

Neinor
HOMES

STATEMENT OF NON-FINANCIAL INFORMATION

SUSTAINABILITY

REPORT

2024

Thinking about people
and our environment.



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01

EXECUTIVE SUMMARY



WHO ARE WE?

Neinor Homes, the real estate platform with the ambition to transform the sector.

STRATEGIC PILLARS



Environmental

We build homes for tomorrow

Because the homes of today will determine our homes of the future, we want to provide residential solutions that respect the environment, whose consumption of resources is only what is essential and which are energy efficient in their development. **Homes that our children and future generations will be proud of.**



Social

Our people and communities

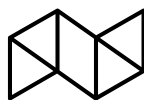
In addition to building the homes where people will live their lives, we are also **committed to the social environment and people's safety, health and well-being.** Our aim is to increase the supply of accessible, quality residential housing for all segments of the population.



Governance

The value of doing the right things, the right way

We firmly believe that how we do things determines who we are and who we want to be. That is why we live by ethical standards of integrity and transparency, so that **our words are consistent with our actions.**



PURPOSE

The purpose of Neinor Homes is to provide and facilitate homes for our clients, ensuring the well-being of people, communities and the environment.

MISSION

Our mission as a company is to **develop business models and formulas for the residential sector that are increasingly sustainable**, accessible and at the same time profitable, in order to secure the future of the company and help to alleviate the housing shortage in Spain's main cities.

VALUES

People: We evolve with people in mind, to provide homes that are more sustainable, spacious, high quality and environmentally responsible.

Sustainability: Committed to the future we will leave behind for the next generations, we measure the impact of everything we do. We have a responsibility to conduct our business in an environmentally friendly way.

Employees and talent: People are fundamental to our development as a company. We believe in equal opportunities, with our Equality Plan, as well as in the development of talent and work-life balance.

Benchmarks: We want to be able to inspire all our stakeholders by our example and become a benchmark within and outside the sector.

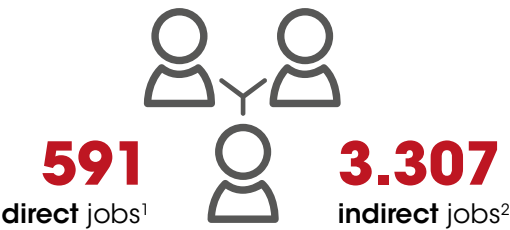
Responsibility: We are committed to society so that housing is at the heart of a fair and sustainable social growth. We contribute to the regeneration of urban environments, to the development of the social fabric and the promotion of employment.

Principles: Transparency, Good Governance and Social Commitment guide all our business decisions.

HOW DO WE CREATE VALUE?

We create value through a responsible business model.

EMPLOYMENT GENERATION



More than **5,000 homes** in various **phases of production**:
1,948 homes in the launch phase
and 3,100 in the execution phase for development.

¹Considers the entire perimeter of the Neinor Homes Group at 31 December 2024, including the employees of Renta Garantizada and Quabir Construcción.

²According to the Association of Real Estate Developers of Madrid (ASPRIMA).
2.4indirect jobs are generated for each dwelling.

We take into account for this calculation finished homes.

ECONOMIC
VALUE
GENERATED

521
million euros

EBITDA

102
million euros



"BEST CUSTOMER
SERVICE 2025"

INDUSTRIALISED MODEL

Promotion of first and second homes, construction, rental management
of own and third-party homes.



Management of **of the residential development process** of the residential development process.



QUALITY AND ENVIRONMENTAL MANAGEMENT



CORPORATE SOCIAL RESPONSIBILITY AS AN INTERNAL POLICY FRAMEWORK

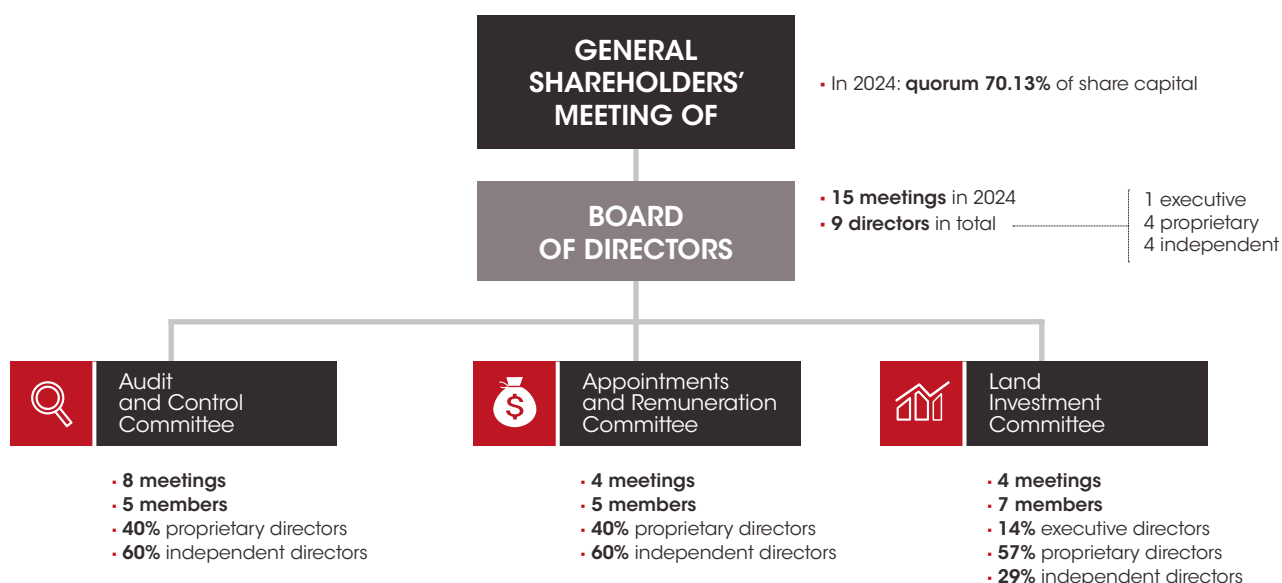


2022 - 2025 Sustainability Plan



WHAT IS OUR GOVERNANCE MODEL BASED ON?

Our business is based on a model of responsible governance



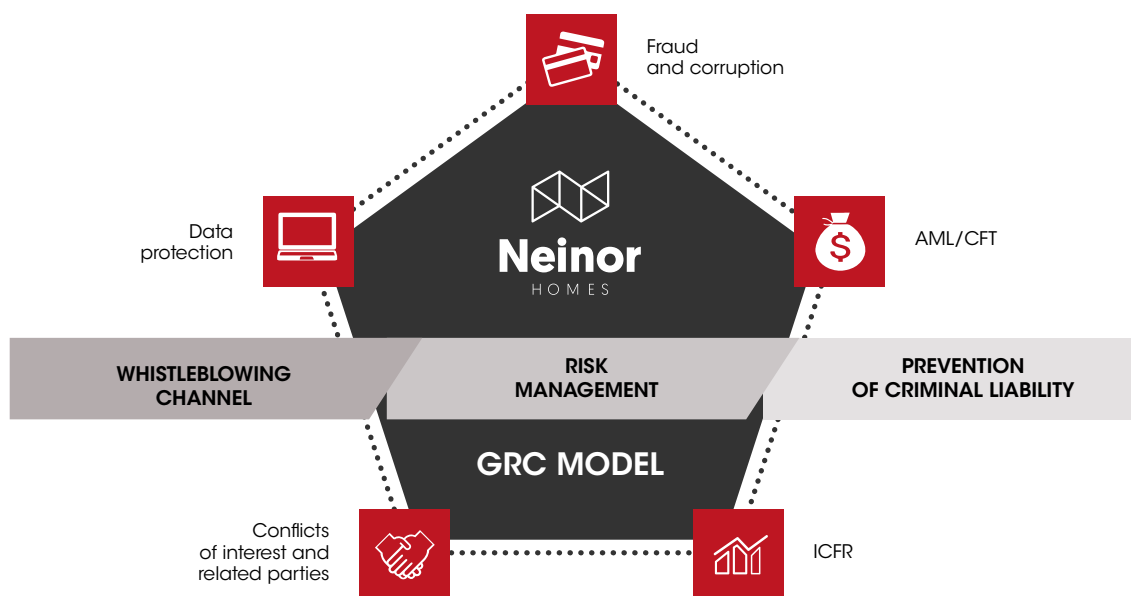
A COMPREHENSIVE MODEL OF CONTROL, COMPLIANCE AND ASSURANCE

GOVERNANCE, RISK AND COMPLIANCE MODEL (GRC)

Based on best practices of companies in the industry and other sectors

CORPORATE SOCIAL RESPONSIBILITY

CORPORATE GOVERNANCE



Whistleblowing Channel

- Code of Ethics
- Whistleblowing Channel
- Ethical channel management procedure
- Code of Conduct for third parties
- Code of best practices in the real estate mediation services
- Human Rights Policy

Risk Management Model

- Integrated Internal Control System
- Corporate Risk Map
- Analysis of ESG risk and opportunities

Prevention of criminal liability

- Criminal Risk Policy
- Criminal Risk Prevention Manual
- Internal rules of conduct
- General economic-financial and corporate communication policy
- Internal manual for the disclosure of privileged and other relevant information

Zero tolerance for corruption

- Anti-Corruption, Fraud and Bribery Policy
- Instructions on gifts, invitations and donations
- Controls in place

Conflict of Interest Management

- Conflict of interest and related party transactions policy
- Conflicts of interest in Joint Venture operations

Data protection, confidentiality and information security

- Privacy Policy on Personal Data Protection
- Procedure for the enforcement of the rights of data subjects

System of internal control over financial and non-financial reporting

Internal control and risk management systems in relation to the financial reporting process (ICFR) and non-financial reporting (SICNFR)



ISO 27001
Information
Security
Certification

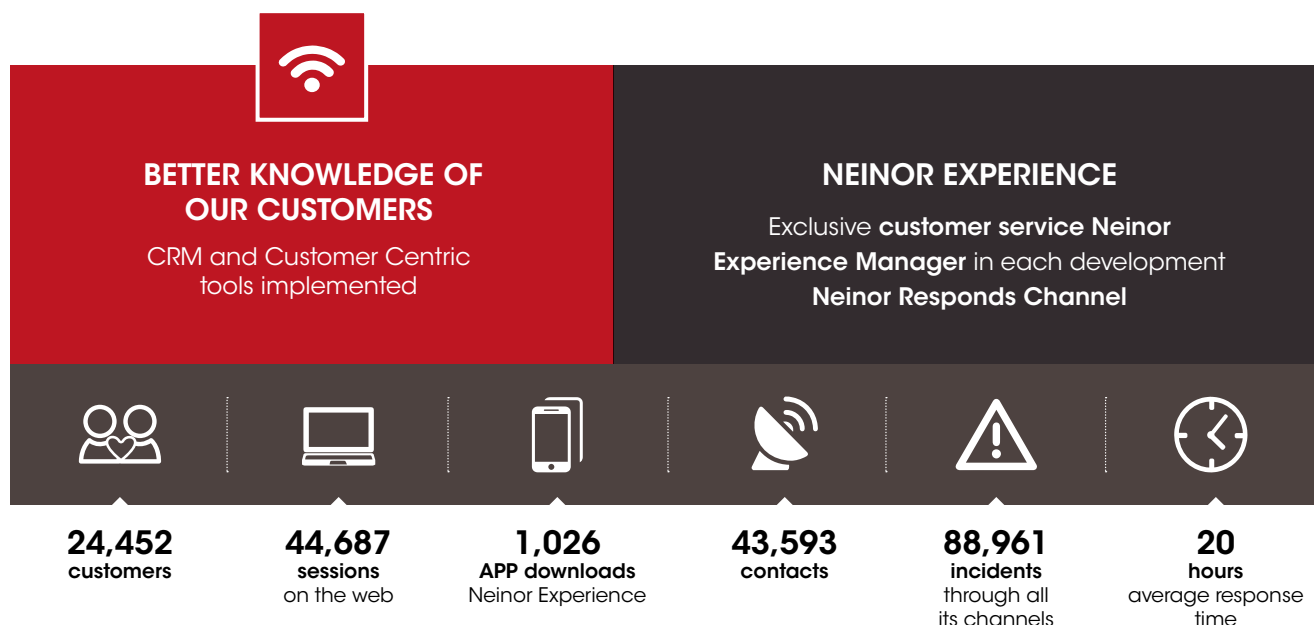
ISO 9001
Quality
Management
Certification

ISO 14001
Environmental
Management
Certification

UNE 166002
R&D&I Management
Certification

WHAT ADDED VALUE DO WE OFFER OUR CUSTOMERS?

We offer a personalised service tailored to customer needs



WE BUILD HOMES WITH ADDED VALUE



INNOVATION AS A DRIVER OF TRANSFORMATION

NEINOR NEXT

- Collaboration with start-ups to test their products/services and see if they generate added value for Neinor Homess

PROCESS INNOVATION

- Analysis of the integration and optimisation of the construction white book in the adaptation to the technical code

COOPERATIVE INNOVATION

- Participation in forums and working groups: Building Cluster, PTEC (Spanish Construction Technology Platform) and Cemex

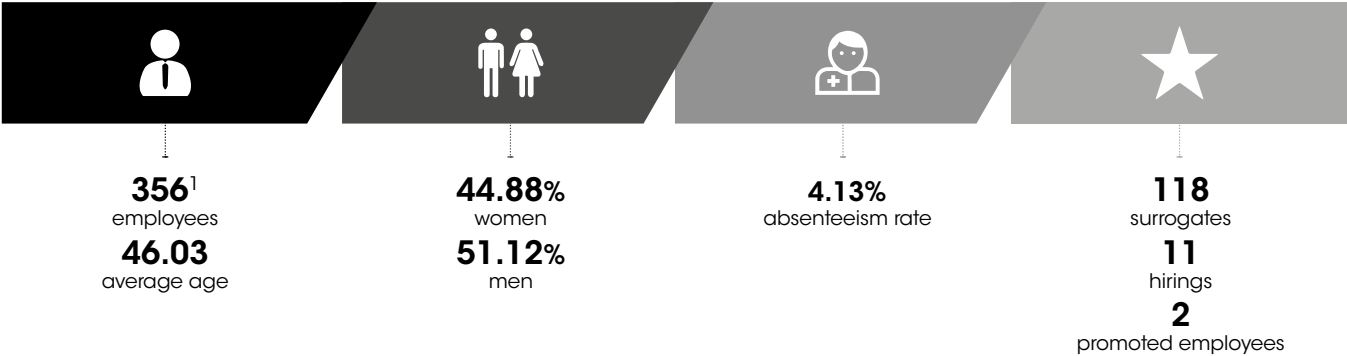
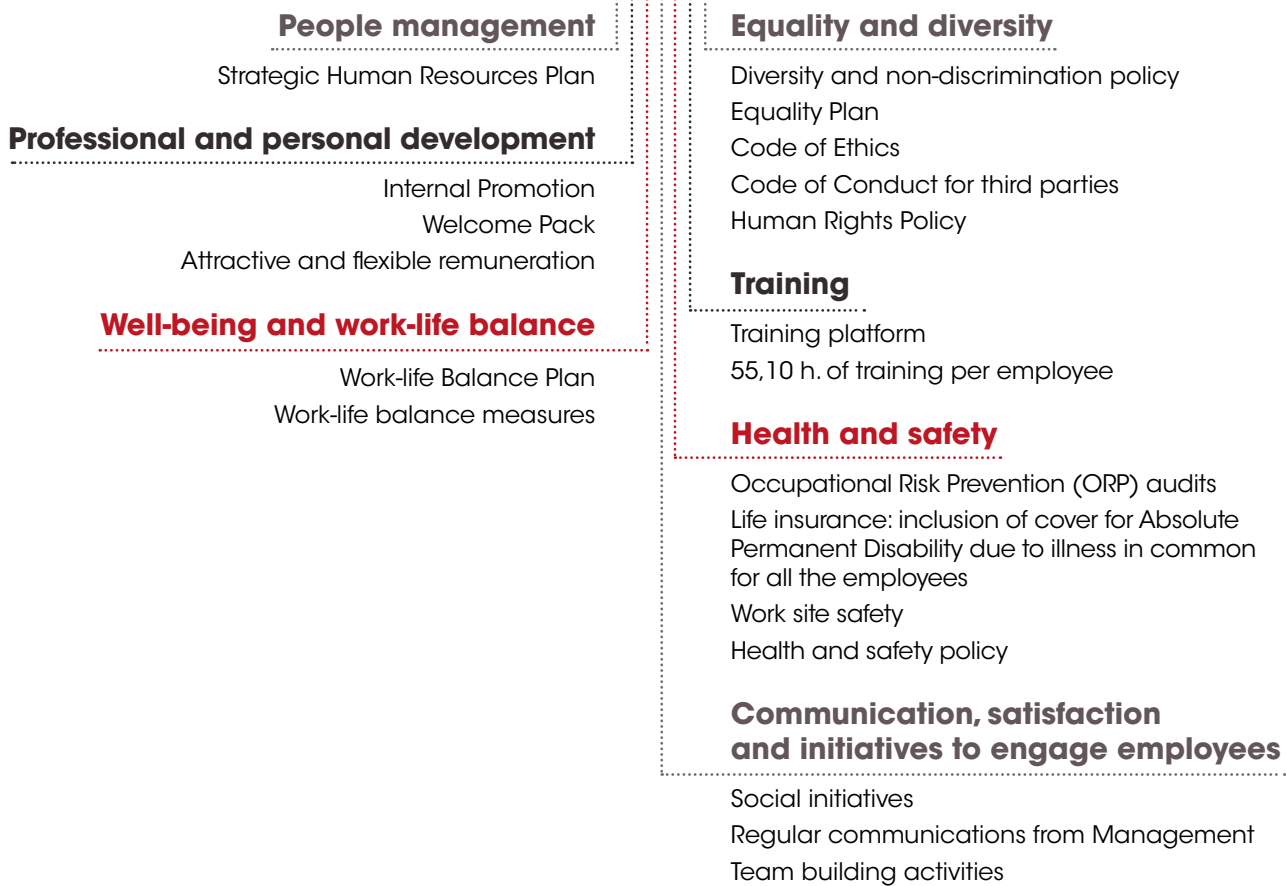
DIGITAL TRANSFORMATION

- Digital Transformation Plan
- Digital initiatives that add value



WHO ARE WE AT NEINOR HOMES?

