

OHLA

Strategic Sustainability Plan

2025-2027



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1. Vision



“The best way to predict
the future is to create it.”
— Peter Drucker

Sustainability as a driver of Strategy, Business, and Growth

Strategy

The new 2025–2029 Corporate Strategic Plan establishes a clear roadmap for the Group's profitable and sustainable growth, with the objective of exceeding €5 billion in revenue, improving margins, and strengthening cash generation. This ambition is not conceived in isolation, but rather supported by the transformation of the business model toward greater operational efficiency, stronger risk management discipline, and a differentiated positioning in key markets.

In this context, the 2025–2027 Sustainability Strategic Plan, with a 2029 ambition, serves as a transformation tool fully integrated into the Corporate Strategic Plan. It is not a parallel framework, but rather a driver of growth, reinforcing the Group's competitiveness in North America, Europe, and Latin America, while supporting the development of key activities across each business line. In our sector, every project creates an impact — a physical impact on the territory, an economic impact across the value chain, and a social impact on the communities where we operate. Under the previous Sustainability Strategic Plan, structured around positive impact, we consolidated a way of doing business based on responsibility, measurement, and continuous improvement.

Accordingly, the 2025–2027 Sustainability Strategic Plan, aligned with the corporate strategy, represents the natural evolution of that commitment.

Business

OHLA firmly believes that sustainability directly contributes to improving margins and efficiency — through energy management, emissions reduction, circular economy practices, and stronger governance — while also strengthening the trust of clients, investors, and public authorities in an increasingly demanding ESG environment.

In addition, the creation of a Strategy and Sustainability Division, reporting directly to the Chief Executive Officer, reinforces this integration and ensures coordinated monitoring of both plans, guaranteeing that growth and sustainability advance in alignment.

We maintain our three strategic pillars — Sustainable Business, Social Progress, and Responsible Management — strengthening them through ambitious objectives, demanding metrics, and full integration into the corporate strategy. Beyond managing impacts, we strive to generate sustainable and differentiated value. This roadmap has been developed together with the business, focusing on material issues and addressing evolving market expectations. It is a plan built on concrete actions that translate the ESG strategy from theory into practice, integrating it into all our operations and decision-making processes.

Growth

We recognize that we operate in an increasingly volatile, uncertain, complex, and ambiguous global environment. For this reason, OHLA embraces the responsibility of ensuring that its legacy as a company remains sustainable, resilient, and relevant over the long term across all the markets in which it operates. Our ambition is clear: to build infrastructure that drives economic and social development while minimizing environmental impact and maximizing positive contributions to the communities and environments where we operate.

Growth and sustainability are therefore not independent objectives, but complementary dimensions of the same ambition: to build a more profitable, more efficient Group that is better prepared to face future challenges, ensuring that the value generated by 2029 is also sustainable and long-lasting.

An environment that drives us to act

Construction sector context

The sector is undergoing a profound transformation driven by the energy transition, digitalization, increasing regulatory pressure, and growing geopolitical instability.

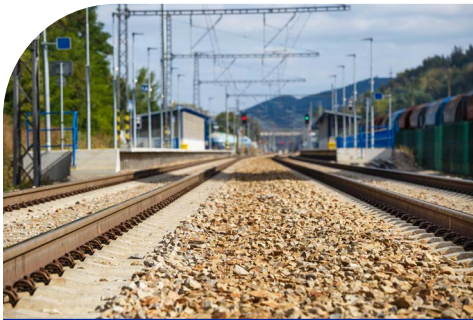
Investment trends in Europe

Investment in civil engineering continues to grow, supported by projects linked to decarbonization, resilience, and sustainable infrastructure.

The urgency of sustainability

Climate risks, biodiversity loss, and evolving market and financing requirements are reinforcing the need to position sustainability as a strategic pillar.

What we learned from the 2022–2024 plan



Strong structure and governance

We strengthened a solid governance structure that supports the integration of ESG criteria across the organization.



Cross-functional collaboration

Collaboration across teams is essential to achieving objectives and advancing sustainability effectively.



Clear metrics

Well-defined metrics make it possible to measure performance and drive continuous improvement.



Innovation and sustainability

Innovation has been recognized as a key accelerator in advancing sustainability across infrastructure projects.

Our vision for a new cycle

Strategic evolution

The 2025–2027 cycle aims to strengthen our leadership in sustainability and competitiveness, building on and surpassing previous objectives.

A catalyst for change

Accelerating positive impact on society and the environment is at the core of this new cycle.

Innovation and resilience

Integrating innovation and resilience across all operations to respond effectively to future challenges.

Shared value creation

Building purpose-driven infrastructure that benefits communities and the environment.

CEO LETTER

Sustainability as a strategic pillar

In an increasingly dynamic global environment, where infrastructure plays a decisive role in transforming mobility and supporting more resilient economic models, strengthening our commitment to innovative and sustainable infrastructure remains a strategic priority for OHLA and a key pillar of our long-term vision.

