environmental performance in investment decisions, while promoting SBTi-aligned targets and encouraging fleet electrification and the adoption of clean energy. Furthermore, building on the results of the climate risk analysis, in 2025 we developed a pilot project to integrate physical climate risks into investment decision-making processes. This initiative strengthens the resilience and robustness of our investment decisions and lays the groundwork for systematically embedding climate risk considerations into future planning and capital allocation.

In other developments, we started to work on adaptation strategies that seek to limit the risks arising from climate change and reduce vulnerabilities. This is the case of S.C.A. Costa Arauco, S.A., which, in October 2023 and in conjunction with the Chilean Ministry of Public Works (MOP), amended the concession arrangement to include the construction, upkeep, maintenance and operation of a tsunami escape route on the Erratchou - El Manco stretch. This area of the Bío Bío Region is classified as a tsunami inundation zone by the Chilean National Disaster Prevention and Response Service (SENAPRED). The Tsunami Walkway was finalised in June 2025 enabling the swift and safe evacuation of thousands of residents in the coastal area in the event of a tsunami alert. The project represents a relevant milestone in risk management and the protection of communities located near the concession in the Bío Bío Region.

Similarly, Ruta 27 carried out a simulation exercise to respond to a landslide, with the aim of increasing preparedness for natural events that may affect road infrastructure. These initiatives reinforce our commitment to user safety, service continuity and coordination with national institutions responsible for risk management.

### 3.2.7 Targets related to climate change mitigation and adaptation

#### GRI 305-5

As previously stated, as part of our commitment to strengthen the ambition and robustness of our climate strategy, in 2025 we carried out a comprehensive revision of our decarbonisation targets. The process included the retroactive recalculation of both target base year 2019 GHG emissions and target most recent year 2024 GHG emissions, to reflect company portfolio changes, as well as, accounting methodology changes and, therefore, ensure consistency and relevance of the reported information. The revised near-term target was successfully validated by the SBTi initiative in September 2025.

Our SBTi targets drive the actions required to achieve significant emission reductions by 2035, ensure the fulfilment of our climate ambition and provide a response to our stakeholders' growing expectations.

- **Scope 1 and 2 target:** absolute emission reduction of 76.78% by 2035 from 2019 base year.
- **Scope 3 target:** absolute emission reduction from purchased goods and services, capital goods, fuel- and energy-related activities, upstream transportation and distribution, waste generated in operations, business travel, employee commuting, upstream leased assets, and investments of 40% by 2035 from 2019 base year.

The commitment considers Globalvia updated portfolio total scope 1 and 2 and total scope 3 GHG emissions, fulfilling the SBTi emissions coverage requirement.

EMISSIONS COVERED BY SBTi TARGETS (tCO <sub>2</sub> eq)	Target base year 2019	Target most recent year 2024	Target performance 2025
SCOPE 1. Direct	1,848	1,911	1,835
SCOPE 2. Indirect	2,745	597	320
<b>Total 1+2</b>	<b>4,593</b>	<b>2508</b>	<b>2,155</b>
SCOPE 3. Other indirect emissions	269,100	242,402	236,292

Progress against the targets indicates that in 2025, emissions derived from own operations (scopes 1 and 2) decreased by 53.1% compared with the 2019 baseline emissions and by 14.1% compared with 2024 emissions. While, scope 3 emissions decreased by 12.2% compared with the baseline 2019 emission and by 2.5% compared with 2024 emissions.

As part of the framework of the European Green Deal and in line with the goals established in the Paris Climate Agreement, we at Globalvia are also committed to making an active contribution to attaining Net-Zero emissions by 2050.

### 3.2.8 Energy consumption and matrix

GRI 302-1, 302-2, 302-3, 302-4, 302-5

<b>7</b> AFFORDABLE AND CLEAN ENERGY 	<b>121,953 GJ</b> Energy consumption	<b>77.4%</b> Electricity sourced from renewable sources	<b>(15.5)%</b> Decrease from previous year
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At Globalvia we count with an Environmental Management System in accordance with the ISO 14001 standard that, among other aspects, helps us collect and consolidate energy consumption data. 82% of Globalvia's concessions are certified by AENOR under this standard. In addition, as indicated in the section 3.1 [Environmental information](#), in 2025, Ruta 27 attained a certification in accordance with the UNE-EN ISO 50001 energy management standard.

The primary sources of energy consumption at Globalvia are as follows:

- Electricity used in our operations and work centres.
- Vehicle travel for maintenance, upkeep, and surveillance, consuming diesel, petrol, biofuels, and electricity.
- Other fuel use, including diesel and petrol in machinery and electricity generators.

ENERGY PERFORMANCE	2023	2024*	2025	Variation (2024-2025)
<b>ELECTRICITY (GJ)</b>	<b>121,618</b>	<b>110,637</b>	<b>95,196</b>	<b>(14)%</b>
Renewable source (%)	71.3%	67.2%	77.4%	15.2%
Renewable I-RECs (%)	7%	12%	8%	(4)%
<b>TOTAL FUEL (GJ)</b>	<b>35,611</b>	<b>33,764</b>	<b>26,757</b>	<b>(20.8)%</b>
Gasoline	4,821	4,471	2,731	(38.9)%
Diesel	31,152	26,430	20,618	(22)%
HVO biodiesel	98	2,665	3,282	23.2%
Biodiesel ME	-	128	32	(75.3)%
LPG	79	69	93	34.6%
<b>TOTAL CONSUMPTION (GJ)</b>	<b>157,229</b>	<b>144,401</b>	<b>121,953</b>	<b>(15.5)%</b>
Energy intensity	177	168	160	(4.8)%

1. Energy intensity = total consumption/number of people employed at year-end.  
 Companies excluded from the scope of the information: Metro de Barajas.  
 \*Updated 2024 data following the inclusion of the most recent invoices in the estimates.

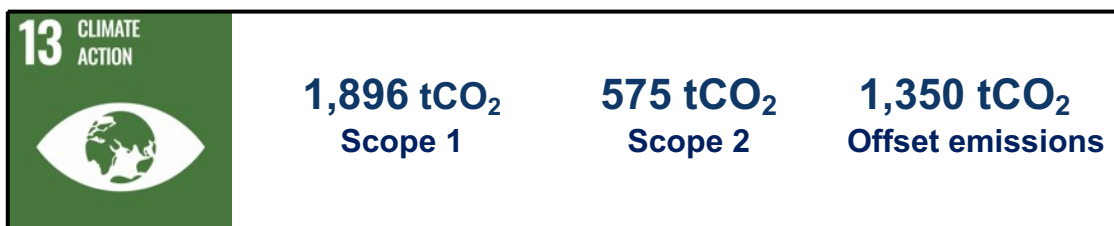
#### 2025 Milestones

- Autoestrada XXI-SU.Trans, S.A. completed the project to convert lighting at all road interchanges to LED technology, while ScutVías Autoestradas Beira Interior, S.A. completed the project to convert tunnel lighting to LED technology. The new lamps have a luminous efficiency of 163 lm/W, achieving a 60% reduction in installed power.

- Ruta Portuaria commissioned a photovoltaic installation at the Barranquilla Toll Plaza with an installed capacity of 52 kW and an estimated annual production of 86 MWh.
- AENOR certified Ruta 27 under ISO 50001 “Energy Management” following the implementation of an Energy Management System (EnMS) based on international standards, enabling the efficient management and optimisation of energy consumption, cost reductions and the minimisation of the environmental impact of its operations.
- Ruta 27 installed 20 new solar panels, with an average daily energy production of 30 kWh, at the multi-vehicle fast-charging centre for electric vehicles. In addition, it implemented the SER SOLAR project at the Escazú shelters, in partnership with ICE, to generate photovoltaic energy and strengthen sustainable infrastructure.
- Ruta 27 installed a dimming system in 100 lamps located in Turrúcares, Balsa and Coyolar, enabling average savings of 15%.
- In 2025, we continued to expand and strengthen the electric vehicle fleet with the addition of six new electric vehicles at Globalvia Jons, LTD, five at ScutVías Autoestradas Beira Interior, S.A., five at Autoestrada XXI-SU.Trans S.A., one at ACEGA together with the installation of four chargers, eight vehicles at S.C.A. Costa Arauco, S.A. together with the installation of six chargers, one hybrid vehicle at Pocahontas Parkway Operations, LLC, five electric vehicles at Ruta Portuaria, one hybrid vehicle at our Portuguese branch, and six electric vehicles and one Zero SR motorcycle for patrol duties at Ruta 27. It should be noted that a large proportion of road patrols are already carried out using electric vehicles.

### 3.2.9 Gross Scopes 1, 2, 3 and total GHG emissions

GRI 305-1, 305-2, 305-3, 305-4, 305-5



We calculate our carbon footprint in accordance with the GHG Protocol, covering direct (scope 1), indirect (scope 2), and other indirect (scope 3) emissions across all categories relevant to our operations.

The calculation perimeter includes all the companies over which Globalvia has operational control. In addition, the emissions generated by companies outside this scope of control are also considered through the investment category (3.15). Below is a description of the methodology for calculating the greenhouse gas emissions for each scope and category of the carbon footprint:

- **Scope 1:** direct emissions from vehicle fuel, fuel from facilities and generators, as well as leaks of fluorinated gases in air conditioning/refrigeration circuits. The activity variables are consolidated based on the registers of each asset's Integrated Management System. The emission factors used for the calculation are taken from the DEFRA and IPCC databases (for the refrigerant gas).
- **Scope 2:** emissions indirectly related to electricity consumption. The activity variable is consolidated based on the registers of each asset's Integrated Management System. The

emission factors for the calculation with a market-based approach are the emission factors of each of the electricity providers with which Globalvia's assets have electricity supply agreements. The emission factors for the calculation with a location-based approach are those published by the IEA of the electricity mix of each geography with attributed network consumption.

- **Scope 3:** other indirect upstream and downstream emissions arising from the Organisation's value chain. These are further divided into 15 categories, ten of which are relevant to Globalvia:
  - **3.1 Purchased goods and services:** the activity variables are obtained from the Company's Procurement Management System, while the emission factors used are those of the DEFRA databases (for the consumption of water) and the DEFRA Input-Output database (for the acquisition of products and services with an spend-based approach).
  - **3.2 Capital goods:** the activity variables are obtained from the Company's Procurement Management System, while the emission factors used are those of the DEFRA Input-Output database (with an spend-based approach).
  - **3.3 Fuel and energy-related activities:** the activity variables are those used for calculating the scopes 1 and 2 relating to fuels and electricity consumed. The phases taken into account comprise the extraction, production and generation of renewable energy and the transmission of all the imported energy. The emission factors used are those of the DEFRA and IEA databases.
  - **3.4 Transportation and distribution:** the activity variables are obtained from the Company's Procurement Management System, while the emission factors used are those of the DEFRA Input-Output database (with an spend-based approach).
  - **3.5 Waste generated in operations:** the activity variables are consolidated based on the registers of each asset's Integrated Management System, while the emission factors used are those of the DEFRA database.
  - **3.6 Business travel:** the activity variables are consolidated based on each concession's business travel registers and the kilometres travelled in the different types of transport, while the emission factors used are those of the DEFRA database.
  - **3.7 Employee commuting:** the activity variables are obtained from the findings of the mobility survey conducted, while the emission factors used are those of the DEFRA database.
  - **3.8 Upstream leased assets:** the activity variables are obtained from the Company's Procurement Management System, while the emission factors used are those of the DEFRA Input-Output database (with an spend-based approach).
  - **3.15 Investments:** the carbon footprint attributed to each investee is obtained directly from each investee's GHG emissions data.

We also calculate the category “**3.11 Use of sold products**” related to infrastructure use. According to the GHG Protocol recommendations, these emissions are not included in our GHG inventory. In this case, the activity variable is obtained from the average traffic on the highways, while the emission factors used are those of the DEFRA database.

EMISSIONS ARISING FROM THE USE OF THE INFRASTRUCTURE (tCO <sub>2</sub> eq)	2023	2024	2025
SCOPE 3. Other indirect emissions			
3.11. Use of the infrastructure (highways)	2,041,303	2,077,998	1,350,032

The implementation of the SBTi targets at our Organisation has conditioned the development of the carbon footprint calculation methodology and gave rise to the need to recalculate the values reported in 2019, 2024 and 2025 to ensure alignment with that standard (see chapter [3.2.7 Targets related to climate change mitigation and adaptation](#)). These SBTi targets are not reflected in the table shown below, or the degree of achievement thereof.

### GHG inventory

GHG EMISSIONS (tCO <sub>2</sub> eq)	2023	2024	2025	Variation (2024 - 2025)
SCOPE 1. Direct	2,551	2,236	1,896	(15.2)%
SCOPE 2. Indirect (market-based)	2,699	1,570	575	(63.4)%
SCOPE 2. Indirect (location-based)	7,076	5,956	3,530	(40.7)%
SCOPE 3. Other indirect emissions				
3.1. Purchased goods and services				
3.2. Capital goods				
3.3. Fuel- and energy-related activities				
3.4. Upstream transportation and distribution				
3.5. Waste				
3.6. Business travel				
3.7. Employee commuting				
3.8. Leased assets				
	53,847	45,420	31,195	(31)%
3.15. Investments	190,306	210,146	206,892	(1.5)%
No. of Companies	22	22	21	(4.5)%
<b>TOTAL Scope 1+2 (market)</b>	<b>5,250</b>	<b>3,806</b>	<b>2,471</b>	<b>(35.1)%</b>
<b>Scope 1+2+3</b>	<b>249,403</b>	<b>259,373</b>	<b>240,558</b>	<b>(7.3)%</b>
Emissions intensity per employee (tCO <sub>2</sub> eq scope 1&2/employees at 31/12/2025)	5.9	4.4	3.2	(26.9)%
Emissions intensity (tCO <sub>2</sub> eq scope 1&2/net income (M€))	10.3	8.3	6.1	(26.5)%

## 3.2.10 GHG removals and GHG mitigation projects financed through carbon credits

### GRI 305-5

At Globalvia we support carbon offset programmes to neutralise scopes 1 and 2 emissions that we have been unable to reduce or eliminate as of yet. In 2025, we offset 1,350 tCO<sub>2</sub>eq, equivalent to 55% of our emissions in our own operations, by participating in the United Nations voluntary carbon emission offset programmes in the framework of the Clean Development Mechanism for climate change. Specifically, the programme selected is a hydroelectric plant located in the hinterland of our Chilean concessions (Globalvia's main scope 2 emissions focus).

In 2025 we were carbon neutral at 8 concessions, our head and country offices and three companies of Globalvia’s technology platform. At geographical level, this means that our activity is carbon-neutral in 5 countries: Spain, Portugal, the United States, Costa Rica and Colombia. This neutrality is the result of the emission reduction actions implemented to reach Globalvia’s SBTi goals, together with the offset of the remaining emissions through the purchase of carbon credits.

### 3.2.11 Internal carbon pricing

The requirements tied to ESRS E1-8 do not apply to Globalvia’s activities, as we do not have an internal carbon price-setting system.

## 3.3 Pollution

### GRI 305-7

In addition to greenhouse gas emissions, travel in our vehicles generates other types of pollutants that can affect air quality and the environment. To address this, we are progressively electrifying our vehicle fleet, a measure that is already contributing to a gradual reduction in these emissions and pollutants and supporting our broader environmental objectives.

OTHER SIGNIFICANT ATMOSPHERIC EMISSIONS (kg)	2023	2024	2025	Variation (2024-2025)
Nitrogen oxides (NOx)	12,194	10,616	8,053	(24.1)%
Sulphur oxides (SOx)	5	5	3	(25.8)%

Companies excluded from the scope of the information: Metro de Barajas.

## 3.4 Water and marine resources

### GRI 2-25,303-1, 303-2, 303-3, 303-4, 303-5

**6**  
CLEAN WATER AND SANITATION

39,114 m<sup>3</sup>

Total consumption

(22)%

Decrease from the previous year

100%

Wastewater managed

The primary environmental impact associated with Globalvia’s water consumption stems from the depletion of water resources, which can affect communities and ecosystems, as well as the pollution of aquatic ecosystems through accidental spillages. Managing water sustainably is therefore essential to minimise these risks and protect the ecosystems surrounding our infrastructure.

According to the Aqueduct 4.0 Water Risk Atlas, the water stress indices at the locations of our main concessions are:

Aqueduct 4.0 Water Stress Index	
S.C. ACONCAGUA, S.A.	Extremely high (>80%)
METRO DE SEVILLA C.J.A., S.A.	Extremely high (>80%)
CONCESIONES DE MADRID, S.A.	Extremely high (>80%)
RUTA DE LOS PANTANOS, S.A.	Extremely high (>80%)
S. C. ITATA, S.A.	High (40-80%)
POCAHONTAS PARKWAY OPERATIONS, LLC	Medium-high (20-40%)
AUTOESTRADA XXI-SU.TRANS, S.A.	Medium-high (20-40%)
AUTOPISTA CENTRAL GALLEGA, S.A. (ACEGA)	Medium-low (10-20%)
GLOBALVIA JONS, LTD	Medium-low (10-20%)
AUTOPISTAS DEL SOL, S.A. (Ruta 27)	Medium-low (10-20%)
SF CONVIAS S.A.S. (Ruta Portuaria)	Low (<10%)
S.C.A. COSTAARAUCO, S.A.	Low (<10%)
SCUTVÍAS AUTOESTRADAS BEIRA INTERIOR, S.A.	Low (<10%)

In the case of Globalvia, the main source of water consumption is in the conduct of the Organisation's operations, such as washing vehicles and machinery, maintenance and construction tasks (i.e. production of brine for winter road maintenance), and for use in staff bathrooms.

EXTRACTION AND CONSUMPTION OF WATER BY TYPE OF SOURCE (%)	2023	2024	2025	Variation (2024-2025)
Potable water	66%	79%	79.2%	0.2%
Underground water resources	34%	20.4%	19.8%	(0.6)%
Collection of rainwater	-	0.7%	1.0%	0.3%

Companies excluded from the scope of the information: Metro Barajas Sociedad Concesionaria, S.A.

WATER CONSUMPTION BY COUNTRY (m3)	2023	2024	2025	Variation (2024-2025)
Chile	24,289	20,079	6,445	(67.9)%
Colombia	-	1,572	2,605	65.7%
Costa Rica	16,575	14,431	14,235	(1.4)%
Ireland	4,020	2,229	3,955	77.4%
Portugal	2,154	2,767	2,634	(4.8)%
Spain	11,696	9,033	9,020	(0.1)%
USA	616	132	220	67.5%
<b>TOTAL</b>	<b>59,350</b>	<b>50,242</b>	<b>39,114</b>	<b>(22.1)%</b>

Companies excluded from the scope of the information: Metro Barajas Sociedad Concesionaria, S.A.

To combat the negative impacts associated with water use, we implement measures to ensure responsible and sustainable consumption and management of water resources in our operations, including the following:

- Promotion of a rational usage of resources.
- Boosting the use of recycled nonpotable water for cleaning or maintenance activities.
- Actions to make use of rainwater.
- Preventive maintenance of facilities and machinery.
- Periodic inspections of the facilities in order to prevent losses through leaks, drips, overflowing, etc.

Proper management of the discharges caused in our activity fulfils the minimum quality criteria established by current legislation in all countries in which the Organisation operates. We have a waste management procedure in place at an internal level. All of the wastewater is discharged into local wastewater treatment networks to be handled by third parties.

The potential types of discharge identified as a result of our operations are:

- Discharges from the facilities (washrooms, toilets, etc.).
- Discharges from the washing of vehicles and machinery.
- Discharges arising in the infrastructure construction phase.

### 3.5 Biodiversity and ecosystems

GRI 2-25, 304-1,304-2, 304-3

Preserving biodiversity and our surrounding ecosystems is one of the objectives of our sustainability strategy SustainMobility2027. We are committed to implementing best environmental practices in our operations and minimising our impacts on natural capital.

We aim to proactively identify and mitigate any potential environmental impacts arising from our activities. Where impacts occur, we work to restore affected ecosystems and promote biodiversity by implementing measures that enhance ecological value and connectivity.

Goals	Actions
<ul style="list-style-type: none"> <li>• Identify and prevent the potential impacts, mitigating what we cannot avoid.</li> <li>• Restore the ecosystems adjacent to our infrastructure.</li> <li>• Promote territorial defragmentation and increase ecological connectivity.</li> <li>• Promote the protection of biodiversity.</li> </ul>	<ul style="list-style-type: none"> <li>• Good practices to manage vegetation, avoiding the use of phytosanitary and pesticide products.</li> <li>• Landscape restoration and tree-planting projects.</li> <li>• Indigenous species rescue activities.</li> <li>• Maintenance of wildlife crossings to reduce the barrier effect and increase permeability.</li> <li>• Maintenance of perimeter enclosures and access control, to reduce fatalities and accidents.</li> <li>• Installation of reflectors</li> <li>• Recommendations of the All-Ireland Pollinator Plan.</li> </ul>

In 2025, we became an adopter of the Taskforce on Nature-related Financial Disclosures (TNFD), committing to implement its recommendations and to begin issuing TNFD-aligned disclosures from financial year 2026. In this first year, prior to the aligned report, we focused on analysing the sensitivity of our sites and reviewing relevant biodiversity indicators, enabling us to begin to understand and prioritise our nature-related risks.

To enhance our analysis, we utilised the WWF Biodiversity Risk Filter (WWF BRF), a tool that identifies and prioritises biodiversity-related risks. This tool is aligned with TNFD recommendations and tailored to the Science-Based Targets for Nature (SBTN) guidelines. The WWF BRF leverages global biodiversity data to assess location- and sector-specific physical, regulatory, and reputational risks; it analyses 56 datasets to generate scores for the importance and integrity of 29 indicators, providing details on rationale, risk score thresholds, and data sources.