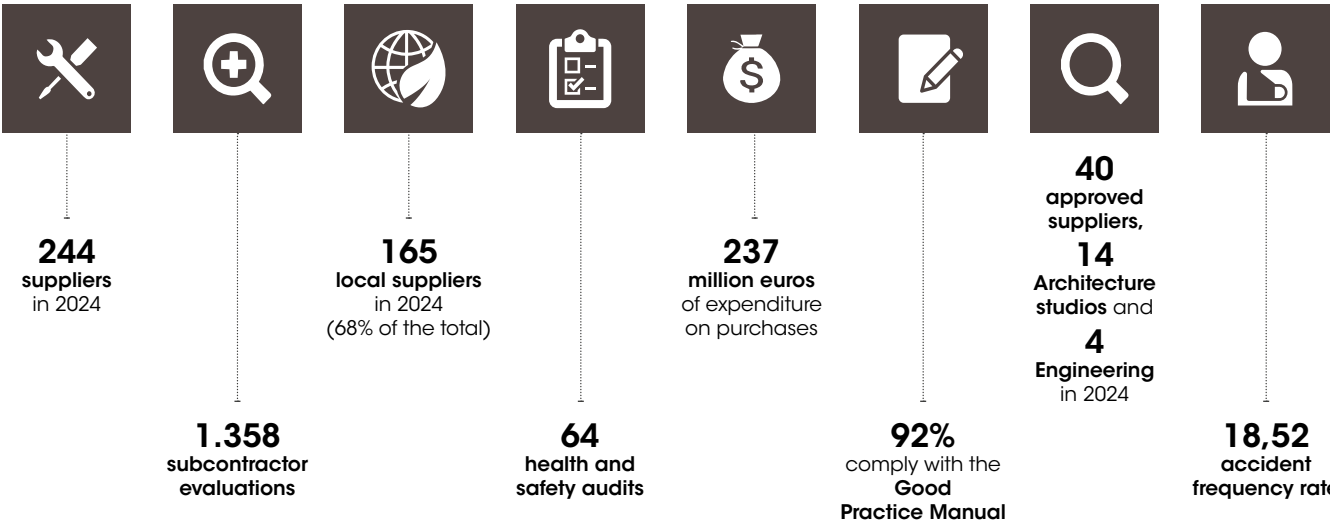
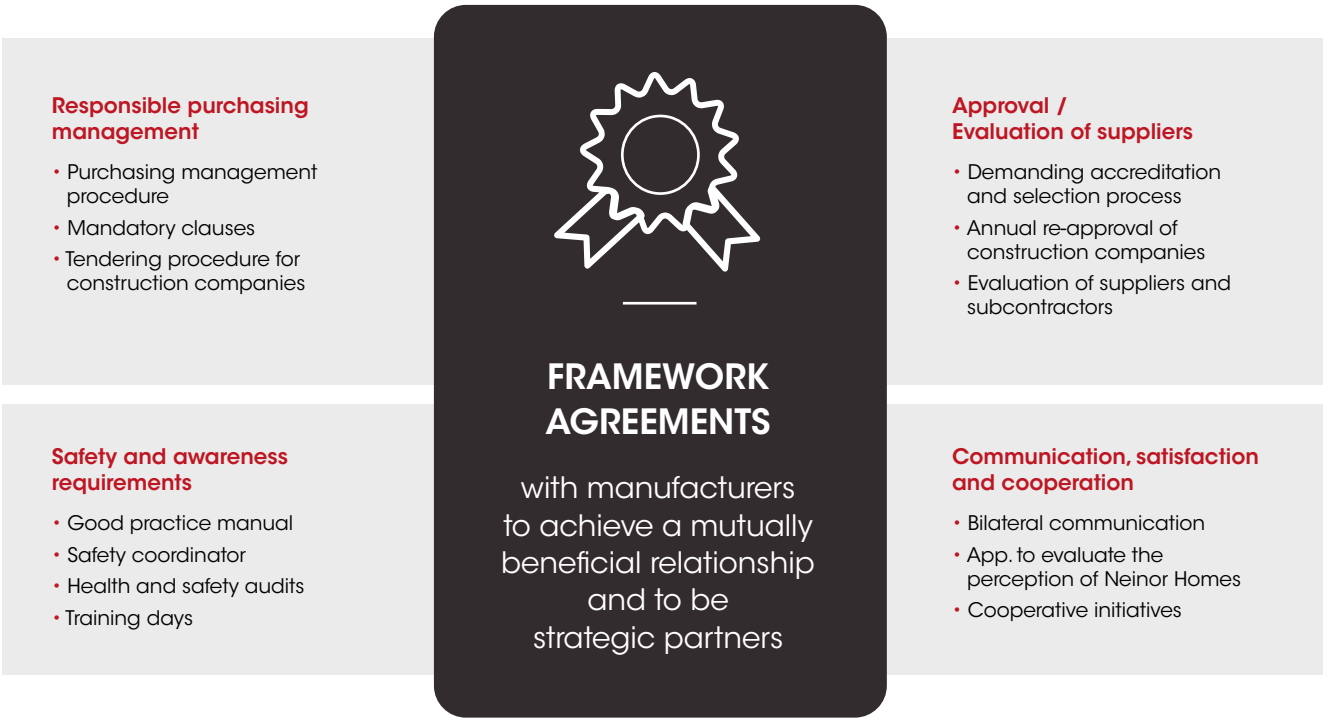
We have a committed **team**



¹Analysis performed for employees of Neinor Homes parent company, excluding RG and QC in the process of integrating the HR control areas.

HOW DO WE WORK WITH OUR SUPPLIERS?

We are strategic partners
of our suppliers



02

LETTER FROM THE **CEO**



We are a company that has been able to achieve its financial targets without compromising its sustainability.

Dear Shareholder,

It is my pleasure to present the Neinor Homes 2024 Sustainability Report, a document through which we aim to share with you all the activity carried out by the company in recent years relating to ESG criteria, focussing fully on our firm commitment to the environment, people and their wellbeing.

We have been working with this premise since our beginnings in 2015, leading the transformation of the country's residential development business through modernization of the sector, improved management and good corporate governance, and always with an eye on a more sustainable future.

Aware of our strengths and weaknesses, we are moving towards a transparent and real understanding of ESG.

In environmental matters, the real estate sector has two main challenges or fields of action: the reduction of emissions and the use of materials during the housing construction process, and the adoption of measures to make new buildings ever more energy efficient, both in terms of the energy input required per square meter and the use of renewable energies or those with lower greenhouse gas emissions per kWh consumed.

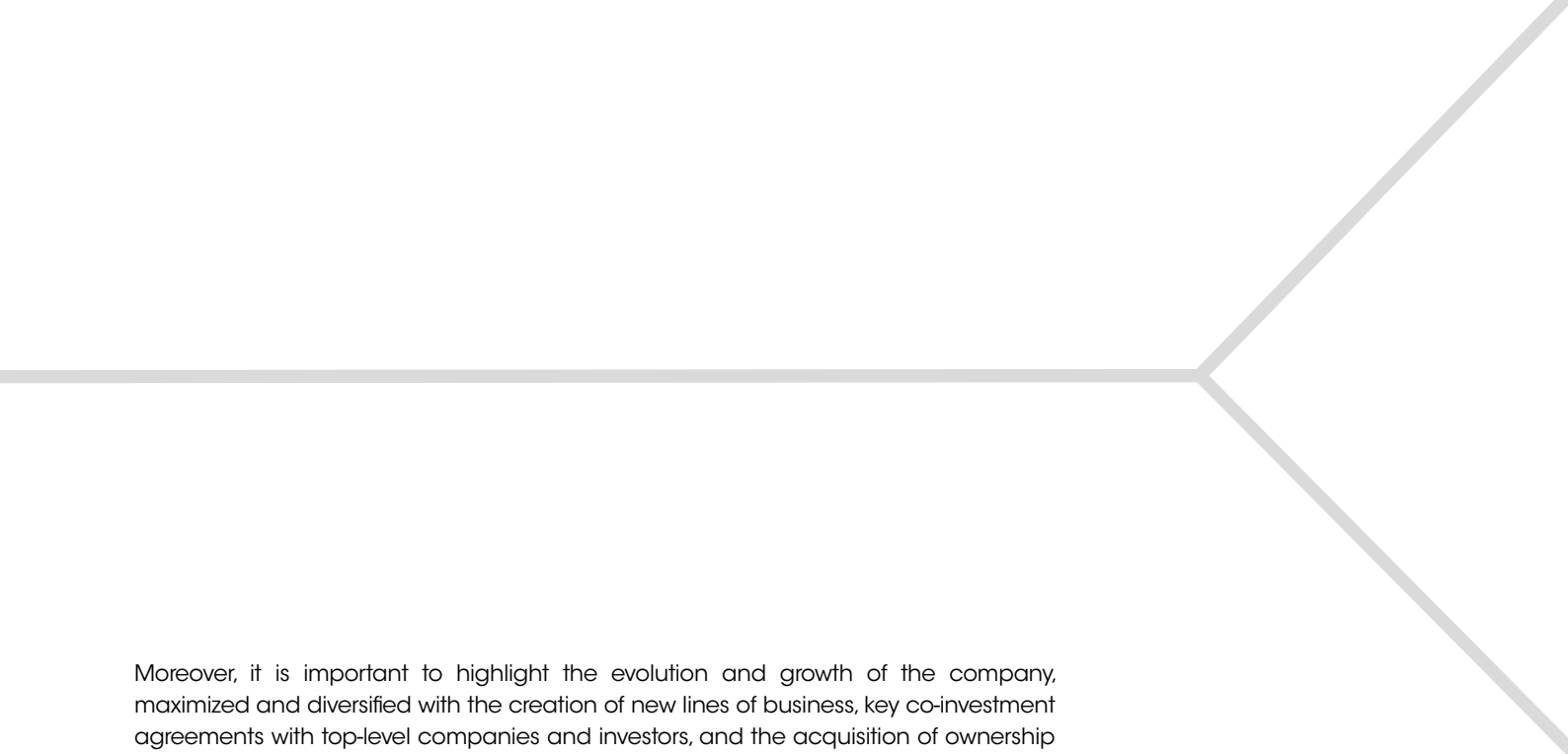
For this reason, we are prioritising our commitments and actions to comply with European taxonomy and our aim is always to be more demanding with ourselves than that required by the guidelines set by current legislation and market standards.

In relation to the social aspect, the main national challenge we face is the housing deficit, now popularly known as the 'housing problem'. Our main objective in this regard is, for this reason, to make an influential contribution to increasing the supply of residential product in Spain, without forgetting the development of more affordable housing close to the large centres of demand, where access to housing has become a serious problem, especially among young people.

Among other aspects of the social dimension that we consider very important in our Strategic Sustainability Plan, I would like to highlight workplace prevention and safety, taking the utmost care of both our own employees and of all those who are part of our value chain. Similarly, we are especially concerned about the well-being of our workforce, our customers' level of satisfaction, and with constantly improving the measurement of the social impact that our activity has on society and the environment.



BORJA GARCÍA-EGOTXEAGA
CEO



Moreover, it is important to highlight the evolution and growth of the company, maximized and diversified with the creation of new lines of business, key co-investment agreements with top-level companies and investors, and the acquisition of ownership and/or operational management of other companies in the sector, an activity that continues to contribute to employment and national and local wealth.

I cannot finish without mentioning a concept that transcends all ESG areas, Good Governance. This is fundamental for Neinor Homes because, since the company's inception, we have prioritized ethics, compliance and transparency throughout the Group, based on very simple premises that can be summarized as: trying to do the right things correctly and being consistent in our actions with what we have said or published.

Throughout this report you will see in more detail what I have just described, showing all our performance, challenges, achievements and also areas where we can improve. I hope you find it interesting and, of course, we remain at your disposal if you have any recommendations or advice so that, together, we can make today's neighbourhood, city, country and world a little better than yesterday's.

Yours sincerely,

Borja García-Egotxeaga

03

FROM CSR TO SUSTAINABILITY. POLICY AND STRATEGIC PLAN



Since its inception, Neinor Homes has maintained a strong commitment to its social and environmental impact, publishing and auditing its Corporate Social Responsibility (CSR) / Sustainability Report since 2016, when it was not yet mandatory to do so.

The development and implementation of Neinor Homes' CSR Policy - which is carried out through the Governance, Risk and Compliance (GRC), Internal Audit and ESG departments, in collaboration with other departments such as the Operations area, which is responsible for the "environmental" aspect, HR, Communication and Marketing - **aims to encourage its employees to change their behaviour in a more supportive and responsible way, as a way** of driving business growth.

We listen to everyone who wants to contribute something to us:

We believe that the collaboration of all our employees and collaborators is key to the development of the ESG strategy of our 2022-2025 Sustainability Plan. Through surveys and emails received in our Social Action mailbox (accion.social@neinorhomes.com) we learn about their concerns, suggestions and preferences in terms of sustainability and social collaboration, which allows us to focus our actions on their opinions and the initiatives they recommend, thus achieving greater staff involvement.

Moreover, as part of the process of analysing the company's dual materiality, where a large number of ESG risks and opportunities have been identified, a questionnaire has been implemented, where all the company's stakeholders have provided us with their vision and the aspects they considered key or that we should focus on in order to have an extraordinary performance in terms of sustainability.

Financial year 2021 was a decisive year in the transformation of Neinor Homes' Corporate Social Responsibility, as the company's 2017 Corporate Social Responsibility Master Plan evolved giving rise to the **2022 - 2025 Sustainability Plan**, which was approved in September 2021 by the Board of Directors.

The Sustainability Plan was developed with the aim of transforming the real estate development model towards a more sustainable one, and was focused on creating value for the environment, society and people: minimising the impact of the company's activity on the environment, contributing to the development of the social and business fabric, as well as reducing the difficulties of access to housing for many groups.

For this reason, the Sustainability Plan is articulated around our **three strategic pillars**: Environmental, Social and Governance (ESG).

 Environmental	 Social	 Governance
<p>We build homes for tomorrow</p> <p>Because the housing of today will determine our home of tomorrow, we want to provide society with residential solutions that respect the environment, that use only the resources necessary, and that are energy-efficient in their development.</p> <p>Homes, in short, that our children and future generations will be proud of.</p>	<p>Our people and communities</p> <p>In Neinor homes we don't just build homes. We build cities, committing ourselves to our social environment and to people's health, safety and wellbeing.</p> <p>The aim is also to provide quality residential homes to all segments of the population.</p>	<p>Our way of doing things</p> <p>We firmly believe that how we do things determines who we are and who we want to be. That's why we hold ourselves and our entire supply chain to ethical standards of integrity and transparency, both for us and for our entire supply chain.</p>



Our Sustainability Plan is made up of 16 areas of activity, within which 30 objectives and their corresponding 95 courses of action have been established, assigning specific deadlines and departments responsible for their development and fulfilment.

We build homes for tomorrow


ENVIRONMENTAL

- E.1. Resilient and Sustainable Homes
- E.2. Taking into account climate change. LCA/Carbon footprint
- E.3. Ecoefficient homes/resource use
- E.4. Protection and improvement of the environment
- E.5. Circular Economy

Our People and Communities


SOCIAL

- S.1. Homes for everyone
- S.2. People's health, safety and wellbeing
- S.3. Customer attention and care
- S.4. Commitment to the team
- S.5. Commitment to Society, the Community and the City

Our way of doing things


GOVERNANCE

- G.1. Best practice in Corporate Governance
- G.2. Ethics and Integrity
- G.3. Transparency and Relations
- G.4. Responsible sourcing chain
- G.5. Digital Culture/Innovation
- G.6. Sustainable Financing

Furthermore, as a sign of our commitment to the United Nations 2030 Agenda for Sustainable Development and the 17 Sustainable Development Goals (SDGs), we have used these as a **reference** to define the courses of action of our **Sustainability Plan**.



- The **Environmental (E)** pillar focuses on building sustainable and resilient homes, with the focus that our developments are aligned with the European Taxonomy, one of the best possible indicators that a home is sustainable and efficient, whose consumption of energy resources is very low, on reducing and offsetting the company's emissions, on promoting sustainable mobility in our developments, on protecting the biodiversity of the area, on supporting urban regeneration and on reducing and recovering construction waste.
- The **Social (S)** pillar focuses on improving access to housing, improving the safety, health and well-being of employees, suppliers/contractors and customers, on measuring the impact that our promotional activity has on society and in the municipalities in which we operate, actively listening to customers to offer them personalised service and products that bring them well-being, attracting and retaining talented employees, placing great importance on issues such as equality, diversity and non-discrimination, and developing and promoting social action and community engagement and human rights initiatives.
- The **Governance (G)** pillar focuses on aligning with best governance standards, maintaining and strengthening the ESG responsibilities of governance bodies, ensuring the company's ethics and integrity, engaging with stakeholders and communicating detailed ESG progress to stakeholders, and incorporating ESG criteria into supplier contracts and evaluations.

In this way, the Sustainability Plan covers all the points reflected in the previous Master Plan, but goes a step further, as it is a Plan that has evolved and broadened its scope, making its objectives more global and giving them a message and meaning, such as the commitment to sustainability at a global level and the company's involvement with an organisation such as the United Nations.

Our Sustainability Strategic Plan can be consulted at:

<https://www.neinorhomes.com/en/corporate/esg/sustainability/sustainability-plan/>

REVIEW AND UPDATE OF THE 2022-2025 SUSTAINABILITY PLAN

At the end of fiscal year 2023, once the company reached the middle of the period in which the plan was in effect (4 years), following our transparency policy, the lines of action that made up the Sustainability Plan and the degree of compliance with them, with the objective of determining if they were maintained until 2025, if they were aligned with the company's strategy or if they were considered concluded because they were included in some standard, not being a priority in the company's strategy. Neinor Homes or are they specific lines of action (one-off) that had already been achieved. Additionally, the need to include new lines of action was also analyzed.

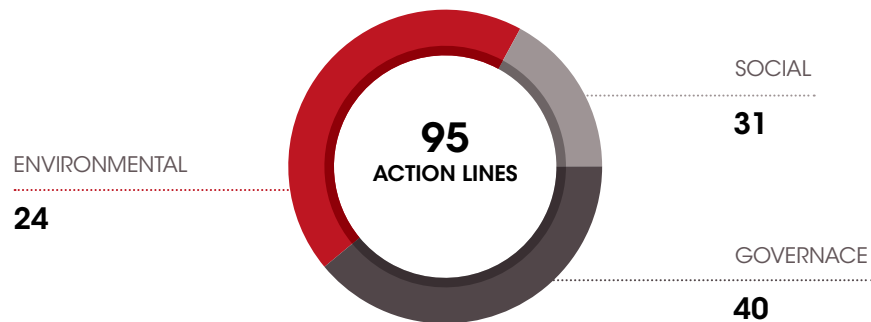
Over the course of 2024, both these lines of action and the main objectives were reviewed again through the Double Materiality Analysis, carried out with all the company's stakeholders and its entire value chain.