In this context, the Board of Directors has approved the 2025–2027 Sustainability Strategic Plan, currently under implementation and fully aligned with the objectives set out in the Group's 2025–2029 Strategic Plan. This new framework establishes a clear roadmap focused on reducing our environmental footprint, maintaining the highest standards of corporate governance and promoting high-impact initiatives in the communities where we operate, thereby reinforcing a responsible management model focused on long-term value creation.

This new Plan builds on a solid and well-established track record in sustainability. Evidence of this is the high level of achievement reached under the 2022–2024 Sustainability Plan, which exceeded 85% implementation. This result reflects the Group's ability to consistently deliver on its commitments and translate its objectives into tangible and measurable outcomes.

This ability to deliver has also been reflected in the Group's business activity. Over recent years, OHLA has strengthened its position as a leading player in the

development of key infrastructure aimed at fostering more efficient and connected sustainable mobility, participating in some of the most relevant railway and transport projects across its main markets.

These include the Purple Line light rail project in the United States, accessibility improvement works in the New York subway system, the development of the Stockholm metro and several projects linked to high-speed rail lines in Spain and the Czech Republic.

Building on this foundation, the 2025–2027 Sustainability Strategic Plan also reinforces our commitment to maintaining and continuously improving the highest standards of corporate governance, a strategic asset for OHLA. In this regard, I would like to highlight that the Group's Board of Directors currently comprises 50% independent directors, thereby exceeding the recommendations established by the leading corporate governance codes that guide our governance model.

Finally, I would like to acknowledge and thank all the professionals who are part of OHLA, whose commitment and dedication are essential to achieving our objectives and continuing to drive the sustainable growth of the Group. Their involvement is key to continuing to promote infrastructure that improves people's quality of life and contributes to building more resilient, sustainable economies that are better prepared for future challenges.



Tomás Ruiz
CEO

"The proposal we are presenting today is underpinned by a solid and well-established track record in sustainability"

2. Strategy and priorities



“Give me a firm place to stand, and I will move the Earth.” — Archimedes

Principles of the 2025–2027 Sustainability Strategic Plan

Five core principles

The Plan is built on continuous improvement, focus and simplicity, responsible ambition, innovation, and a people-centered approach.

Sustainability integration

Sustainability is integrated into key business processes to drive positive impact and transparency.

Commitment to global goals

OHLA is committed to building resilient infrastructure aligned with the Sustainable Development Goals.

Materiality analysis

The Plan's strategy incorporates the results of the double materiality analysis to strengthen responsible, transparent, and business-aligned management.

Our pillars



**Responsible
Management**



**Sustainable
Business**



**Social
Progress**

1

Responsible Management

Acting with ethics, transparency, and a long-term vision

Sustainability is only possible through strong governance. Under this new Plan, we fully integrate ESG criteria into strategic decision-making, risk management, and operational planning.

We are strengthening our compliance, business ethics, and internal control systems, reinforcing a culture built on integrity and zero tolerance for inappropriate practices. We promote

transparency and accountability through measurable indicators and clear communication with our stakeholders.

Responsible management becomes a key differentiator, strengthening stakeholder trust and reinforcing OHLA's reputation as an ethical and sustainable company.