For our analysis, we focused on two WWF BRF risk categories: “Pressure on Biodiversity” (sourced from IPBES, HydroBASINS, and the Invasive Species Specialist Group’s Global Invasive Species Database) and “Environmental Factors” (from UNEP-WCMC’s World Database of Protected Areas and BirdLife International’s Key Biodiversity Areas). The exposure level of each of our concessions to those two risk categories is presented below:

AUTOPISTA CENTRAL GALLEGA, S.A. (ACEGA)	Iberian Peninsula (614)	Medium	Medium
CONCESIONES DE MADRID, S.A.	Tagus	Medium	High
S.C.A. COSTA ARAUCO, S.A.	South Pacific (379)	High	High
GLOBALVIA JONS, LTD	Ireland	Medium	Low
POCAHONTAS PARKWAY OPERATIONS, LLC	North Atlantic (447)	High	Medium
AUTOPISTAS DEL SOL, S.A. (Ruta 27)	North Pacific (474)	High	High
SF CONVIAS S.A.S. (Ruta Portuaria)	Magdalena	Medium	High
SCUTVÍAS AUTOESTRADA BEIRA INTERIOR, S.A.	Tagus	Medium	Medium
AUTOESTRADA XXI-SU.TRANS, S.A.	Douro	High	Medium
METRO DE SEVILLA C.J.A., S.A.	Guadalquivir	High	High
METRO BARAJAS SOCIEDAD CONCESIONARIA, S.A.	Tagus	Medium	High

Source: WWF Risk Filter Suite v2.0

Furthermore, we have identified potential sensitive areas by determining if our assets pass through territories with a certain degree of environmental protection. This relates to the following cases:

- Concesiones de Madrid, S.A.: the M45 crosses the Regional Park of the Southeast as it passes through the municipality of San Fernando de Henares (Madrid, Spain).
- Autoestrada XXI-SU.Trans S.A.: the highway is within the area of influence of the Albufera de Azibo Protected Natural Site and borders the Montesinho Nature Park, which belongs to the Portuguese Protected Areas Network (RNAP).
- Globalvia Jons: the highway is within the area of influence of the Broadmeadow Estuary, a Ramsar site from the EU Natura 2000 network, and the Glen of Downs Natural Reserve.
- Although Ruta 27 does not directly cross protected wild areas, its route is within the area of influence of important ecosystems and biological corridors managed by SINAC, highlighting the Carara National Park and the Paso de las Lapas Biological Corridor.

We also started monitoring relevant metrics and put in place specific measures to preserve biodiversity and enhance habitats:

Number of measures to avoid animal collisions and mitigate fragmentation	2025
Wildlife overpasses (in number)	10
Crossings for small animals: culverts and underpasses (in number)	87
Canopy bridges (in number)	2
Fenced sections (in km)	982
Camera traps for biological monitoring (in number)	12
Animal detection system (in number)	43
Drivers' warning signs (in number)	187

Actions on habitats	2025
<b>Habitat maintained (ha)</b>	
Habitat retained in its current condition through management practices, excluding protection, enhancement, or restoration.	1,696
<b>Habitat enhanced or restored (ha)</b>	
Disturbed habitat identified and improved for the benefit of native animal and plant species occurring in the area.	4.25
<b>Habitat protected (ha)</b>	
Habitat secured from impacts to prevent fragmentation, species extinction or reduction in range.	28

In terms of wildlife mortality on our highways, the number of wildlife fatalities decreased considerably between 2023 and 2024 but remained stable in 2025 (fatalities/vehicle). Nevertheless, the total number of threatened and endangered (T&E) species fatalities decreased by 29% in 2025 compared with the previous year.

**2025 Milestones**

- Ruta Portuaria continued to make progress with its “Living Barrier, Swinglea Lemon” planting project, with the aim of strengthening those areas where the species is already established as well as expanding new areas, consolidating a vegetation line made of 7,300 plants.
- Ruta 27 continued its planting programme “Forests with Purpose, reforestation with sustainable social impact”. During 2025, 1,208 native trees were planted, representing 40 different species, with the participation of 31 people directly benefiting through employment and 169 volunteers.
- Ruta 27 strengthened training for its employees on the proper procedures when wildlife is found on the road through the production of educational videos developed jointly with the concession’s biologist. In addition, new warning signs were installed at wildlife crossing points identified by the concession’s biologist in the annual biological

monitoring. In 2025, 13 domestic species and 15 wild species were rescued under the animal rescue programme for species found on the road.

### 3.6 Resource use and circular economy

One of the main environmental challenges is to transform the current linear economy model into a circular economy model to maximise the lifecycle of products and services, reduce the consumption of raw materials and minimise the generation of waste. At Globalvia we are committed to advancing this transition by integrating circular economy principles into our operations and infrastructure projects.

#### 3.6.1 Waste management

GRI 306-1, 306-2, 306-3, 306-4, 306-5

We maintain a management procedure applicable to both staff and contractors to ensure proper management of hazardous and non-hazardous waste generated in our operations.

WASTE GENERATED (t)	2023	2024	2025	Variation (2024-2025)
<b>Total Waste (t)</b>	<b>66,548.36</b>	<b>10,289</b>	<b>13,603</b>	<b>32.2%</b>
Non-hazardous (%)	99.9%	99.5%	99.8%	0.3%
Hazardous (%)	0.1%	0.5%	0.2%	(0.3)%

Companies excluded from the scope of the information: Metro Barajas Sociedad Concesionaria, S.A.

The most significant impacts arising from the waste generated at Globalvia are the contamination of soil and water and the degradation of the habitats where we operate.

Potencial waste from our activity	
HAZARDOUS WASTE	NON-HAZARDOUS WASTE
<ul style="list-style-type: none"> <li>Used oils</li> <li>Spill absorbents</li> <li>Contaminated plastics and packaging</li> <li>Contaminated rags</li> <li>Air or oil filters</li> <li>Waste electrical and electronic equipment (WEEEs)</li> </ul>	<ul style="list-style-type: none"> <li>Tyres, wheel rims, etc. (road cleaning)</li> <li>Organic waste</li> <li>Paper and cardboard</li> <li>Plastic containers and packaging</li> <li>Plant waste</li> <li>Urban solid waste</li> </ul>

An analytical procedure is applied to the main impacts and risks concerning waste generation to establish a series of lines of action and specific prevention measures.

Lines of action	Measures
<ul style="list-style-type: none"> <li>Minimise and recover waste.</li> <li>Engage in proper separation, labelling and storage of waste.</li> <li>Ensure the correct treatment and ultimate disposal of waste.</li> <li>Prioritise recovery over disposal.</li> <li>Raise user awareness and knowledge.</li> </ul>	<ul style="list-style-type: none"> <li>Reuse of plastics (agreement with the company Pedregal for Ruta 27) and tyres.</li> <li>Tool to identify and evaluate compliance with legal requirements, including those applicable to waste generation and management.</li> <li>Hazardous and Non-Hazardous Waste Management procedures.</li> <li>Specific Management System record for waste data, in which each company registers waste collections as they occur.</li> </ul>

FINAL DISPOSAL OF WASTE (t)	2023	2024	2025	Variation (2024-2025)
Reuse	60,651.51	1,898	9,037	376.1%
Landfill	4,143.06	4,893	2,939	(39.9)%
Recycling	577	1,052	1,501	42.7%
Waste to energy	1,168.74	2,435	104	(95.7)%
Composting	3	2	14	460.5%
Incineration	5	5	6	33.7%
Other or unknown final elimination	1	3	-	(86.5)%

Companies excluded from the scope of the information: Metro Barajas Sociedad Concesionaria, S.A.

### 2025 Milestones

- Ruta 27 continued to promote the use of bioremediations and absorbent moss to improve spill response, significantly reducing the generation of hazardous waste.
- Ruta 27 continued its plastic material recycling project using materials collected along the road through the installation of 145 plastic vertical signposts and the use of 3D printing to produce different plastic components. In addition, plastic waste was reduced through the reuse and repair of traffic cones by replacing the reflective collars.
- Ruta 27 reused 8,058 tonnes of profiling material in maintenance works and donations to municipalities to improve cantonal roads.

### 3.6.2 Responsible use of materials

The main raw materials used in our operations are asphalt agglomerate, concrete, cement, sand, sepiolite, paint and salt.

In view of the shortage of natural resources, we have implemented measures based on efficient resource management and circular economy models, thus contributing to resilience and adaptation to climate change and to sustainable development.

Our responsible management and consumption of raw materials is based on the following principles:

- Process optimisation by encouraging the rational use of resources.
- Purchase planning, bearing in mind quantities and reusable containers.
- Proper inventory, storage and protection of resources.
- Giving priority to the use of sustainable materials.

CONSUMPTION OF MATERIALS	2023	2024	2025	Variation (2024-2025)
Asphalt agglomerate (t)	55	34	15	(57.4)%
Concrete, cement, sand and other (t)	23	67	47	(28.9)%
Herbicide-Phytosanitary products (l)	1,565	580	52	(91)%
Paint (roads, structures, etc.) (l)	1,655	4,082	844	(79.3)%
Salt (winter road safety campaigns) (t)	354	220	262	19.4%
Other chemical products (kg)	1,389	3,381	3,738	10.6%
Other chemical products (l)	4,883	5,126	4,507	(12.1)%

Companies excluded from the scope of the information: Metro Barajas Sociedad Concesionaria, S.A. and Globalvia Jons, LTD.

### 2025 Milestones

- On the Portuguese motorways, progress continued to be made in the reuse of milled asphalt in paving works. The paving campaign carried out at Autoestrada XXI-SU. Trans in 2025 included 30% milled asphalt in all pavement layers, except at interchanges. In the campaign carried out at ScutVias Autoestradas Beira Interior, S.A., the implementation of 30% milled asphalt in the base layers was initiated.

## 4. Social information

### 4.1 Our workforce

#### GRI 3-3

A key pillar of our Sustainability Strategy is our commitment to making Globalvia a place where employees can develop professionally, take pride in their work, and maintain a healthy work-life balance. We also work daily to foster a fair and equitable workplace, promoting diversity, inclusion, and equal opportunities for all.

We have several policies and procedures that foster continuity in leadership and ensure that our services are provided in accordance with our quality standards, with all these aspects formalised in our General Human Resources Process.

We seek to attract and retain the best talent and to establish the ideal conditions for their long-term development and commitment. To this end, we foster a culture where people can grow, contribute and make an impact. All in accordance with the ethical principles and values set out in our [Code of Ethics and Conduct](#), updated in 2025, as detailed in section 5.1.2, [Corporate culture and business conduct policies](#).

#### 4.1.1 Distribution of the workforce

##### GRI 2-7, 405-1

In 2025, the concession periods of several Globalvia projects came to an end, resulting in a reduction in the Group's workforce. The most significant impact occurred in Chile, following the exit of S.C. Aconcagua, S.A. and S.C. Itata, S.A. from the Group's perimeter.

OUR TEAM	2023	2024	2025
<b>Total number of employees</b>	<b>887</b>	<b>858</b>	<b>762</b>
Women (%)	25%	25%	25%
Men (%)	75%	75%	75%
Full-time (%)	98%	99%	99%
Permanent (%)	96%	93%	94%

BREAKDOWN OF EMPLOYEES BY COUNTRY AND GENDER	Spain	Costa Rica	Portugal	Chile	Ireland	USA	Colombia	TOTAL
<b>(at 31 December)</b>								
<b>Total*</b>	<b>337</b>	<b>118</b>	<b>134</b>	<b>38</b>	<b>49</b>	<b>14</b>	<b>72</b>	<b>762</b>
Women	99	18	25	9	7	8	28	194
Men	238	100	109	29	42	6	44	568

\*In Spain, three employees are currently on expatriate assignments in different Globalvia companies. In certain tables, these employees are presented under their respective host entities rather than under Globalvia Corporación.

Regarding the geographical breakdown of our workforce, Spain is the country with the largest proportion of employees, totalling 337, and accounting for 44% of our global workforce.

In all our markets we are committed to the ongoing improvement of diversity and inclusion, particularly in terms of gender, in a traditionally male-dominated industry. We have made significant progress in our strategy to attract and retain female talent. In Spain where women represent approximately 29% of our workforce, we have created an inclusive environment that

supports the development of women in the industry. Also, in other countries such as Colombia and Chile, women represent almost 39% and 24% of the workforce, reflecting the positive impact of our local initiatives. Although challenges remain in markets such as Costa Rica and Portugal, where women represent roughly 15% and approximately 19%, we continue to be committed to fostering an inclusive culture that offers equal opportunities for everyone.

Regarding the time horizons of contracts, as in prior years, the data reflects our commitment to stable employment, with the vast majority of our employees being hired on permanent contracts. Of a total of 762 employees, 94% have permanent contracts and 99% are full-time.

See [Appendix IV “Social Indicators”](#) for further information on the breakdown of employees by different criteria.

As part of the consolidation of the Work Climate Survey, in 2025 we launched the 5th Engagement Survey to assess employee satisfaction and determine whether the Organisation meets their expectations. Addressed to all Group employees, the survey covered topics such as work-life balance, compensation, leadership style, team relationships, and development opportunities, among others. Work-life balance, flexibility, teamwork, and a positive work environment remain the main pillars of well-being. In addition, our employees emphasise the importance of motivating leadership, clear communication of the Organisation’s strategy and objectives to engage the entire workforce, and fostering recognition, development plans, and training opportunities.

During the reporting period, several updates and adjustments were implemented across different geographies to ensure alignment with evolving labour regulations and internal workforce management practices. These changes resulted in specific actions and policy updates applicable to Globalvia.

## 4.1.2 An equal and diverse team

### GRI 406-1

At Globalvia we comply with the legislation in the countries in which we operate and follow international best practices in equality and diversity. Furthermore, as a supporting resource, we have an internal Equal Opportunities and Diversity Policy in place.

Regarding the inclusion of people with disabilities, we abide by the various regulations on integration and universal accessibility, facilitating the inclusion of disabled people in any area of our operations. In the case of Spain, we comply with the General Law on the rights of persons with disabilities and their social inclusion. See [Appendix IV, “Social Indicators”](#) for further information.

Through our Human Rights and Community Relations Policy, we have strengthened our commitment in this area by establishing the principles and guidelines to consolidate respect for human rights and promote responsible and sustainable business practices in all of our concessions’ areas of influence.

### 2025 Milestones

- At Globalvia Inversiones we continued to collaborate with A LA PAR Foundation by supporting its programme to facilitate the workplace integration of young people with intellectual disabilities. Our employees took active part in its CAMPVS training programme by delivering several master-classes during 2025, as well as through the mentoring programme. In 2025 an awareness workshop in different capacities was celebrated in our offices in which a group of CAMPVS students were invited to share their experience and motivations, as well as to talk about some of the barriers they still find in their professional development and daily lives.

- Similarly, At Globalvia Inversiones we kept providing support to Adecco Foundation's Female Employment Project by sharing relevant job opportunities with the Foundation when openings aligned with its talent pool, supporting the labour integration of vulnerable women, including victims of gender-based violence, to find stable employment.
- In the same company, Globalvia Inversiones, we continued our cooperation agreement with the Ángel Mariscal Association in support of its PEPO Project, which assists women who have been victims of gender-based violence in rebuilding their lives. Through the training of protection dogs, known as 'pepos', which are assigned to these women, the programme aims to help them regain self-confidence and independence. Where necessary, the initiative also provides psychological and legal support.
- At Metro de Sevilla C.J.A., S.A. we moved forward in our collaboration with the Ana Bella Foundation for Aid for Battered Women and Single Mothers. In 2025 our Metro de Sevilla C.J.A., S.A. team has trained a total of 11 women: 7 for both station and driving roles, and 4 for station roles. All of them were hired to cover service needs in temporary positions. As a result, we have created employment opportunities for women in vulnerable situations in a field where they were previously underrepresented, while enriching our workforce with skilled and highly motivated professionals.
- At Globalvia Inversiones and Openvia Mobility, S.L. we continued our commitment with "Grandes Amigos" Foundation as part of our internal CSR programme "With you, 1=2", through which employees can voluntarily donate a monthly amount that is matched by the Company. Grandes Amigos seeks to combat loneliness among the elderly in our society by providing them with volunteers to accompany them, strengthening ties with neighbourhood networks and raising awareness in this area. In 2025 two volunteering activities were organised with Grandes Amigos, that were joined by 11 volunteers.

#### Equality for women and men

At Globalvia we maintain our firm commitment to equal treatment and equality by fostering an environment that favours both the personal growth and the professional development of our employees. This commitment is reflected in selection processes based on ability and merit, as well as a rigorous evaluation and monitoring system founded on measurable objectives. We also review our remuneration policies, taking into account the impact on each function within the business, provide training adapted to individual needs and foster open and transparent communication, raising awareness of diversity and ensuring that discriminatory language is removed from all areas of the Organisation.

Equality is one of the core principles of our compulsory [Code of Ethics and Conduct](#), which was formally updated during the year 2025 to reinforce our commitment to equal opportunities and fair treatment (see [section 5.1.2, Corporate culture and business conduct policies](#)). Any violation of this principle is considered a very serious breach of the contractual relationship. In line with this commitment, the Collective Agreements applicable to Globalvia subsidiaries include measures and principles aimed at guaranteeing equal opportunities and non-discriminatory treatment. Moreover, to ensure correct application of these values and principles, at Globalvia we have a Chief Compliance Officer, an Ethics Channel and a specific investigation and management procedure for the channel, which allows anyone to report any possible infringements or psychological or sexual harassment. This mechanism also functions as a tool for prevention and taking action in cases of workplace harassment or gender-based discrimination. Lastly, it is crucial to highlight the existence of a specific Protocol for the prevention and action against conduct affecting sexual freedom and moral integrity in the workplace, which was updated during the year.

## 2025 Milestones

- In line with our equality-related commitments, in 2025 we updated the Protocol for the prevention and action against conduct affecting sexual freedom and moral integrity in the workplace, approved in June 2025, incorporating the provisions established in the new LGTBI regulation (Royal Decree 1026/2024, of 8 October).
- We further strengthen our commitment by offering training and awareness initiatives across the five pillars of diversity (gender, abilities, LGBTQ+, generational, and cultural), driven by the launch of the DEI Portal in June 2024. This initiative is complemented by specific training actions, such as the LGBTIQ+ diversity session in collaboration with REDI and the monitoring of the Equality Plan, whose progress and effectiveness have been positively assessed.
- In 2025, the Moving Stories programme was launched to collaborate with Globalvia's Diversity Network, focusing on expanding their training and knowledge in Diversity, Equity, and Inclusion, and providing them with the tools to effectively carry out their role as internal ambassadors.
- At Globalvia Inversiones, we highlight the number of women who have taken part in professional development training. In this respect, 33% of the training initiatives given individually were for women.
- Ruta Portuaria has integrated equality actions into its Human Resources policies, resulting in 41% of the workforce being female, a notable achievement given the male-dominated characteristics of the sector.
- At Metro de Sevilla C.J.A., S.A., the new Equality Committee has been established, which will be responsible for drafting and negotiating the company's Third Equality Plan.
- At Globalvia Inversiones, a follow-up meeting was held with the trade union CC.OO., during which the measures included in the Equality Plan were reviewed, their status was assessed, and updates were made as necessary.
- ACEGA completed the First Equality Plan (2022–2025) in April 2025. The Plan was formally closed at the Monitoring Committee meeting held in June 2025. Most of the measures agreed under the Plan were successfully implemented, and the proposed objectives were achieved.
- ACEGA established the Negotiating Committee for the Second Equality Plan in September 2025.

## Prevention of harassment

The Compliance System has been consolidated at Globalvia as a solid framework that ensures the protection of sexual freedom and the psychological well-being of all employees and the people who work with us. The Code of Ethics and Conduct and each company's specific policies and internal regulations expressly prohibit any conduct constituting workplace, sexual or gender-based harassment.

## 2025 Milestones

- The Protocol for the prevention and action against conduct affecting sexual freedom and moral integrity in the workplace, for Globalvia Inversiones, Openvia Mobility, S.L. and Bluenest by Globalvia, as previously indicated, has been updated to incorporate the provisions established under the new LGTBI regulation (Royal Decree 1026/2024) in line with Globalvia's commitment to ensuring a workplace that respects the dignity and freedom of all employees.

- At Metro de Sevilla C.J.A., S.A. they have agreed to incorporate the measures on equality and non-discrimination for the LGTBI Group within the Collective Bargaining Agreement, which is being negotiated for this purpose.
- ACEGA updated the Protocol for the prevention and action against conduct affecting sexual freedom and moral integrity in the workplace in 2025 in line with the corporate one.

Regarding the management of complaints, no cases of discrimination were recorded in the year 2025 at any Globalvia subsidiaries, either on grounds of gender or for any other reason. Therefore, no measures needed to be implemented.

### 4.1.3 Talent development

GRI 2-18, 404-1, 404-2, 404-3

#### Training

In line with its strong commitment to people development, we made a significant investment in training during the year, delivering a total of 27,687 hours of learning, equivalent to an average of 36 training hours per employee. This sustained effort reflects a clear focus on continuous learning and capability building across the workforce. The higher average number of training hours among women (47 hours per year, compared to 33 hours for men) is primarily explained by workforce composition, as office-based employees and management positions are the groups that receive the highest volume of training. In this regard, 70% of women are concentrated in these two professional levels.

#### 2025 Milestones

- Ongoing training and awareness-raising actions on the five pillars of diversity-gender, capabilities, LGTBIQ+, and generational and cultural diversity-continued throughout the year, supported by the Diversity Portal, which provides specific documentation and resources to foster the ongoing development of these pillars.
- Continuity of the Pharos platform, through which employees can access different modules and specialist content in engineering, infrastructure, public/private cooperation, technologies, information systems and soft skills.
- Organisation of other informative actions which are not considered regulated training, but which provide knowledge, such as industry-related conferences, presentations and meetings.

On the subject of career transition outside Globalvia when professionals' contractual relationships are severed in certain circumstances, Globalvia has a framework agreement with Adecco – LHH, whereby we offer a three- to six-month outplacement programme to any employee at Globalvia Inversiones and to management staff at Globalvia, providing them with a team of consultants specialised in career transition.

#### Performance assessment

The performance assessment procedure involves identifying and measuring the established annual objectives relating to the professional performance of the Organisation's employees. The basis is the Development Plan, which detects the needs of the areas and departments to respond effectively to the needs of the Organisation as a whole. This plan sets out a policy establishing the attitudes, skills and technological knowledge required for employees to be able to take on responsibility in the next level of the Organisation. Lastly, it establishes that everyone in a management role must receive an annual performance assessment which is also linked to

their variable remuneration. The Concessions are working on the gradual implementation of this procedure at lower levels.

Furthermore, 100% of managerial staff undergoes performance evaluations in accordance with the Group's performance management policy implemented across the Company. All employees share common corporate objectives, which include a sustainability-related goal every year, reflecting the Group's commitment to integrating environmental, social and governance (ESG) criteria into decision-making, performance management and long-term value creation.

See [Appendix IV "Social Indicators"](#) for further information on talent development and retention at Globalvia.