The aim of this review and analysis has been to reorient the company's strategy, to adapt it to the expectations of our environment, to reality and to regulations and, above all, to generate a real positive impact on people and the environment, avoiding greenwashing.

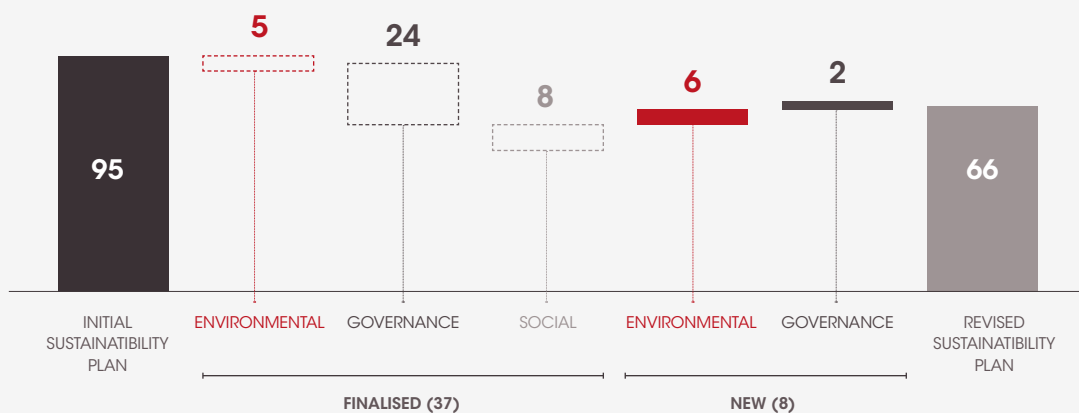
> Evolution of the Sustainability Plan

The initial Plan had 95 courses of action which, following the revision and updating of the Plan, have been reduced to 66 courses of action. In this first period, 37 courses of action have been finalised and it has been considered appropriate to add 8 new courses of action.

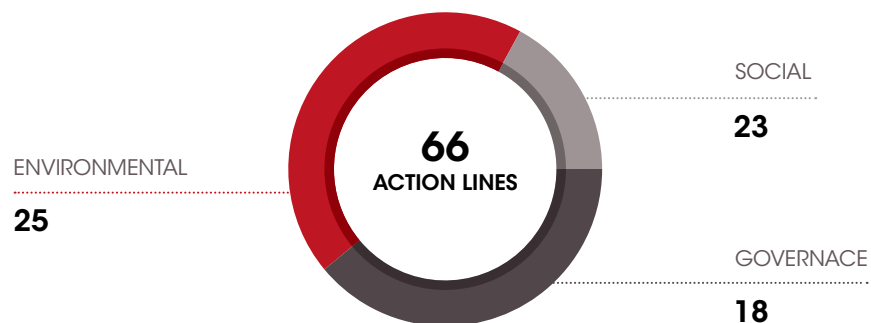
INITIAL PLAN



EVOLUTION 2022 - 2025 SUSTAINABILITY PLAN



REVISED PLAN



Of the 95 courses of action set out in the Plan, 16 (17%) have been adjusted to the company's strategy¹, 42 (44%) are maintained until the Plan's end date in 2025 and, as mentioned above, 37 (39%) have been finalised² (see Annex I).

> Compliance with the Sustainability Plan

With regard to compliance with the Plan up to the date of its first review, December 2023, below we detail its compliance when the period was halfway through:

DIMENSIÓN	Action lines	Fulfillment	Not fulfillment
Environmental	24	20	4
Social	31	18	13
Governance	40	30	10
Total	95	68	27
<i>Governance</i>		<i>72%</i>	<i>28%</i>

Regarding compliance with the new lines of action / objectives of the Plan once it has been revised and updated with the Strategy and the various stakeholder groups:

As of December 31, 2024, once the plan has been updated and revised, of the 66 lines of action, 56 have been completed or are in the process of being completed, representing an 85% degree of compliance.

The company expects to complete the 10 activities that are pending during the 2025 financial year, the last year of the Plan.

¹ The level of requirements has been raised, the range of compliance has been widened, more alternatives for compliance have become available and/or have been adjusted to the reality of the company and its real needs.

² They are already included in some regulations that imply their mandatory compliance, they are not a priority in Neinor Homes' strategy or they are not material and/or they are specific actions that have been complied with and that must be maintained over time.

At the halfway point towards the objectives we had set ourselves, the **results in terms of compliance and monitoring of the courses of action are quite satisfactory**. Nevertheless, we will continue to work until the finalisation of the updated Plan in order to meet 100% of the objectives.

➤ **Validation of the Neinor Homes Group's ESG by rating agencies and other indices and ESG associations**

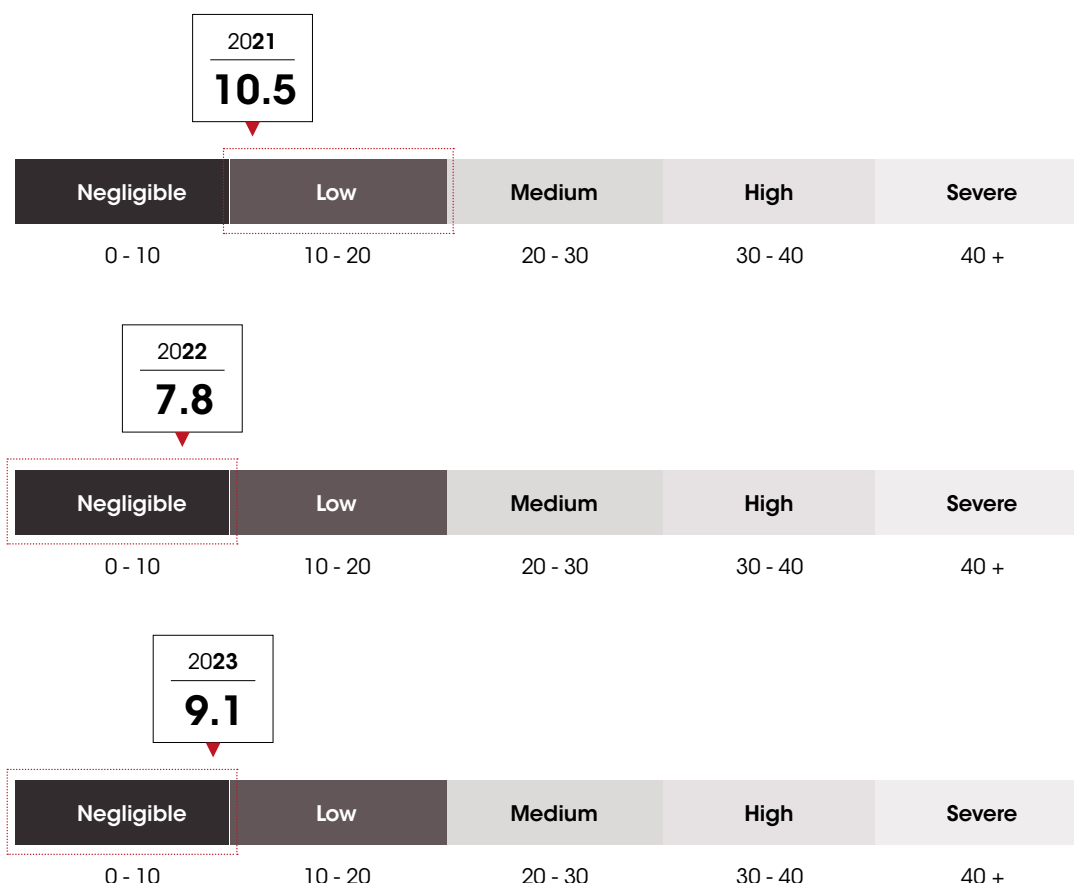
Based on the available public information, the Neinor Homes group is subject to analysis and evaluation by the various ESG rating agencies, which offer their ratings to the market and investors publicly or for a fee (Sustainalytics, MSCI, S&P CSA, CDP, etc.).

Normally, in the evaluation processes with these agencies there are two options. The first is that they carry out the evaluation autonomously based on the company's public information; the second is that upon payment or provision of fees/services to the rating agency, the company can interact with the agency's team of analysts and there can be an initial private evaluation, with an option to improve the rating, through appropriate explanations or the provision of additional non-public information. This second option is very often supported by consultants who specialize in such assessments/agencies and usually yields significantly better results in the assessment of the companies.

In 2021, in order to assess Neinor Homes' ESG performance, it was decided to work on the evaluation with Sustainalytics, carrying out an analysis interacting with their team of analysts in order to receive feedback that would allow the company to continue to improve.

This evaluation process with intermediate feedback from the agency was carried out over three years, 2021, 2022, 2023, and the company was recognized in all three years as the best listed residential developer in the world in ESG criteria by this prestigious analyst.

ESG RISK RATING



In the 2024 financial year, the company decided to discontinue reporting (with an interaction and feedback process) to the various analysts, leaving it up to them to capture the company's public information as they saw fit. The reasons for this decision were as follows:

1. With the implementation of the CSRD report, on which the company had been working, it had prioritized focusing more efforts and time on making progress in this area than on reporting what it was doing.
2. Irrespective of the fact that the company had at some point responded to other analysts such as S&P's CSA or MSCI, it was difficult to respond to all the different relevant market analysts (about 6), given that each analyst weighs and values the various sub-topics of the ESG parameters differently. There is no homogeneity of valuation criteria, although there is greater coherence among credit risk analysts, for example.

3.

The different methodologies of these analysts sometimes have disparate criteria with respect to the company in terms of best practices, stakeholder expectations, regulations, etc. To give several examples:

- An external building environmental seal of approval is valued in the same way as an internal one created by the company itself.
- It is penalized if not all the directors have shares in the company (with the conflicts of interest risks that this might entail) and this is solved if all the directors buy even just one share.
- Important advances and work in ESG matters, such as reporting and improving compliance with the European sustainability taxonomy or the annual study of the social impact of all our developments, are not valued.
- Measuring scope 1 and 2 emissions is valued in the same way as reducing scope 3, which is responsible for 99% of the emissions of a residential developer.
- Having a specific policy is scored positively, without analysis of the content and detail of that policy, which leads us to companies that have 7 or 8 policies that are rated very positively by the analyst and their content does not exceed two pages; it is clear that this has been done exclusively to improve the analysts' score.

4.

A refusal on the part of institutional investors, funds and credit institutions to recognize analysts' ratings when carrying out corporate purchase and sale operations and/or financing asset portfolios, focusing instead on compliance with energy certificates, emissions and, above all, compliance/alignment with European taxonomy.

Although the company has discontinued periodic reporting, it may occasionally undergo a specific evaluation with one of the analysts, in order to keep up with ESG rating practices and see if its practices and objectives are aligned with those of these analysts; however, at the moment, this is not a priority issue.

As of 31 December 2024, the company maintained ESG ratings from various analysts that were significantly above the real estate sector average.

In 2024 Neinor Homes achieved the category of excellence in ESG performance from **EUPD Research Sustainable Management GmbH**; our organization has been selected as a leading company, which honours those organizations that have been identified as leaders within their country based on classification by industry and size.

In the 2024 financial year, the company that regulates the stock market index in Spain (*BME, Bolsas y Mercados Españoles*) included Neinor Homes in the **IBEX ESG index, an index that includes the 49 most important companies in the continuous market in ESG**. This index measures the performance of companies in environmental, social and governance aspects.

In addition, in this financial year Neinor Homes received the **ESG Transparency Award**: Recognition of **Neinor Homes as winner** of the ESG Transparency Award at the **2024 European Sustainability Week**, which took place from December 10 to 12 at the historic Steigenberger Grandhotel & Spa, a venue that has hosted numerous events of political and economic importance, and where it provided a unique platform for the exchange and presentation of outstanding ESG strategies and in which **Neinor Homes was honoured as a role model within its sector**.



This **ESG Transparency Award seal** not only serves as the symbol of an invaluable personal commitment, but also as a mark of trust for the company in the eyes of investors, partners and customers, especially in times of political uncertainty. It supports internal and external communications across all channels and reinforces the company's position as a leader in the sustainability field.

04

TRANSFORMATION OF THE SECTOR



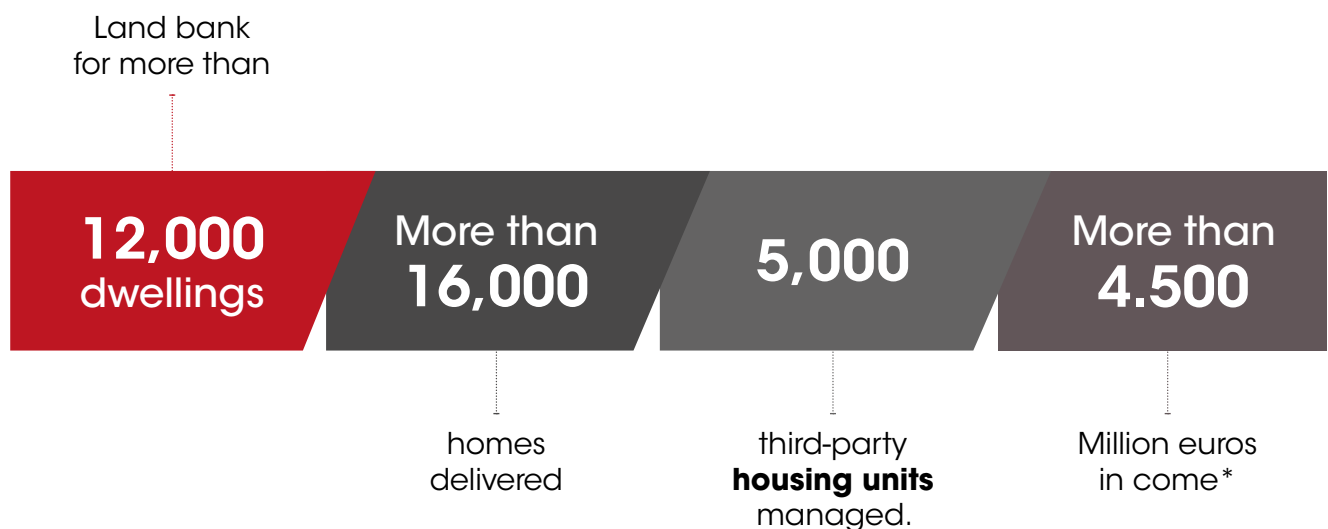
We are a **real estate platform** in which, through the application of best practices in the various areas of our activity, we seek to **accompany our customers** in a **close and responsible way** in one of the most important decisions of their lives, the **choice and purchase/rental of their home**.

4.1. OUR IDENTITY

We are Neinor Homes, the **first housing platform in Spain to cover the entire value chain of the developer and rental business**. Through our various business lines, we **contribute to the essential social good of housing and generate value** simultaneously and sustainably for all the company's stakeholders.

We work to adapt to a changing reality and respond to new needs and ways of living, and we **are very committed to our social impact**, aware that our activity responds to a vital need around which people's lives revolve. For this reason, we contribute to facilitating access to housing while developing projects that meet high standards of design, quality, sustainability and innovation.

We contribute to the **regeneration of urban spaces** and are committed to **co-investment** as a fundamental part of our growth. We are a **benchmark in the sector**, always with the aim of offering maximum safety and profitability to all our stakeholders.



* Data at company origin.

4.2. A NEW TRAJECTORY, A LONG JOURNEY

With more than 30 years of experience in the property development sector, in May 2015 the commitment of new investors allowed Neinor Homes to establish itself as a **leading national real estate developer**.

Pioneers in implementing a new, more innovative management style, based on professionalisation, procedural culture and digitalisation, together with the most renowned architects, **we were able to embark on a path that many other developers would later follow**.

In March 2017, **the company carried out the first IPO in the residential development sector in Spain** since the financial crisis of 2008, **becoming a benchmark and leading the change** in a sector that needed to evolve and adapt to the new housing needs and ways of living.

Since then, we have been working to place **sustainable development and value to our stakeholders at the heart of our activity**, promoting environmentally friendly construction, contributing to the progress of the social and business fabric of the areas in which we are present and facilitating access to housing in large population centres where there is a supply shortage.

In these years, **Neinor Homes has strengthened and diversified**, with the commitment in 2018 to the rental business, pioneering Build to Rent; the integration in 2020 of companies such as Renta Garantizada, specialising in rental management; and the merger with Quabit Inmobiliaria in 2021, positioning it as one of the leading construction companies in Spain. In 2024 we continued to take on new challenges: on this occasion we acquired 10% of the property development company Promotora Habitat, taking on 100% of its workforce. As a result, the workforce has increased 7.4 times in its evolution as a property developer, from 80 to 591 employees. We are also forerunners in the commitment to coinvestment in residential development as a fundamental part of the company's growth strategy.

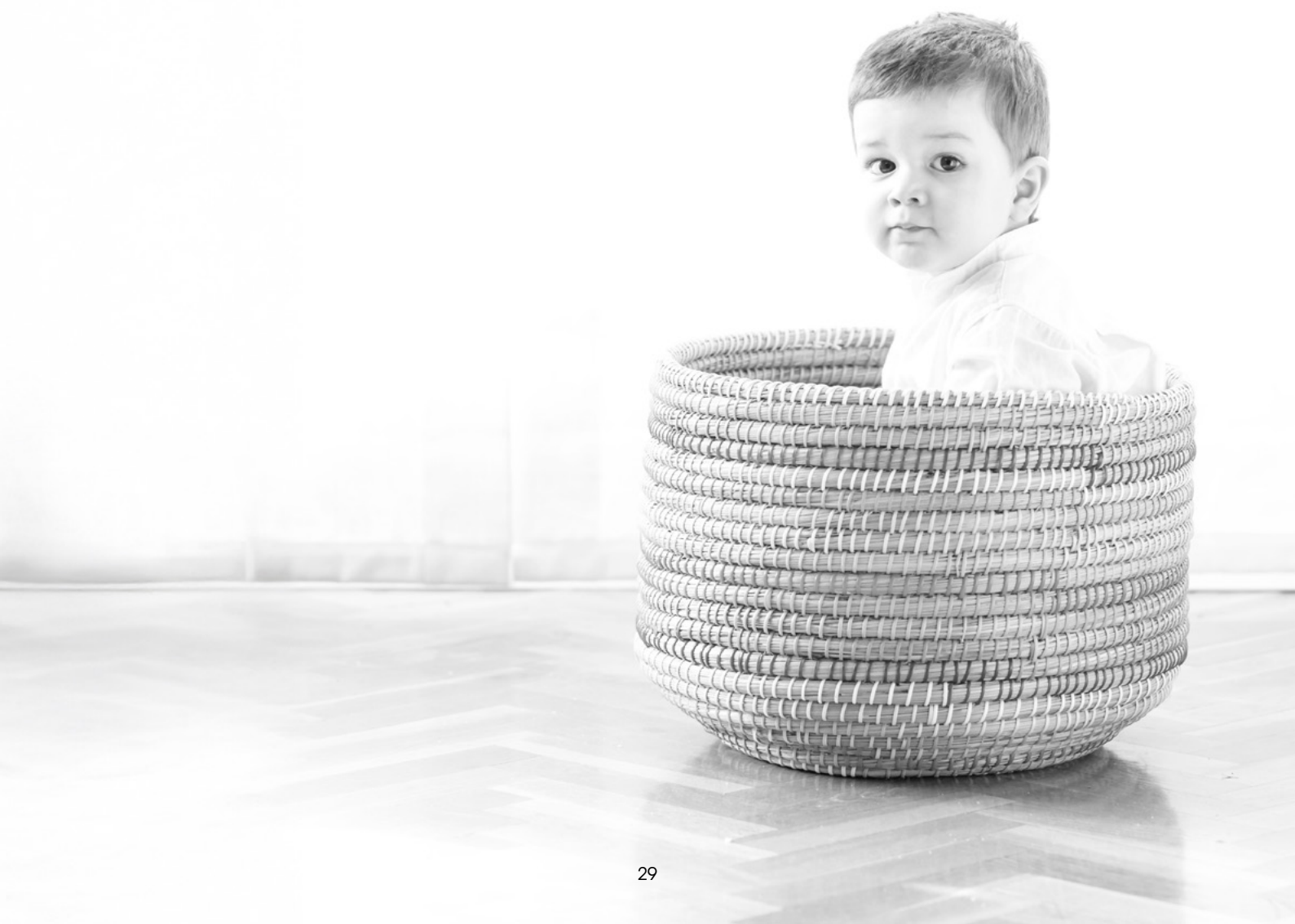
Neinor has become the benchmark for real estate platforms.