Optimization of the Mstětice line section. Prague–Vysočany

2

Sustainable Business

Driving a competitive, low-carbon business model built for the long term

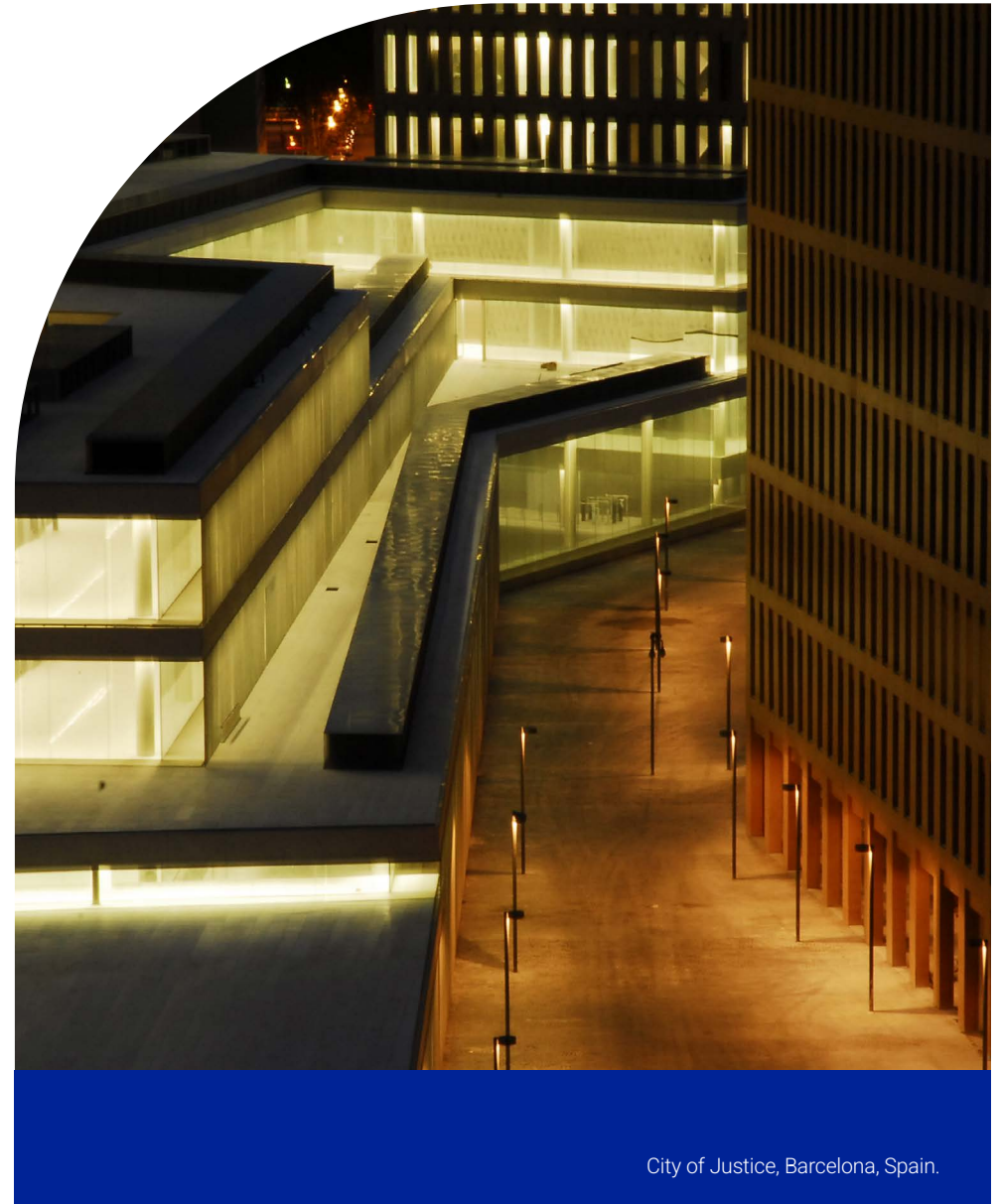
Sustainability is a strategic business driver. In this new cycle, we are accelerating the transformation of our operations toward more efficient, innovative, and resilient solutions.

We continue advancing the progressive decarbonization of our operations and projects by integrating environmental criteria from the design phase through execution and delivery. We are committed to energy efficiency, resource optimization, process industrialization, and the use of lower-impact materials.

At the same time, we are strengthening our commitment to the circular economy and the positive management

of natural resources by prioritizing waste reduction, reuse, and recovery, as well as responsible water and raw material management. Digitalization and technological innovation will act as key enablers to improve productivity, reduce impacts, and deliver greater value to our clients.

Our approach ensures that sustainability not only reduces impacts, but also becomes a strategic differentiator across all areas of the business.



City of Justice, Barcelona, Spain.

3

Social Progress

Creating positive impact for people and the communities where we operate

Sustainable progress starts with people, and construction is, above all, a people-driven business. Our commitment to social progress is focused on ensuring safe, inclusive work environments that support talent development.

We continue strengthening our health and safety culture with the goal of creating increasingly safer and more prevention-focused workplaces. We promote continuous training, talent attraction and retention, and foster diversity, equal opportunity, and barrier-free professional development.

At the same time, we are reinforcing our role as an active contributor to local development. We prioritize responsible hiring, support local suppliers, and collaborate with communities and social organizations. Every project should also be an opportunity to strengthen the local economy and contribute to collective well-being.

Each project aspires to become a driver of progress, creating quality jobs and opportunities for the communities around us.



King Juan Carlos I Hospital, Móstoles, Spain.

2029 ambition: strengthening our sustainable leadership

The 2025–2027 Sustainability Strategic Plan is not a starting point, but a key milestone in a journey already underway. Our ambition for 2029 is to consolidate a clear and differentiated business model.



RESPONSIBLE MANAGEMENT that ensures trust, transparency, and long-term resilience. We will further integrate sustainability into compensation frameworks, strengthening the direct involvement of leadership teams, while advancing a sustainable financing framework that supports our operations and ensures financial decisions promote positive environmental, social, and governance impacts.

6 CHALLENGES
10 ACTION LINES
22 OBJECTIVES



SUSTAINABLE BUSINESS as a synonym for innovation, efficiency, and low-carbon leadership. We aspire to strengthen a sustainable and resilient business model that leads the transition toward low-carbon construction by integrating climate change mitigation and adaptation, energy efficiency, and circular economy principles. These ambitions reflect our commitment to transformation, making sustainability a material part of the Company's identity.