#### 4.1.4 Health and safety

**GRI 403-1, 403-2, 403-3, 403-4, 403-5, 403-6, 403-7, 403-8, 403-9**

At Globalvia we maintain an Occupational Health and Safety Management System (OH&S). In addition, all companies within the Globalvia Group comply with the requirements applicable in the jurisdictions in which they operate and 100% of Globalvia's companies are covered by the Integrated Management System.

The health and safety of our employees is our priority, supported by a total of 82% of our concessions having been certified under the ISO 45001 by AENOR, an international standard whose compliance is audited both internally and externally on an annual basis.

Our Management System integrates the following Occupational Health and Safety procedures:

- Hazard identification and occupational risk assessment
- Operational control, monitoring, and measurement of occupational health and safety
- Health surveillance
- Coordination of business activities
- Preventive resource management
- Machinery and equipment control
- Personal protective equipment (PPE) control
- Safety inspections
- Incident investigation

All these processes take into account the applicable national regulations and the specific activities carried out by each company.

Furthermore, we have an online platform in place, developed to manage regulations related to Occupational Risk Prevention and Occupational Health and Safety, as well as iMetrics, a dashboard used to manage these aspects. The latter tool enables the measurement of key indicators such as accident rates, absenteeism, and specific training, among others. Likewise, we carry out periodic monitoring of the main identified risks, which include ergonomic and psychosocial risks among office-based employees, ergonomic risks among drivers in the railway business, and physical risks - such as falls - within operations and maintenance teams.

Simultaneously, we consider it essential for employees to play an active role in the management and promotion of their own health and safety. To facilitate their participation, various communication channels are available, including email, notice boards, the Ethics Channel, a

suggestion box, and regular meetings with legal or trade union representatives in those companies where such representation exists.

In addition, some companies conduct quarterly or semiannual surveys to gather employee feedback on different aspects related to occupational health and safety. Employee involvement in health and safety matters is also encouraged through various dedicated bodies, whose structure varies depending on the company and the country in which they operate:

- Prevention Representatives at ACEGA.
- Occupational Health and Safety Committees at Metro de Sevilla C.J.A., S.A., Ruta Portuaria, and all the Portuguese companies.
- Joint Health and Safety Committees at the Chilean companies.
- Emergency Team at Globalvia Infraestructuras, Openvia and Bluenest by Globalvia.

On the other hand, the internal management of health and safety matters is handled at different organisational levels in each company. Depending on the case, this responsibility may lie with the Labour Relations Department, the concession's general management, the Human Resources Department, the Operations Management, or specific roles such as the Integrated Management System Manager (RSIG) or the Occupational Risk Prevention Manager (PRL).

### **2025 Milestones - H&S Procedures**

- Throughout Globalvia we made available a cardiovascular health monitoring campaign for employees interested in assessing their cardiovascular health, reinforcing preventive healthcare and early detection.
- Concesiones de Madrid, S.A., Metro de Sevilla C.J.A., S.A., Globalvia Inversiones, Openvia Mobility, S.L. and Bluenest by Globalvia have conducted a psychosocial study in accordance with the guidelines of the Occupational Risk Assessment. The study evaluates workplace psychosocial factors such as stress, workload, and job satisfaction. Note that Metro de Sevilla C.J.A., S.A. is currently in the dissemination phase.
- Ruta 27 and Promotora de Infraestructuras have become the first companies in Costa Rica to obtain ISO 39001 Road Traffic Safety certification. This certification is awarded to organisations that implement a Road Traffic Safety Management System, demonstrating their ability to reduce traffic accidents and their consequences.
- M45 has received a special mention in the VII Edition of the Occupational Risk Prevention Awards and Recognitions of the Community of Madrid, acknowledging best practices in the management of psychosocial risks in the workplace.
- The Group has participated in the GRESB questionnaire (Global Real Estate Sustainability Benchmark), which evaluates ESG performance, including health and safety criteria. We obtained a rating of 97 out of 100 in the global benchmark and 53 out of 54 in the social section.
- The PPE at Bluenest by Globalvia has been renewed, and new equipment has been delivered, such as special protective trousers to ensure the highest level of protection and to prevent workplace accidents and occupational illnesses.
- Metro de Sevilla C.J.A., S.A., through an external company, carried out a diagnosis of its occupational risk prevention management system. Based on this diagnosis, a plan of specific actions has been drawn up and is currently being implemented.

- Metro de Sevilla C.J.A., S.A. and ACEGA has initiated a specific hygienic study on the possible presence of radon gas; the study is expected to last one year. Specifically, at ACEGA, equipment for gas detection and mitigation has been installed in one of the toll booths.
- Ruta Portuaria was incorporated into Globalvia Group's existing Integrated Management System (SIG) in 2025, strengthening its Occupational Health and Safety Management through a preventive and fully integrated approach. This integration ensured full regulatory compliance and enhanced risk management, employee participation, and safety culture, contributing to sustainability and the safe continuity of operations. As a result, 2025 recorded the lowest accident rate since Ruta Portuaria began operations, reflecting the maturity of the Globalvia SIG and the effectiveness of the preventive measures implemented.
- A preventative reminder has been sent by ACEGA to operations and maintenance personnel regarding safe manual handling of loads, especially regarding the carry of heavy death animals on the road.
- In Pocahontas Parkway Operations, LLC, weekly meetings have been held with the maintenance team regarding occupational health and safety.
- In Pocahontas Parkway Operations, LLC, new PPE has been provided to the personnel working on the roadway.
- Ruta Portuaria has celebrated Health and Environment Week, implementing specific actions related to health and environmental awareness.
- Operestradas XXI, S.A., Portvias - Portagem Da Vias, S.A., ScutVias Autoestradas Beira Interior, S.A. and Manutenção de Rodovias Nacionais, S.A., have joined the third edition of the road safety awareness campaign, whose main objective is to protect road workers, who are at risk of fatal road accidents, due to drivers' failure to comply with traffic regulations.
- At Globalvia Inversões Portugal, S.A.U., Operestradas XXI, S.A., ScutVias Autoestradas Beira Interior, S.A., Portvias - Portagem Da Vias, S.A. and Manutenção de Rodovias Nacionais, S.A., a consultation process with employees was carried out to actively involve them in health and safety matters, in accordance with Decree-Law 50/2005, which establishes the minimum health and safety requirements for the use of work equipment by employees.

In terms of training, both mandatory and voluntary courses have continued to be delivered with the aim of reinforcing and expanding employees' knowledge of health and safety. Likewise, we have carried out awareness-raising campaigns aimed at strengthening awareness and commitment in this area among employees of all companies, senior management, and other third parties associated with Globalvia.

### **2025 Milestones - H&S Training**

- Metro de Sevilla C.J.A., S.A. has delivered Occupational Health and Safety (OHS) training on chemical Agents and Silica in the Workplace: Risks and preventive measures, targeted at Maintenance Staff.
- Globalvia Jones has rolled out a "Permit to Work" evaluation aimed at employees working on auxiliary lanes, ensuring that only properly trained personnel perform these activities under safe conditions.
- In recognition of International Stroke Day, a reminder was sent to all employees at Globalvia.

- Ruta 27 and Promotora de Infraestructuras have implemented a training programme on the identification, prevention, and management of psychosocial risk factors in the workplace.
- Ruta 27 and Promotora de Infraestructuras have delivered a Critical tasks training: providing participants with the knowledge, skills, and tools necessary to identify, plan and execute critical tasks safely and efficiently.
- Unconscious Bias Awareness and Training in Ruta 27 and Promotora de Infraestructuras, focused on raising awareness and training employees to recognize and manage unconscious biases, promoting fairer, more objective, and more inclusive decision-making across workplace processes and professional relationships.
- Ruta Portuaria provided employees with a refresher training on the road-accident protocol with a clear course of action in the event of a road accident.
- ACEGA sent a reminder to operations and maintenance personnel regarding safe manual handling of loads.

At Globalvia we do not only focus on ensuring the health and safety of our employees in their workplaces, but we also actively seek to promote initiatives that encourage a healthy lifestyle in all aspects.

### **2025 Milestones - H&S Lifestyle**

- At Globalvia Inversiones, Openvia Mobility, S.L. and Bluenest by Globalvia, we provide the access to the online platform “Wellhub” to all employees, which allows them to subscribe and enjoy daily access to more than 800 sports centres and gyms. In addition, the platform offers a wide range of specialized applications focused on wellness, nutrition, meditation, personal training, and sleep.
- At Globalvia Inversiones, Openvia Mobility, S.L., and Bluenest by Globalvia, we offer coverage of a percentage of the total membership fee for the Tower gym. In addition, during 2025, the contribution assumed by Globalvia has been increased to further encourage employees and promote a healthy lifestyle.
- We provide our employees with a flu vaccination campaign at Globalvia Inversiones, Openvia Mobility, S.L., Bluenest by Globalvia, and across the various companies in Portugal.
- We offer a medical check-up campaign at Globalvia Inversiones, Openvia Mobility, S.L., Bluenest by Globalvia, Ruta 27 and Promotora de Infraestructuras.
- In recognition of International Stroke Day, a reminder was sent to all employees at Globalvia Inversiones, Globalvia Mobility, and Bluenest by Globalvia highlighting the importance of being alert to stroke symptoms and raising awareness among colleagues and communities.
- On World Mental Health Day, Globalvia Inversiones, Globalvia Mobility, and Bluenest by Globalvia held a dedicated session in which Edurne Pasabán (Spanish professional alpinist) shared her personal story of resilience and overcoming challenges. The session provided valuable insights and practical tools to promote emotional well-being and foster open conversations about mental health.
- Globalvia Inversiones, Openvia Mobility, S.L., and Bluenest by Globalvia collaborated in the solidarity campaign organised by Fundación Contigo Against Cancer. Globalvia purchased solidarity bracelets and made an extraordinary donation to support the Foundation’s essential work in research, awareness, and support for women affected by breast cancer.

- Ruta Portuaria strengthened epidemiological surveillance, health promotion, and emergency preparedness during 2025, reinforcing risk prevention, emergency response capabilities, and a mature Occupational Health and Safety Management System aligned with best practices.
- Ruta Portuaria has implemented a voluntary complementary health plan that provides access to a preferred network of healthcare centres, reduced waiting times, and additional medical services for employees and one beneficiary; in 2025, 25% of the workforce enrolled in this plan.
- ACEGA has increased the number of employees covered under the company-funded health insurance policy.
- Positive Masculinities initiative in Ruta 27 and Promotora de Infraestructuras, to promote healthy, equitable, and responsible ways of expressing masculinity, contributing both to individual well-being and to organisational performance.
- The Women’s Health Initiative in Ruta 27 and Promotora de Infraestructuras aims to promote the physical, mental, and emotional health of female employees through prevention, awareness, information, and support actions.
- Manutenção de Rodovias Nacionais, S.A., Portvias - Portagem Da Vias, S.A. and ScutVías Autoestradas Beira Interior, S.A. offered a flu prevention campaign focused on educating employees about hygiene practices to reduce the spread of influenza and maintain workplace health.
- Manutenção de Rodovias Nacionais, S.A., Portvias - Portagem Da Vias, S.A. and ScutVías Autoestradas Beira Interior, S.A. implemented regular occupational health monitoring through monthly visits and scheduled appointments. This includes occupational health consultations and periodic medical examinations, ensuring early detection of health risks and compliance with legal occupational health and safety requirements.
- At Globalvia Inversiones Portugal, S.A.U., Manutenção de Rodovias Nacionais, S.A., Portvias - Portagem Da Vias, S.A. and ScutVías Autoestradas Beira Interior, S.A., initiatives are implemented to promote awareness of the importance of physical exercise for health, together with the provision of information on sustainable and healthy food options that can be prepared and taken home. Likewise, an initiative is implemented to promote ergonomic best practices, such as proper posture, appropriate workstation setup, and regular movement breaks, in order to prevent musculoskeletal disorders and enhance workplace health

ACCIDENT RATE INDICATORS BY GENDER	2023		2024		2025	
	Women	Men	Women	Men	Women	Men
Occupational accidents with sick leave (no.)	9	17	2	29	1	17
Accident frequency rate*	22.8	13.4	4.5	23.2	2.8	14.9
Accident severity rate**	1.3	0.4	0.01	0.6	0.03	0.7

\* Frequency rate: number of occupational accidents with sick leave / number of hours worked x 1,000,000.

\*\*Accident severity rate: number of days lost due to occupational accidents / number of hours worked x 1,000.

See [Appendix IV “Social Indicators”](#) for further information on the accidents.

## 4.1.5 Labour relations

GRI 2-29, 2-30, 403-4

### Organisation of work

Work organisation at Globalvia is structured in accordance with the labour legislation in force in each jurisdiction, ensuring compliance with local regulatory frameworks. In addition, the Company has a Labour Relations Procedure applicable to all Globalvia companies, which establishes the fundamental guidelines in this area. This framework is complemented by specific policies and regulations for each company, which in some cases include collective bargaining agreements, collective contracts, and internal regulations, depending on the particularities of the relevant jurisdiction.

At Globalvia the annual working hours vary, ranging from a minimum of 1712 hours to a maximum of 2400 hours for 2025. However, the characteristics of the work organisation may differ among companies, as they adapt to local labour legislation and the specific features of each workforce group. Examples include telework arrangements for select employees, flexible start and end times, intensive working hours during the summer months for corporate services and certain groups within concession companies, as well as shift systems governing operations and maintenance positions in those companies.

HOURS OF ABSENTEEISM	2023	2024	2025
	121,905	111,918	103,190

The number of hours of absenteeism includes hours resulting from accidents, illnesses, justified and unjustified absences, paid and unpaid leave, leave of absence and strikes. Vacations are not included.

### Collective bargaining

With regard to collective bargaining, Globalvia complies with national and international regulations, always ensuring freedom of association, trade union freedom, and collective representation rights. Fostering an environment of dialogue and collaboration with employee representatives is fundamental to our Organisation. Accordingly, several of our companies apply sector-wide collective agreements, which vary in their regional scope, while others operate under company-level collective agreements or equivalent collective arrangements adapted to the specific features of each jurisdiction.

Employee participation in labour matters takes place both directly and through their legal or trade union representatives, in those companies where such representation exists. In Spain, 100% of employees are covered by a collective bargaining agreement. In countries where collective agreements or equivalent documents do not exist, employees' working conditions are governed by individual employment contracts and/or internal company regulations.

COLLECTIVE BARGAINING COVERAGE	Social dialogue		
	Coverage rate	Salaried workers - EEA (for countries with more than 50 salaried employees representing more than 10% of the total salaried workers)	Salaried workers - Non-EEA (estimate for regions with more than 50 salaried employees representing more than 10% of the total salaried workers)
0-19%	-	Costa Rica Colombia	Portugal
20-39%	-	-	-
40-59%	Portugal	-	-
60-79%	-	-	Spain
80-100%	Spain	-	-

**2025 Milestones**

- At Metro de Sevilla C.J.A., S.A., quarterly meetings have been held with the Works Council, as well as meetings of the Health and Safety Committee. In addition, two meetings of the Collective Agreement Negotiating Committee and two meetings of the Joint Committee of the Collective Agreement have also been held.
- ACEGA held two periodic meetings with the Workers’ Prevention Representative to review the occupational health and safety measures implemented.
- At S.C.A. Costa Arauco, S.A., the participation and compliance with the activities of the Company’s Joint Committee should be highlighted; all meetings have been held, the corresponding investigations and analyses have been carried out, and on-site inspections have been conducted.
- In Ruta Portuaria, participation has taken place in the Workplace Coexistence Committee (COCOLA), as a body aimed at the prevention and management of situations related to workplace harassment and the promotion of healthy work environments.
- Additionally, at Ruta Portuaria, the Joint Occupational Health and Safety Committee (COPASST) has been established as a mechanism for the active participation of our employees in the management of occupational health and safety.
- In the case of Portugal, following the voluntary dissolution of the AECOPS collective agreement in October 2024, a new sectoral collective agreement became applicable to Manutenção de Rodovias Nacionais, S.A. and Operestradas XXI, S.A..

## 4.1.6 Remuneration and employee benefits

GRI 2-19, 2-20, 201-3, 401-2

At Globalvia we have a Nomination and Remuneration Committee that is in charge of defining, reviewing and approving the remuneration policy for the directors, senior executives and other key roles, and also setting the objectives associated with the annual variable remuneration and the incentive plans, assessing their attainment. Our remuneration policy is based on a system which annually analyses and assesses each employee's remuneration, taking into account their performance and the position of their salary in the corresponding salary band.

Our variable remuneration model includes the opportunity to obtain a bonus in line with the results obtained at an organisational level. We also have a Flexible Remuneration Plan which offers our employees the chance to engage additional services with tax advantages according to their personal needs, thereby promoting a healthy work-life balance.

In 2025, average employee remuneration evolved positively in all segments of the Organisation, with a general increase that reflects our commitment to recognition and competitive remuneration. On average, there was an approximate 5% rise in the average remuneration of male employees, which was particularly significant for executives (approximately 25%). The average remuneration of female employees showed a general increase of approximately 6%. At global level, total average remuneration increased by approximately 5%.

In the United States all workers have access to a 401k retirement plan whereby the companies match the employees' contributions up to 4% of their salary.

Among other benefits, depending on their geographical location and the company to which they belong, employees have meal vouchers for their lunches, subsidised gym membership, medical check-ups, co-payment for their health insurance and that of their family members and life insurance (for each employee to request on a voluntary basis).

In 2025, in response to new legislation in Ireland, Globalvia Ireland and Globalvia Jons negotiated a contributory pension scheme applicable to all employees, in line with the legal requirement for employers to implement this type of plan. Although the agreement was reached during the year, the pension scheme will enter into force on 1 January 2026.

At Ruta Portuaria, a food allowance was provided as an extra-salary benefit for employees. In addition, following the entry into force of the new national pension system in Colombia in July 2025, Ruta Portuaria adapted its pension obligations to comply with the updated regulatory framework.

In Ireland, it is mandatory to provide sick pay under the Statutory Sick Pay Scheme, which grants entitlement to up to five days of sick leave per year. Sick pay is paid by the employer at 70% of normal pay, subject to a maximum of €110 per day. In 2025, Globalvia Jons aligned its sick leave policy with Ireland's Statutory Sick Pay Scheme.

See [Appendix IV "Social Indicators"](#) for further information on remuneration.

### 4.1.7 Work-life balance

During 2025, several Globalvia companies updated their remote working policy, adding two additional remote working days per month, which, together with the four existing days, amount to a total of six remote working days per month.

In some cases - such as Bluenest by Globalvia, Openvia Mobility, S.L., Openvia Mobility USA, LLC, and Openvia Portugal - between two and five remote working days per week continue to be maintained, depending on what has been individually agreed.

Likewise, we count with a digital disconnection policy applicable to Globalvia Inversiones, which has been extended to Openvia Mobility, S.L., Bluenest by Globalvia, Metro de Sevilla C.J.A., S.A., ACEGA and Concesiones de Madrid, S.A., through the approval and implementation of their own policies.

Other work-life balance measures currently in place across Globalvia companies include, among others, the following:

- Intensive working hours during certain periods of the year in some companies and employee groups.
- Leaves of absence for childcare, as well as the accumulation of breastfeeding leave, among others.
- The possibility of adjusting start and end times to provide greater flexibility and support work-life balance, including in some companies with split or staggered working schedules.
- Extension of statutory minimum leave entitlements to address work-life balance needs, such as maternity/paternity leave, bereavement leave, or care for family members, among others.
- At Globalvia Inversiones, Openvia Mobility, S.L., and Bluenest by Globalvia, in order to adapt the maximum annual working hours established by the collective bargaining agreement, five non-working days and two discretionary leave days are granted.
- At Globalvia Jons, the work-from-home policy has been modified and from 2026 it will change to a maximum of 2 days of remote work per week to make the policy similar to the corporate one.
- At Ruta Portuaria, the main update in terms of work-life balance was the reduction of working hours, in line with recent legal changes that establish a progressive reduction of the maximum legal working week to 44 hours per week in 2025, with no impact on salary. Within this broader context, Colombia has introduced several labour-law adjustments throughout 2025, which have resulted in actions applicable to Ruta Portuaria, including (i) Sunday, holiday, and night shift surcharges; (ii) the reduction of working hours; apprenticeship hiring; and disciplinary procedures. Accordingly, the Internal Work Regulations have been updated to align with and adapt to these labour reforms.
- Ruta Portuaria maintains work-life balance measures included in their Wellness Plan, such as Family Day and the employee's birthday granted as paid leaves, which contribute to balancing work, personal, and family life.
- In Ruta 27 and Promotora de Infraestructuras, for the winter of 2025, a second day of voluntary and temporary remote work was enabled in order to mitigate hazards and risks associated with commuting under adverse weather conditions.

### Maternity and paternity leave

In 2025, 35 people took maternity/paternity leave at Globalvia, of whom 14 were women and 21 men.

See [Appendix IV, "Social Indicators"](#) for further information on maternity and paternity leave.

## 4.2 Workers in the value chain

### GRI 3-3

#### 4.2.1 Responsible management of the value chain

##### GRI 2-8, 2-23, 2-24, 2-25, 204-1, 308-1, 414-2

Our value chain is built on the activities of Globalvia subsidiaries, which are specialised either by the nature of their business or by geographic area, all within the transport infrastructure sector. Responsible supply chain management is a cornerstone of our operations, as reflected in our Sustainability Strategy. At Globalvia we strive for excellence in our relationships with suppliers and contractors while promoting the sustainability of the entire supply chain.

With a view to contributing value to the communities in which we operate, where possible we give priority to local suppliers. Our relationship with these suppliers is set out in the Code of Ethics and Conduct for Business Partners and in the Purchasing Procedure. The two documents feature a common underlying theme: the pursuit of excellence in the relationship with our suppliers through fair, equitable and responsible contract practices, incorporating environmental, social and governance criteria.

2025	Spain	Chile	Costa Rica	USA	Portugal	Ireland	Colombia	TOTAL
<b>Number of suppliers</b>	755	343	377	102	475	326	136	2,514
<b>Number of local suppliers*</b>	679	331	348	88	415	296	132	2,289
<b>Local suppliers (%)</b>	89.9%	96.5%	92.3%	86.3%	87.4%	90.8%	97.1%	91.1%
<b>Volume of local purchases (%)</b>	81.8%	97.6%	90.1%	92.2%	92.6%	95.8%	82.7%	91.1%

\*Globalvia defines local suppliers as those located in the same country as that in which the Company operates.

Each year we identify the key suppliers for the Company based on the economic value of the contract, the impact on operations and the potential risks, among other criteria, and we evaluate the quality of the service provided, analysing, among other factors, any incidents or non-conformities that may have arisen. It should be emphasised that no noteworthy incidents occurred with our suppliers in 2025.