And all this, with a **responsible financial profile** with the objective of maintaining an LTV of less than 25%, which has made us an example to follow.

All these milestones have allowed us to **evolve, diversify and adapt to a constantly changing environment**, being able to cover the “Living” (shared, non-traditional) sector, covering the entire value chain, both the developer and rental business, as well as new real estate trends, such as coliving, senior living or microliving, always with the aim of offering maximum safety and profitability to all our stakeholders.

We are **highly committed to our social impact and to facilitating access to housing**, which is why we are also developing more affordable housing, for purchase or rent, in the Alovera area and throughout the metropolitan area of Barcelona, under the first publicprivate partnership agreement with Barcelona City Council for the development of affordable rental housing. And always with **projects that meet high standards of design, quality, sustainability and innovation**.

In 2023, with the aim of continuing to grow, Neinor approved a new business plan for the 2023-27 period with two main pillars. On the one hand, an ambitious shareholder remuneration plan with the objective of distributing €600 million and, on the other, maintaining its capital-efficient growth trajectory with an investment of €1 billion, half of which will come from new investment partners through joint ventures.



4.3. OUR PURPOSE AND VALUES

The purpose of Neinor Homes is to provide and facilitate a home for our customers which ensures the well-being of our customers, people, communities and the environment.

Our mission as a company is to develop business models and formulas for a residential sector that are ever more sustainable, accessible and at the same time profitable, which will guarantee the future of the company and help to alleviate the lack of housing in the main cities of Spain.

The **commitment to sustainability** at Neinor Homes is real and is not about pretending or greenwashing. Since its inception, Neinor Homes has driven the **transformation of real estate development to a more sustainable model**, focused on **creating value for the environment, society and people. Our values:**



PEOPLE

We evolve with people in mind, to provide them with **more sustainable, spacious, quality** and environmentally **responsible housing**.



SUSTAINABILITY

Committed to the **future we leave behind for future generations**, we measure the impact of everything we do. We have a responsibility to conduct our business in an environmentally respectful manner.



EMPLOYEES AND TALENT

People are fundamental to our development as a company. We believe in **equal opportunities**, with our Equality Plan, as well as in **talent development and work-life balance**.



BENCHMARK

We want to be able to **inspire** all our stakeholders **by our example and become a benchmark in the industry and beyond**.



RESPONSIBILITY

We engage with society to put housing at the heart of **fair and sustainable social growth**. We contribute to the **regeneration of urban environments**, the progress of the social fabric and the promotion of employment.



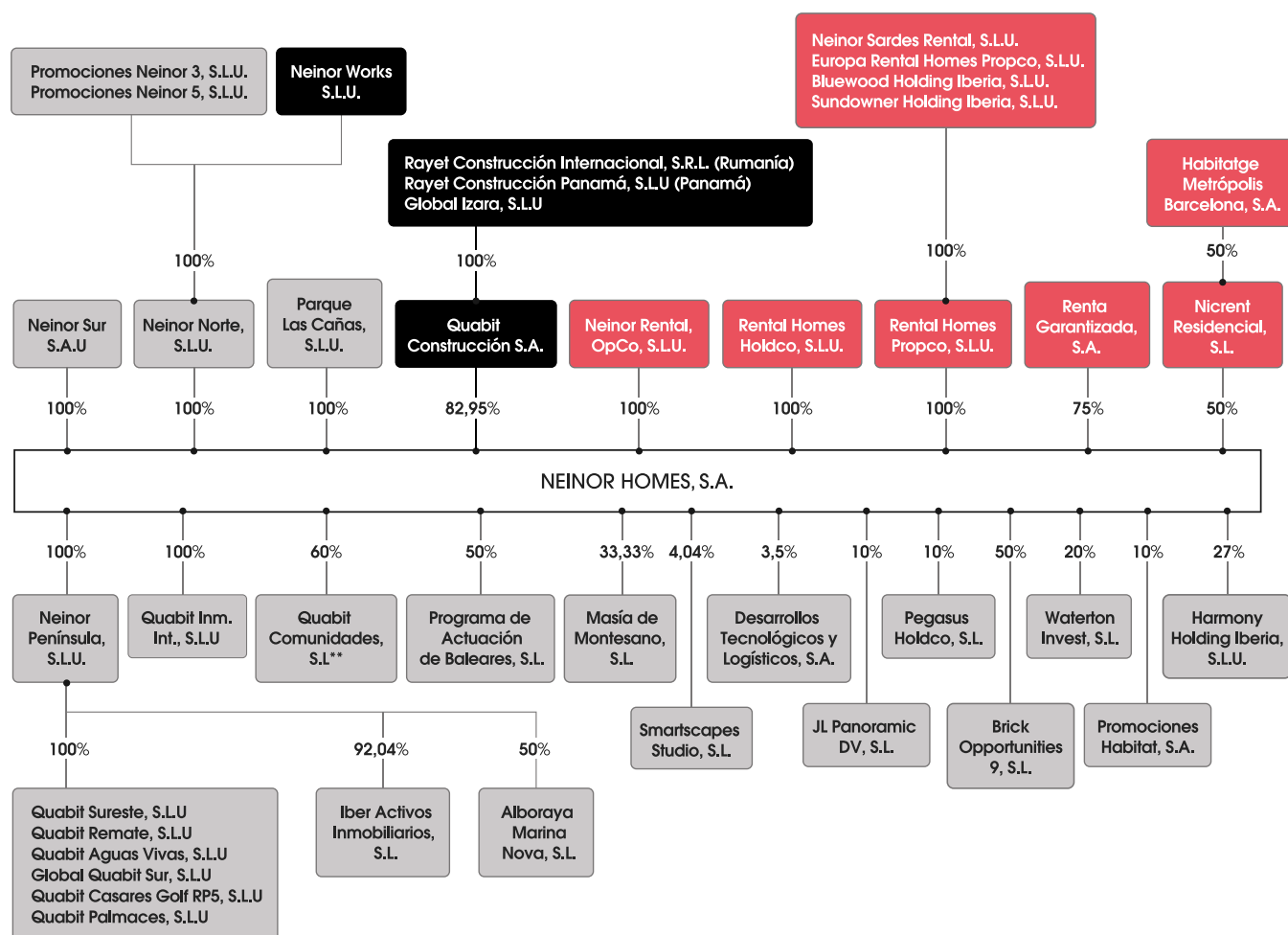
PRINCIPLES

Transparency, good governance and social commitment guide all our business decisions.

4.4. OWNERSHIP STRUCTURE

Neinor Homes has its main base in the **Basque Country**, from where it has extended its activity throughout the **rest of Spain**, concentrating on the markets with the highest demand and lowest stock, with a special presence in Madrid, the Basque Country, Catalonia, Castile- La Mancha, Andalusia, Valencia and the Balearic Islands. It has offices in Bilbao, Barcelona, Madrid, Vigo, Gran Canaria, Sevilla, Guadalajara, Cordoba, Malaga and Valencia.

Below is an outline of the Neinor Homes **Group's corporate structure**.



5 Group companies engaged in the **construction business**.

10 Group companies engaged in the **rental business**.

27 Group companies engaged in the **developer business**.

* This table does not include other types of entities belonging to the group, such as joint ventures, cooperative societies, EIGs, UIAs, etc.

** This company is in the process of dissolution and liquidation (deed granted and submitted for registration on 30/12/2024).

05

SOCIAL IMPACT: CREATING VALUE THROUGH OUR RESPONSIBLE BUSINESS MODEL



The priority of our **business model** is to satisfy the needs of our customers based on responsibility in the **exercise of our activities** and the **commitments** we have made to our stakeholders.

5.1. ECONOMIC AND SOCIAL ENVIRONMENT

At Neinor Homes we are focused on meeting the needs, changing appetites and aspirations of our customers. We have a superior first home product, the best locations in Spain and a land bank acquired for the best prices.

Despite the climate of uncertainty resulting from the war in Europe that began in February 2022, the sharp increase in costs and prices that has followed, and the effect of the consequent restrictive monetary measures dictated by central banks around the world to try to curb price increases, we remain in optimal financial, operational and technological conditions to meet this challenge.

To counteract the effects of inflation, we incorporated the construction line into our **home-building division**, creating our construction company, **Neinor Works**, which was strengthened with the acquisition of Quabit and its construction company, Quabit Construcción.

In 2021 we created the **Neinor Essential line**, in which we develop affordable housing for more segments of the population with the company's usual qualities. In addition, we have also committed to the public-private partnership line to build 4,500 social rental homes in Barcelona and its Metropolitan Area through the mixed company Habitatge Metròpolis Barcelona (HMB).

Neinor Homes continues to be in optimal financial, operational and technological conditions.

One of the major novelties of the Strategic Plan approved this year is the **launch of various co-investment vehicles** for different types of projects such as sales, rental or senior living. A target set was to raise 500 million euros in five years, a figure that has already been far exceeded and 700 million has been raised through alliances with Axa, Orion, Urbanitae, Banco Santander, Ameris, and fundamentally, with the JV closed with Habitat after the acquisition of 10% of this company in October 2024.

The stabilisation of interest rates is helping Spaniards to access home ownership, even though financial institutions have put an end to the long-standing policy of facilitating access to mortgage loans. In this context, there continues to be a solid demand for new housing in our main areas of activity in Spain, in comparison with the scarce existing supply.

In this **context of a degree of economic stability** and bearing in mind that residential development is a sector with a complex value chain in which numerous agents are involved, Neinor Homes is tackling all these factors through a critical analysis based mainly on **new technologies, innovation** and **sustainability**. Improved **continuous listening** to our current and potential **customers**, virtual visits, on-line prereservations and digital signatures are other factors that allow us to better understand the direction the market is taking.

5.2. DEVELOPMENTS ON THE STOCK EXCHANGE

Neinor Homes was floated on the stock exchange on 29 March 2017 **with a value of 16.46 euros per share**. The first years of listing were marked by political and economic uncertainty for Spain. Subsequently, 2020 saw the COVID-19 health emergency have a social and economic impact that was reflected in the financial markets. Since the lows of March 2020, Neinor's stock has recovered as investor confidence has increased, driven by the roll-out of vaccines. The first half of 2021 continued to be based on optimism in the economic recovery. In contrast, during the second half of the year, fears of a more restrained economic policy by central banks, coupled with the advance of new variants of the virus, have caused the markets to reduce some of the gains made during the first months.

Following the announcement of the creation of the new rental business line in 2020 and a record year of both financial and operating results, Neinor announced in early 2021 the first consolidation transaction in the Spanish real estate sector: the merger by acquisition of Quabit Inmobiliaria. This merger added a total of 7,000 units to Neinor's land bank - 1,600 of them under construction or already completed. The valuation of the transaction together with its capital structure allowed for strong value creation for shareholders in the following years. By the end of 2021 Quabit was fully integrated into Neinor Homes and was generating operating profits for the company.

2022 was a year marked by atypical macroeconomic factors such as the war in Ukraine and inflation levels close to 10% year-on-year in Europe and the United States. This led central banks to implement a contractionary monetary policy by raising interest rates and thus increasing the cost of financing for households. However, it is important to highlight the resilience of Neinor's development business, whose sales performance remains at historically high levels, highlighting the shortage of new housing in Spain. Moreover, Neinor's rental business had a very solid performance marked by high occupancy rates and double digit rental growth.

The sector's discounts to its asset value have increased, pressured by the stock price of the real estate sector which had the worst performance of the EUROSTOXX 600 with a 38% drop in 2022. At year-end 2022, Neinor Homes was trading at a discount of approximately 52% with regard to its asset value.

Given the discount at which Neinor Homes was listed, the strength of its balance sheet with no refinancing or interest rate risks, the resilience of the Spanish residential market and one of the best land banks in its history, in March 2023 the company has decided to present a new business plan in which it will change its capital allocation policy to ensure attractive returns for its investors while maintaining its growth policy in a sustainable and capital-efficient manner.

The support of the new business plan by the capital market was clear, to the extent that at the end of said year 90% of analysts recommended buying Neinor shares and the target price is 12.60 euros per share. In 2023 Neinor Homes shares delivered a total return of 29% and the NAV discount was reduced to levels close to 33%.

In 2024 Neinor Homes continued with the solid implementation of the Strategic Plan (2023-27) presented in March 2023. Among the most notable milestones are three key indicators that reaffirmed the company's commitment to its shareholders. Firstly, the divestment of the Build-to-Rent (BTR) business has been a success, with the sale of six assets between 2023-24: Hacienda Homes to Kygal, Sky Homes to Savills IM, Europa Homes to Harrison Street and DeA Capital, Dual Homes to CBRE IM, Alovera Homes to Avalon Properties and Parla Homes to Round Hill Capital. These divestments total more than 1,000 BTR units and have generated revenues of approximately €275 million. Secondly, these asset sales have allowed the company to bring forward part of the shareholder remuneration programme, with €200 million planned for distribution in 2024, of which €75 million has already been disbursed and the remaining €125 million approved at the extraordinary general meeting, thus consolidating the market's confidence in Neinor's strategy. Including the €125 million in dividends to be distributed in the first quarter of 2025, Neinor will have already reached 54% of the €600 million shareholder remuneration target up to 2027.

Thirdly, the company signed important strategic agreements, Joint Ventures (JVs) with partners such as Avenue Capital, Bain Capital and Octopus Real Estate. These alliances have not only accelerated Neinor Homes' strategic objectives but have also allowed it to exceed the targets set for the next five years of €500 million, raising a total of €1.1 billion of capital for co-investment businesses, of which €700 million has already been invested. This success highlights the company's ability to adapt quickly to market opportunities and strengthen its position in the Spanish property sector.

In 2024, the capital market reacted positively to the evolution of the business plan. Neinor Homes managed to exceed its financial and operational objectives, which led to a significant revaluation of its shares. At the end of the year, **the company was trading at €16.90 per share**, excluding the €1 dividend per share that was distributed during the year, which means that the company was trading above its asset value. However, it is important to emphasise that the net asset value (NAV) excludes Neinor's stake in the capital of the joint venture vehicles, as well as the management fees Neinor will charge its strategic partners, thus reinforcing the market's perception of Neinor's ability to generate long-term value.

NEINOR HOMES SHARE PRICE EVOLUTION



The distribution of the shareholding is estimated as follows:

MAIN SHAREHOLDERS AS AT DECEMBER 2024

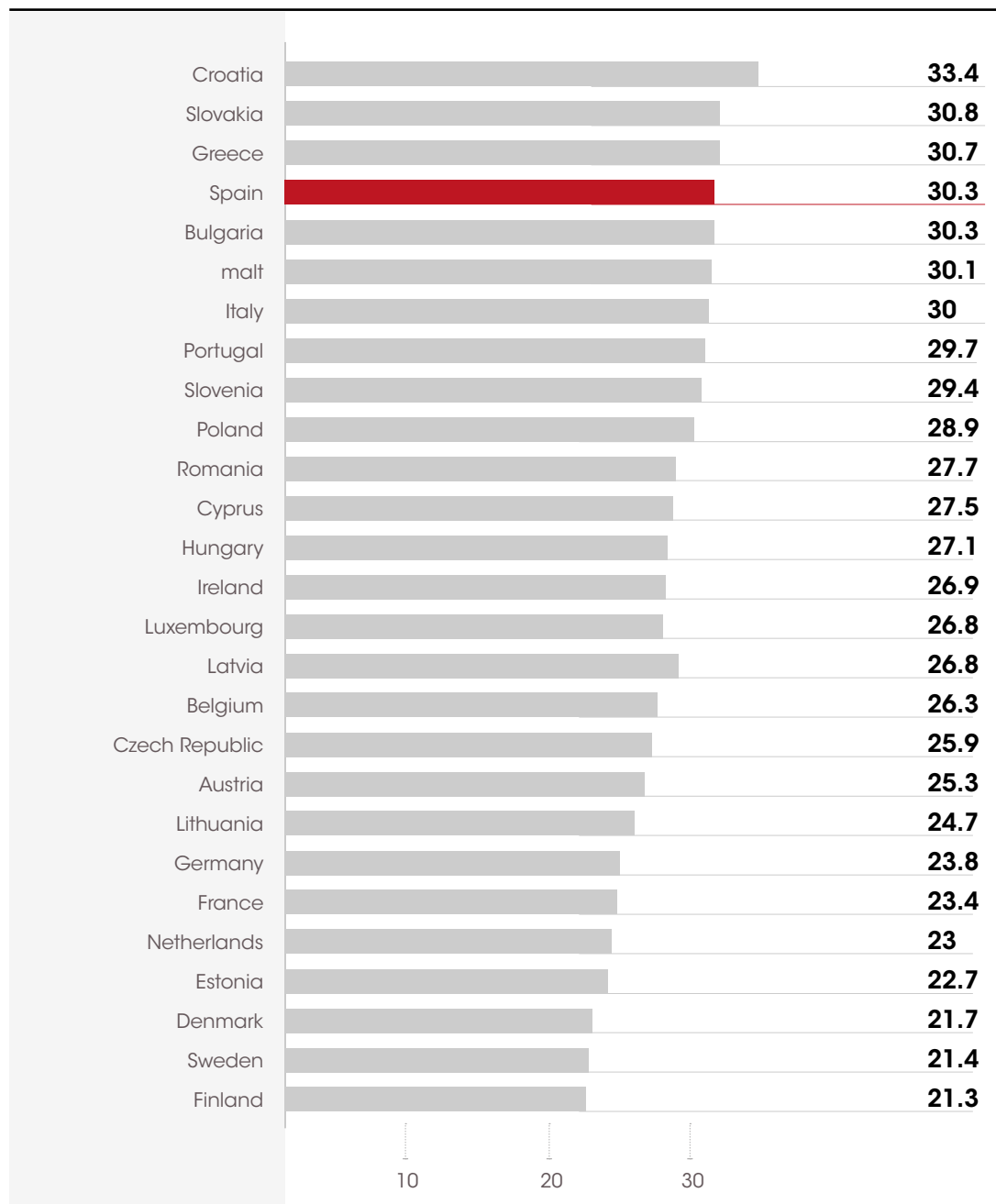
Name or company name of shareholder	Total % of voting rights
Orion European Real Estate Fund IV, SLP	29.52%
Stoneshield HOLDING S.A.R.L.	25.00%
Adar Capital Partners LTD	12.69%
Fidelity International Limited	1.04%
Other Shareholders	31.75%

5.3. ACCESSIBILITY TO HOUSING / DECENT HOUSING

In Spain, one of the biggest social problems is financial accessibility to housing. According to Eurostat 2022 data, the **average age for housing independence of young people in Spain** increased by half a year in 2022 and reached **30.3 years**, almost four years above the EU average.