8 CHALLENGES
14 ACTION LINES
33 OBJECTIVES



SOCIAL PROGRESS reflected in safety, talent, and shared development. We will continue working to ensure our social footprint is associated with diversity and inclusion, the promotion of well-being, equality and equity, long-term trusted relationships, and the advancement of human rights across the communities and regions where we operate.

6 CHALLENGES
12 ACTION LINES
34 OBJECTIVES

We build the present. We build the future.
 And we do so with the conviction that sustainability is the only path to creating lasting value.

Objectives

The infrastructure sector plays a key role in the transition toward a more sustainable world — and we are taking action. Through our Sustainability Policy and the new 2025–2027 Sustainability Strategic Plan — structured around 20 challenges, 36 action lines, and 89 objectives under our three strategic priorities — we are advancing with a clear purpose, a coherent strategy, and a long-term vision. Key highlights include:



Responsible Management

- ESG variable remuneration: 5% → 6% → 8% → 10% by 2029.
- ESG internal control: update of the SCIINF and strengthening of the non-financial information governance system.
- Ethics and compliance training: 100% of exposed employees, plus 100% of Senior Management and Board members trained in anti-corruption and ethical conduct.
- Supplier due diligence: strengthening and updating regulations, together with the rollout of the new Supplier Code of Ethics.
- Compliance certifications: maintenance of UNE 19601 and ISO 37001 certifications and expansion of their scope.
- Data and sustainable finance: development of a sustainable finance framework, ESG systems enhancements, and use of AI for non-financial management.



Sustainable Business

- Climate adaptation catalogue: identification, development, and deployment of nature-based solutions and resilient materials.
- -46.2% Scope 1+2 GHG emissions vs. 2021 and -55% Scope 3/BO GHG emissions vs. 2021: advancing decarbonization across the entire value chain.
- Net Zero 2050 roadmap: definition and progressive activation across all regions.
- ISO 50001: implementation and certification of the Energy Management System in Spain, LATAM, and progressively across the Group.
- Sustainable energy on-site: replacement of conventional fuels (3% → 5%) and electrification of auxiliary equipment in high-impact projects.
- Advanced circularity: ≥3–5% recycled materials, ≥3–5% sustainably certified materials, and progress toward “Zero Waste” aligned with EU Taxonomy principles.



Social Progress

- Female leadership: 15% → 25% women in management positions.
- Pay equity: gender pay gap below 12% and AENOR equality certification.
- Well-being and working conditions: well-being campaigns, internal mobility, senior talent initiatives, and enhancement of the benefits package.
- Health and safety: maintenance of SEES certification, participation in HCLG, and rollout of OHLA PEOPLE in Spain and LATAM (+10% and +5% annual participation respectively).
- Climate-related occupational risk prevention: global survey, specific measures, and tracking of accident rates linked to climate change.
- Social impact and customer experience: Social Impact methodology, SROI automation, “solidarity cent” initiative, and NPS deployment.

Governance model

Wishing for things to change does not in itself create impact – action is required. At OHLA, we take action at every level of the organization, from our highest governing bodies to each of our employees, while also promoting our culture among suppliers and subcontractors.



Our governance and sustainability oversight model is established in both the Board of Directors' Regulations and our Sustainability Policy.

Board of directors:

- Approval of the Sustainability Policy and Sustainability Strategy.
- Oversight of the Sustainability Policy.

Appointments and remuneration committee:

- Monitoring of the objectives included in the Sustainability Policy.
- Monitoring of the Sustainability Plan and strategy, including periodic assessment of the degree of achievement of the defined objectives.

Management committee:

- Monitoring of the Sustainability Plan.
- Integration of sustainability into the Group's processes.

Business units / corporate departments:

- Integration of sustainability into decision-making processes and day-to-day operations.

Each year, OHLA will report on the progress achieved against the objectives and action lines established in the Sustainability Plan through the Group's Integrated Report.

3. Challenges and monitoring



“To believe something is possible is to make it so.”
— Friedrich Hebbel

Responsible Management



Trust

OUR OBJECTIVES



Responsible Management

CORPORATE CULTURE


CHALLENGE	ACTION LINE	2025	2026	2027	2029 (Ambition)	SDGs
Ensure leadership commitment to sustainability	Variable compensation system linked to ESG metrics	5% of variable compensation linked to ESG metrics	6% of variable compensation linked to ESG metrics	8% of variable compensation linked to ESG metrics	10% of variable compensation linked to ESG metrics	
	Strengthening internal control over sustainability information		Review and update of the SCIINF			
Implement best practices in ethical and business conduct	Strengthen knowledge on anti-corruption, fair competition, cybercrime, market abuse, and market manipulation	Design of training content	100% of particularly exposed employees trained in compliance matters	100% of senior management, Board members, and the Board trained	Board of Directors assessment supported by an independent consultant (1 assessment every three years)	
	Strengthen the due diligence regulatory framework	Update of the due diligence tool	Update and development of regulations			
	Maintain criminal compliance (UNE 19601) and anti-bribery (ISO 37001) certifications	Maintenance of certifications	Maintenance of certifications	Expand ISO 37001 scope		
	Compliance management system for fair competition		Review of the competition compliance model prior to certification	Fair competition compliance management system (UNE 19603)		