In order to ensure that all our suppliers share our standards and good practices, we conduct inspections, monitoring of contract indicators, training processes, incident investigation and/or audits.

CONTRACTOR SAFETY ACCIDENT RECORDS 2025	Fatalities	Accidents with leave	Accidents without leave	Near misses
Chile	0	8	1	1
Costa Rica	0	14	0	20
Spain	0	16	6	38
Portugal	0	1	0	1
USA	0	0	0	0
Colombia	0	1	0	0
Ireland	0	0	2	0
<b>TOTAL</b>	<b>0</b>	<b>40</b>	<b>9</b>	<b>60</b>

Companies included within the scope of the Integrated Management System (IMS).

### 2025 Milestones

- At S.C.A. Costa Arauco, S.A., it is worth noting that on-site inspections of contractors have been increased, which has helped promote good conduct in occupational safety and health matters. Meetings and activities have also been carried out with the prevention officers of contractor companies to strengthen communication and good practices in safety and health.
- Ruta Portuaria implemented systematic processes for document verification, induction, supervision, and on-site monitoring. These actions enabled the identification of substandard conditions, reinforcement of safe behaviours, and ensured consistency between preventive planning and the execution of work activities.
- Regarding contractor and supplier accident rates, Metro de Sevilla C.J.A., S.A. carries out continuous monitoring of accident investigations conducted by contractor companies.
- In Ruta 27 and Promotora de Infraestructuras, a mandatory temporary traffic signage workshop has been established for contractors operating along the route.

## 4.2.2 Supplier approval system

GRI 308-1, 407-1, 408-1, 409-1, 414-1

All our suppliers must meet a series of requirements that are systematically monitored on a regular basis by Globalvia subsidiaries:

- Compliance with the applicable legislation in force in the spheres of employment, taxation, financial regulation, government contracts, privacy and data protection, environment, and occupational health and safety.
- Absence of any conviction or indictment relating to offences of bribery of public officials, asset laundering and/or terrorist financing.

The criteria for the approval of suppliers at Globalvia subsidiaries, which are set out in the internal procedures applicable to the Purchasing Manual (MPS01) and include environmental, social and governance aspects, are as follows:

- Trust: an assessment of this criterion is based on whether the supplier is in breach of the principles of the United Nations Global Compact in relation to human rights and anti-corruption, and whether approval as supplier has previously been withdrawn.

- **Capability:** an assessment is made of whether the supplier is in possession of any voluntary quality certification issued by an accredited entity and whether it is a supplier of renowned prestige and technical solvency in the industry.
- **Environmental management:** an assessment is made of whether the supplier is in possession of any voluntary environmental certification issued by an accredited entity or whether it has implemented best practices.
- **Occupational health and safety:** an assessment is made of whether the supplier is in possession of any voluntary health and safety certification issued by an accredited entity or whether it has implemented best practices.
- **Personal data protection:** an assessment is made of whether the supplier has personal data security practices in place in terms of the design and operating effectiveness of its processes.

In 2025, 100% of new suppliers underwent the approval process.

It should be highlighted that no significant social risks or negative social impacts have been identified in our supply chain, aided by the reality that our suppliers are mainly local entities from OECD countries whose legislation guarantees respect for fundamental human rights. In addition, we control and monitor the compliance, on the part of our suppliers whose employees are present at our facilities, with labour, health and safety and regulatory compliance standards. These suppliers must be familiar with the Code of Ethics and Conduct and provide documentary evidence of their compliance with different aspects of the aforementioned areas.

## 4.3 Affected communities

### GRI 3-3

#### 4.3.1 Material impacts, risks and opportunities and their interaction with strategy and business model

As indicated in chapter 2.3, "[Double materiality assessment](#)", at Globalvia we conducted a double materiality exercise, on the basis of which IROs were identified and prioritised, and initiatives for their management have been incorporated in the SustaiMobility Strategic Plan 2027. To this end, we have in place a Corporate Social Responsibility (CSR) approach focusing on the support for people, communities affected by our activities and diversity. At the same time, this approach enables us to create value, with an emphasis on both diversity and social inclusion. Based on the approach, we undertake the following commitments:

- Cultivate an inclusive and growth-oriented workplace.
- Enhance Globalvia's employer brand and employee engagement.
- Develop meaningful and impactful CSR initiatives.
- Promote a safe and equal work environment.

### 4.3.2 Policies related to affected communities

GRI 2-23, 2-24

At Globalvia we have a Human Rights and Community Relations Policy, which is described in section 5.1.2., “[Corporate culture and business conduct policies](#)”. This policy prioritises respect for the human rights of indigenous peoples, rights over land and access to resources, ensuring that our projects and operations do not violate any of these rights. Presented separately, it is implemented through the CSR actions developed by the concessions, with a focus on respect for human rights and the active participation of communities, based on transparency and ongoing dialogue. One of the commitments of this policy is to define and implement actions to prevent and mitigate any negative impacts that our activity may have on communities.

Furthermore, our Stakeholder Communication Policy establishes the general guidelines for the effective use by Globalvia entities and companies of communication with stakeholders (including communities) and customers with respect to the transparent management of the activities associated with their respective businesses, within a framework of respect for the applicable legal and contractual obligations. This policy applies to, and is mandatory for, the Board of Directors, senior executives and human resources in general of Globalvia entities and companies.

One of its aims is to clearly identify and understand the implicit and explicit requirements, as well as the current and future needs, of the Group’s customers and stakeholders. To this end, robust and satisfactory relationships are built, making it possible to achieve optimum and sustainable economic results. The Board of Directors of Globalvia and its entities and companies undertake to disclose important matters relating to the Organisation in a balanced manner so as to ensure that all stakeholders have access to clear and objective information. In addition, at Globalvia we are committed to using more accessible and transparent channels to provide our stakeholders with continuous access, for example via our website or social media.

In our [Human Rights and Community Relations Policy](#) we define indigenous people as people who may have special rights or interests, including both cultural and territorial aspects, in the areas in which we operate. At Globalvia we acknowledge and respect the singular nature of indigenous, tribal, aboriginal and native peoples, as well as their rights, in accordance with the legislation in force in each country and with human rights.

### 4.3.3 Processes for engaging with affected communities about impacts

GRI 2-29, 413-1

At Globalvia we recognise how important it is that we engage directly and effectively with the communities affected by our activities in order to guarantee that any impacts caused are managed in a responsible and sustainable manner. To this end, we engage in the following set of initiatives:

#### Direct engagement with affected communities

Engagement is established through an ongoing, transparent dialogue with the affected communities, adapted to the particular characteristics of each community and based on an active listening approach. This process includes face-to-face meetings, user surveys, participatory forums and other mechanisms that facilitate the exchange of information.

#### Details of engagement approach

Interaction begins at the early stages of projects, such as planning and impact assessment, and continues throughout all phases of the concession lifecycle. The frequency of our engagement

varies depending on the nature of the project and the needs identified, thus guaranteeing the constant participation of stakeholders.

#### **Responsibility for guaranteeing engagement**

Our commitment to engagement is spearheaded by the highest-ranking local management officer at each Concession, i.e., the person appointed General Manager under the auspices of Globalvia's Sustainability Area. This approach ensures that the concerns and contributions of the affected communities are incorporated into the Company's strategy and its actions.

#### **Measuring the success of engagement**

We measure the success of engagement efforts by means of key indicators such as user satisfaction, the performance of agreements reached, the reduction of negative impacts and the extent of tangible social benefits, such as the children who receive a positive impact thanks to the contributions we make to Foundations geared towards providing them with greater opportunities.

We remain committed to respecting and safeguarding the human rights of all groups of individuals, paying particular attention to any that may find themselves in a vulnerable situation. Moreover, the results of our engagement with communities are reviewed periodically to enable us to adapt to changing needs and bolster the Company's approach to sustainability and the respect for human rights.

### **4.3.4 Processes to remediate negative impacts and channels for affected communities to raise concerns**

GRI 2-25, 2-26, 413-2

As indicated in chapter 5.1.3., "[Ethics and compliance safeguard mechanisms](#)", we have an Ethics Channel, which affected communities have ongoing access to through our website, in order to raise their concerns and alert us of their needs. In 2025 no significant negative impacts on local affected communities as a result of our activity were identified through the available channels. The communication channels defined for local affected communities include, in addition to the Ethics Channel, the holding of meetings. Although our activity does not necessarily entail the existence of "affected communities" in a negative sense, we acknowledge that exceptional circumstances, such as interruptions due to strike action, natural disasters or other unforeseen events, can impact the communities in which we operate. In the event that such circumstances arise, we adopt an approach based on transparency, responsibility and active dialogue with the affected communities in order to mitigate or remediate the negative impacts. This approach includes:

#### **Impact identification and assessment:**

An exhaustive analysis is conducted to determine the extent of the impact caused and its relation to our activities, taking into consideration the particular characteristics of each community and the specific circumstances of the event in question.

#### **Provision of, or contribution to remediation:**

We strive to provide or facilitate the appropriate means of remediation, which may include measures such as logistical support, compensation, restoration of affected services, or cooperation with local organisations to manage the response. These measures seek not only to mitigate the negative effects, but also to build up the resilience of the affected communities.

#### **Assessment of remediation effectiveness:**

The effectiveness of the measures implemented is assessed using key indicators, satisfaction surveys and consultations with the communities involved. This process guarantees that the actions taken provide an adequate response to the actual needs of the persons affected and promote the recovery of the communities suffering the impact.

We maintain our resolve to act with integrity and responsibility when faced by situations of this kind, ensuring that the results obtained are consistent with international human rights standards and meet the expectations of the communities in which we operate.

### **4.3.5 Actions to address IROs and evaluate their effectiveness**

GRI 2-25, 201-1, 203-1, 203-2

In 2025 no significant negative impacts on specific communities as a result of Globalvia's activities were identified and, therefore, it was not necessary to implement any remediation actions. Nevertheless, we uphold our commitment to prevent, mitigate and, where necessary, remediate any impact that may arise, adopting an approach based on responsibility and respect for the communities in which we operate.

In the event of any future significant impacts, we will take the following course of action:

#### **Damage prevention and reduction:**

Actions designed to minimise the potential negative impacts on the affected communities will be implemented. This will include specific preventive measures, such as the improvement of operating processes, coordination with local authorities and the development of contingency plans adapted to the needs of each community.

#### **Specific damage remediation:**

Where specific damage is caused, we will work together with the affected communities to design and implement customised solutions that ensure fair and effective remediation is provided, such as service restoration or economic compensation, as appropriate.

#### **Additional projects to improve the situation:**

Beyond the remediation actions taken, we will assess and develop additional initiatives to help improve the conditions of the affected communities, keeping alignment with our social commitments and Sustainable Development Goals.

#### **Monitoring and assessment:**

The actions and initiatives implemented will be submitted to a rigorous, ongoing monitoring process in the shape of performance indicators, perception surveys and consultations with the affected communities. The use of these mechanisms will guarantee that the measures adopted achieve the expected outcome and that communities perceive actual improvements in their conditions.

Thus, we reaffirm our commitment to sustainability, respect for human rights and the positive development of the communities in which we are present.

In line with our commitment to contribute to the development of society, in 2025 we continued to make financial contributions to different initiatives and not-for-profit entities, and to engage actively with local affected communities, by promoting social projects and organising corporate volunteering activities.

It should be noted that all our social commitment and support operations feature programmes for the participation of local affected communities, impact assessments, or development programme. This is illustrated by the different collaboration schemes that have been set up, such as the Adecco Foundation's Female Employment Programme, the support for the social and sports schools of the Real Madrid Foundation in Costa Rica and Chile, and the support for entities helping vulnerable groups, such as Grandes Amigos Foundation, whose aim is to accompany old people in our society to enable them to age with dignity, as well as our collaboration with entities which seek to achieve the social and workplace integration of people with intellectual disabilities, such as A LA PAR and Prodis foundations.

CONTRIBUTIONS TO LOCAL COMMUNITY FOUNDATIONS AND ASSOCIATIONS (€)	2023	2024	2025
Association memberships	218,939	251,205	228,345
Sponsorships	179,948	502,278	109,354
Donations	103,043	163,927	109,228
Other CSR actions	119,750	113,153	147,343
<b>TOTAL (€)</b>	<b>621,680</b>	<b>1,030,564</b>	<b>594,270</b>

#### Key actions:

- Completion of the construction of the first tsunami evacuation route in S.C.A. Costa Arauco, S.A., Chile: The construction of the tsunami evacuation pedestrian bridge and route in the municipality of Coronel represents a milestone in risk management and in the commitment to the safety of coastal communities in the Biobío Region. This infrastructure provides a response to the urgent need for safe, reliable and fully operational evacuation routes in areas exposed to potential tsunami events. Developed in coordination with the Chilean Ministry of Public Works, the project improves sector connectivity and strengthens the resilience and safety of the population by enabling swift and secure evacuation towards designated safe areas in emergency situations.
- Ruta 27 ensured road connectivity in extreme weather events in Costa Rica. During one of the most intense rainy seasons in recent years in Costa Rica, marked by widespread flooding and the closure of key national roads, Ruta 27 remained operational at all times, playing a decisive role in maintaining connectivity. This performance was made possible by a rigorous preventive maintenance programme, including stabilisation works on multiple slopes, structural reinforcements and enhanced technical and operational monitoring along the highway. As a result, Ruta 27 was able to absorb increased traffic flows during the rainy season, reflecting both users' confidence in its operability and the strategic importance of the infrastructure in critical situations.
- Also Ruta 27 signed a collaboration agreement with the Municipal Police of Escazú. This agreement reinforces cooperation with the Municipal Police of Escazú and strengthens institutional coordination, facilitating police operations along the motorway by providing access to facilities for operational needs and safe spaces for duty shifts. At the same time, the increased presence of municipal police on the highway contributes to enhanced user safety and improved service for the thousands of Costa Ricans who rely on Ruta 27 for their daily journeys.
- S.C.A. Costa Arauco, S.A. carried out collaborative work with fire brigades from the provinces of Concepción and Arauco, strengthening operational and preventive coordination along the entire concession. These actions included the delivery of essential supplies and materials, the implementation of educational campaigns and the execution of emergency drills together with local fire brigades. These initiatives have contributed to improving emergency readiness and response capacity, such as in the case of the recent forest fires in the region, reinforcing user protection and generating a positive and tangible impact on surrounding communities.

- In Colombia, our Ruta Portuaria team implemented a strategy to establish regular communication with community leaders and residents in the area of influence of the Barranquilla port corridor. On a quarterly basis, a direct and participatory channel was established to listen to emerging needs and concerns, strengthening trust and collaborative work with communities. These forums also enabled joint efforts to formulate requests to the relevant authorities and to address local challenges identified in the area. As a result of these dialogue forums, relevant environmental and social issues were identified, enabling the development of an environmental improvement programme, including planting initiatives to mitigate thermal discomfort and enhance the urban landscape.

As part of the Globalvia Risk Plan, we have identified and considered the risk of potential impacts on the communities affected as a result of our activities or due to exceptional situations, such as operational outages or natural disasters. This risk is fully integrated into our existing risk management processes, ensuring that it is addressed in a systematic manner aligned with our global strategy. We thus guarantee an ongoing risk assessment, the implementation of preventive and corrective measures, and an appropriate response, should the risk materialise, at all times adopting an approach centred on the protection and well-being of communities. Objectives for handling significant issues, promoting the benefits and managing the risks and opportunities related to them.

As established in the Human Rights and Community Relations Policy, at Globalvia we implement actions to prevent and mitigate any negative impacts that may result from our activity. Furthermore, in each project we identify any opportunities to maximise the positive impacts of our activity, contributing to local social and economic development and to environmental protection in our areas of influence, keeping alignment with our commitments regarding the achievement of Sustainable Development Goals.

In order to evaluate the progress made in connection with these commitments, we actively seek feedback from the communities to enable us to make the necessary adjustments to our action plan. This monitoring is performed using different channels, such as grievance mechanisms providing communities with a transparent channel for raising their concerns, and regular reports on achievements and challenges issued by the local social welfare entities with which we work, which guarantee public accountability and at the same time allow their activity and impact on local communities to be monitored.

The objectives set in this area are based on our Sustainability Strategy included in the SustaiMobility 2027 plan, and, more specifically, are defined in the strategic line "CSR to support people, communities and diversity". This strategic line includes the concrete goal of "Driving meaningful CSR initiatives and impactful communication", which is further translated into specific targets and actions, each supported by defined indicators, assigned responsibilities and implementation timelines. Each year the Sustainability Committee reports to the Audit and Risk Committee on the progress made towards the objectives contained in the Plan.

The commitments established in the SustaiMobility Strategic Plan 2027 are aligned with our priority Sustainable Development Goals, taking into account the specific needs of the local communities.

## 4.4 Consumers and end-users

GRI 3-3

### 4.4.1 Material impacts, risks and opportunities and their interaction with strategy and business model

As indicated in chapter 2.3 of this document, [“Double materiality assessment”](#), as a result of the double materiality exercise performed, at Globalvia we detected two material topics related to our end users: user experience and user health and road and rail safety. Consequently, we were able to identify certain associated IROs, which we managed through the initial phase of our SustainMobility Strategic Plan. In fact, one of the four strategic lines of the Plan, both in its initial implementation period and in its current phase, is mobility centred on our users. Our efforts in this regard are devoted to integrating our users’ needs and expectations into our day-to-day work in order to offer them sustainable mobility solutions. At Globalvia we have the potential to improve the quality of life in the cities and regions where we operate by providing innovative and efficient mobility services to accelerate the transition towards more sustainable and circular development. For further information, please consult section 2.4.1.1, [“SustainMobility Strategic Plan 2027”](#) of this report.

### 4.4.2 Policies related to consumers and end-users

GRI 2-23, 2-24

At Globalvia we have a Human Rights and Community Relations Policy in place that includes our commitments to guarantee the human rights of our stakeholders and, among these, our users. Through this Policy we undertake to identify, prevent and mitigate any negative impacts that our activities may have, and to promote sustainable and ethical practices in our operations and alliances. In turn, the Policy establishes the undertaking to implement effective mechanisms for communication with users so that they can report any situation representing a potential impact on human rights. To this end, we have placed the Ethics Channel at the disposal of our users. For further information, please consult section 5.1.3, [“Ethics and compliance safeguard mechanisms”](#).

This policy applies to all Globalvia subsidiaries, and responsibility for its implementation and oversight lies mainly with the Communication and Corporate CSR Department. It also adheres to the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Universal Declaration of Human Rights (UDHR).

Furthermore, the Integrated Management System Policy contains our undertaking to contribute to the development of society, by connecting people through transport infrastructure and sustainable mobility. This Policy includes, inter alia, the commitment to manage both infrastructure and companies in a responsible, effective manner, ensuring user health and safety, in keeping with our mission to provide a convenient, simple user experience. It applies to Globalvia’s stakeholders, including consumers and end-users.

### 4.4.3 User safety

GRI 416-1, 416-2

User safety is a priority and a factor of strategic importance to Globalvia, hence we have a road safety procedure in place. We measure accident rates and subsequently monitor them so that improvement measures can be adopted. Also, the concessions have Road Safety Committees which report to the Board of Directors on the measures implemented and their effectiveness.

## 2025 Milestones

- During the year, we carried out a road safety audit at Pocahontas Parkway Operations, LLC, identifying opportunities for improvement and potential actions to enhance the safety performance of the asset.
- At Concesiones de Madrid, S.A., we continued to implement the improvements derived from the road safety audit, including the installation of R-301 illuminated signs with LED technology and the correction of deflections in metal safety barriers.
- ACEGA undertook works aimed at improving highway infrastructure, including the reinforcement of vertical signage, rehabilitation of road surfaces, repainting of road markings and reinforcement of traffic bollards.
- Ruta 27 implemented measures to optimise road safety and improve communication with users, including the modernisation of signage, the protection of high-risk areas and the control of dangerous manoeuvres. In parallel, the concession strengthened training programmes and awareness-raising initiatives, continuing the “I Am Responsible” programme through road safety and environmental protection talks delivered at schools located near the highway.
- ScutVías Autoestradas Beira Interior, S.A. improved the lighting in the Alpedrinha, Gardunha, Ramela and Barracão road tunnels, as well as at urban interchanges. In Autoestrada XXI-SU. Trans., a pavement grooving campaign was carried out to prevent aquaplaning, and the concession also participated in the national road safety campaign.
- S.C.A. Costa Arauco, S.A. implemented comprehensive road safety actions focused on risk mitigation and community engagement. These included safe driving campaigns carried out in coordination with Carabineros and other entities, improvements to signage, traffic bollards and containment systems, and active participation throughout the year in road safety awareness and education initiatives.

HIGHWAY HAZARD INDEX*	2023	2024	2025
SCUTVÍAS AUTOESTRADAS BEIRA INTERIOR, S.A.	6.8	6.6	7.3
AUTOPISTA CENTRAL GALLEGA, S.A. (ACEGA)	9	8	7
AUTOESTRADA XXI-SU.TRANS., S.A.	7.2	7	8.9
S.C.A. COSTA ARAUCO, S.A.	36	35.4	33.7
CONCESIONES DE MADRID, S.A.	2.7	2.9	2.1
POCAHONTAS PARKWAY OPERATIONS, LLC	6.2	2.6	0.8
AUTOPISTAS DEL SOL, S.A. (Ruta 27)	19	16.1	20.5
S.C. ACONCAGUA, S.A.	19	22.7	22.2
S. C. ITATA, S.A.	37	37.4	39.2
SF CONVIAS S.A.S. (Ruta Portuaria)	-	70.5	29.8

\* Number of accidents involving casualties (last 12 months) \* 10<sup>8</sup>/ veh \* km (last 12 months)  
 Excluding Globalvia Jons, LTD.  
 S.C. Aconcagua, S.A. y S.C. Itata, S.A. at 31st March 2025.

RAILWAY HAZARD INDEX*	2023	2024	2025
METRO DE SEVILLA, C.J.A., S.A.	23	18.8	16.2

\* Number of accidents and incidents (last 12 months) \* 10<sup>5</sup> / km of production (last 12 months).  
 Excluding Metro Barajas Sociedad Concesionaria, S.A.

#### 4.4.4 Processes for engaging with consumers and end-users affected by impacts

GRI 2-26, 2-29

In line with our commitment to provide the best services to our users, we have implemented the necessary procedures and resources to offer active assistance and swiftly respond to their requests. We have different communication channels in place at each concession, such as the customer service offices, our website, telephone hotlines and social networks.