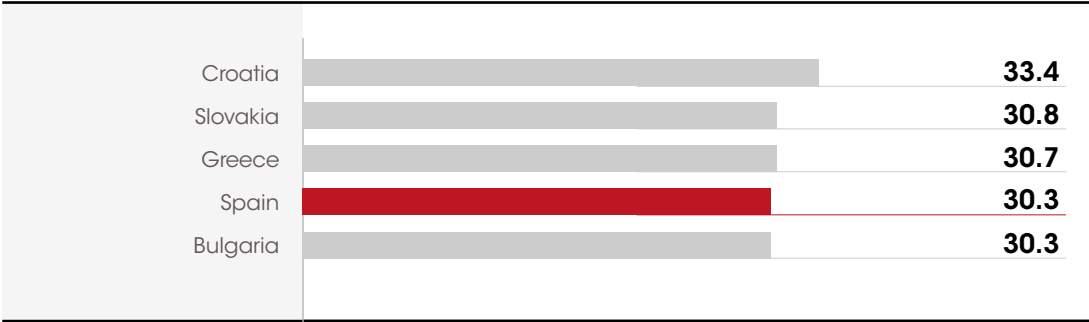
Spain is equal fourth in the EU, together with Bulgaria, of countries where young people leave the family home the latest. This is due to the high rate of youth unemployment.

AGE AT WHICH YOUNG PEOPLE IN THE EUROPEAN UNION BECOME EMANCIPATED ON AVERAGE

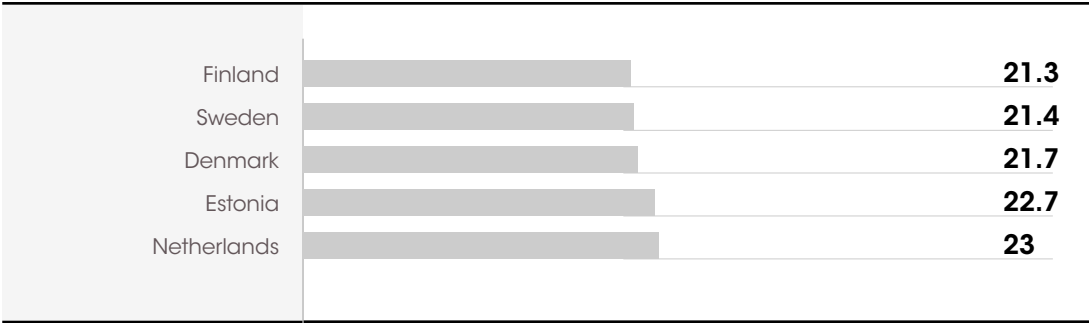


Source: Eurostat (2022)

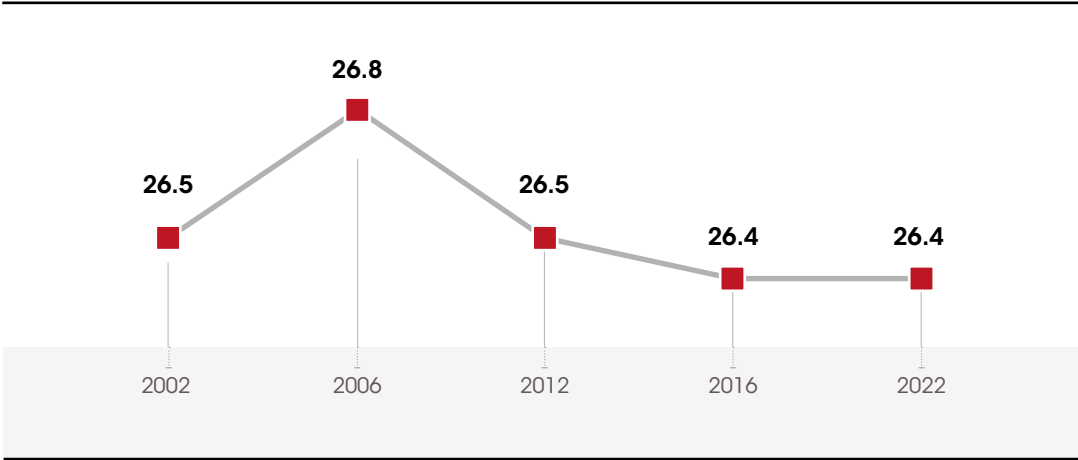
COUNTRY WHERE THEY EMANCIPATE LATER



COUNTRY WHERE THEY EMANCIPATE THEMSELVES MORE SOON



EVOLUTION OF THE MIDDLE AGES IN THE EUROPEAN UNION AS A WHOLE (27 COUNTRIES)



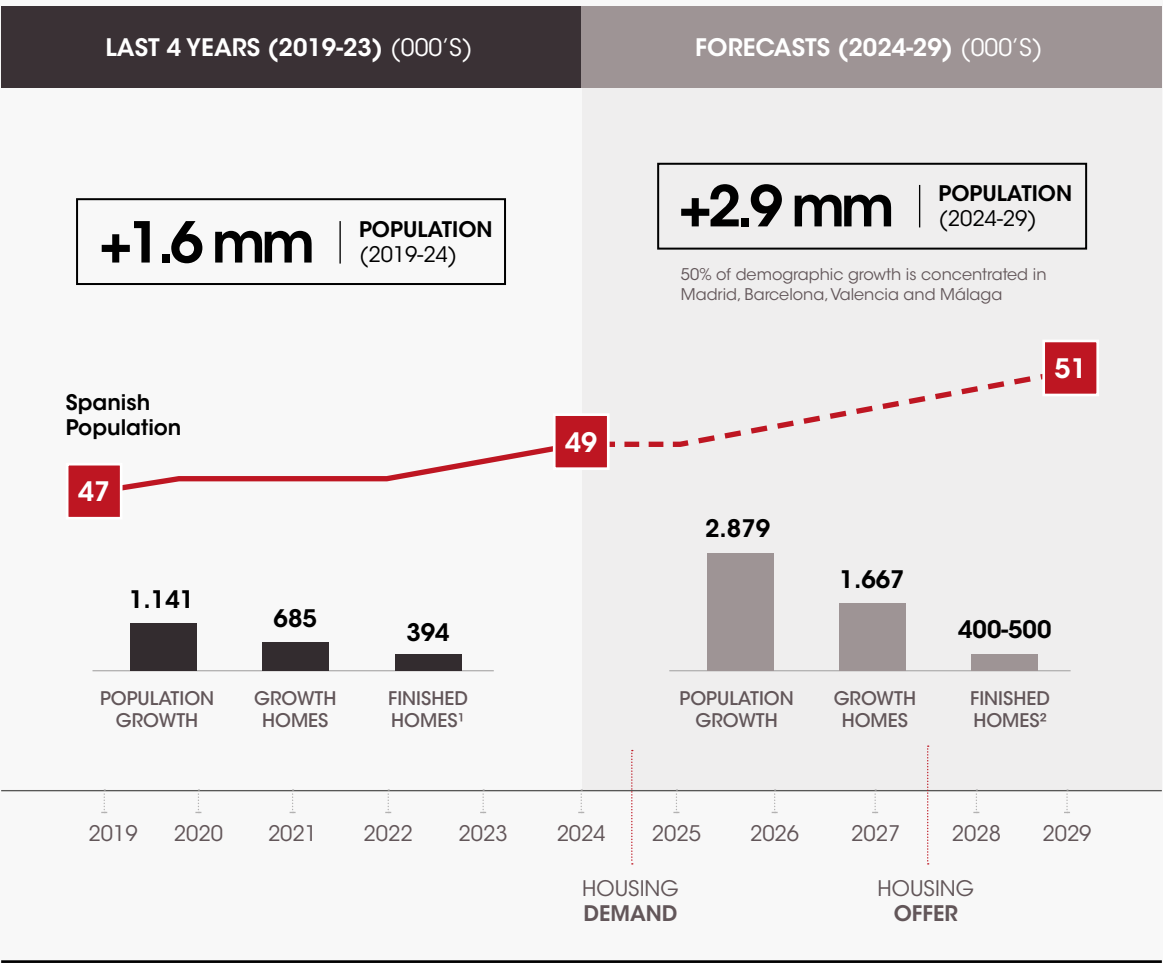
Fuente: Eurostat (2022)

There is a strong prospect of growth driven by households. In this connection, the following table shows that in the last five years, from 2019 to 2024, the population has grown by 1.14 million inhabitants. This fact indicates the need to create 685,000 households.

However, from 2024 to 2029, growth forecasts are for 2.9 million, with a forecast household growth of 1.7. Meanwhile, housing completions in these five years will only amount to 500,000. In addition, population growth is expected to be concentrated in Madrid, Barcelona, Valencia and Malaga.

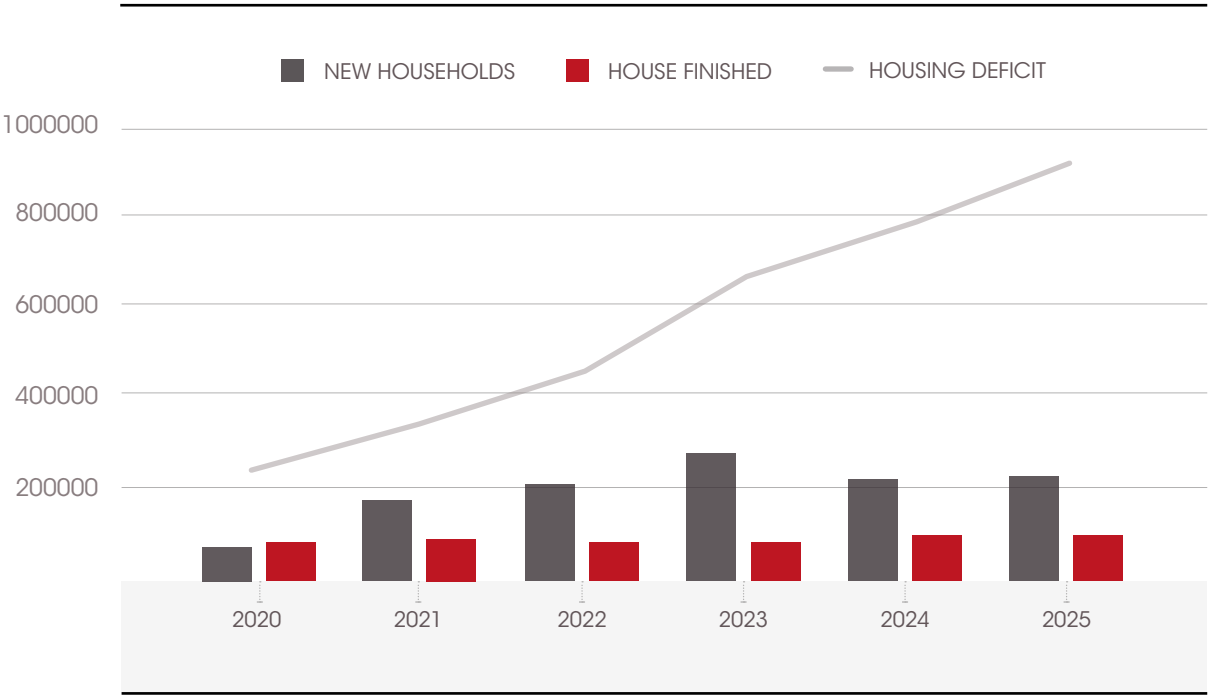
The Spanish population grew by 1.6 million in the last 5 years and an acceleration is expected until 2029

GROWTH OF THE SPANISH POPULATION (2019-2029)



¹. Between 2029 and 2023.
². Neinor Homes estimates.
The origin: INE and Fomento.

The trend over the last five years has been for there to be a large shortfall between completed houses and the creation of new homes. This has led to a problem of an accumulated housing deficit, which means that right now, in 2025, we are talking about a deficit of almost one million homes.



Neinor Homes, aware of this challenge, has developed various **lines of business** focused on the construction of **accessible and affordable homes** (free housing, protected housing, public-private partnership and rental).



UNSUBSIDISED HOUSING

Neinor Homes is currently the developer with the **highest number of affordable housing** units delivered.



SUBSIDISED HOUSING

Neinor Homes has demonstrated **its commitment to the construction of homes for groups with difficulties in accessing housing** through its subsidised housing development business line.



PUBLIC-PRIVATE PARTNERSHIP

Neinor Homes together with Cevasa has carried out a Public-private **collaboration with Barcelona City Council and the Barcelona Metropolitan Area.**



RENTAL

Neinor Homes has demonstrated **a strong presence in the rental market.**

> UNSUBSIDISED HOUSING

Neinor Homes is currently the developer with the highest number of subsidised homes delivered. In 2024, it managed to deliver close to 435 homes, including affordable housing and subsidised housing priced below €200,000. This achievement has enabled many groups with financial difficulties to gain access to home ownership.

In addition to its experience in the construction of subsidised housing, Neinor Homes has created a new product line, called Neinor Essential. This line is exclusively aimed at offering unsubsidised housing at affordable prices, making it the first real estate development company to do so. With this objective, it seeks to bring the quality and services it offers to a wider public, irrespective of their economic situation. During 2024, the company delivered 258 privately-developed homes priced below €200,000 (with an average price of €167,000), **with the company meeting its target of 10% of its homes delivered, in progress or in design annually being affordable housing.**

In addition to the deliveries of housing already made, it has a portfolio of projects with 96 homes under construction and 109 homes in the project phase, aimed at groups with difficulties in accessing unsubsidised housing. With these projects, it seeks to continue to fulfil its commitment to the acquisition of quality housing at affordable prices, so that everyone can have a decent and comfortable home.

Objective of the Strategic Plan fulfilled

HOMES
DELIVERED AT
AFFORDABLE PRICES

258

SUBSIDISED
HOUSING DELIVERED

177

HOMES UNDER
CONSTRUCTION FOR
SOCIAL RENTAL

296

> SUBSIDISED HOUSING

Neinor Homes has demonstrated its commitment in the construction of housing for groups with difficulty accessing housing through of its line of business in subsidised housing. In 2024, 177 low-priced subsidized homes will have been delivered appraised (VPT) at an average price of €138,000 located in the province of Guadalajara. Furthermore, Neinor Homes currently has a total of 816 subsidised housing in different stages of production, of which 472 homes are already under construction.

> PUBLIC-PRIVATE PARTNERSHIP

Neinor Homes has engaged in a public-private partnership, Habitatge Metròpolis Barcelona (HMB), in alliance with the Metropolitan Area of Barcelona (AMB), Barcelona City Council and Cevasa, to build 4,500 affordable rental homes in Barcelona and its metropolitan area.

This agreement, formalized in 2021 represents a milestone in public-private collaboration of this kind in Spain, boosting the population's access to affordable rental housing.

Work is currently underway on the development of two of the four phases into which the project is divided, with the housing units due to come into use between 2025 and 2028.

At the moment, four developments, with a total of 296 homes, are under construction, to which another five developments will be added between the first and second quarters of 2025, thus reaching a total of 688 homes under construction.

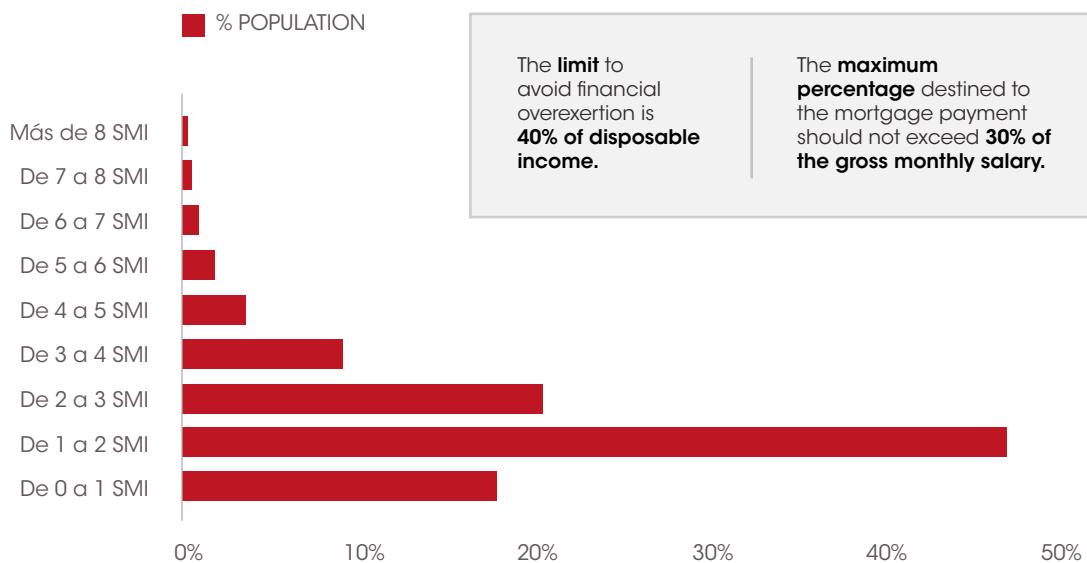
In addition, significant progress is being made in the launch of the developments corresponding to Phase 2, with a volume of 661 homes, and the analysis of the future phases of the project is beginning in parallel.