Responsible Management

SUPPLIER RELATIONSHIP MANAGEMENT, INCLUDING PAYMENT PRACTICES

CHALLENGE	ACTION LINE	2025	2026	2027	2029 (Ambition)	SDGs
Strengthen due diligence mechanisms across the supply chain	Establish appropriate due diligence control mechanisms throughout the supply chain	Development of a Supplier Code of Ethics (SCE)	Approval of the SCE	Rollout and communication of the SCE		 

CROSS

CHALLENGE	ACTION LINE	2025	2026	2027	2029 (Ambition)	SDGs
Sustainable financing for OHLA	Establish a framework to identify sustainable financing needs and opportunities				Development of a sustainable financing framework	
Positioning with analysts	Strengthen our positioning with ESG analysts	Maintain positioning in the GRESB Infrastructure Index	Maintain positioning in the GRESB Infrastructure Index			-
Adaptation and enhancement of data collection and management systems in response to new regulatory requirements	Implement system improvements to support the collection of non-financial information before 2027	Proposal for improvements to information systems	Development of the solution for systems integration	Optimization of ESG management through the use of artificial intelligence		-

Sustainable Business




Climate action

OUR OBJECTIVES

Sustainable Business

ADAPTATION


CHALLENGE	ACTION LINE	2025	2026	2027	2029 (Ambition)	SDGs
Exploring new adaptation opportunities	Promotion of a catalog and identification of best practices		Compilation of adaptation-related projects and assessment of their scalability	Development of a catalog of adaptive and climate-resilient materials	Launch of at least one pilot project related to adaptation and the development of green and blue infrastructure in line with European Commission definitions	

MITIGATION

CHALLENGE	ACTION LINE	2025	2026	2027	2029 (Ambition)	SDGs
Contributing to decarbonization	Reduction of emissions across the value chain and for clients		Monitoring next-generation materials with potential industrial application (LC3 cement, transparent wood, carbon fiber, etc.)	Promote dialogue with material producers and strategic suppliers to identify collaboration opportunities	46.2% reduction in Scope 1 and 2 GHG emissions vs. 2021; 55% reduction in Scope 3 GHG emissions per €1 million of operating profit vs. 2021	
Progressive decarbonization of OHLA	Achieving net zero by 2050 through the implementation of its decarbonization roadmap					


Sustainable Business

ENERGY

CHALLENGE	ACTION LINE	2025	2026	2027	2029 (Ambition)	SDGs
Efficient and sustainable energy management	Implementation of an Energy Management System (EMS) based on ISO 50001:2018	Implementation of the EMS under ISO 50001:2018 (in high-impact projects) in Spain	Implementation of the EMS under ISO 50001:2018 (in high-impact projects) in LATAM. Certification of the EMS under ISO 50001:2018 for OHLA S.A. – Spain		Certification of the EMS under ISO 50001:2018 across the entire Group	
	Promotion of renewable energy on-site	Analysis to optimize the responsible use of fuels in projects	Replace conventional fuel consumption with sustainable alternatives (biofuels, hydrogen, renewable electricity) in high-impact projects. 3% sustainable fuel use	Replace conventional fuel consumption with sustainable alternatives (biofuels, hydrogen, renewable electricity) in high-impact projects. 5% sustainable fuel use		
	Promotion of on-site electrification	Use of electrification for auxiliary renewable energy generation equipment on-site (in all high-impact projects in Spain)	Use of electrification for auxiliary renewable energy generation equipment on-site (in all high-impact projects in Spain)	Use of electrification for auxiliary renewable energy generation equipment on-site (in all high-impact projects in Spain and Europe)	Use of electrification for auxiliary renewable energy generation equipment on-site (in all high-impact projects in Spain, Europe, and other regions)	


Sustainable Business

WATER CONSUMPTION


CHALLENGE	ACTION LINE	2025	2026	2027	2029 (Ambition)	SDGs
Uso responsable del agua e innovación	Transparency in water management and promotion of best practices across projects	Update of the water footprint calculation methodology in line with the Water Footprint Network proposal	<ul style="list-style-type: none"> Public disclosure of OHLA's water footprint results Development of a Water Management Policy 	<ul style="list-style-type: none"> Development of a best practices manual for on-site water management and identification of innovative levers and nature-based solutions Increase in the number of people benefiting from projects providing water supply and sanitation in areas with limited access to water Identification of OHLA's exposure to water stress-related risks within the environmental risk mapping 		
	Innovation in water use			Promotion of nature-based solutions for flood and drought management		