Complaints are handled in accordance with the framework provided by ISO 9001 (Quality Management) and, in the case of railways, by UNE-EN 13816 (Public Passenger Transport). To enable us to resolve complaints in the most convenient and agile manner for users, we have implemented customer service and grievance handling procedures.

COMPLAINTS PER MILLION HIGHWAY USERS*	2023	2024	2025
SCUTVÍAS AUTOESTRADAS BEIRA INTERIOR, S.A.	35	29	19
AUTOPISTA CENTRAL GALLEGA, S.A. (ACEGA)	4	5	1
AUTOESTRADA XXI-SU.TRANS., S.A.	37	25	27
S.C.A. COSTA ARAUCO, S.A.	128	131	136
CONCESIONES DE MADRID, S.A.	-	-	-
POCAHONTAS PARKWAY OPERATIONS, LLC	1	-	1
AUTOPISTAS DEL SOL, S.A. (Ruta 27)	32	31	50
S.C. ACONCAGUA, S.A.	322	268	191
S. C. ITATA, S.A.	16	22	6
SF CONVIAS S.A.S. (Ruta Portuaria)	-	4	4
<b>TOTAL AVERAGE</b>	<b>78</b>	<b>64</b>	<b>37</b>

\*(Number of admissible complaints / annual traffic) × 1.000.000  
S.C. Aconcagua, S.A. y S.C. Itata, S.A. at 31st March 2025.  
Excluding Globalvia Jons, LTD.

RAILWAY PASSENGER COMPLAINTS INDEX *	2023	2024	2025
METRO DE SEVILLA. C.J.A., S.A.	4	4	4

\* Number of admissible complaints per 10<sup>5</sup> / total passengers for the year.  
Excluding Metro Barajas Sociedad Concesionaria, S.A.

We assess the level of satisfaction of the users of our infrastructure by employing our internal procedures, principally through our satisfaction survey campaigns. The aim pursued is to gain an understanding of the experience of users throughout their interaction with our infrastructure, with a view to improving each phase of user experience. In addition to this, we analyse the complaints and suggestions received in order to identify opportunities for improvements in our service.

By applying these methods, we are able to compile valuable information on the perception of our activity. Pursuant to our internal procedures, in our analysis we consider only the companies in which we have a significant ownership interest. This approach guarantees that the data reflect, in a representative way, our stakeholders' perception of us. The results obtained in 2025 revealed a highly positive level of satisfaction.

AVERAGE USER QUALITY INDEX	2023	2024	2025
Chile	4.1	3.8	4.2
Colombia	-	3.2	4.7
Costa Rica	4.1	2.9	2.9
Spain	4.2	4.2	4.1
Portugal	3.9	4.2	4.4
USA	3.9	-	-
<b>TOTAL AVERAGE</b>	<b>4.1</b>	<b>3.9</b>	<b>4.1</b>

Maximum score of 5.

Excluding the companies outside the scope of the Integrated Management System: Metro Barajas Sociedad Concesionaria, S.A. (Spain) and Globalvia Jons, LTD (Ireland).

Another channel set up for users to report and express their concerns and/or needs is the Ethics Channel, the implementation of which is the responsibility of Globalvia, and which engages external managers to receive certain communications and complaints. For further information on the Ethics Channel, please consult section 5.1.3, [“Ethics and compliance safeguard mechanisms”](#).

On a yearly basis we evaluate the effectiveness of the actions carried to increase consumer satisfaction. As part of the System Review by Management (SRM) conducted in this connection, the following aspects are covered: changes in stakeholder satisfaction, the main actions implemented, their performance in terms of effectiveness, and the conclusions drawn on consumer relations.

#### 4.4.5 Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions

##### GRI 2-25

In line with managing the identified IROs, in 2025 Globalvia maintained a continued focus on strengthening safety, operational efficiency and user experience across its assets. To this end, we carried out different actions, structured around the following areas:

- In technological development, at Openvia Mobility, S.L., we continued to develop and apply state-of-the-art technology to provide improved solutions for users, including the ongoing deployment of digital tolling tools such as Slora Mobility, designed to enhance security, performance and user experience.
- In terms of maintenance and operational reinforcement, several initiatives were implemented across the network. At S.C.A. Costa Arauco, S.A., dedicated teams provided additional support for maintenance work during the wet season. Likewise, winter crews were also successfully incorporated in 2025, contributing to improved road safety conditions for users.

We also have a series of procedures in place to ensure that the risks associated with user experience are managed in the best possible way. As mentioned in the preceding subsection, we have our Customer Experience programme, which implements a proprietary methodology to analyse service quality and measure user experience before, during and after the use of our infrastructure. This programme also allows our quality management, customer service and innovation teams to be one step ahead of user problems and needs in a process aimed at the continuous improvement of our services.

## 5. Governance information

### 5.1 Business conduct

GRI 3-3

#### 5.1.1 The role of governing, managing and oversight bodies

GRI 2-17

Ethics governance and business conduct at Globalvia are the responsibility of the Chief Compliance Officer. The Chief Compliance Officer reports to the Board of Directors through the Audit and Risk Committee. Their role is to ensure ethical management in the Organisation and compliance with the Code of Ethics and Conduct, as well as the prevention of crime through autonomous decision-making and control powers.

#### 5.1.2 Corporate culture and business conduct policies

GRI 2-15, 2-16, 2-23, 2-24, 2-26, 205-2

At Globalvia ethical behaviour is a fundamental pillar of corporate culture, as reflected in the Code of Ethics and Conduct. This document, updated following the newest revision carried out in 2025, defines the essential principles and values that guide the actions of employees and stakeholders, with the aim of avoiding conduct that contravenes the values of the Organisation. The update of the Code of Ethics and Conduct incorporates, among other aspects, a consolidation of the core principles to ensure consistency and coherence throughout the document, as well as, simultaneously, enhanced detail within individual sections. The updated four principles that guide professional conduct, both within and outside the Company, are:

- Respect for people and the working environment
- Integrity in all actions and decisions
- Transparent and responsible relationships with third parties
- Protection of information and respect for confidentiality

In order to engage new hires in our culture, all new recruits receive a copy of the Code of Ethics and Conduct as part of their onboarding pack.

Additionally, at Globalvia we have a series of policies, procedures and controls that are implemented and reviewed periodically, aimed at mitigating the corruption risk. These policies, which guide our commercial activities, are applicable and must be complied with by all members of the Organisation, and any breaches may be subject to disciplinary measures. Furthermore, all these policies take into account not only the interests of Globalvia, but also those of business partners and third parties. As the newest addition, in 2025 we developed the Procedure for Personnel Especially Exposed to Compliance Risks, with the objective to establish proportionate control measures to manage and mitigate Compliance risks associated with personnel especially exposed to such risks. The Compliance Policy; the Policy for Relations with Public Officials; the Donations and Sponsorships Policy; the Gifts and Hospitality Policy, the Conflict of Interest Policy and the Procedure for Personnel Especially Exposed to Compliance Risks are aligned with the international ISO 37001 standard on anti-bribery management systems. Moreover, the Donations and Sponsorships Policy, the Gifts and Hospitality Policy, the Conflict of Interest Policy, the Purchasing Management Procedure and the Procedure for Personnel Especially Exposed to Compliance Risks comply with the UNE 19601 Criminal Compliance Management Systems standard.

### Compliance Policy

With this policy, we ratify Globalvia's desire to maintain respectful conduct, with regard to both legal provisions and its ethical values. For this purpose we have defined the framework of compliance principles. This Policy covers people exposed to compliance risk.

### Policy for Relations with Public Officials

Through this policy, we seek to ensure that all employees, as well as business partners and third parties with whom we engage, adhere to the key anti-bribery regulations in the markets where we operate, establishing a fundamental compliance framework in this regard. This policy applies to all members of the Organisation. In 2025 this policy was revised and updated accordingly.

### Donations and Sponsorships Policy

With the implementation of this policy, we aim to establish basic criteria for making and receiving donations, sponsorships or social actions. All of this aims to ensure that all the Organisation's members, as well as its business partners and other third parties with whom it maintains business relations, comply with the provisions of the main anti-bribery regulations existing in the markets in which it has a presence. In 2025 this policy was revised and updated accordingly.

### Gifts and Hospitality Policy

Through this policy we seek to define the procedure for action and the criteria that members of Globalvia must take into consideration when offering or accepting a gift or hospitality from a third party. In 2025 this policy was revised and updated accordingly.

### Conflict of Interest Policy

The purpose of this policy is to establish our procedure for preventing and managing conflicts of interest that may arise with shareholders, executives, managers or employees of Globalvia, as well as with third parties that have relations with Globalvia, such as, inter alia, suppliers and business partners. Any member of Globalvia may be affected by a conflict of interest and, accordingly, it is essential that there be clear lines of action for addressing any situations of this nature. In 2025 this policy was revised and updated accordingly.

### Purchasing Management Procedure

The purpose of this Procedure is to establish the criteria and responsibilities associated with the control of the purchasing and subcontracting processes, as well as the process for verifying the products/services purchased, in order to ensure that those products/services meet the standards required by the Organisation. This procedure affects all Globalvia departments that make purchases and is mandatory for all companies in which the Group has a controlling interest.

### Human Rights and Community Relations Policy

This policy establishes the principles and guidelines that guide our Company's relations with local communities and our commitment to human rights, promoting responsible and sustainable business practices that foster social, economic and environmental development in the areas of influence of our concessions. This policy is implemented through the CSR actions developed by the concessions, with a focus on respect for human rights and the active participation of communities, based on transparency and ongoing dialogue. Through this policy, at Globalvia we seek to consolidate a long-term relationship with local communities, oriented towards inclusive, sustainable development that respects human rights in all their facets. We support and adhere to the principles established in the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Universal Declaration of Human Rights (UDHR).

### Ethics Channel Policy

This policy aims to explain the use of Globalvia's Ethics Channel and its specificities in the communication of complaints by whistleblowers. The Ethics Channel Policy complies with the provisions of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law and with Spanish Law 2/2023 on the Protection of Persons Reporting Regulatory Violations and the Fight Against Corruption.

This policy sets out the principles, guarantees, rights and protection measures for persons who report breaches, as well as the general principles on which the Ethics Channel is based.

As indicated in section 5.1.3, "[Ethics and compliance safeguard mechanisms](#)", the Ethics Channel is the mechanism for detecting, reporting and investigating problems related to illicit behaviour or behaviour contrary to our Code of Ethics and Conduct. As also indicated in this section, one of the principles on which the Ethics Channel is based is confidentiality and the prohibition of retaliation against persons who report violations.

Also, the document entitled Procedure on the Ethics Channel, as well as the Communications Management and Investigation procedures establish the procedure for reporting and investigating complaints and investigating cases related to business conduct, including cases of corruption and bribery.

The Ethics Channel Policy and the Ethics Channel Procedure, Communications Management and Investigation Procedures provide information on the roles and responsibilities in receiving complaints and queries and managing investigations. The personnel in charge of managing the channel have been appropriately duly trained in this area.

In addition, the Ethics Channel Policy establishes the following support and protection measures against retaliation, in accordance with Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law as well as the Spanish Whistleblower Protection Law:

- Persons who report irregularities will not be penalised or held liable for disclosing information, provided they have reasonable grounds for doing so. This also applies to employee representatives, even if they are subject to confidentiality obligations. However, this protection does not eliminate possible criminal liability and applicable labour regulations will be respected.
- Whistleblowers will not incur any liability in respect of the acquisition of or access to information that is communicated or disclosed publicly, provided that such acquisition or access does not constitute a criminal offence.
- Any other potential liability of whistleblowers arising from acts or omissions that are not related to the communication or public disclosure or that are not necessary to disclose a violation under the Whistleblower Protection Law will be enforceable under the applicable law.
- If a whistleblower proves that they have made a communication or public disclosure and suffered harm, the harm will be presumed to have been retaliatory. In such a case, the burden will be on the party that took the harmful action to prove that it was based on legitimate reasons and was not linked to the communication or disclosure made. In legal proceedings involving defamation, copyright, trade secret, data protection or workers' compensation, those who report in accordance with the Channel Policy will not be held liable for their protected communications. In addition, they may defend themselves by claiming that they acted with justified reasons for reporting a violation. The Ethics Channel Policy and Procedure were both last updated in 2024, with no further revisions made in 2025.

### Procedure for Personnel Especially Exposed to Compliance Risks

As mentioned, this procedure was newly developed in the year 2025. It establishes the control and risk management measures applicable to personnel identified as being especially exposed to Compliance risks within Globalvia. The Procedure defines criteria for identifying exposed personnel based on their level of decision-making authority, interaction with public authorities, and access to sensitive information, and distinguishes between two levels of exposure with differentiated control measures. It sets out initial and ongoing selection, monitoring, and additional controls, which may be reinforced by the Compliance Department where necessary. The Procedure complements existing internal policies and ensures ongoing oversight, confidentiality, and escalation of significant risks through the appropriate governance bodies.

Lastly, as indicated in chapter 5.1.5, "[Prevention and detection of corruption and bribery](#)", Globalvia workers receive training in compliance and anti-corruption every two years. These training sessions were successfully delivered in 2025. For more information, please consult the aforementioned chapter.

## 5.1.3 Ethics and compliance safeguard mechanisms

### GRI 2-26, 2-27

At Globalvia we have a cross-cutting compliance model described in the Compliance Management System Steering Document, which defines mechanisms to prevent, detect and manage regulatory risks, ensuring compliance with applicable regulations and that all this is aligned with its strategic objectives. This system includes a Compliance Policy, as well as the internal policies indicated in chapter 5.1.2, "[Corporate culture and business conduct policies](#)".

#### Ethics Channel

At Globalvia we make the Ethics Channel available to the members of the Organisation, as well as to third parties. This is a Channel with a broad scope, to which Globalvia's workers and its suppliers, local communities and end users have access. The Ethics Channel is public and is available on our intranet and on the external website.

As specified in the Ethics Channel Procedure; the Organisation's reference document on this matter, complaints can be made both in writing and orally. Written complaints can be made through the form on the website. Communications registered using this form are received by a manager external to Globalvia, the Ombudsman. Also, an email can be sent to [compliance@globalvia.com](mailto:compliance@globalvia.com) or by traditional mail to Paseo de la Castellana 259C (Torre de Cristal), floor 21 and 22, 28046, Madrid (Spain). On the other hand, oral complaints must be documented by recording the conversation or through a complete and exact transcription of the conversation made by the personnel responsible for handling them.

As noted in section 5.1.2, "[Corporate culture and business conduct policies](#)", the Ethics Channel Policy explains how the channel works, how complaints must be submitted, and the safeguards in place for whistleblowers. It enables reporting of any breach of the Code of Ethics and Conduct, internal rules, or applicable laws, either openly or anonymously, with identities kept confidential. Both the Policy and its Procedure guarantee the whistleblower's right to protection and indemnity, strictly prohibiting any form of retaliation, including threats or attempted threats.

It should also be noted that, through dissemination campaigns on the Ethics Channel, employees are informed about its functionalities and reminded of their own guarantees and rights.

We also specify that the investigation must be completed within three months from the receipt of the complaint. In 2025, 3 inquiries were received. Furthermore, 3 investigations were carried out and 3 were resolved. The average resolution time was 86 days. The investigations were

conducted in accordance with the Procedure and as a result, no disciplinary measures have been necessary and there have been no fines, sanctions or compensation.

The Procedure for the Management of the Ethics Channel, as well as the Communications Management and the Investigation procedures establish the rules of conduct to be followed in relation to investigations. The person responsible for managing communications is the Channel Director (Chief Compliance Officer), although, to ensure the proper functioning of the channel, they may call upon such Channel managers (internal and/or external) as might be designated for this purpose.

The communications management process includes receipt and admission of the complaint, followed by the investigation phase, during which the Channel Director appoints an investigator or investigation committee to clarify and determine the facts in compliance with applicable regulations, particularly data protection rules. Once the investigation is completed, an investigation report with conclusions and recommendations is issued and submitted to the Channel Director, who then decides on the closure of the case, either dismissing it or proposing appropriate disciplinary or corrective measures, duly justifying the decision.

The Channel Director acts independently and autonomously, without receiving instructions, and performs their duties with objectivity, impartiality and professionalism, having the necessary qualifications and resources to do so.

In 2025 Globalvia did not receive any complaints for violation of human rights, and no potential violations were detected internally.

#### 5.1.4 Commitment to human rights

Respect for human rights and individual freedom is expressly included in the internal Code of Ethics and Conduct and the Code of Ethics and Conduct for business partners, both of which are mandatory, and which expressly name:

- The prohibition of forced or compulsory labour,
- The prohibition of child labour,
- Respect for the right of association and collective bargaining,
- The right to equal opportunities and the prohibition of discrimination of any kind based on sex, race, ideology, religion, political opinion, social status, etc.,
- The right to balance personal and family life,
- The right to receive fair remuneration, in accordance with the applicable labour legislation.

In addition, at Globalvia we are signatory members of the Principles of the United Nations Global Compact, which include the protection of human and labour rights. Our procedures are also aligned with the guidelines of the International Labour Organisation (ILO), and we contribute to the achievement of the Sustainable Development Goals (SDG).

Globalvia's investment processes include due diligence on potential partners, which includes, among other aspects, labour, health and safety issues, and respect for human rights. Additionally, we control and monitor compliance in labour, health and safety matters and regulatory compliance for supplier companies whose employees are present at our facilities, who must first be familiar with the Code of Ethics and Conduct.

In 2025 no significant supply chain-related risks were identified, aided by the reality that our suppliers are mainly local and from OECD countries, where the applicable legislation guarantees the protection of human rights.

### 5.1.5 Prevention and detection of corruption and bribery

GRI 2-26, 205-1, 205-2

At Globalvia we are committed to carrying on our operations with integrity, avoiding any form of corruption or bribery. As described in chapter 5.1.2, [“Corporate culture and business conduct policies”](#) we have certain policies that make tangible, guarantee and strengthen this commitment. Our policies and procedures are communicated to all workers and are available on the intranet. Relevant changes to policies and procedures are also communicated by email.

At Globalvia we conduct Criminal Risk assessments, including risks related to corruption and bribery, every two years, with a new revision scheduled for the year 2026. This permits us to identify the activities most exposed to these risks and to identify the controls aimed at preventing and detecting them. The Compliance Department also oversees the implementation of the controls by the areas.

We make available to our employees and third parties with whom we interact the Ethics Channel, a mechanism through which all kinds of non-compliance and cases of corruption and bribery can be reported. This channel is defined in section 5.1.3., [“Ethics and compliance safeguard mechanisms”](#). The Chief Compliance Officer is responsible for the Ethics Channel, and their responsibilities include its management and the processing of investigation files.

In 2025, we reinforced our culture of integrity through the delivery of compliance training and awareness-raising sessions across the Group. In parallel, an online training programme was launched to further embed knowledge of Compliance, the Code of Ethics and Conduct, Integrity Policies, and the Ethics Channel throughout the Organisation.

### 5.1.6 Confirmed cases of corruption or bribery

GRI 205-3

No instances of corruption were identified in 2025.

## 5.2 Cybersecurity and data protection

GRI 3-3, 418-1

Data protection and cybersecurity in infrastructure management are key issues for Globalvia. Accordingly, we have an Information Security Management System and a Privacy Policy based on the international data security management standard ISO 27001, the European NIS2 Directive and NIST standards, among others, to complete business protection. The Security Committee coordinates its implementation and management to meet business challenges and centralise policies, processes and procedures, taking into account the different national regulations applicable to each concession. Moreover, in 2025, the Media Use and Protection Policy was updated.

We also count with security protocols for governance, identification, protection, detection, response and recovery in connection with data security incidents, as well as for data protection, the purpose of which is to protect the confidentiality of personal information and data. Our procedures are included in the Globalvia Integrated Management System and are updated on an ongoing basis.

Accordingly, we have approved a new Cybersecurity and Data Protection Procedure for investee companies in which Globalvia does not hold a controlling position. The procedure provides a reference framework for board members to promote measures aligned with our Group’s criteria and has been formally communicated to the relevant companies.

In this regard, it is noteworthy that, no complaints have been received in connection with the security and privacy of user data. There is also no evidence of any cases of non-compliance relating to security incidents in which personal data have been affected, and no leaks, thefts or losses of customer data have been identified.

#### Cybersecurity and risk model

The cybersecurity management framework is focused on meeting business needs, seeking ways to improve our defence and recovery capabilities against possible incidents, thus ensuring business continuity.

The cybersecurity model allows us to establish a common strategy and carry out a continuous monitoring process in relation to the level of security within Globalvia, thus minimising possible risks. The processes implemented include the following services: control diagnosis, SOC, Threat Hunting, Red Team, user awareness and training, and unified operations.

This system is applied to suppliers, which are required to provide cybersecurity guarantees to be eligible and continue their relationship with us. The security requirement is more stringent if confidential information is handled or in the event of access to our systems.

#### 2025 Milestones

- In 2025, we joined ISMS FORUM, a cybersecurity association and, in coordination with the Sustainability team, we have formalised a pact aimed at promoting sustainable cybersecurity, with contracts considering the carbon footprint.
- As is customary, each year we provide cybersecurity training to all employees, who also receive newsletters with security news to raise awareness in this area, and social engineering tests were conducted to verify that the level of cybersecurity awareness was as it should be.

Finally, in 2025 no security breaches were recorded, and no complaints were received in relation to data losses within the framework of the General Data Protection Regulation.

## 5.3 Financial information

### 5.3.1 Tax governance

GRI 3-3, 207-1, 207-2, 207-3

The Tax Compliance Management System constitutes a key pillar of our overall Compliance Management System. It was successfully implemented in 2024 as part of our existing compliance framework and subsequently expanded in 2025 to cover Colombia and Ireland. This set of documents and processes defines the framework for our action in relation to tax risk. In order to fully comply with the requirements of Spanish tax and criminal legislation, and in order to achieve our strategic and operational objectives, the specifications and requirements established in the UNE119602 standard "Tax Compliance Management Systems" are followed. The System also sets out the responsibilities of the Board of Directors, senior management and the Compliance Committee in connection with this issue.

We also have a corporate [Tax Policy](#) that ensures compliance with tax regulations at Globalvia subsidiaries. This document is guided by the pursuit of corporate objectives within the framework of our long-term strategy, ensuring that business decisions are made in a way that avoids tax risks and inefficiencies.

The tax strategy is also included in the Code of Ethics and Conduct, the Tax Specifications Document, the Catalogue of Tax Risks, conduct parameters and other tax details and the Document on the backbone of the Compliance Management System. This formal framework is

aligned with our culture of integrity, which also includes the interests of third parties and the objective of not tolerating the wilful commission of tax violations and of minimising their culpable or negligent commission.