With this agreement, the company is fully aware that increasing financial accessibility to housing (one of our main objectives) requires cooperation with public administrations and demonstrates its commitment to inclusion and the construction of affordable housing for all segments of the population.

> RENTAL

The choice to rent housing is affected by factors such as affordability and mortgage costs, labour mobility and social changes. Renting is a more affordable alternative for households with limited budgets and is more common among those with incomes below 60% of median income.

WORKERS AS A FUNCTION OF THEIR ANNUAL INCOME IN RELATION TO THE MINIMUM INTERPROFESSIONAL WAGE



(National Institute of Statistics, 2020)

Neinor Homes has demonstrated its strength in the rental market - where there is a significant shortage of product and where the availability of new-build supply is practically non-existent - thanks to the consolidation and growth of its Neinor Rental line, that includes Renta Garantizada.

Neinor Rental is a platform that encompasses the entire value chain in the residential rental market, making it one of the leading players in the sector. This is possible thanks to the diversification of its strategy, which includes:

- Management of the rental of third-party housing through Renta Garantizada.
- Construction of homes for rent (BTR) to maintain ownership and rental management through Neinor Homes/Renta Garantizada.
- Construction of homes for rent (BTR) to increase the market supply of this asset in high demand and to increase its rental portfolio or subsequent sale to investors, including, as the case may be, rental management through Neinor Homes/Renta Garantizada.

During the year, 3 sales transactions were carried out with different companies / funds such as Santander Alternative Investments, Ares o Roundhill, for a total amount of 95 million euros, placing a total of 482 homes and 8 commercial premises on the rental market, and in two of these transactions the investors have entrusted Neinor with the management of the homes.

As at the end of 2024 Neinor Homes has a portfolio of around 5,276 rental housing units under management. Of these 5,276 dwellings, 465 are owned dwellings and 462 are managed dwellings belonging to large funds. In addition, the occupancy rate of the consolidated developments is 97%.

> HOUSING ACCESSIBILITY AT THE SOCIAL LEVEL

Neinor Homes, aware of the difficulty that certain groups have in accessing housing, In 2023, began participation in two initiatives whose objective is **to facilitate access to housing, define the conditions of decent housing, guarantee the right to housing and end homelessness:**

- ESADE Observatorio de la vivienda digna (Decent Housing Observatory).
- The Grand Alliance to end homelessness.

1. DECENT HOUSING OBSERVATORY

The ESADE Institute for Social Innovation has created the "Decent Housing Observatory" project with the aim of analysing and making visible the various social challenges posed by housing, from a social, international and intersectorial point of view. Neinor Homes supports and works together on this project with Fotocasa and Leroy Merlin.



In line with Neinor's social commitment to housing in general and in particular to the promotion of quality and affordable housing, the Observatory gives us the opportunity to **approach the analysis of housing as a social phenomenon and a primary and essential vehicle for the development of a full life for all.** Housing is not simply a passive element in our lives. Our home is our refuge, a place where we can feel safe, which in turn protects us and which at every moment of our lives facilitates the greatest and best expression of our possibilities.

In our country, there are many people who, **at one time or another in their lives, have great difficulties in accessing, staying in or maintaining their housing in optimal conditions.** The obstacles to access, a multi-causal phenomenon, are clearly manifested in the most vulnerable groups in our society (people with medium, medium-low or low incomes, families with children, single-parent families, young people, migrants, elderly people, people with illnesses or different types of disability). Beyond these, more and more people and families are spending much more than the 30% of disposable income considered appropriate by international standards on housing costs.

The work of the Observatory will combine rigorous research with an analysis of social reality giving voice to its protagonists with a twin focus: on the one hand, on the social, economic and human processes associated with housing that lead to housing insecurity and legitimise it, and, on the other, on the consequences of situations of substandard housing at the individual, collective and social level. Led by Ignasi Martí, director of the Institute for Social Innovation, the Observatory seeks to understand in detail the realities that housing insecurity entails.

In line with Neinor's desire for transformation, the Observatory also aspires to become a forum for social innovation that provides actors and agents linked in one way or another to the housing phenomenon (third sector, public administration, companies) with a platform to advance knowledge and explore approaches that, from the first-person experience of those who live in substandard housing conditions, contribute to advancing practices, policies and actions for improvement. The Observatory also has a multidisciplinary Advisory Council that brings together a wide range of renowned experts and will accompany the work to inform and guide it.

As of December 31, 2024, the observatory is finishing defining, based on scientific literature, national and international reports, the contributions of the Observatory's advisory board and its own fieldwork, **how decent housing should be understood in our context** (or, in the opposite sense, what makes a dwelling substandard). The objective in this first stage of the project is to define the sufficient and necessary conditions for decent housing in order to, in subsequent phases, contrast the reality of the different housing experiences in the light of these conditions. This first phase **will culminate in the first quarter of 2025 with the presentation of the first of three reports that the Observatory will produce in the coming years.**

In successive phases, the Observatory **will focus on the life experiences of certain groups depending** on the conditions of their housing in order to analyse the relationship and impact of substandard housing on, among other things, physical and mental health, the proper emotional and educational development of children and adolescents, job expectations and options, the experiences of our elders and the prosperity of society as a whole.

In order to increase social impact, throughout its work, the Observatory will make use of the knowledge generated to allow both dissemination and academic research outputs and, on the basis of these, to make recommendations for action and public policies that exclude housing insecurity as a solution to the housing emergency.

2. THE GRAND ALLIANCE TO END HOMELESSNESS. START WITH THE ROOF

NEINOR HOMES, as part of its commitment to society, is participating in the **GRAND ALLIANCE TO END HOMELESSNESS** to ensure that no one lives on the street.

Promoted by **HOGAR SI**, it is in line with the objectives of the European Union and the 2023-2030 National Strategy to Combat Homelessness, with the aim of **eradicating homelessness on the streets** in Spain by 2030.

Solving this problem is possible thanks to the collective endeavour of various actors, who bring to the table innovative and definitive solutions, and to meaningful and large-scale transformation, harnessing the talents of all organisations interested in solving homelessness.



HOGAR SI, a social initiative, non-profit, state-wide, independent and plural **organisation**, created in 1998, is convinced that **IT IS POSSIBLE TO END HOMELESSNESS** through housing solutions, and it believes in the responsibility of society to tackle the phenomenon, focusing on the problem and not on the person who suffers from it.



Present in 10 autonomous regions, it works with a rights-based approach so that no one lives on the street, focusing on housing solutions (with professional support), health and employment, to guarantee the right to housing which, in turn, guarantees other rights such as health and security.

HOMELESSNESS is a structural phenomenon that affects all societies and is due to social, economic and political factors. It is a multifactorial problem that requires comprehensive solutions and social transformations. Homelessness is not a personal choice and goes beyond the particular circumstances that lead a person to live on the street.

Homelessness severely compromises a range of human rights:

RIGHT TO HOUSING

- **37,117 People in Spain are homeless.**
- **77%** of those affected are **men** and **23%** are **women**.
- **45%** of people living on the street have been homeless for more than 3 years.
- **74%** of the places in the system are oriented towards a temporary stay.

RIGHT TO HEALTH

- 35% of homeless people are outside the care system.
- 44% of homeless people have a negative perception of health.
- Homeless people have up to 30 years less life expectancy.

RIGHT TO DECENT EMPLOYMENT

RIGHT TO SECURITY

- 50% of homeless people have experienced a hate crime.

All data are from the Homeless People Survey 2022 (INE, 2022), except: *Survey on centres and services for homeless people 2016 (INE, 2016) and **HATento Observatory 2015.

Large companies such as Mapfre, El Corte Inglés, etc., and now also Neinor Homes, committed to having a positive impact on the environment and society, are key players in **helping to achieve this goal and eradicate street homelessness in Spain.**

Objectives 2022-2025 Sustainability Plan



SUBSIDISED HOUSING

Promote housing construction of social protection for sale.



PUBLIC-PRIVATE PARTNERSHIP

Encourage and promote public-private agreements for the development and construction of social rental housing.



AFFORDABLE HOUSING

Incorporate a new line of housing with more affordable prices than those offered on the market.



ACCESSIBILITY TO HOUSING IN THE SOCIAL LEVEL

Develop social and community regeneration initiatives in those areas where the company is present that present said need.

According to the company's pioneering Social Impact Report, **greater accessibility to housing** has been achieved through three channels*:



UNSUBSIDISED HOUSING

Since we started measuring our social impact, we have completed **6,940 unsubsidised housing** (2,209 of them completed in 2023), **representing 5.9% of the total number of homes completed in our areas of operation** (6.7% in 2023).



SUBSIDISED HOUSING

In the last two years **we have built a total of 1,154 subsidised housing units, 457 of them in 2023**. In 2023, Neinor Homes promoted 77% of the Official Protection homes in the province of Guadalajara.



RENTAL

In 2021, the reduced financial effort required to live in a home in our Rental line enabled **20% more of the population to have access to a top-quality home**.

*Data from the latest social impact report, which includes figures for developments delivered in 2023.

In addition, the following 4 points of the Strategic Sustainability Plan have been achieved in the 2023 financial year:

TO PROMOTE

the construction of subsidised housing for sale, aiming for 10% of the housing delivered, in the execution or design phase each year, to be subsidised housing. In **2024**, we have:

- 177** SUBSIDISED HOUSING UNITS WERE DELIVERED UNDER THE VPT SCHEME
- 472** HOMES UNDER CONSTRUCTION
- 344** IN THE DESIGN AND PRODUCTION PHASES.

TO PROMOTE AND ENCOURAGE

public-private agreements for the development and construction of rental social housing, with at least 10% of the housing each year delivered or in the design or construction phase allocated to social rental. In **2024**, we have:

- 296** HOMES UNDER CONSTRUCTION
- 661** IN THE DESIGN PHASE OF THE HMB PUBLIC-PRIVATE AGREEMENT

INCORPORATING

of a new line of homes at more affordable prices than those offered on the market in wellconnected locations and with quality services (Neinor Essential) with at least 10% of the housing units delivered/under construction/in design each year being affordable housing. In **2024**, we have:

- 258** AFFORDABLE HOUSING UNITS
- 96** HOMES UNDER CONSTRUCTION
- 109** HOUSING IN THE PIPELINE

DEVELOP SOCIAL AND COMMUNITY REGENERATION INITIATIVES

in those areas where the company is present that have such a need.

5.4. MEASURING SOCIAL IMPACT

Over the past decade, the environmental impact of companies has been the main focus of sustainability commitments. While environmental issues have been, and will continue to be, critical to the achievement of the SDGs, **social impact is becoming an increasingly important issue on the business agenda**, especially following the presentation in July 2021 of the **European Union's** draft **Social Taxonomy**, where it seems clear that the classification of activities will contribute significantly to boosting sustainable and responsible investment with a focus on social aspects.

As part of Neinor Homes' commitment to its Stakeholders and being aware of its **capacity for both social and environmental impact**, the Top Management of the company is committed to the search for elements that allow it to measure and manage this impact as a source for making better strategic decisions and thus maximise its contribution to society.

Along these lines, the company, with the support of what we consider to be the best external expert in this field (Transcendent), embarked in 2022 on a project with the aim of measuring the social impact of its developments. Thus, Neinor Homes was the first developer to carry out and report a measurement of its social impact, in aspects such as accessibility to housing, basic services, healthy lifestyle, employment and local development, among others.

[Link to the 2022 Social Impact Report](#)

This is supported within the framework of the Impact Management Project (IMP), a pioneering global association in impact measurement that brings together many of the available international standards and guidelines.

Based on an internal process of identification and prioritisation of impacts, which has involved both the Management Committee and key people in the organisation, Neinor Homes has developed its own tool based on international standards, which allows the quantification of the impact **that the company has on its Stakeholders**.

The development of this tool has made it possible for Neinor to measure the social impact of its developments this year without the need for the assistance of an external expert.

The measurement of this impact is framed in three broad dimensions:

1

LIVEABILITY, WELL-BEING AND SOCIAL COHESION

We consider this to be the most important aspect of this project, as it refers to housing accessibility, one of the biggest problems for Spanish society, especially for the working class and young people. After the pandemic, the housing market situation in Spain is facing a significant shortage of supply, especially in large urban centres, and even more notably a shortage of social housing, with Spain being one of the countries in Europe with the lowest number of social housing units per number of inhabitants. Our most important responsibility as developers is to improve access to housing for those segments of the population that need it most and for young people, especially in areas within or close to large urban centres, as well as to contribute to the wellbeing of the people who live in our homes. An example of this commitment is the major development we are carrying out in the municipality of Alovera, in an area very close to Madrid, which allows us to offer quality housing at a much more affordable cost than in other municipalities in the capital.

2

ECONOMIC SUSTAINABILITY AND LOCAL DEVELOPMENT

Neinor Homes contributes to the economic development of the municipalities in which it operates, being a relevant player in the development and regeneration of the neighbourhoods in which the developments are located.

3

RESOURCE EFFICIENCY AND THE ENVIRONMENT

We promote urban transformation towards a more sustainable and efficient model. Traditional energy sources are increasingly expensive, generate dependence on the foreign market and have a significant impact on the environment. Furthermore, sustainable mobility is a critical aspect of both the European Union's Urban Agenda and the Spanish Urban Agenda.



The management of Neinor Homes, totally involved with and committed to this project, intends for the company, by means of the same, to be a benchmark in driving the transformation of the real estate sector towards more inclusive and sustainable models, **consolidating the company's leadership in sustainability.**

The project was initially developed by Transcendent, an expert consultancy in impact and sustainability, through **5 major phases:**

- **Understanding the projects and classification by type.** This first phase allowed Neinor Homes' developments to be classified according to various criteria, such as line of business, size in number of homes, type, per capita income and population density, etc.
- **Review of international standards,** on two levels, analysing on the one hand the international framework established by the United Nations in its **Sustainable Development Goals** and on the other hand various impact measurement guides in real estate, such as the **UK Building Council's Green Book**. This phase resulted in the creation of an initial database with 90 indicators.
- **Identification and prioritisation of impacts.** Based on this initial database, a prioritisation process was carried out (**Figure 1**), conducting two workshops involving key members of the company and the Management Committee.

Once this preliminary measurement framework was established, work was done on a prioritisation matrix (**Figure 2**), ranking indicators according to their importance and ease of calculation and reliable data access.

- **Definition of the method of quantification and search for quality data sources,** prioritising official and standardised data sources.
- **Development of a proprietary measurement tool** that allows reporting at the individual development level, at the regional level, or at the aggregate global level.

FIGURE 1 | Prioritization of impacts and transversal indicators

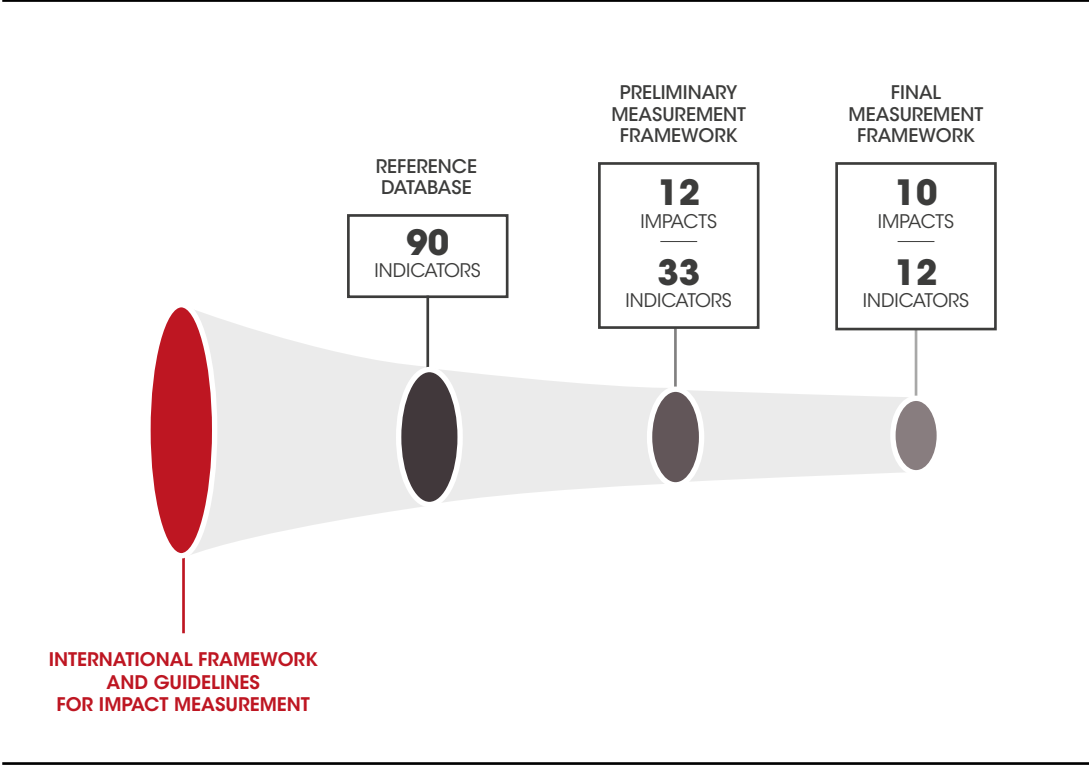
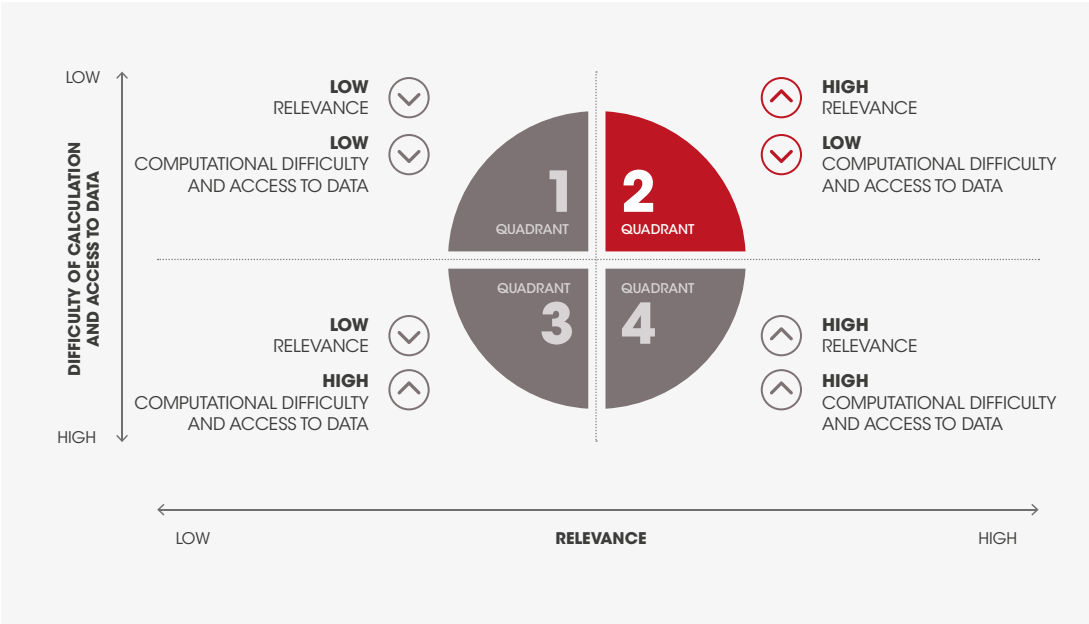


FIGURE 2 | Prioritization matrix



In 2022, the **first measurement of the impact of Neinor's developments** with end of works in 2021 was carried out. The final measurement framework was made up of a total of 3 dimensions encompassing 9 impacts and 12 indicators.