Sustainable Business

IMPACTS ON THE EXTENT AND CONDITION OF ECOSYSTEMS


CHALLENGE	ACTION LINE	2025	2026	2027	2029 (Ambition)	SDGs
Best sustainability practices applied to natural capital	Promotion of natural capital management	Development of an assessment of the impact of our projects on nature using the current reference framework (TNFD)	Rollout of an environmental volunteering program, either internally developed and/or in collaboration with local organizations, combining habitat restoration or conservation actions with environmental awareness activities in communities near project sites	Rollout of an environmental volunteering program, either internally developed and/or in collaboration with local organizations, combining habitat restoration or conservation actions with environmental awareness activities in communities near project sites		

RESOURCE INPUTS, INCLUDING RESOURCE USE

CHALLENGE	ACTION LINE	2025	2026	2027	2029 (Ambition)	SDGs
Integration of circularity criteria into projects	Promotion of a guide for the application of circularity criteria (efficient materials and waste management) for internal use	Promote the use of materials incorporating eco-design principles aligned with the circular economy, including material reuse, through the dissemination of the Sustainable Procurement Guide	Development of a country-level database/ list of suppliers for key materials (Catalog)			
	Promotion of circularity criteria for suppliers		Development of a Circular Economy Policy	Obtain an Environmental Product Declaration (EPD) for strategic ELSAN and Pacadar products using Life Cycle Assessment (LCA) methodology		

Sustainable Business

WASTE MANAGEMENT

CHALLENGE	ACTION LINE	2025	2026	2027	2029 (Ambition)	SDGs
Increase OHLA's waste circularity rate	Increase the use of recycled or reused materials within total construction materials		Inclusion of 3% recycled materials (including recycled content) within the total materials used in construction for high-impact projects	Inclusion of 4% recycled materials within the total materials used in construction for high-impact projects	Inclusion of 5% recycled or reused materials within the total materials used in construction	
	Increase the percentage of materials with sustainable certifications in high-impact projects		3% of materials used with sustainable certifications (Ecolabels, Blue Label, Client Labels, etc.)	<ul style="list-style-type: none"> 5% of materials used with sustainable certifications 5% of suppliers holding sustainability-related certifications/labels 		
	Increase the percentage of construction and demolition waste (CDW) directed to reuse and recycling			<ul style="list-style-type: none"> Alignment of at least one activity with the Circular Economy objective under the EU Sustainable Finance Taxonomy criteria Zero Waste certification for all activities in Spain 	Group-wide "Zero Waste" certification	

Social Progress




Everyone

OUR OBJECTIVES



Social Progress

EQUAL TREATMENT AND EQUAL OPPORTUNITIES FOR ALL

CHALLENGE	ACTION LINE	2025	2026	2027	2029 (Ambition)	SDGs
Diversity and inclusion	Professional development and advancement of women		Increase female representation in professional development programs	15% women in management positions	25% women in management positions	
	Reduction of the gender pay gap		AENOR Equal Opportunity and Equal Pay Certification	Gender pay gap below 12%		



Social Progress

WORKING CONDITIONS


CHALLENGE	ACTION LINE	2025	2026	2027	2029 (Ambition)	SDGs
Improvement of working conditions for direct employees (wages, working time, collective bargaining, work-life balance, health and safety) and posted workers within the EU	Communication of policies and procedures promoting employee well-being	Design and launch of a communication campaign on policies and procedures promoting employee well-being				 
	Increase employee satisfaction regarding overall working conditions	<ul style="list-style-type: none"> Assessment of pay gaps to implement the measures necessary to ensure pay equity under the new Pay Transparency Directive Achievement of AENOR Equal Pay Certification 	<ul style="list-style-type: none"> Development of a senior talent program Development of clear and accessible internal mobility plans Harmonization of benefits packages and in-kind compensation, and extension of variable compensation to additional employee groups 	Harmonization of benefits packages and in-kind compensation, and extension of variable compensation to additional employee groups		
	Incorporation of best practices in occupational health and safety	<ul style="list-style-type: none"> Participation in the "Health in Construction Leadership Group (HCLG)" industry working group Maintenance of the Healthy Business Excellence System (SEES) certification 	Establishment of well-being indicators	Recognition of best practices in Healthy Company management by IRSST		
	Creation of safe and healthy work environments	Implementation of the new OHLA PEOPLE well-being platform in Europe Division (Spain) and LATAM Division	Achieve a participation rate 10% higher than in 2025	Achieve a participation rate 5% higher than in 2026		
	Preventive measures in occupational risk prevention related to climate change risks	Conduct a survey on preventive measures (new technologies, circular economy applied to prevention) related to climate change risks (extreme heat, flooding, etc.) that may affect the health and safety of workers across OHLA's projects and worksites globally	Establish specific preventive measures for each situation identified through the survey	Parameterization of accident and incident data exclusively related to climate change risks		

Social Progress

OTHER LABOR RIGHTS

CHALLENGE	ACTION LINE	2025	2026	2027	2029 (Ambition)	SDGs
Promotion of best practices in Human Rights	Continue promoting respect for and compliance with Human Rights	Raise awareness among employees and other stakeholders on Human Rights matters	Development of regulations related to respect for Indigenous Peoples	Increase supplier qualification criteria related to Human Rights	Human Rights assessment/awareness for 100% of suppliers involved in high-impact projects	 