In addition, in 2024 a tool was implemented using SAP GRC that makes it possible to monitor controls and evidence of compliance with respect to Globalvia subsidiaries that fall under the umbrella of the tax compliance system, and this tool was further extended in 2025. To help teams better understand the tax compliance system and reporting tools in place, explanatory sessions were organised for the professionals responsible for the controls.

## **Tax Compliance Management System**

### Tax Risk management

With regard to Tax Risk management, our Management Model is aligned with the identification and evaluation methodology of the Organisation's Comprehensive Risk Management System (ERM).

To prevent, detect and control Tax Risks, those that prevent the achievement of the established strategic and compliance objectives are periodically identified. The analysis includes aspects such as the applicable regulatory framework, best practices in the sector and risks recognised by the Tax Department or third parties in previous periods. In this regard, the tax compliance tool allows for better monitoring of whether the controls to be carried out by the persons responsible actually are being carried out.

### Tax compliance culture

The Tax Department advises and supports the Globalvia subsidiaries, identifying the groups exposed to Tax Risks and defining their training and communication needs, which are submitted to the Compliance Committee. A communication plan for the tax compliance culture is periodically implemented.

### Reporting mechanisms

All the people belonging to Globalvia are required to report individual or collective behaviour or activities that occur in the context of their activities that might contravene tax regulations or Globalvia's Tax Compliance System.

### Stakeholder participation

Bearing in mind the fact that Tax Risks can materialise at any level of the Organisation, customers, employees, shareholders, suppliers, the Board of Directors, public authorities, non-profit entities and companies in general are considered to be exposed to such risks. Business partners are subject to the same Globalvia Tax Compliance Management System whenever circumstances make this advisable.

## 5.3.2 Economic performance

### GRI 201-4, 207-4

We recognise and uphold our tax responsibilities in all jurisdictions where we operate, with a strong commitment to full compliance with applicable tax laws and obligations.

<b>DISTRIBUTION BY COUNTRY OF THE PROFIT BEFORE TAX FROM CONTINUING OPERATIONS (thousands of euros)*</b>			
<b>Country</b>	<b>2023</b>	<b>2024**</b>	<b>2025</b>
Spain	(12,267)	51,788	58,914
Costa Rica	28,020	38,102	33,365
Chile	26,221	(15,762)	(18,724)
USA	6,626	(15,901)	6,403
Ireland	34,093	3,252	1,766
Mexico	247	(409)	749
Portugal	(5,827)	(3,322)	31,595
UK	(4,863)	5,287	(45,041)
Colombia	-	1,702	2,624
<b>TOTAL</b>	<b>72,250</b>	<b>64,737</b>	<b>71,651</b>

\*Per the scope of consolidation reflected in the consolidated financial statements of Global Via Infraestructuras, S.A.

\*\*2024 figures have been recalculated following updates to the underlying data.

<b>INCOME TAX PAID* (thousands of euros)</b>			
<b>Country</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>
Spain	10,836	28,061	14,321
Chile	7,780	12,247	628
Costa Rica	15,248	9,961	15,486
USA	-	1	1
Ireland	546	502	1,957
Mexico	-	-	-
Portugal	9,046	6,138	6,893
Colombia	-	522	928
<b>TOTAL</b>	<b>43,456</b>	<b>57,432</b>	<b>40,214</b>

\* Income tax paid. Including: cash inflows and outflows, income tax paid in each of the countries in which Globalvia has a presence by the Globalvia subsidiaries in which there is an ownership interest of more than 50%. The exchange rate at December 31 was applied.

The grants received recognised in profit or loss in 2025 amounted to EUR 3,398 thousand. For more information, see Note 14.c to the consolidated financial statements for 2025.

## 6. Appendices

**Appendix I.** Table of contents pursuant to Spanish Non-Financial Information and Diversity Law 11/2018

**Appendix II.** GRI (Global Reporting Initiative) table of contents

**Appendix III.** CSRD table of contents

**Appendix IV.** Social Indicators

**Appendix V.** Membership of associations

**Appendix VI.** Acronyms

**Appendix VII.** Assurance report

## Appendix I. Table of contents pursuant to Spanish Non-Financial Information and Diversity Law 11/2018

Information requested by the Spanish Non-Financial Information and Diversity Law		Chapter of reference / Direct response	Related GRI standards and other non-GRI indicators
<b>General information</b>			
	Brief description of the Group's business model.	1.1 Mission, vision and values 2.1.1 General basis for the preparation of the Sustainability Report 2.4.1 Strategy, business model and value chain	3-3 Management of material topics 2-1 Organisational details 2-2 Entities included in the organisation's sustainability reporting
	Markets in which it operates.	Message of the General Manager 1.3 The response of Globalvia	2-6 Activities, value chain and other business relationships 2-22 Statement on sustainable development strategy
Business model	Goals and strategies of the organisation.	2.4.1 Strategy, business model and value chain 2.7 Our integrated management system	2-6 Activities, value chain and other business relationships 2-23 Policy commitments 2-24 Embedding policy commitments
	Main factors and trends that could affect the organisation's future evolution.	1.2 Sectoral and sustainability macrotrends 1.3 The response of Globalvia	3-3 Management of material topics
	Mention in the national, European or international reporting framework used to select key indicators of non-financial results included in each of the sections.	2.1.2 Information on specific circumstances	GRI 1 Section 3 Preparation of reports in accordance with GRI Standards
General	If the company complies with the Non-Financial Information Law by issuing a separate report, the fact that this information forms part of the directors' report must be expressly indicated.	Appendix VII: Assurance report	N/A
	Materiality principle.	2.3.1 Description of the process for the determination and assessment of material impacts, risks and opportunities	3-1 Process to determine material topics 3-2 List of material topics

**Information on environmental matters**

Management approach	<p>Description of the policies that the Group applies in relation to these issues, which will include the due diligence procedures for the identification, assessment, prevention and mitigation of risks and significant impacts and for verification and control, as well as the measures adopted.</p>	3 Environmental information	3-3 Management of material topics 2-23 Policy commitments
	<p>The results of these policies, which must include relevant key indicators of non-financial results that enable the monitoring and evaluation of progress and that foster comparisons between companies and industries, in accordance with the national, European or international reference frameworks used.</p>	3 Environmental information	3-3 Management of material topics 2-24 Embedding policy commitments
	<p>The main risks related to these issues that are associated with the Group's activities, including, where relevant and proportionate, its commercial relations, products or services that may have adverse effects on those areas, and how the Group manages those risks, explaining the procedures used to identify and evaluate them in accordance with the national, European and international reference frameworks for each issue. Information should be included on the impacts detected and they should be detailed, particularly in relation to the principal risks at short, medium and long term.</p>	<p>2.4.2 Material impacts, risks and opportunities and their interaction with strategy and the business model</p> <p>3.2.3 Material impacts, risks and opportunities and their interaction with strategy and the business model</p> <p>3.2.4 Description of the processes for determining and assessing the material climate-related impacts, risks and opportunities</p>	3-3 Management of material topics 2-25 Processes to remediate negative impacts

Environmental management	Current and foreseeable effects of the company's activities on the environment and, where applicable, on health and safety.	3 Environmental information	3-3 Management of material topics
	Environmental assessment or certification procedures.	3.1 Environmental management	3-3 Management of material topics
	Resources dedicated to the prevention of environmental risks.	3.1.2 Environmental investments	3-3 Management of material topics
	Application of the precautionary principle.	3.1 Environmental management	3-3 Management of material topics 2-23 Commitments and policies
	Amount of provisions and guarantees for environmental risks.	3.1.2 Environmental investments	3-3 Management of material topics
Pollution	Measures to prevent, reduce or offset emissions that seriously affect the environment, taking into account any type of activity-specific atmospheric pollutants including noise and light pollution.	<p>We have created a procedure to properly manage noise from activities and facilities, such as vehicle and machinery use or construction work. It includes measures to keep noise within allowed limits and requires regular inspections.</p> <p>Light pollution does not apply in the case of Globalvia's business activity.</p>	<p>3-3 Management of material topics</p> <p>305-7 Nitrogen oxides (NOx), sulphur oxides (SOx), and other significant air emissions</p>

Circular economy and prevention of waste	Prevention measures, recycling, reuse, other forms of recovery and disposal of waste.	3.6 Resource use and circular economy	306-1 Waste generation and significant waste-related impacts 306-2 Management of significant waste-related impacts 306-3 Waste generated 306-4 Waste diverted from disposal 306-5 Waste directed to disposal
	Activities to fight food waste.	Not applicable in the case of Globalvia's business activity	N/A
	Water consumption and supply in accordance with local limitations.	3.4 Water and marine resources	303-1 Interactions with water as a shared resource 303-2 Management of water discharge-related impacts 303-3 Water withdrawal 303-4 Water discharge 303-5 Water consumption
Sustainable use of resources	Consumption of raw materials and measures taken in order to improve the efficiency of their use.	3.6 Resource use and circular economy	301-1 Materials used by weight or volume 301-2 Recycled input materials used 301-3 Reclaimed products and their packaging materials
	Direct and indirect energy consumption.	3.2.8 Energy consumption and matrix	302-1 Energy consumption within the organisation 302-2 Energy consumption outside of the organisation 302-3 Energy intensity
	Measures adopted to improve energy efficiency.	2.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model 3.2.2 Transition plan to mitigate climate change 3.2.3 Material impacts, risks and opportunities and their interaction with strategy and business model	3-3 Management of material topics 302-4 Reductions in energy requirements of products and services
	Use of renewable energies.	3.2.6 Actions and resources related to climate change policies 3.2.8 Energy consumption and matrix	

Climate change

Biodiversity protection

<p>Significant elements of the greenhouse gas (GHG) emissions generated as a result of the company's activities including the use of the goods and services it produces.</p>	<p>3.2.9 Gross Scopes 1, 2, 3 and Total GHG emissions</p>	<p>305-1 Direct (Scope 1) GHG emissions</p> <p>305-2 Energy indirect (Scope 2) GHG emissions</p> <p>305-3 Other indirect (Scope 3) GHG emissions</p> <p>305-4 GHG emissions intensity</p> <p>305-6 Emissions of ozone-depleting substances (ODS)</p>
<p>Measures adopted to adapt to the consequences of climate change.</p>	<p>3.2.3 Material impacts, risks and opportunities and their interaction with strategy and business model</p> <p>3.2.6 Actions and resources in relation to climate change policies</p>	<p>3-3 Management of material topics</p> <p>201-2 Financial implications and other risks and opportunities due to climate change</p> <p>305-5 Reduction of GHG emissions</p>
<p>Medium and long-term targets voluntarily set for the reduction of greenhouse gas emissions, and measures implemented to that end.</p>	<p>3.2.3 Material impacts, risks and opportunities and their interaction with strategy and business model</p> <p>3.2.7 Targets related to climate change mitigation and adaptation</p>	<p>3-3 Management of material topics</p> <p>305-5 Reduction of emissions</p>
<p>Measures taken to conserve or restore biodiversity.</p>	<p>3.5 Biodiversity and ecosystems</p>	<p>304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value</p> <p>304-2 Significant impacts of activities, products, and services on biodiversity</p>
<p>Impacts caused by activities or operations in protected areas.</p>	<p>3.5 Biodiversity and ecosystems</p>	<p>304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value</p> <p>304-2 Significant impacts of activities, products, and services on biodiversity</p>

Information on social and personnel-related matters

Management approach

Description of the policies that the Group applies in relation to these issues, which will include the due diligence procedures for the identification, assessment, prevention and mitigation of risks and significant impacts and for verification and control, as well as the measures adopted.

4.1 Our workforce

3-3 Management of material topics  
2-23 Commitments and policies

The results of these policies, which must include relevant key indicators of non-financial results that enable the monitoring and evaluation of progress and that foster comparisons between companies and industries, in accordance with the national, European or international reference frameworks used.

4.1 Our workforce

3-3 Management of material topics  
2-24 Embedding policy commitments

The main risks related to these issues that are associated with the Group's activities, including, where relevant and proportionate, its commercial relations, products or services that may have adverse effects on those areas, and how the Group manages those risks, explaining the procedures used to identify and evaluate them in accordance with the national, European and international reference frameworks for each issue. Information should be included on the impacts detected and they should be detailed, particularly in relation to the principal risks at short, medium and long term.

4.1 Our workforce

2.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model

3-3 Management of material topics  
2-25 Processes to remediate negative impacts

Employment	Total number and distribution of employees by gender, age, country and employee category.	4.1.1 Distribution of the workforce Appendix IV: Social Indicators	2-7 Employees 405-1 Diversity of governance bodies and employees
	Total number and distribution of employment contracts by type and annual average number of permanent, temporary and part-time contracts by gender, age and professional category.	2.4.1 Strategy, business model and value chain 4.1.1 Distribution of the workforce Appendix IV: Social Indicators	2-7 Employees
	Annual average number of permanent, temporary and part-time contracts by gender, age and professional category.	Appendix IV: Social Indicators	3-3 Management of material topics
	Number of terminations by gender, age and professional category.	Appendix IV: Social Indicators	401-1 New employee hires and employee turnover
	Average remuneration and remuneration trends by gender, age and professional category or equivalent value.	Appendix IV: Social Indicators	3-3 Management of material topics 2-21 Annual total compensation ratio 405-2 Ratio of basic salary and remuneration of women to men
	Gender pay gap, remuneration of equal or average jobs at the company	Appendix IV: Social Indicators	3-3 Management of material topics
	Average remuneration of directors and executives, including variable remuneration, attendance fees, termination benefits, payments to long-term savings schemes and any other benefits, broken down by gender.	<i>For the data associated with the Board of Directors and the Steering Committee, refer to the Note 22.b of the financial statements.</i>	3-3 Management of material topics 2-19 Remuneration policies 201-3 Defined benefit plan obligations and other retirement plans
Organisation of work	Implementation of work disconnection measures.	4.1.7 Work-life balance	3-3 Management of material topics 2-23 Commitments and policies 2-24 Embedding policy commitments
	Employees with a disability.	4.1.2 An equal and diverse team Appendix IV: Social Indicators	3-3 Management of material topics 405-1 Diversity of governance bodies and employees
	Organisation of working hours.	4.1.5 Labour relations	3-3 Management of material topics
	Absenteeism (number of hours).	4.1.5 Labour relations	3-3 Management of material topics
	Measures to foster a good work-life balance and shared parental responsibility.	4.1.7 Work-life balance	3-3 Management of material topics 401-3 Parental leave

Health and safety

Labour relations

Occupational health and safety conditions.	4.1.4 Health and safety	<p>403-1 Occupational health and safety management system</p> <p>403-2 Hazard identification, risk assessment, and incident investigation</p> <p>403-3 Occupational health services</p> <p>403-5 Worker training on occupational health and safety</p> <p>403-6 Promotion of worker health</p> <p>403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships</p> <p>414-2 Coverage by an occupational health and safety management system</p>
Occupational accidents, in particular the frequency and severity thereof, and occupational diseases, by gender.	<p>4.1.4 Health and safety</p> <p>Appendix IV: Social Indicators</p> <p><i>In 2025 no cases of work-related ill health were recorded and there were no work-related fatalities.</i></p>	<p>403-9 Work-related injuries</p> <p>403-10 Work-related ill health</p>
Organisation of social dialogue, including the procedures for informing, consulting and negotiating with employees.	<p>2.2 Stakeholder engagement and participation</p> <p>4.1.5 Labour relations</p>	<p>2-29 Approach to stakeholder engagement</p> <p>403-4 Worker participation, consultation, and communication on occupational health and safety</p>
Percentage of employees covered by collective agreements by country.	<p>4.1.5 Labour relations</p> <p>Appendix IV: Social Indicators</p>	<p>2-30 Collective bargaining agreements</p>
Assessment of collective agreements, particularly in the occupational health and safety area.	4.1.5 Labour relations	<p>403-1 Workers representation in formal joint management–worker health and safety committees</p> <p>403-4 Worker participation, consultation, and communication on occupational health and safety</p> <p>403-8 Workers covered by an occupational health and safety management system</p>

Training	Training policies implemented.	4.1.3 Talent development	3-3 Management of material topics 2-23 Policy commitments
	Total number of training hours by professional category.	4.1.3 Development of talent Appendix IV: Social Indicators	404-1 Average hours of training per year per employee 404-2 Programs for upgrading employee skills and transition assistance programmes 404-3 Percentage of employees receiving regular performance and career development reviews
Universal accessibility for people with disabilities	Integration of, and universal accessibility for, people with disabilities.	4.1.2 An equal and diverse team Appendix IV: Social Indicators	405-1 Diversity of governance bodies and employees
	Measures adopted to promote equal treatment and opportunities for women and men.	4.1.2 An equal and diverse team	2-23 Policy commitments 2-24 Embedding policy commitments
Equal opportunities	Equality plans (Chapter III of Organic Law 3/2007, of 22 March, for the effective equality of women and men); measures adopted to foster employment, and protocols in place against sexual and gender-based harassment. Integration of, and universal accessibility for, people with disabilities.	4.1.2 An equal and diverse team	2-23 Policy commitments 2-24 Embedding policy commitments
	Anti-discrimination policy and, where appropriate, diversity management policy.	4.1.2 An equal and diverse team	2-23 Policy commitments 2-24 Embedding policy commitments 406-1 Incidents of discrimination and corrective actions taken

Information on respect for human rights

	<p>Description of the policies that the Group applies in relation to these issues, which will include the due diligence procedures for the identification, assessment, prevention and mitigation of risks and significant impacts and for verification and control, as well as the measures adopted.</p>	<p>4.3.2 Policies related to the affected communities                  4.4.2 Policies related to consumers and end users                  5.1.2 Corporate culture and business conduct policies                  5.1.4 Commitment to human rights</p>	<p>3-3 Management of material topics                  2-23 Policy commitments</p>
<p>Management approach</p>	<p>The results of these policies, which must include relevant key indicators of non-financial results that enable the monitoring and evaluation of progress and that foster comparisons between companies and industries, in accordance with the national, European or international reference frameworks used.</p>	<p>5.1.4 Commitment to human rights</p>	<p>3-3 Management of material topics                  2-24 Embedding policy commitments</p>
	<p>The main risks related to these issues that are associated with the Group's activities, including, where relevant and proportionate, its commercial relations, products or services that may have adverse effects on those areas, and how the Group manages those risks, explaining the procedures used to identify and evaluate them in accordance with the national, European and international reference frameworks for each issue. Information should be included on the impacts detected and they should be detailed, particularly in relation to the principal risks at short, medium and long term.</p>	<p>2.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model                  5.1.4 Commitment to human rights</p>	<p>3-3 Management of material topics                  2-25 Processes to remediate negative impacts</p>

Information on respect for human rights

Application of due diligence procedures in human rights matters and prevention of the risks of violation thereof, and measures to mitigate, manage and redress any abuses committed.

2.5.3 Statement of due diligence  
5.1.4 Commitment to human rights

2-23 Policy commitments

Human rights violation whistleblowing.

5.1.3 Ethics and compliance safeguard mechanisms

2-26 Mechanisms for seeking advice and raising concerns

406-1 Incidents of discrimination and corrective actions taken

Promotion and fulfilment of the provisions of the fundamental conventions of the International Labour Organisation in relation to respect for freedom of association and the right to collective bargaining, elimination of discrimination in respect of employment and occupation, elimination of forced or compulsory labour and effective abolition of child labour.

5.1.4 Commitment to human rights

407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk

408-1 Operations and suppliers at significant risk for incidents of child labour

409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour

Information on combating corruption and bribery

Management approach

Description of the policies that the Group applies in relation to these issues, which will include the due diligence procedures for the identification, assessment, prevention and mitigation of risks and significant impacts and for verification and control, as well as the measures adopted.

5.1.2 Corporate culture and business conduct policies

3-3 Management of material topics

5.1.5 Prevention and detection of corruption and bribery

2-23 Policy commitments

The results of these policies, which must include relevant key indicators of non-financial results that enable the monitoring and evaluation of progress and that foster comparisons between companies and industries, in accordance with the national, European or international reference frameworks used.

5.1.5 Prevention and detection of corruption and bribery

3-3 Management of material topics

2-24 Embedding policy commitments

205-2 Communication and training about anti-corruption policies and procedures

The main risks related to these issues that are associated with the Group's activities, including, where relevant and proportionate, its commercial relations, products or services that may have adverse effects on those areas, and how the Group manages those risks, explaining the procedures used to identify and evaluate them in accordance with the national, European and international reference frameworks for each issue. Information should be included on the impacts detected and they should be detailed, particularly in relation to the principal risks at short, medium and long term.