Over the last three financial years, we have continued to measure the impact of our completed housing developments using the same final measurement framework. We present below the results obtained from the latest impact measurement carried out, corresponding to those developments completed throughout 2023, aggregated and/or as compared to the previous measurements:

1. HABITABILITY, WELL-BEING AND SOCIAL COHESION			
1.1	ACCESSIBILITY TO HOUSING	<p>We measure our contribution towards making housing more accessible, increasing supply in relation to demand, and opening lines of business focused on facilitating access to housing for the most disadvantaged segments of society.</p>	<p>Since we started measuring our social impact, we have completed a total number of 6,940 unsubsidised housing units (2,209 of them completed in 2023), which represents 5.9% of the total number of housing units completed in our areas of operation (6.7% in 2023).</p> <p>In the three financial years where impact measurement has been carried out, we have built a total of 1,154 subsidised housing units, 457 of them in 2023. In 2023, Neinor Homes developed 77% of the subsidised housing in the province of Guadalajara, near Madrid, one of the most high-pressure areas and one with the greatest need for affordable housing in the country.</p> <p>In 2021, the reduced financial effort required to live in a home in our Rental line enabled 20% of the population to have access to a top-quality home. This positive impact could not be repeated in the following financial years in which the measurement was carried out, due to the higher rental cost of the developments launched on the market. However, the presence on the rental market presents other advantages for consumers, such as greater flexibility, the fact that large amounts of capital are not needed to access housing, and the increase in the gross overall housing supply.</p>
1.2	ACCESSIBILITY TO BASIC SERVICES	<p>Basic services are those to which the entire population should have access in order to guarantee a life of quality: health, education and food.</p>	<p>Thanks to the location of our developments, we have increased by 12.5 times the accessibility to basic services for the inhabitants of our homes compared to the average of the area where our developments are located (13.6 times in 2023).</p>
1.3	PROMOTING A HEALTHY LIFESTYLE	<p>The availability of nearby green spaces and the regular practice of sport offer multiple benefits related to mental and physical health and well-being.</p>	<p>Our developments, on average, increase the accessibility to sports facilities by 4.2 times the provincial average (3.1 times for developments completed in 2023) and the size of green areas available within a 10-minute walk by 2.3 times (2.1 times in 2023).</p>
1.4	FAMILY WELL-BEING AND SOCIAL COHESION	<p>We promote family interaction and the creation of a strong and united community.</p>	<p>Our homes completed in the last two years of impact measurement have, on average, 26% more common areas than the average for the autonomous region where they are located, 24% for homes developed in 2023.</p>

2. ECONOMIC SUSTAINABILITY AND LOCAL DEVELOPMENT

2.1	EMPLOYMENT GENERATION	The construction sector is considered one of the main drivers of the Spanish economy. Neinor Homes, through the construction and subsequent habitability of its developments, increases the employment in certain locations.	As a result of the development of the homes delivered in 2023, 2022 and 2021, we have created 20,355 direct and indirect jobs , 6,529 of them created during 2023, taking into account the jobs created during the construction phase and during the habitation phase of the homes.
2.2	URBAN REGENERATION	Taxes and fees are the main source of revenue for municipalities. The arrival of new inhabitants in a locality contributes to increase the resources of the Municipal Public Administration.	Neinor's direct contribution through taxes in the municipalities in which it has developed its activity in the last two years has been 52.1 million euros , of which 14.6 million euros correspond to 2023. The residents of the homes completed in 2023, 2022 and 2021, for their part, will contribute 5 million euros annually to the municipal administrations through the payment of recurring taxes such as the IBI or the IVTM.
2.3	PROMOTION OF LOCAL BUSINESS AND COMMERCE	The arrival of residents from a Neinor Homes development stimulates business activity in the area.	We estimate that the arrival of new residents in the neighbourhoods where we operate in 2023, 2022 and 2021 generate 99,5 million euros per year in profits for local businesses .

3. RESOURCES AND ENVIRONMENTAL EFFICIENCY

3.1	BOOSTING SUSTAINABLE MOBILITY	By choosing the location of the development, Neinor Homes determines the ease of access to public transport for its residents.	<p>According to our measurements, our developments offer lower access to public transport than the average in the municipalities in which we operate. This is because the areas of urban expansion, where property developers, including Neinor, tend to operate, are far from the centre of these municipalities and, therefore, tend to be less well served by the public transport network.</p> <p>However, the creation of new neighbourhoods and the regeneration of urban areas such as those in which we operate means that this public transport network is expanding, reaching places where it was previously less present.</p>
3.2	EFFICIENT HOUSING DESIGN	Energy efficiency has become a priority for consumers and governments around the world.	We estimate that each family living in a Neinor Homes home completed in 2023, 2022 or 2021 will save an average of 1,782 euros per year in energy costs (2,323 euros in the case of residents of homes completed in 2023). We estimate that families who buy a finished house from Neinor Homes throughout 2023 will save more than 5% of their annual income thanks to lower energy costs.

5.5. INDUSTRIALISED BUSINESS MODEL WITH THE CUSTOMER IN MIND

Neinor Homes is a real estate platform that covers the entire value chain of its business activity: urban development management, design, construction, sale and rental.

Neinor Homes' main activity is the **residential development of first and second homes in Spain**. Unlike other companies in the sector, it **buys development-ready land at market value and strategic land with a high degree of urban development**, without running financial risks in the event that it does not reach development-ready status, obtaining a profit margin from the transformation of this land into homes. In addition, Neinor Homes **manages all phases of the value chain of the residential development process**, including land acquisition and urban development management, design, construction and marketing of the product and after-sales service. Its business model is based on the industrialisation and systematisation of processes, involving the entire company in the business objectives and strategy. Thus, **all employees are involved in the aim of creating a stand-out developer**.

Neinor Homes applies an **industrialised model based on 6 main pillars**:

Neinor Homes manages all the phases of the value chain residential development process.

SYSTEMATISATION

The systematisation of the company's processes makes it possible to **work with defined rules** in all developments.

STANDARDISATION

Neinor Homes has developed the **construction White Book**, in which it establishes the design criteria and company-specific product attributes that are adapted and applied to all products.

RIGOUR

Rigour in **meeting development deadlines** and focus on the margins are clear principles of the company's industrial model, which enables it to meet its commitment to customers and shareholders.

LISTENING

The design and functionality of the final product is based on the expectations and needs of potential customers and market preferences.

INNOVATION AND TECHNOLOGY

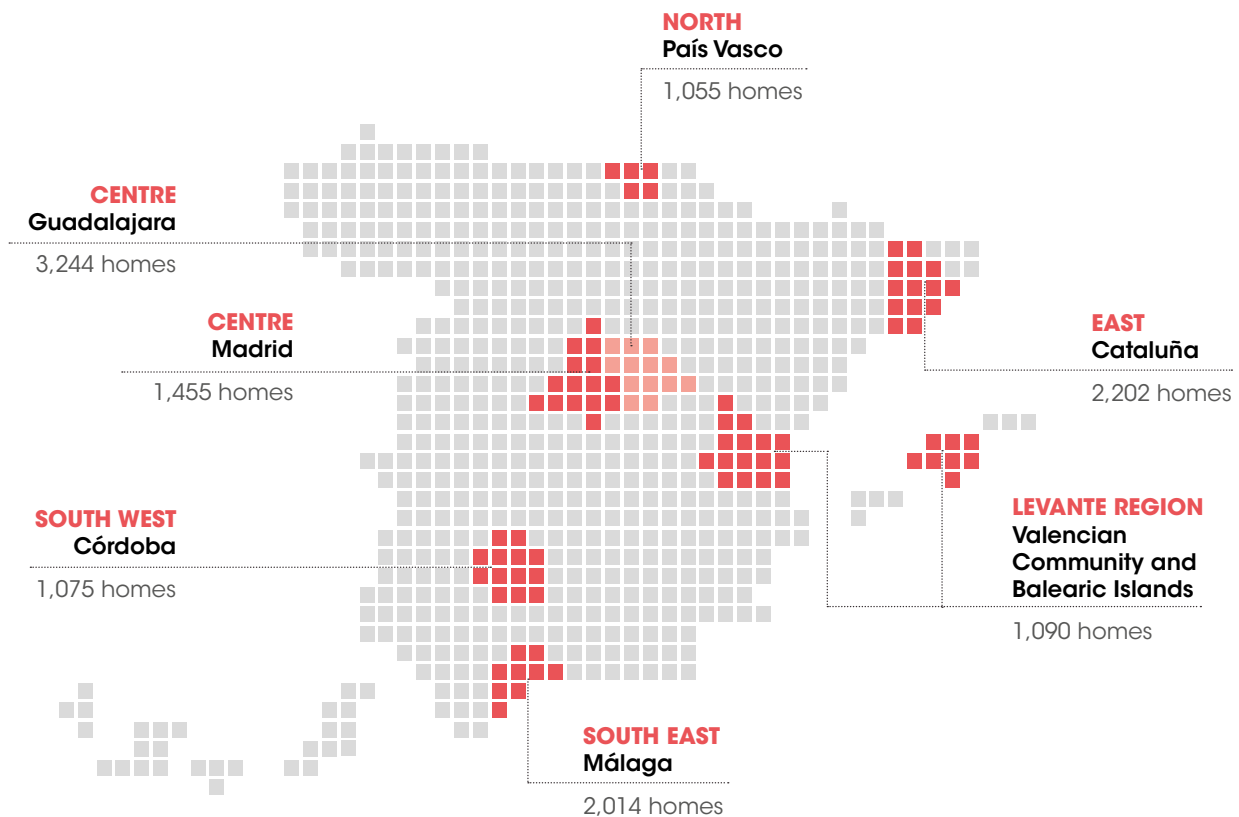
Through **innovation**, Neinor Homes **optimises** the development of the different processes, incorporating new services, construction systems, technologies and materials. Integration of the entire value chain in a **digital environment**, with the objective of increasing productivity, fostering collaborative work and decision-making.

SUSTAINABILITY

Integration in the final product of the latest materials and advances that allow a **lower impact of emissions** both in the construction and in the use of the homes, being an environmentally responsible company with a strong commitment to sustainable building, with all its homes being eco-efficient and thus offering its customers maximum energy efficiency and user comfort.

> THE MAIN FIGURES FOR NEINOR HOMES

Neinor Homes currently has **one of the largest banks of quality development-ready land in Spain**, with an area of **1.50 million m²**



Within its pre-eminent position in the real estate sector, the fundamental component of Neinor Homes' business model and its value chain is the **launch of residential developments**. The year 2024 has continued to be a year of profound institutional development with the consolidation of Neinor Homes as a benchmark developer thanks to the **delivery of 1,975 homes; and having, at the end of 2024, more than 5,000 homes in various stages of production (1,948 homes in the launch phase and 3,100 homes under construction for development)**.

> VALUE CREATION FOR OUR STAKEHOLDERS



ECONOMIC VALUE

Neinor Homes is an engine of economic progress in the Spanish real estate sector. In 2024 it purchased land worth €48.8 million, in line with the dynamic of land acquisition at prices in accordance with the company's business plan, in line with the containment policy implemented in 2020 which advised waiting for the right time to buy.

Total revenues for the year were €502 million, with a net profit of €63 million euros and EBITDA of €102 million. In addition, €15 million income tax was paid, and no subsidies were recorded. Moreover, the net book value of Neinor Homes' stock at 31 December 2024 was €1,067 million, in line with 2023*.

In the 2024 financial year, the economic value generated was **€521 million** and the economic value distributed was **€454 million**, with a retained economic value of **€67 million**.

In the 2024 financial year, Neinor Homes continued with its co-investment strategy by signing joint venture agreements with other partners, thus demonstrating its capacity for the integral management of its business portfolios. Of note in 2024 was the corporate operation of entering into the capital of the real estate company Habitat, with Neinor Homes taking charge of its global management.

*For further information please see Annual Accounts.

ECONOMIC VALUE
GENERATED
€521 million

(ordinary income + other income
+ gain or loss on disposal of fixed assets)

DISTRIBUTED
ECONOMIC VALUE
€454 million

(costes de existencias + costes operativos
+ costes financieros + costes de personal)

ECONOMIC VALUE
RETAINED
€67 million



SOCIAL VALUE

Neinor Homes seeks to sell homes that meet the **needs of its customers** and contribute to the **social and economic development** of the places where they are located.

Since its origins, Neinor Homes has maintained a strong commitment to outsourcing. Its **591 employees** work side by side with the **best external professionals in the sector**, from architects to project managers, from construction companies to quality control, geologists, etc. Therefore, Neinor Homes acts as a driving force in the sector, with a strong national presence and which this year has generated indirect employment for, **3,307 professionals**.

¹According to the Association of Real Estate Developers of Madrid (ASPRIMA), 2.4 indirect jobs are generated per individual home.



591
DIRECT JOBS

3,307
INDIRECT JOBS¹



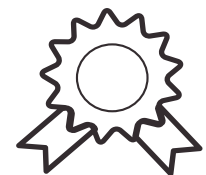
ENVIRONMENTAL VALUE

Neinor Homes is a company committed to the environment that surrounds it and promotes the preservation of and respect for the environment, setting itself demanding challenges to work in a more sustainable way and to find solutions that allow it to reduce the environmental impact of all its corporate activity. This commitment is reflected in the fact that most of its homes from the outset meet the requirements of the prestigious **BREEAM® sustainability certificate**.

Currently, 53% of our developments have BA/BB Energy Certification and 34% have AA Energy Certification, and Neinor Homes has committed to carrying out a life cycle analysis of all its projects started from 2022. In addition, in 2021 Neinor Homes began measuring the corporate carbon footprint.

Neinor Homes has an **Environmental, Quality and Innovation Policy** and is ISO 14001 certified for promoting the use of sustainable techniques in the design of energy efficient buildings*.

*For more information, please see pages 61 to 64.



QUALITY,
ENVIRONMENT
AND
INNOVATION
POLICY

ISO 14001
CERTIFIED

5.6. SUSTAINABILITY AS AN INTERNAL ACTION FRAMEWORK

> SUSTAINABILITY GOVERNANCE

Sustainability management at Neinor Homes is carried out by the **Sustainability Committee**, chaired by the CEO of the company and led by the Governance, Risk and Compliance (GRC), Internal Audit and ESG Department, which reports directly to the Board of Directors through its Audit and Control Committee (the supervisory body for this matter in line with the principles established in the **Sustainability Policy**).

The Neinor Homes Sustainability Policy establishes the **general principles and the internal action framework** for the integration and management of social responsibility with respect to people, operations and the environment, based on the company's strategic pillars: environment, society and governance.

> SUSTAINABILITY PLAN 2022-2025

In October 2016, Neinor Homes defined its sustainability strategy to 2030 through the **Corporate Social Responsibility Master Plan**. The aim of the Plan was to create a **single cross-cutting framework** that would allow for the **integrated management of all** social, environmental and good governance initiatives, identify specific objectives and design specific actions in the short, medium and long term. For each of the company's strategic pillars, a **set of courses of action and operational monitoring indicators** were established.

As we have mentioned previously, **in fiscal year 2021**, the company worked to improve and update this Plan, on the understanding that its premises and objectives were still valid but that they needed to evolve, thus giving rise to the **2022- 2025 Sustainability Plan**, which was approved by the Board of Directors in September 2021. This Plan was updated and revised at the end of the 2023 financial year and in 2024, as explained earlier in this report (in section 3), based on the analysis of environmental risks and opportunities and the company's impact on the environment and people (double materiality analysis)..

To define the areas of action, objectives and courses of action of the Plan, the **17 Sustainable Development Goals (SDGs)** of the United Nations were taken as a reference, and to involve all the company's departments in the achievement of the goals set, each line of action was assigned a deadline, area and person responsible for its fulfilment.

STRATEGIC PILLAR	AREAS OF ACTION	OBJECTIVES
 <p>SOCIAL</p> <p>Our people and communities</p>	<ul style="list-style-type: none"> • Housing for all • People's safety, health and well-being • Customer relations and protection • Commitment to the team • Social, community and city engagement 	<ul style="list-style-type: none"> • Affordable social housing • Safety, health and well-being of employees, suppliers/contractors and customers • Community well-being and cohesion • Personalised attention and active listening to customers • Attracting and retaining talent • Diversity and equality • Social action • Relations with local communities and human rights
 <p>ENVIRONMENTAL</p> <p>Building homes for tomorrow</p>	<ul style="list-style-type: none"> • Sustainable and resilient housing • Consideration of climate change. LCA / Carbon footprint • Eco-efficient housing / resource consumption • Protection and improvement of the environment • Circular economy 	<ul style="list-style-type: none"> • Environmental management system • Resilient housing • Emissions in construction, operations and energy • Energy efficiency • Climate change risks • Water management • Sustainable mobility • Biodiversity • Urban planning and community transformation
 <p>GOVERNANCE</p> <p>Our way of doing things</p>	<ul style="list-style-type: none"> • Best practices in corporate governance • Ethics and integrity • Transparency and relations • Responsible supply chain • Digital culture / innovation • Sustainable financing 	<ul style="list-style-type: none"> • Alignment with government standards • Maintaining and strengthening ESG responsibilities in governance bodies • Ethics and integrity • Engagement with stakeholders and external initiatives • Transparency and publication of policies • Sustainable discourse • Quantification of impact • Responsible supply chain • Sustainable innovation • Promoting digital literacy • Alignment with the European taxonomy of sustainable finance • Definition of theoretical frameworks for ESG fundraising

For more details on the degree of compliance and the resulting courses of action after the Plan was updated, see point 3.