WORKING CONDITIONS / EQUAL TREATMENT AND OPPORTUNITIES / OTHER LABOR RIGHTS

CHALLENGE	ACTION LINE	2025	2026	2027	2029 (Ambition)	SDGs
Awareness and responsibility regarding value chain workers' conditions (wages, working hours, collective bargaining, work-life balance, health and safety)	Reduction of negative labor impacts through training and implementation of control systems	Awareness/training on occupational health and safety. Leadership training initiatives in occupational risk prevention for directors and middle management	Awareness/training on occupational health and safety. Leadership training initiatives in occupational risk prevention for directors and middle management; 2 initiatives per Business Area, Division, or subsidiary	Awareness/training on occupational health and safety. Leadership training initiatives in occupational risk prevention for directors and middle management; 3 initiatives per Business Area, Division, or subsidiary	Increased awareness and responsibility regarding value chain workers' conditions (wages, working hours, collective bargaining, work-life balance, health and safety)	

Social Progress

ECONOMIC, SOCIAL, AND CULTURAL RIGHTS OF COMMUNITIES

CHALLENGE	ACTION LINE	2025	2026	2027	2029 (Ambition)	SDGs
Increase positive impacts on local communities when developing civil infrastructure projects	Measurement and promotion of the social impact of infrastructure		Development of a Social Impact Management methodology for projects affecting local communities and other stakeholders	Development of a Social Impact Management methodology for projects affecting local communities and other stakeholders		 
	Align social action programs with the Company's purpose and know-how	<ul style="list-style-type: none"> Implementation of the "solidarity cent" initiative Automation and calculation of SROI (Social Return on Investment) for key social projects 	<ul style="list-style-type: none"> Implementation of pro bono initiatives to increase support for social development Automation and calculation of SROI for key social projects 	Automation and calculation of SROI for key social projects		

N/A

CHALLENGE	ACTION LINE	2025	2026	2027	2029 (Ambition)	SDGs
Brand recognition as a provider of sustainable, accessible, and safe infrastructure that promotes social progress	Implementation of a customer experience indicator			Deployment of the NPS (Net Promoter Score)		-

Detailed Monitoring of the 2025–2027 Sustainability Strategic Plan

Below is the overall progress achieved against the objectives established under our three strategic priorities: Responsible Management, Sustainable Business, and Social Progress.



Responsible Management 2025

10 ACTION LINES

7 OBJECTIVES FOR 2025

22 OBJECTIVES FOR 2025-2027



CORPORATE CULTURE

Ensure Leadership Commitment to Sustainability

2025

5% of variable compensation linked to ESG metrics

2026

- 6% of variable compensation linked to ESG metrics
- Review and update of the SCIINF

2027

8% of variable compensation linked to ESG metrics

Implementation of Best Practices in Ethical and Business Conduct

2025

- Design of training content
- Update of the due diligence tool
- Maintenance of certifications

2026

- 100% of particularly exposed employees trained in compliance matters
- Update and development of regulations
- Maintenance of certifications
- Review of the competition compliance model prior to certification

2027

- 100% of senior management, Board members, and the Board trained
- Expansion of ISO 37001 scope
- Competition compliance management system (UNE 19603)

SUPPLIER RELATIONSHIP MANAGEMENT, INCLUDING PAYMENT PRACTICES

Strengthening Due Diligence Mechanisms Across the Supply Chain

2025

Development of a Supplier Code of Ethics (SCE)

2026

Approval of the SCE

2027

Rollout and communication of the SCE

CROSS-FUNCTIONAL Positioning with Analysts

2025

• Maintain positioning in the GRESB Infrastructure Index

2026

• Maintain positioning in the GRESB Infrastructure Index

2027

-

Adaptation and Enhancement of Data Collection and Management Systems in Response to New Regulatory Requirements

2025

• Proposal for improvements to information systems

2026

• Development of the solution for systems integration

2027

• Optimization of ESG management through the use of artificial intelligence

- COMPLETED
- IN PROGRESS
- NOT STARTED

Sustainable Business 2025

14 ACTION LINES 6 OBJECTIVES FOR 2025 33 OBJECTIVES FOR 2025-2027



ADAPTATION

Exploring New Adaptation Opportunities

2025

-

2026

Compilation of adaptation-related projects and assessment of their scalability ☐

2027

Development of a catalog of adaptive and climate-resilient materials ☐

MITIGATION

Contribution to Decarbonization

2025

-

2026

Monitoring next-generation materials with potential industrial application (LC3 cement, transparent wood, carbon fiber, etc.) ☐

2027

Promote dialogue with material producers and strategic suppliers to identify collaboration opportunities. climate-resilient materials ☐

ENERGY

Efficient and Sustainable Energy Management

2025

- Implementation of the EMS under ISO 50001:2018 (in high-impact projects) in Spain ■
- Analysis to optimize the responsible use of fuels in projects ■
- Use of electrification for auxiliary renewable energy generation equipment on-site (in all high-impact projects in Spain) ■