2.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model

3-3 Management of material topics

5.1.5 Prevention and detection of corruption and bribery

2-25 Processes to remediate negative impacts

Information on combating corruption and bribery

<p>Measures taken to prevent corruption and bribery.</p>	<p>4.3.4 Processes to remediate negative impacts and channels for affected communities to raise their concerns</p> <p>4.4.2 Policies related to consumers and end users</p> <p>4.4.4 Processes for engaging with consumers and end users affected by impacts</p> <p>5.1.2 Corporate culture and business conduct policies</p> <p>5.1.3 Ethics and compliance safeguard mechanisms</p> <p>5.1.5 Prevention and detection of corruption and bribery</p>	<p>2-26 Mechanisms for seeking advice and raising concerns</p>
<p>Measures to combat money laundering.</p>	<p>2.6 Risk management</p> <p>5.1.2 Corporate culture and business conduct policies</p> <p>5.1.6 Confirmed cases of corruption and bribery</p> <p><i>In 2025 there were no confirmed cases of corruption.</i></p>	<p>205-1 Operations assessed for risks related to corruption</p> <p>205-2 Communication and training about anti-corruption policies and procedures</p> <p>205-3 Confirmed incidents of corruption and actions taken</p>
<p>Measures to combat money laundering.</p>	<p>4.3.4 Processes to remediate negative impacts and channels for affected communities to raise their concerns</p> <p>4.4.2 Policies related to consumers and end users</p> <p>4.4.4 Processes for engaging with consumers and end users affected by impacts</p> <p>5.1.2 Corporate culture and business conduct policies</p> <p>5.1.3 Ethics and compliance safeguard mechanisms</p> <p>5.1.2 Corporate culture and business conduct policies</p> <p>5.1.5 Prevention and detection of corruption and bribery</p> <p><i>In 2025 there were no confirmed cases of corruption.</i></p>	<p>2-26 Mechanisms for seeking advice and raising concerns</p> <p>205-2 Communication and training about anti-corruption policies and procedures</p> <p>205-3 Confirmed incidents of corruption and actions taken</p>
<p>Contributions to foundations and non-profit entities.</p>	<p>Appendix V: Membership of associations</p> <p><i>Globalvia does not make financial contributions of this nature.</i></p>	<p>201-1 Direct economic value generated and distributed</p> <p>415-1 Political contributions</p>

Information on the Company

Management approach	<p>Description of the policies that the Group applies in relation to these issues, which will include the due diligence procedures for the identification, assessment, prevention and mitigation of risks and significant impacts and for verification and control, as well as the measures adopted.</p>	<p>2.5.3 Statement of due diligence 4.2.2 Supplier approval system 4.3.2 Policies related to the affected communities 5.1.4 Commitment to human rights</p>	<p>3-3 Management of material topics 2-23 Policy commitments</p>
	<p>The results of these policies, which must include relevant key indicators of non-financial results that enable the monitoring and evaluation of progress and that foster comparisons between companies and industries, in accordance with the national, European or international reference frameworks used.</p>	<p>2.5.3 Statement of due diligence 4.2.2 Supplier approval system 4.3.2 Policies related to the affected communities 5.1.4 Commitment to human rights</p>	<p>3-3 Management of material topics 2-24 Embedding policy commitments</p>
	<p>The main risks related to these issues that are associated with the Group's activities, including, where relevant and proportionate, its commercial relations, products or services that may have adverse effects on those areas, and how the Group manages those risks, explaining the procedures used to identify and evaluate them in accordance with the national, European and international reference frameworks for each issue. Information should be included on the impacts detected and they should be detailed, particularly in relation to the principal risks at short, medium and long term.</p>	<p>2.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model 4.3.1 Material impacts, risks and opportunities and their interaction with strategy and business model</p>	<p>3-3 Management of material topics 2-25 Processes to remediate negative impacts</p>

The Company's sustainable development commitments

Impact of the Company's activity on employment and local development.

- 4.2.1 Responsible management of the value chain
- 4.3.1 Material impacts, risks and opportunities and their interaction with strategy and business model
- 4.3.4 Processes to remediate negative impacts and channels for affected communities to raise their concerns

- 2-25 Processes to remediate negative impacts
- 201-1 Direct economic value generated and distributed
- 203-1 Infrastructure investments and services supported
- 203-2 Significant indirect economic impacts
- 204-1 Proportion of spending on local suppliers
- 413-2 Operations with significant actual and potential negative impacts on local communities

Relations with local community actors and the avenues of dialogue with them.

- 2.2 Stakeholder engagement and participation
- 4.3.1 Material impacts, risks and opportunities and their interaction with strategy and business model
- 4.3.3 Processes for engaging with communities affected by impacts
- 4.3.4 Processes to remediate negative impacts and channels for affected communities to raise their concerns

- 3-3 Management of material topics
- 2-29 Approach to stakeholder engagement
- 413-1 Operations with local community engagement, impact assessments, and development programmes
- 413-2 Operations with significant actual and potential negative impacts on local communities

Sponsorship and association actions.

- 4.3 Affected communities
- Appendix V: Membership of associations

- 2-28 Membership of associations
- 201-1 Direct economic value generated and distributed

Subcontracting and suppliers

Inclusion of social, gender equality and environmental issues in the procurement policy.

4.2.2 Supplier approval system

3-3 Management of material topics

2-23 Policy commitments

2-25 Processes to remediate negative impacts

308-1 New suppliers that were screened using environmental criteria

414-1 New suppliers that were screened using social criteria

Consideration in relationships with suppliers and subcontractors of their social and environmental responsibilities.

2.4.1 Strategy, business model and value chain

4.2.2 Supplier approval system

2-6 Activities, value chain and other business relationships

308-1 New suppliers that were screened using environmental criteria

414-1 New suppliers that were screened using social criteria

Supervision systems, audits and audit findings.

4.2.2 Supplier approval system

308-2 Negative environmental impacts in the supply chain and actions taken

414-2 Negative social impacts in the supply chain and actions taken

Consumers	Consumer health and safety measures.	4.4.3 User safety	416-1 Assessment of the health and safety impacts of product and service categories
	Grievance systems, complaints received and their resolution.	4.4.3 User safety	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services
		4.4.4 Processes for engaging with consumers and end users affected by impacts	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data
Tax information	Earnings obtained on a country-by-country basis.	5.1.3 Ethics and compliance safeguard mechanisms	201-1 Direct economic value generated and distribute
		5.3.1 Tax governance	207-1 Approach to tax
		5.3.2 Economic performance	207-2 Tax governance, control, and risk management
	Income tax paid.		207-4 Country-by-country reporting
	Information on government grants received.	5.3.2 Economic performance	207-4 Country-by-country reporting
			201-4 Financial assistance received from government

## Appendix II. GRI (Global Reporting Initiative) table of contents

GRI standard	GRI contents	Chapter	Direct response/ Omissions	
<b>GRI 1: Foundation 2021</b>				
<b>GRI 2: General disclosures 2021</b>				
<b>The organisation and its reporting practices</b>	2-1 Organisational details	1.1 Mission, vision and values		
	2-2 Entities included in the organisation's sustainability reporting	2.1.1 General basis for the preparation of the Sustainability Report		
	2-3 Reporting period, frequency and contact point	2.1.1 General basis for the preparation of the Sustainability Report		
	2-4 Restatements of information	2.1.2 Information on specific circumstances		
	2-5 External assurance	Appendix VII: Assurance Report		
	2-6 Activities, value chain and other business relationships	2.4.1 Strategy, business model and value chain		
	<b>Activities and workers</b>	2-7 Employees	4.1.1 Distribution of the workforce	
			Appendix IV: Social Indicators	
		2-8 Workers who are not employees	4.2.1 Responsible management of the value chain	
		2-9 Governance structure and composition	2.5.1 The role of the administrative, management and supervisory bodies	
2-10 Nominating and selecting the highest governance body		2.5.1 The role of the administrative, management and supervisory bodies		
<b>Governance</b>	2-11 Chair of the highest governance body	2.5.1 The role of the administrative, management and supervisory bodies		
	2-12 Role of the highest governance body in overseeing the management of impacts	2.5.1 The role of the administrative, management and supervisory bodies		
	2-13 Delegation of responsibility for managing impacts	2.6 Risk management		
		3.1.1 Mitigation of environmental risks and impacts		
		3.1.3 Environmental communication and dissemination		
	2-14 Role of the highest governance body in sustainability reporting	2.1.1 General basis for the preparation of the Sustainability Report		
	2-15 Conflicts of interest	5.1.2 Corporate culture and business conduct policies		
	2-16 Communication of critical concerns	5.1.2 Corporate culture and business conduct policies		
	2-17 Collective knowledge of the highest governance body	2.5.1 The role of the administrative, management and supervisory bodies		
		5.1.1 The role of the administrative, management and supervisory bodies		
	2-18 Evaluation of the performance of the highest governance body	2.5.1 The role of the administrative, management and supervisory bodies		
<b>Workers</b>	2-19 Remuneration policies	4.1.3 Talent development		
		3.2.1 Integration of sustainability-related performance in incentive schemes		
		4.1.6 Remuneration and employee benefits		
	2-20 Process for determining remuneration	3.2.1 Integration of sustainability-related performance in incentive schemes		
		4.1.6 Remuneration and employee benefits		
2-21 Annual total compensation ratio	Appendix IV: Social Indicators			

<p><b>Strategy, policies and practices</b></p>	<p>2-22 Statement on sustainable development strategy</p>	<p>Message of the General Manager</p> <p>2.5.3 Statement of due diligence</p> <p>2.7 Our Integrated Management System</p> <p>3.2.5. Policies related to climate change mitigation and adaptation</p>	
	<p>2-23 Policy commitments</p>	<p>4.2.1 Responsible management of the value chain</p> <p>4.3.2 Policies related to the affected communities</p> <p>4.4.2 Policies related to consumers and end users</p> <p>5.1.2 Corporate culture and business conduct policies</p> <p>2.5.3 Statement of due diligence</p> <p>2.7 Our Integrated Management System</p> <p>3.1 Environmental management</p>	
	<p>2-24 Embedding policy commitments</p>	<p>3.2.5 Policies related to climate change mitigation and adaptation</p> <p>4.2.1 Responsible management of the value chain</p> <p>4.3.2 Policies related to the affected communities</p> <p>4.4.2 Policies related to consumers and end-users</p> <p>5.1.2 Corporate culture and business conduct policies</p> <p>3.1 Environmental management</p> <p>3.2.6 Actions and resources in relation to climate change policies</p> <p>3.4 Water and marine resources</p> <p>3.5 Biodiversity and ecosystems</p> <p>3.6 Resource use and circular economy</p>	
	<p>2-25 Processes to remediate negative impacts</p>	<p>4.2.1 Responsible management of the value chain</p> <p>4.3.4 Processes to remediate negative impacts and channels for affected communities to raise their concerns</p> <p>4.3.5 Actions to address the IROs and evaluate their effectiveness</p> <p>4.4.5 Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions</p> <p>4.3.4 Processes to remediate negative impacts and channels for affected communities to raise their concerns</p>	
	<p>2-26 Mechanisms for seeking advice and raising concerns</p>	<p>4.4.4 Processes for engaging with consumers and end users affected by impacts</p> <p>5.1.2 Corporate culture and business conduct policies</p> <p>5.1.3 Ethics and compliance safeguard mechanisms</p> <p>5.1.5 Prevention and detection of corruption and bribery</p>	
	<p>2-27 Compliance with laws and regulations</p>	<p>3.1 Environmental management</p> <p>5.1.3 Ethics and compliance safeguard mechanisms</p>	
	<p>2-28 Membership of associations</p>	<p>Appendix V: Membership of associations</p>	

<b>Stakeholder engagement</b>	2-29 Approach to stakeholder engagement	2.2 Stakeholder engagement 4.1.5 Labour relations 4.3.3 Processes for engaging with communities affected by impacts 4.4.4 Processes for engaging with consumers and end users affected by impacts
	2-30 Collective bargaining agreements	4.1.5 Labour relations Appendix IV: Social Indicators
<b>GRI 3: Material topics 2021</b>		
<b>GRI 3: Material topics</b>	3-1 Process to determine material topics	2.3.1 Description of the process for the determination and assessment of material impacts, risks and opportunities 2.3.1 Description of the process for the determination and assessment of material impacts, risks and opportunities
	3-2 List of material topics	2.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model
<b>Ethics, transparency and business conduct</b>		
<b>GRI 3: Material topics</b>	3-3 Management of material topics	2.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model 5.1.2 Corporate culture and business conduct policies
		5.1.3 Ethics and compliance safeguard mechanisms 5.1.4 Commitment to human rights 5.1.5 Prevention and detection of corruption and bribery
<b>GRI 205: Anti-corruption 2016</b>	205-1 Operations assessed for risks related to corruption	5.3.1 Tax governance 2.6 Risk management 5.1.5 Prevention and detection of corruption and bribery
	205-2 Communication and training about anti-corruption policies and procedures	5.1.2 Corporate culture and business conduct policies 5.1.5 Prevention and detection of corruption and bribery
	205-3 Confirmed incidents of corruption and actions taken	5.1.6 Confirmed cases of corruption or bribery
<b>GRI 206: Anti-competitive Behavior 2016</b>	206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	
<b>GRI 415-1 Public Policy</b>	415-1 Political contributions	
<b>Business management</b>		
<b>GRI 201: Economic Performance 2016</b>	201-1 Direct economic value generated and distributed	4.3.5 Actions to address IROs and evaluate their effectiveness
	201-2 Financial implications and other risks and opportunities due to climate change	3.2.3 Material impacts, risks and opportunities and their interaction with the strategy and business model 3.2.4 Description of the processes to identify and assess material climate-related impacts, risks and opportunities
	201-3 Defined benefit plan obligations and other retirement plans	4.1.6 Remuneration and employee benefits
	201-4 Financial assistance received from government	5.3.2 Economic performance

*No cases of anti-competitive behaviour were recorded in 2025  
Globalvia does not make financial contributions of this nature.*

<b>GRI 202: Market Presence 2016</b>	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	Appendix IV: Social Indicators
	202-2 Proportion of senior management hired from the local community	N/A
<b>GRI 203: Indirect Economic Impacts 2016</b>	203-1 Infrastructure investments and services supported	4.3.5 Actions to address the IROs and evaluate their effectiveness
	203-2 Significant indirect economic impacts	4.3.5 Actions to address the IROs and evaluate their effectiveness
<b>GRI 207: Tax 2019</b>	207-1 Approach to tax	5.3.1 Tax governance
	207-2 Tax governance, control, and risk management	5.3.1 Tax governance
	207-3 Stakeholder engagement and management of concerns related to tax	5.3.1 Tax governance
	207-4 Country-by-country reporting	5.3.2 Economic performance
<b>Cybersecurity</b>		
<b>GRI 3: Material topics</b>	3-3 Management of material topics	2.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model 5.2 Cybersecurity and data protection
	<b>GRI 418: Customer Privacy</b>	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data
<b>Our workforce</b>		
<b>GRI 3: Material topics</b>	3-3 Management of material topics	2.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model 4.1 Our workforce
	401-1 New employee hires and employee turnover	4.1.1 Distribution of the workforce Appendix IV: Social Indicators
<b>GRI 401: Employment 2016</b>	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	4.1.6. Remuneration and employee benefits
	401-3 Parental leave	4.1.7 Work-life balance Appendix IV: Social Indicators

*In 2025 the percentage of executives hired in the local community was 98%.*

<b>GRI 403: Occupational Health and Safety 2018</b>	403-1 Occupational health and safety management system	4.1.4 Health and safety	<i>During 2025, no cases of recordable occupational diseases and illnesses or related deaths have been recorded.</i>
	403-2 Hazard identification, risk assessment, and incident investigation	4.1.4 Health and safety	
	403-3 Occupational health services	4.1.4 Health and safety	
	403-4 Worker participation, consultation, and communication on occupational health and safety	4.1.4 Health and safety 4.1.5 Labour relations	
	403-5 Worker training on occupational health and safety	4.1.4 Health and safety	
	403-6 Promotion of worker health	4.1.4 Health and safety	
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	4.1.4 Health and safety	
	403-8 Workers covered by an occupational health and safety management system	4.1.4 Health and safety	
	403-9 Work-related injuries	4.1.4 Health and safety	
	403-10 Work-related ill health	Appendix IV: Social Indicators	
<b>GRI 404: Training and Education 2016</b>	404-1 Average hours of training per year per employee	4.1.3 Talent development Appendix IV: Social Indicators	
	404-2 Programs for upgrading employee skills and transition assistance programmes	4.1.3 Talent development	
	404-3 Percentage of employees receiving regular performance and career development reviews	4.1.3 Talent development	
<b>GRI 405: Diversity and Equal Opportunity 2016</b>	405-1 Diversity of governance bodies and employees	4.1.1 Distribution of the workforce Appendix IV: Social Indicators	
	405-2 Ratio of basic salary and remuneration of women to men	Appendix IV: Remuneration and employee benefits	
<b>GRI 406: Non-discrimination 2016</b>	406-1 Incidents of discrimination and corrective actions taken	4.1.2 An equal and diverse team	
<b>GRI 407: Freedom of association and collective bargaining 2016</b>	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	4.2.2 Supplier approval system	
<b>GRI 408: Child Labour 2016</b>	408-1 Operations and suppliers at significant risk for incidents of child labour	4.2.2. Supplier approval system	

<b>GRI 409: Forced or Compulsory Labour 2016</b>	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour	4.2.2. Supplier approval system	
<b>GRI 411: Rights of Indigenous Peoples 2016</b>	411-1 Incidents of violations involving rights of indigenous peoples		<i>In 2025 no cases were identified of violations involving rights of indigenous peoples.</i>
<b>Responsible supply chain</b>			
<b>GRI 3: Material topics</b>	3-3 Management of material topics	2.4.2. Material impacts, risks and opportunities and their interaction with strategy and business model 4.2.1 Responsible management of the value chain 4.2.2 Supplier approval system	
<b>GRI 204: Procurement Practices 2016</b>	204-1 Proportion of spending on local suppliers	4.2.1. Responsible management of the value chain	
<b>GRI 308: Supplier Environmental Assessment 2016</b>	308-1 New suppliers that were screened using environmental criteria 308-2 Negative environmental impacts in the supply chain and actions taken	4.2.2. Supplier approval system 3.2.6 Actions and resources related to climate change policies 4.2.1. Responsible management of the value chain	
<b>GRI 407: Freedom of Association and Collective Bargaining 2016</b>	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	4.2.2. Supplier approval system	
<b>GRI 414: Supplier Social Assessment 2016</b>	414-1 New suppliers that were screened using social criteria 414-2 Negative social impacts in the supply chain and actions taken	4.2.2. Supplier approval system 4.2.1. Responsible management of the value chain	
<b>Contribution to social and local development</b>			
<b>GRI 3: Material topics</b>	3-3 Management of material topics  413-1 Operations with local community engagement, impact assessments, and development programmes 413-2 Operations with significant actual and potential negative impacts on local communities	2.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model 4.3.1 Material impacts, risks and opportunities and their interaction with strategy and business model 4.3.2 Policies related to affected communities 4.3.3 Processes for engaging with communities affected by impacts 4.3.4 Processes to remediate negative impacts and channels for affected communities to raise concerns 4.3.5 Actions to address IROs and evaluate their effectiveness 4.3.3 Processes for engaging with communities affected by impacts 4.3.4 Processes to remediate negative impacts and channels for affected communities to raise their concerns	

Users		
<b>GRI 3: Material topics</b>	3-3 Management of material topics	2.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model
		4.4.1 Material impacts risks and opportunities and their interaction with strategy and business model
		4.4.2 Policies related to consumers and end-users
		4.4.3 User safety
		4.4.4 Processes to engage with consumers and end-users and impacts
<b>GRI 416: Customer Health and Safety 2016</b>	416-1 Assessment of the health and safety impacts of product and service categories 416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	4.4.5 Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions
		4.4.3 User safety
		4.4.3 User safety
Energy efficiency and consumption		
<b>GRI 3: Material topics</b>	3-3 Management of material topics	2.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model
		3.2 Climate change
<b>GRI 302: Energy 2016</b>	302-1 Energy consumption within the organisation	3.2.8 Energy consumption and matrix
	302-3 Energy intensity	3.2.8 Energy consumption and matrix
	302-4 Reduction of energy consumption	3.2.6 Actions and resources related to climate change policies
	302-5 Reductions in energy requirements of products and services	3.2.8 Energy consumption and matrix
	<b>GRI 305: Emissions 2016</b>	305-1 Direct (Scope 1) GHG emissions
305-2 Energy indirect (Scope 2) GHG emissions		3.2.9 Gross Scopes 1, 2, 3 and total GHG emissions
305-3 Other indirect (Scope 3) GHG emissions		3.2.9 Gross Scopes 1, 2, 3 and total GHG emissions
305-4 GHG emissions intensity		3.2.9 Gross Scopes 1, 2, 3 and total GHG emissions
305-5 Reduction of GHG emissions		3.2.6 Actions and resources related to climate change policies
		3.2.7 Targets related to climate change mitigation and adaptation
		3.2.9 Gross Scopes 1, 2, 3 and total GHG emissions
305-6 Emissions of ozone-depleting substances (ODS)	3.2.10 GHG removals and GHG mitigation projects financed through carbon credits	
305-7 Nitrogen oxides (NOx), sulphur oxides (SOx), and other significant air emissions	3.2.6 Actions and resources related to climate change policies	
		3.3 Pollution
Climate change adaptation		
<b>GRI 3: Material topics</b>	3-3 Management of material topics	2.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model
		3.2 Climate change
Materials		
<b>GRI 301: Materials</b>	301-1 Materials used by weight or volume	3.6 Resource use and circular economy

**Water and effluents**

<b>GRI 303: Water and Effluents</b>	303-1 Interactions with water as a shared resource	3.4 Water and marine resources
	303-2 Management of water discharge-related impacts	3.4 Water and marine resources
	303-3 Water withdrawal	3.4 Water and marine resources
	303-4 Water discharge	3.4 Water and marine resources
	303-5 Water consumption	3.4 Water and marine resources

**Biodiversity**

<b>GRI 304: Biodiversity 2016</b>	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value	3.5 Biodiversity and ecosystems
	304-2 Significant impacts of activities, products, and services on biodiversity	3.5 Biodiversity and ecosystems
	304-3 Habitats protected or restored	3.5 Biodiversity and ecosystems

**Effluents and waste**

<b>GRI 306: Effluents and Waste</b>	306-1 Waste generation and significant waste-related impacts	3.6 Resource use and circular economy
	306-2 Waste by type and disposal method	3.2.6 Actions and resources related to climate change policies 3.6 Resource use and circular economy
	306-3 Significant spills	3.6 Resource use and circular economy
	306-4 Waste diverted from disposal	3.6 Resource use and circular economy
	306-5 Waste directed to disposal	3.6 Resource use and circular economy

**Marketing and labelling**

	417-3 Incidents of non-compliance concerning marketing communications	<i>In 2025 no incidents of non-compliances were recorded in relation to marketing communications.</i>
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## Appendix III. CSRD table of contents