2026

- Implementation of the EMS under ISO 50001:2018 (in high-impact projects) in LATAM. Certification of the EMS under ISO 50001:2018 for OHLA S.A. – Spain ▒

- Replace conventional fuel consumption with sustainable alternatives (biofuels, hydrogen, renewable electricity) in high-impact projects. 3% sustainable fuel use ☐
- Use of electrification for auxiliary renewable energy generation equipment on-site (in all high-impact projects in Spain) ☐

2027

- Replace conventional fuel consumption with sustainable alternatives (biofuels, hydrogen, renewable electricity) in high-impact projects. 5% sustainable fuel use ☐
- Use of electrification for auxiliary renewable energy generation equipment on-site (in all high-impact projects in Spain and Europe) ☐

■ COMPLETED
▒ IN PROGRESS
☐ NOT STARTED

Sustainable Business 2025

WATER CONSUMPTION

Responsible Water Use and Innovation

2025

Update the water footprint calculation methodology in line with the Water Footprint Network proposal

2026

- Public disclosure of OHLA's water footprint results
- Development of a Water Management Policy

2027

- Development of a best practices manual for on-site water management and identification of innovative levers and nature-based solutions
- Increase in the number of people benefiting from projects providing water supply and sanitation in areas with limited access to water
- Identification of OHLA's exposure to water stress-related risks within the environmental risk mapping
- Promotion of nature-based solutions for flood and drought management

IMPACTS ON THE EXTENT AND CONDITION OF ECOSYSTEMS

Best Sustainability Practices Applied to Natural Capital

2025

Conduct an assessment of the impact of our projects on nature using the current reference framework (TNFD)

2026

Rollout of an environmental volunteering program, either internally developed and/or in collaboration with local organizations, combining habitat restoration or conservation actions with environmental awareness activities in communities near project sites

2027

Rollout of an environmental volunteering program, either internally developed and/or in collaboration with local organizations, combining habitat restoration or conservation actions with environmental awareness activities in communities near project sites

RESOURCE INPUTS, INCLUDING RESOURCE USE

Integration of Circularity Criteria into Projects

2025

Promote the use of materials incorporating eco-design principles aligned with the circular economy, including material reuse, through the dissemination of the Sustainable Procurement Guide

2026

- Develop a country-level database/list of suppliers for key materials (Catalog)
- Development of a Circular Economy Policy

2027

Achievement of EPDs for strategic ELSAN and Pacadar products using Life Cycle Assessment (LCA) methodology

WASTE MANAGEMENT

Increase OHLA's Waste Circularity Rate

2025

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2026

- Include 3% recycled materials (including recycled content) within the total materials used in construction for high-impact projects
- 3% of materials used with sustainable certifications (Ecolabels, Blue Label, Client Labels, etc.)

2027

- 5% of materials used with sustainable certifications
- 5% of suppliers holding sustainability-related certifications/labels
- Alignment of at least one activity with the Circular Economy objective under the EU Sustainable Finance Taxonomy criteria
- Zero Waste certification for all activities in Spain

Social Progress 2025

OTHER LABOR RIGHTS

Ensure Best Practices in Human Rights

2025

Raise awareness among employees and other stakeholders on Human Rights matters ■

2026

Development of regulations related to respect for Indigenous Peoples ▨

2027

Increase supplier qualification criteria related to Human Rights

WORKING CONDITIONS / EQUAL TREATMENT AND OPPORTUNITIES / OTHER LABOR RIGHTS

Awareness and Responsibility Regarding Value Chain Workers' Conditions (wages, working hours, collective bargaining, work-life balance, health and safety)

2025

Awareness/training on occupational health and safety (OHS). Leadership training initiatives in occupational risk prevention for directors and middle management ■

2026

Same as above + 2 initiatives per Business Area, Division, or subsidiary

2027

Same as above + 3 initiatives per Business Area, Division, or subsidiary

ECONOMIC, SOCIAL, AND CULTURAL RIGHTS OF COMMUNITIES

Increase Positive Impacts on Local Communities When Developing Civil Infrastructure Projects

2025

- Implementation of the "solidarity cent" initiative ■
- Automation and calculation of SROI (Social Return on Investment) for key social projects ■

2026

- Development of a Social Impact Management methodology for projects affecting local communities and other stakeholders
- Implementation of pro bono initiatives to increase support for social development
- Automation and calculation of SROI for key social projects

2027

- Development of a Social Impact Management methodology for projects affecting local communities and other stakeholders
- Automation and calculation of SROI for key social projects ■

N/A

Brand Recognition as a Provider of Sustainable, Accessible, and Safe Infrastructure that Promotes Social Progress

2025

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2026

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2027

Deployment of the NPS (Net Promoter Score)

- COMPLETED
- ▨ IN PROGRESS
- NOT STARTED

OHLA