ESRS	Standard	Chapter
<b>Basis for preparation</b>		
ESRS 2	ESRS 2 BP-1	2.1.1 General basis for the preparation of the Sustainability Report
ESRS 2	ESRS 2 BP-2	2.1.2 Information on specific circumstances
<b>Governance</b>		
ESRS 2	ESRS 2 GOV-1	2.5.1 The role of the administrative, management and supervisory bodies
ESRS 2	ESRS 2 GOV-3	2.5.2 Integration of sustainability-related performance in incentive schemes
ESRS 2	ESRS 2 GOV-4	2.5.3 Statement of due diligence
ESRS 2	ESRS 2 GOV-5	2.5.4 Risk management and internal controls over sustainability reporting
<b>Management of impacts, risks and opportunities</b>		
ESRS 2	ESRS 2 IRO-1	2.3.1 Description of the process for the determination and assessment of material impacts, risks and opportunities
ESRS 2	ESRS 2 IRO-2	2.3.2 Disclosure requirements established in the ESRS covered by the undertaking's sustainability report
<b>Strategy</b>		
ESRS 2	ESRS 2 SBM-1	2.4.1 Strategy, business model and value chain
ESRS 2	ESRS 2 SBM-2	2.2 Stakeholder engagement and participation
ESRS 2	ESRS 2 SBM-3	2.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model
<b>Climate change</b>		
ESRS E1	E1. GOV-3	3.2.1 Integration of sustainability-related performance in incentive schemes
ESRS E1	E1. SBM-3	3.2.3 Material impacts, risks and opportunities and their interaction with strategy and business model
ESRS E1	E1. IRO-1	3.2.4 Description of the processes to identify and assess material climate-related impacts, risks and opportunities
ESRS E1	E1-1	3.2.2 Transition plan to mitigate climate change
ESRS E1	E1-2	3.2.5 Policies related to climate change mitigation and adaptation
ESRS E1	E1-3	3.2.6 Actions and resources in relation to climate change policies
ESRS E1	E1-4	3.2.7 Targets related to climate change mitigation and adaptation
ESRS E1	E1-5	3.2.8 Energy consumption and matrix
ESRS E1	E1-6	3.2.9 Gross Scopes 1, 2, 3 and total GHG emissions
ESRS E1	E1-7	3.2.10 GHG removals and GHG mitigation projects financed through carbon credits
ESRS E1	E1-8	3.2.11 Internal carbon pricing
ESRS E1	E1-9	Globalvia opted the avail itself of the transitional period established the Regulation
<b>Pollution</b>		
ESRS E2	E2-1	Not material
ESRS E2	E2-2	Not material
ESRS E2	E2-3	Not material
ESRS E2	E2-4	Not material
ESRS E2	E2-5	Not material
ESRS E2	E2-6	Not material
<b>Water and marine resources</b>		
ESRS E3	E3-1	Not material
ESRS E3	E3-2	Not material
ESRS E3	E3-3	Not material

ESRS	Standard	Chapter
ESRS E3	E3-4	Not material
ESRS E3	E3-5	Not material
<b>Biodiversity and ecosystems</b>		
ESRS E4	E4-1	Not material
ESRS E4	E4-2	Not material
ESRS E4	E4-3	Not material
ESRS E4	E4-4	Not material
ESRS E4	E4-5	Not material
ESRS E4	E4-6	Not material
<b>Resource use and circular economy</b>		
ESRS E5	E5-1	Not material
ESRS E5	E5-2	Not material
ESRS E5	E5-3	Not material
ESRS E5	E5-4	Not material
ESRS E5	E5-5	Not material
ESRS E5	E5-6	Not material
<b>Our workforce and workers in the value chain<sup>3</sup></b>		
<b>Affected groups</b>		
ESRS S3	S3. SBM-3	4.3.1 Material impacts, risks and opportunities and their interaction with strategy and business model
ESRS S3	S3-1	4.3.2 Policies related to the affected communities
ESRS S3	S3-2	4.3.3 Processes for engaging with communities affected by impacts
ESRS S3	S3-3	5.1.3 Ethics and compliance safeguard mechanisms
ESRS S3	S3-4	4.3.4 Processes to remediate negative impacts and channels for affected communities to raise concerns
ESRS S3	S3-5	4.3.5 Actions to address the IROs and evaluate their effectiveness
<b>Consumers and end-users</b>		
ESRS S4	S4. SBM-3	4.4.1 Material impacts, risks and opportunities and their interaction with strategy and business model
ESRS S4	S4-1	4.4.2 Policies related to consumers and end users
ESRS S4	S4-2	4.4.4 Processes for engaging with consumers and end users affected by impacts
ESRS S4	S4-3	5.1.3 Ethics and compliance safeguard mechanisms
ESRS S4	S4-4	4.4.5 Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions
<b>Business conduct</b>		
ESRS G1	G1. GOV-1	5.1.1 The role of governing, managing and oversight bodies
ESRS G1	G1-1	5.1.2 Corporate culture and business conduct policies
ESRS G1	G1-3	5.1.5 Prevention and detection of corruption and bribery
ESRS G1	G1-4	5.1.6 Confirmed cases of corruption or bribery

<sup>3</sup> We are currently making progress in the integration of the specific topical requirements related with our workforce and workers in the value chain, in order to strengthen the reporting on the basis of the CSRD. In addition, we are also working on reporting the targets relating to users and certain information relating to business conduct based on the new legislation.

## Appendix IV: Social Indicators

### Globalvia team

#### GRI 2-7

DISTRIBUTION OF EMPLOYEES BY GENDER AND PROFESSIONAL CATEGORY (at 31 December)	2023		2024		2025	
	Women	Men	Women	Men	Women	Men
<b>Total</b>	<b>225</b>	<b>662</b>	<b>218</b>	<b>640</b>	<b>194</b>	<b>568</b>
Executives	24	68	21	65	19	37
Office staff	158	202	149	213	122	199
Field employees	43	392	48	362	53	332

DISTRIBUTION OF EXECUTIVE POSITIONS (at 31 December)	2023		2024		2025	
	Women	Men	Women	Men	Women	Men
Percentage of executive positions	26%	74%	25%	75%	34%	66%

#### GRI 2-7

DISTRIBUTION OF EMPLOYEES BY PROFESSIONAL CATEGORY AND AGE (at 31 December)	2023			2024			2025		
	<30	30 - 50	>50	<30	30 - 50	>50	<30	30 - 50	>50
<b>Total employees</b>	<b>70</b>	<b>638</b>	<b>179</b>	<b>81</b>	<b>599</b>	<b>178</b>	<b>71</b>	<b>533</b>	<b>158</b>
Executives	-	65	27	-	57	29	-	39	17
Office staff	36	274	50	39	267	56	32	249	40
Field employees	34	299	102	42	275	93	39	245	101

## GRI 2-7

DISTRIBUTION OF EMPLOYEES BY TYPE OF CONTRACT AND GENDER (at 31 December)	2023	2024	2025
<b>PERMANENT</b>			
Men	635	596	540
Women	217	204	180
<b>Total</b>	<b>852</b>	<b>800</b>	<b>720</b>
<b>TEMPORARY</b>			
Men	27	44	28
Women	8	14	14
<b>Total</b>	<b>35</b>	<b>58</b>	<b>42</b>
<b>FULL-TIME</b>			
Men	652	636	562
Women	214	214	191
<b>Total</b>	<b>866</b>	<b>850</b>	<b>753</b>
<b>PART-TIME</b>			
Men	10	4	6
Women	11	4	3
<b>Total</b>	<b>21</b>	<b>8</b>	<b>9</b>

## GRI 2-7

<b>DISTRIBUTION OF EMPLOYEES BY CONTRACT TYPE, TIMETABLE AND PROFESSIONAL CATEGORY (at 31 December)</b>			
	<b>2023</b>	<b>2024</b>	<b>2025</b>
<b>PERMANENT</b>			
Executives	91	86	56
Office staff	350	358	314
Field employees	411	356	350
<b>Total</b>	<b>852</b>	<b>800</b>	<b>720</b>
<b>TEMPORARY</b>			
Executives	1	-	-
Office staff	10	4	7
Field employees	24	54	35
<b>Total</b>	<b>35</b>	<b>58</b>	<b>42</b>
<b>FULL-TIME</b>			
Executives	90	85	55
Office staff	350	360	318
Field employees	426	405	380
<b>Total</b>	<b>866</b>	<b>850</b>	<b>753</b>
<b>PART-TIME</b>			
Executives	2	1	1
Office staff	10	2	3
Field employees	9	5	5
<b>Total</b>	<b>21</b>	<b>8</b>	<b>9</b>

## GRI 2-7

DISTRIBUTION OF EMPLOYEES BY CONTRACT TYPE, TIMETABLE AND AGE (at 31 December)	2023	2024	2025
<b>PERMANENT</b>			
<30	63	73	66
30 - 50	616	556	506
>50	173	171	148
<b>Total</b>	<b>852</b>	<b>800</b>	<b>720</b>
<b>TEMPORARY</b>			
<30	7	8	5
30 - 50	22	43	27
>50	6	7	10
<b>Total</b>	<b>35</b>	<b>58</b>	<b>42</b>
<b>FULL-TIME</b>			
<30	67	79	70
30 - 50	623	597	528
>50	176	174	155
<b>Total</b>	<b>866</b>	<b>850</b>	<b>753</b>
<b>PART-TIME</b>			
<30	3	2	1
30 - 50	15	2	5
>50	3	4	3
<b>Total</b>	<b>21</b>	<b>8</b>	<b>9</b>

## An equal and diverse team

## GRI 405-1

DISTRIBUTION OF EMPLOYEES WITH A DISABILITY BY COUNTRY (at 31 December)	2023	2024	2025
Spain	24	24	19
Costa Rica	1	-	-
Ireland	-	-	-
Portugal	1	1	-
Chile	-	-	-
Colombia	-	-	-
USA	-	-	-
<b>TOTAL</b>	<b>26</b>	<b>25</b>	<b>19</b>

DISTRIBUTION OF EMPLOYEES WITH A DISABILITY BY PROFESSIONAL CATEGORY AND GENDER (at 31 December)	2023	2024	2025
<b>Executives</b>	-	-	-
Women	-	-	-
Men	-	-	-
<b>Office staff</b>	<b>4</b>	<b>2</b>	<b>1</b>
Women	3	2	1
Men	1	-	-
<b>Field employees</b>	<b>22</b>	<b>23</b>	<b>18</b>
Women	3	3	3
Men	19	20	15

DISTRIBUTION OF EMPLOYEES WITH A DISABILITY (at 31 December)	2023	2024	2025
Percentage of employees with a disability	2.9%	2.9%	2.5%

## Talent development

### GRI 404-1

HOURS OF TRAINING BY PROFESSIONAL CATEGORY (at 31 December)	2023	2024	2025
Executives	6,412	5,862	3,603
Office staff	28,756	23,289	13,536
Field employees	14,664	13,668	9,916
<b>Total workforce</b>	<b>49,832</b>	<b>42,819</b>	<b>27,055</b>
<b>Average per employee</b>	<b>56.2</b>	<b>49.9</b>	<b>35.5</b>

### GRI 401-1

NEW HIRES (at 31 December)	2023		2024		2025	
	Women	Men	Women	Men	Women	Men
New hires	38	81	14	87	36	85
Employee turnover*	20	66	18	54	13	14

\* Employees that have left the Organisation voluntarily or dismissals.

DISMISSALS (at 31 December)	2023	2024	2025
<b>Total</b>	<b>34</b>	<b>29</b>	<b>103</b>
Women	9	7	25
Men	25	22	78
Under 30 years of age	5	2	5
Between 30 and 50 years of age	20	24	67
Over 50 years of age	9	3	31
Executives	4	4	4
Office staff	9	14	84
Field employees	21	11	15

## Health and safety

### GRI 403-9

ACCIDENT RATE INDICATORS	2023	2024	2025
Fatalities as a result of work-related injury (no.)	-	-	-
High-consequence work-related injuries (excluding fatalities) (no.)	-	-	-
Recordable work-related injuries (no.)*	38	25	25
Rate of recordable work-related injuries**	4.6	2.9	3.3
Hours worked (no.)	1,665,757	1,695,673	1,499,744

\* Contusions, burns, blows and muscular injuries.

\*\* Rate of recordable work-related injuries: Number of recordable work-related injuries / Number of hours worked x 200,000.

### GRI 403-10

WORK-RELATED ILL-HEALTH	2023	2024	2025
Cases of work-related ill-health (no.)	-	-	-

## Labour relations

### GRI 2-30

PERCENTAGE OF EMPLOYEES COVERED BY COLLECTIVE AGREEMENTS BY COUNTRY**							
	Spain*	Chile	Costa Rica*	USA*	Ireland*	Portugal	Colombia
2025	100%	8%	—%	—%	—%	49%	—%
2024	100%	3%	-%	-%	-%	45%	-%
2023	100%	3%	-%	-%	-%	44%	-%

\* The negotiation of collective agreements is not applicable in Costa Rica, Ireland and the United States.

\*\*It should be noted that outside Spain it is not compulsory for employees to be covered by a collective agreement. In Chile collective agreements only apply when trade unions are established in a company, and they only cover employees forming part of that trade union. In Portugal they only apply to certain groups that belong to an industry covered by an industry-specific collective agreement.

## Remuneration and employee benefits

### GRI 405-2, GRI 2-21

AVERAGE REMUNERATION BY GENDER, AGE AND PROFESSIONAL CATEGORY (in euros)	2023	2024	2025	Variation (2024-2025)
<b>By gender</b>				
Women	40,497	41,587	44,099	6.0%
Men	42,368	42,177	44,289	5.0%
Wage gap*	4%	1.4%	0.4%	(69.3)%
<b>By age group</b>				
Under 30 years of age	18,595	17,676	17,559	(0.7)%
Between 30 and 50 years of age	40,505	41,426	43,436	4.9%
Over 50 years of age	55,954	55,128	58,946	6.9%
<b>By professional category</b>				
Executives	134,589	137,047	170,922	24.7%
Office staff	36,314	38,340	42,101	9.8%
Field employees	26,906	25,351	27,599	8.9%

\* Wage gap: (average salary of men - average salary of women) / average salary of men × 100

<b>RATIO OF THE ANNUAL TOTAL REMUNERATION OF THE HIGHEST PAID PERSON TO THE MEDIAN ANNUAL TOTAL REMUNERATION OF ALL THE EMPLOYEES (excluding the person with the highest salary)</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>
Spain	11.6	11.3	18
Chile	18.2	23.6	23.3
Portugal	9.2	8.2	8.6
United States	4.2	2.5	3.1
Ireland	4.7	3.3	3.4
Costa Rica	21.2	13.5	11.1
Colombia	-	36.1	22.7

## GRI 202-1

<b>RATIO OF THE STANDARD ENTRY LEVEL SALARY BY GENDER TO THE LOCAL MINIMUM WAGE</b>	<b>Annualised minimum wage*</b>	<b>Entry level average (men)</b>	<b>Entry level average (women)</b>	<b>Variance (men)</b>	<b>Variance (women)</b>
<b>(at 31 December) (in euros)</b>					
<b>2025</b>					
Spain	16,572	22,709	17,551	37.0%	5.9%
Chile	6,030	12,647	13,046	109.7%	116.3%
Portugal	12,180	15,731	14,438	29.2%	18.5%
USA	13,303	38,985	35,225	193.1%	164.8%
Ireland	27,384	48,642	38,173	77.6%	39.4%
Costa Rica	8,293	8,462	12,382	2.0%	49.3%
Colombia	3,742	3,871	5,839	3.5%	56.0%
<b>2024**</b>					
Spain	15,876	22,684	38,455	42.9%	142.2%
Chile	5,575	16,362	16,142	193.5%	189.5%
Portugal	11,480	19,625	38,152	70.9%	232.3%
USA	13,896	37,854	34,628	172.4%	149.2%
Ireland	25,756	35,722	44,177	38.7%	71.5%
Costa Rica	7,440	7,956	14,376	6.9%	93.2%
Colombia	3,726	3,688	9,116	(1.0)%	144.7%
<b>2023</b>					
Spain	15,120	18,872	19,478	24.8%	28.8%
Chile	6,192	13,563	13,070	119.0%	111.1%
Portugal	9,840	14,637	26,154	48.8%	165.8%
USA	13,314	35,669	48,847	167.9%	266.9%
Ireland	21,294	31,739	62,815	49.1%	195.0%
Costa Rica	5,353	8,185	15,049	52.9%	181.1%

\*National minimum wage.

\*\* In 2024 the calculation method was changed, and the variance was calculated using the following formula:

Variance = (Entry level salary - min. wage / min. wage) × 100

## Work-life balance

GRI 401-3

WORK-LIFE BALANCE	2023*			2024*			2025		
	W	M	TOTAL	W	M	TOTAL	W	M	TOTAL
Employees entitled to parental leave	13	31	44	10	26	36	14	21	35
Employees taking parental leave	13	31	44	10	26	36	14	21	35
Employees who returned from parental leave*	10	29	39	7	22	29	9	21	30
Employees who continued to work at the Company 12 months after returning	5	14	19	10	27	37	7	20	27
Rate of return to work**	100%	90%	93%	70%	85%	81%	64%	100%	86%
Retention rate***	38%	50%	46%	100%	93%	95%	100%	91%	93%

W=Women, M=Men

\*The 2024 and 2023 data have been adjusted with respect to the previous Sustainability Reports.

\*\* Rate of return to work = (Employees who returned from parental leave / Employees taking parental leave) x 100

\*\*\* Retention rate = (Employees retained 12 months after returning to work following a period of parental leave / Employees returning from parental leave in the prior reporting period) x 100

## Appendix V. Membership of associations

### GRI 2-28

#### Globalvia Inversiones, S.A.U.

- Asociación Americana de Metros y Subterráneos (ALAMYS)
- Asociación de Directivos de Comunicación (Dircom)
- Asociación de Empresas Constructoras y Concesionarias de infraestructuras (SEOPAN)
- Asociación Española de Gerencia de Riesgos y Seguros (AGERS)
- Asociación para el Progreso de la Dirección (APD)
- Asociación Técnica de Carreteras (ATC)
- Business for Societal Impact (B4SI)
- Cámara de Comercio de EE.UU. en España (AmChampSpain)
- CEOE (Confederación española de organizaciones empresariales)
- CPOnet
- CTN-159 "SISTEMAS INTELIGENTES DE TRANSPORTE"
- Empresas por la Movilidad Sostenible
- Iniciativa Gerentes de Riesgos Españoles Asociados (IGREA)
- Instituto de Auditores Internos de España
- ITS Spain
- Madrid Green Urban Mobility Lab
- Railgrup
- Red Empresarial por la Diversidad e Inclusión LGBTI (REDI)
- Red Española del Pacto Mundial - UN Global Compact
- The International Association of Public Transport (UITP)

#### Autopista Central Gallega, S.A. (ACEGA)

- Asociación de Empresas Constructoras y Concesionarias de Infraestructuras (SEOPAN)

#### Metro de Sevilla C.J.A., S.A.

- Asociación de Empresas Gestoras de los Transportes Urbanos Colectivos (ATUC)
- Asociación para el Progreso de la Dirección (APD)
- Instituto de Estudios Cajasol | Asociación Club Directivos
- The International Association of Public Transport (UITP)

#### Openvia Mobility, S.L.

- Railway Innovation Hub

#### Openmobi Portugal Unipessoal LDA (Openvia Portugal)

- Nervir

**Openvia Air S.L.U. (Bluenest by Globalvia)**

- Alliance for new mobility Europe (AME)
- AERA (Clúster de Aeronáutica, Aeroespacial y Defensa de Aragón)
- Centro de Innovación para la Logística y el Transporte de Mercancías (CITET)
- EUROCARE
- SIAM

**ScutVías Autoestradas Beira Interior, S.A**

- Asociación Portuguesa de Concesionarios de Carreteras y Puentes con Peajes (APCAP)

**Autoestradas XXI-SU. Trans., S.A.**

- Asociación Portuguesa de Concesionarios de Carreteras y Puentes con Peajes (APCAP)
- Associação Portuguesa de Gestão e Eng. Industrial (APGEI)

**Globalvia Jons, LTD**

- CIPD - Chartered Institute of Personnel and Development

**Autopistas del Sol, S.A. (Ruta 27)**

- Asociación de Carreteras y Caminos de Costa Rica
- Cámara costarricense americana de comercio (AMCHAM Costa Rica)
- Cámara Costarricense de la Construcción
- Cámara de Exportadores de Costa Rica (CADEXO)
- Cámara Oficial Española de Comercio e Industria en Costa Rica

**SF Convias S.A.S. (Ruta Portuaria)**

- Asociación de Puertos del Atlántico (ASOPORTUARIA)
- Cámara Colombiana de la Infraestructura

**Globalvia Chile SPA**

- Consejo Políticas de Infraestructura (CPI)

**Globalvia Inversiones Holdings, LLC**

- Association for the Improvement of American Infrastructure (AIAI)
- International Bridge, Tunnel and Turnpike Association (IBTTA)

## Appendix VI. Acronyms

APCAP	Associação Portuguesa das Sociedades Concessionárias de Autoestradas ou Pontes com Portagens
BIM	Building Information Modelling
BP	Basis of Preparation
CCL	Canuck Capital Limited
CFO	Chief Financial Officer
CNMV	Nacional del Mercado de Valores (Spanish National Securities Market Commission)
CO <sub>2</sub>	Carbon Dioxide
CSR	Corporate Social Responsibility
CSRD	Corporate Sustainability Reporting Directive
EFRAG	European Financial Reporting Advisory Group
ERM	Enterprise Risk Management
ESG	Environmental, Social and Governance
ESRS	European Sustainability Reporting Standard
EU	European Union
GHG	Green House Gases
GOV	Governance
GRESB	Global Real Estate Sustainability Benchmark
GRI	Global Reporting Initiative
HPS	High-Pressure Sodium
HR	Human Resources
ILO	International Labour Organisation
IMS	Integrated Management System
IROs	Impacts, Risks and Opportunities
ISO	International Organisation for Standardisation
IT	Information Technology
LED	Light Emitting Diode
LGBTIQ+	Lesbian, Gay, Bisexual, Transgender, Intersexual, Queer and other identifies not included in these
LGD	Spanish General Law on the rights of persons with disabilities and their social inclusion
MDR-A	Minimum Disclosure Requirements regarding Actions
MDR-M	Minimum Disclosure Requirements regarding Metrics
MDR-P	Minimum Disclosure Requirements regarding Policies
MDR-T	Minimum Disclosure Requirements regarding Targets
MT	Metrics and Targets
NIS	Network and Information Systems
OECD	Organisation for Economic Cooperation and Development
OHS	Occupational Health and Safety
PPE	Personal Protection Equipment
PR	Physical Risks
REC / IREC	Renewable Energy Certificate / International Renewable Energy Certificate
REDI	Business Network for Diversity and Inclusion
S.A.	Spanish Public Limited Liability Company
S.L.U.	Private Limited Company

S.P.A.	Italian Joint-Stock Company
S.R.L.	Italian Limited Liability Company
SAED	Semi-Automated External Defibrillator
SBM	Strategy and Business Model
SBTi	Science-Based Targets Initiative
SDG	Sustainable Development Goal
SME	Small and Medium-sized Enterprises
TCFD	Task Force on Climate-related Financial Disclosures
TR	Transition Risks
UITP	Union International des Transports Publics
UNE-EN	Spanish Standard - European Standard

## Appendix VII. Assurance report

GRI 2-5

The logo features a large, stylized letter 'G' in a light blue color. To the right of the 'G' is a smaller, solid light blue circle. Below the 'G' and circle is a thick, dark blue, stylized shape that resembles a checkmark or a stylized 'V'.

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