> SECTORAL ALLIANCES AND MEMBERSHIP OF ASSOCIATIONS

Neinor Homes, as a real estate developer, is a member of several associations linked to the construction sector within the scope of activity thereof. Likewise, aware of the importance of sustainability and the environment, it is a part of the BREEAM® programme reserved for companies that share the philosophy and objective of transforming the building sector, promoting more sustainable construction.

Pursuant to its Corporate Governance, Ethics and Compliance policy, these are the associations of which it is a member:

Association of Builders and Developers of **Bizkaia** (ASCOBI)

Association of Real Estate Developers of **Madrid** (ASPRIMA)

Provincial Association of Real Estate Developers
and Agents of Building and Rehabilitation of **Valencia**

Provincial Association of Constructors and Developers of **Málaga**

Association of Construction Entrepreneurs of **Córdoba**

Association of Developers and Building Constructors of **Barcelona**

Association of **Internal Auditors**

Global Compact (Sustainable Development Goals -SDGs-)

Global Compact (Sustainable Development Goals)

ASVAL (Association of Rental Property Owners)

CPEA (Climate Positive Europe Alliance)

Clúster de la Edificación (Association made up
of companies, universities and research centres)

PTEC: PSpanish Technological Platform for Construction
(Public and private R&D&I collaboration)

Members of the Board of Directors of APEC (Provincial Association
of Construction Companies of Guadalajara)

GAESCO (Association of Builders and Developers of Seville)

> QUALITY AND ENVIRONMENTAL MANAGEMENT

The application of the principles established in the area of ESG, together with its commitment to offer its stakeholders the maximum excellence in quality in its products and actions, lead Neinor Homes to carry out efficient management of quality and the environment in its daily activities. The Environment, Quality and Innovation Policy is focused on achieving excellence in management in order to meet these expectations.

Neinor Homes has a **Quality Committee** which, since 2016, has been responsible for setting the annual Quality and Environment objectives, to advance towards excellence, and to monitor these objectives, meeting as needed, and the presentation and approval of the company's procedures, monitoring of the Quality department and management review, keeping them up to date and in a process of continuous improvement. The Committee is made up of the general management, regional managers and the company's CEO.

The Quality area became part of the Corporate General Management in 2021, prioritising the updating of procedures and their accessibility. Among the tasks carried out, priority was given to updating and improving the company's processes and the procedures that support them, in pursuit of continuous improvement and improving the efficiency of all areas. The integrated Quality, Environment and Innovation Management System was successfully recertified in accordance with the ISO 9001:2015, ISO 14001:2015 and UNE 166002 standards..

Neinor's activity involves a large number of suppliers and contractors who work together in the development of projects. To ensure the **highest quality standards**, all of them are obliged to comply with what the provisions of the signed contracts and with the indications included in the White Book.



Promoción **Limonar Homes**



Reducing the **environmental impact in all its offices** is another of the key points for Neinor Homes, which is why significant efforts are made to minimise energy consumption and the usage of materials such as paper and toner. In addition, 100% of the company's facilities are certified according to widely accepted quality standards.



SIGNED UP TO GREEN ENERGY

We continue to focus on green energy in our offices.



MEASURES TO REDUCE ENERGY CONSUMPTION

The replacement of lighting takes into account the installation of **new lighting with LED technology**. In addition, motion sensors have been installed in the new Bilbao offices in meeting rooms, offices, workstations and bathrooms.

In 2024, thanks to Neinor Homes awareness campaigns, we have managed to reduce use by 12.19% compared to last year.



DUAL-SCREEN WORKSTATIONS

The addition of more dual-screen workstations **avoids unnecessary printing.**



PAPERLESS POLICY

A company-wide paperless policy was established in 2017, with recommendations to **reduce paper consumption**.

Dual screen at each workstation

Sharing documents in digital format

Possibility of submitting Board documentation via tablets, avoiding the need to print out all the documentation

Default option on computers for double-sided printing

Using recycled paper for certain documents

Thanks to our firm commitment to environmental sustainability, these actions have improved environmental indicators and raised awareness in Neinor Homes offices. In **2024**, we achieved a **12.19% reduction** in energy consumption compared to the previous year, registering a total of **216,025 KW** compared to **246,031 KW in 2023**.

However, paper consumption increased by **13%** compared to the previous year due to an **increase in legal documents, sales contracts, leases, deeds, and agreements**; despite digitising all these processes, there are still situations in which a printed version is required for signature or legal validation. We have gone from **spending 2.00 to 2.84 kg of paper per employee in 2024**. Total companywide consumption has **been 1,564.8 kg, 652 packages** (647 packages in 2023).

Neinor Homes is strongly committed to sustainability and the environment. For this reason, it has adapted all its facilities to facilitate the recycling of all kinds of waste. It also complies with current legislation regarding the management and treatment of materials **such as confidential paper, fluorescent tubes, toner, batteries and sanitary products**, using an external company specialised in the collection of each type of waste in its offices.

The company remains committed to reducing its environmental impact. In 2023, as a result of the change of location of the Bilbao office, there was an increase in the destruction of documentation. However, this was normalised in 2024 and a **76% reduction** compared to the previous year was achieved. This is also thanks to the physical **reduction of documentation, focusing on its digitisation** to improve efficiency and reduce paper accumulation.

102 kg of toner, 5 kg of key metal, 21 kg of batteries and 112 kg of sanitary hygiene products were also recycled, achieving a reduction of **75%** in waste generation and significantly exceeding the previous year's results.

Neinor Homes employees reduced work-related car journeys to **558,197 km** compared to the **617,023 km** travelled in 2023. This effort contributed to lower fuel consumption, representing an expense of **€204,362**. In **2024**, we managed to reduce fuel consumption by minimising travel in personal vehicles and other means of transport.

Finally, water consumption in our regional offices* stood at **around 1,155 m³**, showing a **reduction of 11%** compared to the previous year.

*The water consumption for 2024 associated with the offices whose rent includes the payment of utilities has been estimated on the basis of the actual consumption of the remaining offices and the number of employees in these offices.

**Only the water consumption of the 7 Neinor Homes offices has been taken into account, since that the consumption of the 4 Habitat delegations is not considered material due to its brief period of membership in Neinor Homes (3 months).

COMPARISON OF CONSUMPTION OVER THE LAST THREE YEARS *

	YEAR 2021	YEAR 2022	YEAR 2023	YEAR 2024
Nº of employees	328	297	283	223
kwh consumed	305,913	282,788	247,327	216,025
Kg paper used	1,500	1,855	1,553	1,564
Paper use per employee	2.10	2.54	2.23	2.84




*Data taking into account only the parent company.



5.7. THE IMPORTANCE OF COMMUNICATION WITH OUR STAKEHOLDERS

Communication at Neinor Homes is the visible face of the work carried out by the company, both at a business as well as corporate and professional level. It is the tool that connects us with society and allows us to publicise our activity while communicating our mission, vision and values.

In this connection, Neinor Homes focusses its efforts on **effective communication that highlights its role in the leadership of the residential sector in Spain and extols its brand attributes**; all with the ultimate goal of **contributing to a change in the sector and generating customer trust and approachability**.

To this end, we have a **360° communication strategy promoted and supervised by Senior Management**, with the **involvement of various corporate areas**, to promote open and bilateral communication with the main stakeholders:

INTEREST GROUP	WHY IS IT RELEVANT?	COMMUNICATION CHANNELS
 INVESTORS AND SHAREHOLDERS	Shareholders are an excellent thermometer of a company's confidence and financial health.	<ul style="list-style-type: none"> • Shareholders' Day • General Shareholders' Meeting • Investor Relations website • Email communications • Press releases • Corporate and product presentations
 CUSTOMERS	Customers are the raison d'être of Neinor Homes , which strives to offer them the best service and the highest possible quality in order to achieve maximum satisfaction.	<ul style="list-style-type: none"> • Neinor Experience website • Neinor Experience app • Development mailbox with personalised attention by NEXT manager • Neinor Store • Communication to clients • Newsletters • Satisfaction surveys • Direct care from Neinor Experience manager • Client's personal website • Personalized call center with NEXT manager
 EMPLOYEES	Employees are what make Neinor Homes what it is , so achieving their satisfaction and pride in belonging to the Company is the key to achieving maximum efficiency and being competitive in the market.	<ul style="list-style-type: none"> • Meetings with the CEO • Work climate survey • Whistleblowing Channel • Corporate Newsletter • Performance appraisals • Inefficiency Channel

 <p>SUPPLIERS</p>	<p>Neinor Homes works with a large number of suppliers and they are in charge of carrying out the construction of the housing and a key element in maintaining high quality standards.</p>	<ul style="list-style-type: none"> • Ongoing dialogue • Regular meetings • App to evaluate Neinor Homes • Building committees • Supplier evaluation • Third party code of conduct
 <p>SOCIETY</p>	<p>Neinor Homes' activity has a significant impact on society, creating direct and indirect jobs, and contributing to the social and economic development of the places where the developments are located.</p>	<ul style="list-style-type: none"> • Corporate website • Dissemination of press release on our corporate and product milestones • Interviews and statements by our spokespersons in the media • Participation in sectoral forums and associations • Work with universities and associations • Participation in fairs and events • Social media

In addition, communication continues to be boosted through **social networks**, generating higher quality content on a fixed and regular basis, as well as through the internal communication channel with employees. Finally, the company continues to increase the presence of various company spokespersons at **events and forums in the sector**, thus reinforcing Neinor Homes' leading position in the market.



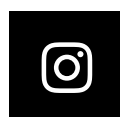
EN LAS REDES SOCIALES



LINKEDIN
54,394
followers



FACEBOOK
11,000
followers



INSTAGRAM
15,100
followers



TWITTER
3,711
followers



YOUTUBE
1,700
followers

5.8. SOCIAL ACTION

At Neinor Homes we continue to be committed to our employees and those who work with us, to society and to the planet.

Neinor Homes, aware that a sustainable company must be economically, socially and environmentally sustainable, and with its actions based on good governance, has taken the **17 Sustainable Development Goals (SDGs)** of the United Nations as a benchmark to define its Sustainability Plan, and therefore the social action to be pursued, with the conviction that the actions and cooperation of everyone - company, employees and those working with it - is essential.



In line with the SDGs and in compliance with the provisions of our Strategic Sustainability Plan, the social actions carried out by Neinor Homes in 2024 have sought to reach as many stakeholders as possible, focusing on having **the best possible impact on our employees, our customers and society.**

> OUR EMPLOYEES

To talk about social action, we believe that you have to start by talking about how you treat your employees or how you care for them, which is why we have put the focus of our social commitment on Neinor Homes' main asset: its workforce. We have encouraged various activities focused on improving their wellbeing, their work-life balance, promoting health, sport, a healthy lifestyle, teamwork, solidarity and their involvement in caring for the environment and leading a more sustainable lifestyle.

Some of these are detailed below:

- **Family and work-life balance**, understood as a means to achieve equality, is another of Neinor Homes' priorities. In addition to the measures already in place and implemented in terms of job quality, work and time flexibility (such as teleworking, which has increased this year), family support, personal and professional development, the Equality Plan approved in 2023 was added, which is a guarantee of equal treatment and opportunities between women and men, as well as the elimination of discrimination.
- Neinor Homes encourages and pays for its employees to register for various sporting events to **encourage team sports and to support and help various social causes and charities.**
- Neinor Homes collaborates with Wellhub (formerly Gympass) which offers our employees a **physical and mental wellness programme** with access to multiple gyms, psychological care, therapy, personal trainers and nutritional apps at below-market prices.
- **Fresh fruit in the offices.** With the aim of creating better eating habits among our employees, fresh fruit for the week is distributed every week in each of the Neinor Homes branches.
- **Corporate gifts of solidarity.** This 2024, as a Christmas gift, Neinor Homes employees received unique hand-painted notebooks from the Bilbao workshop of **Nahiarle, a space for artistic creation that offers a personal and professional development programme for people with mental and/or intellectual disabilities.**
- It encourages its employees to contribute to caring for the environment, which 'is everyone's business'. Initiatives such as: the installation of new recycling bins in the offices to try to reduce the number of wastebaskets and bags, and thus facilitate the cleaning work of the cleaning staff.

Moreover, in this area, we consider it essential to protect and safeguard health and safety, which we also pass on to **our suppliers** with a clear motto of no accidents on our sites, which we explain later in this report.

> OUR CLIENTS

- Neinor Homes has reached an agreement with **Papernest**, a comprehensive management platform where customers can manage all the utilities/supplies of their new home in one click, one call, at no cost and with preferential times. In this way, Neinor Homes **provides customers with a free sign-up service designed to facilitate their experience and save them time and effort**. When the time comes to hand over the property, the customer does not have to worry about arranging for these services, as they have the following benefits:

The best price and without a fixed-minimum contract: Endesa, Total Energies, Holaluz, etc.

A **fast sign-up process** instead of having to spend an average of 8 hours on the phone to deal with all the necessary formalities.

Faster activation of household meters. This will allow the active and available supply to be available sooner.

- Sign-up and contract with Hobeem, a company focused on home energy management, which, through the use of physical and digital devices, allows our clients to:

Analyse their energy consumption by hours, days, type of device with the highest consumption.

Be able to carry out an **energy audit**, to analyse whether the power, contract and type of tariff is adapted to the customer's needs.

Provision of a **comparative study of offers** from supply companies

Information on the hours of the day when the electricity tariff is cheapest.

Training and energy **saving tips**.

AHORRA Y EXPLOTA TODO EL POTENCIAL DE TU NUEVA VIVIENDA

Observa tus consumos
Compara con tu anterior factura y evita sorpresas consultando lo que has gastado desde principio de mes hasta hoy.
¡Reduce tus gastos lo antes posible!

Aprovecha nuestra asesoría energética
Comprueba que tus potencias contratadas y los precios de tus contratos estén siempre optimizados.
¡Podrás ahorrar hasta un 30%!

Consume en las horas más baratas
Planifica tus consumos con nuestro semáforo energético para que no te cojan de sorpresa las olas de calor ni las olas de frío.
Con Hobeem estarás siempre informado

Ahorro y sostenibilidad
Aprende sobre sostenibilidad y eficiencia y saca el máximo partido a tu vivienda.
De A a triple A: APRENDE, ACTUA, AHORRA

¿CÓMO LO HACO?

- 1. Descarga Hobeem App**
Desde App Store o Google Play. También puedes leer el código QR de la parte inferior derecha.
- 2. Regístrate en Hobeem**
Solo tendrás que seguir los pasos que te indiquemos, te guiaremos en todo el proceso.
- 3. Canjea el código de Neinor**
Cuando te preguntemos si tienes un código premium solo tienes que poner el código que Neinor te habrá entregado.
- 4. Activa el Contador**
Es el primer paso para empezar a explotar todo el potencial de Hobeem y de tu nueva vivienda. ¡Empieza a consumir de forma inteligente!

¡DESCARGA

This way of dealing with our customers led to us being **chosen in 2024, for the second consecutive year, as 'Real Estate Developer of the Year' for our customer service in the pre-sales area**, in the 14th edition of the 'Customer Service of the Year' competition.

> THE COMPANY

Neinor Homes is involved in social initiatives and solidarity movements:

- In cases where a tragedy occurs, such as a war, an earthquake, floods, etc., Neinor Homes launches initiatives for its employees to collect funds in order to alleviate as far as possible the consequences of these phenomena. The contributions of employees, which are sometimes even multiplied by the company.
- Neinor Homes encourages solidarity among its employees by **collecting money to help the people of Valencia affected by the storm that flooded and destroyed several municipalities in the region**, pledging to match the amount raised by the entire workforce. The amounts donated were used to provide direct aid to the victims to cover their basic needs and for renovation work, with a special focus on those of our customers who were particularly affected, as in the case of the Neinor Homes development in Paiporta Homes, where we have collaborated in reconstruction and the provision of basic services.
- **Our continued participation in the Gavi Programme, the Vaccine Alliance through the "la Caixa" Foundation** through donations every year, to fight child mortality, save children's lives and protect the health of the most vulnerable populations.
- Neinor Homes, in addition to **paying for the registration of employees and their families and sponsoring the I MARCHA Quince - Por el Autismo** (Fifteenth Walk for Autism), collaborates with the Foundation by making a donation to the Quinta Foundation and the CEPRI School, which are focused on helping autistic people, understanding autism, and sharing life with autistic people, bringing us closer to their reality.
- Working with the **FUNDACIÓN DEPORTE Y DESAFIO** (Sport and Challenge Foundation) through participation in a charity dinner with which this sports community will be able to help young people with functional diversity to show themselves and others that they can go further, and whose work is to guide and support, fostering the autonomy and personal empowerment of each individual.
- **Working with the A LA PAR Foundation, hiring and incorporating people with intellectual disabilities from the Foundation into Neinor Homes' activities.** The A LA PAR Foundation has more than 75 years of history responding to the challenges and needs of this group. Working for the rights and opportunities of people with intellectual disabilities in our society, designing support where they encounter barriers. In 2024, Adrián was hired for the Madrid office, filling the Receptionist position during the holidays of the staff in this department.
- As in previous years, **Neinor Homes made a donation in 2024 to the Hospital San Joan de Déu**, a non-profit organisation and world-renowned centre for paediatrics, obstetrics and teaching that combines scientific advances with the more human side of care. Neinor's contributions have made it possible to cover the costs of carers and entertainers, so that no child with a serious illness will be alone in their room. In addition, the hospital is located in Esplugues de Llobregat, where Neinor Homes is very active, developing more than 800 homes.

> IN THE AREAS WHERE WE ARE PRESENT

In line with our Sustainability Plan, and with the integration of the community and territories in which Neinor Homes has offices or in the places where it carries out its activity, it continues to carry out actions aimed at fostering and promoting links with these areas, as well as the development of their communities. A clear example of this is Neinor Homes' sponsorship of the **Eibarrés cycling club**, through which, as in previous years, it has sponsored various cycling races and events organised by the club, the main objective of which is to promote cycling at all levels. Or with the collaboration of and support for associations and foundations located in the developer's areas of activity such as: Las Rozas (I MARCHA Quince - FOR AUTISM) and Esplugues de Llobregat (Hospital San Joan de Déu).

- Sponsorship of various **sports and cultural activities**.

In the Alovera area (Guadalajara) where Neinor is building residential developments and for integration with the community through sponsorship of the children's team of the Alovera Athletics Club and participation in cultural workshops at festivals.

- Voluntary **cooperation to encourage and promote sport and its values**: It collaborates with and supports the 'Osos del Pardo' Rugby Foundation (Madrid) in its children's categories.
- **Sponsorship of the Bilbao Chamber of Commerce** to promote and improve the business fabric of the Bilbao area.



Economic and social development / Resilience: In these rather economically unstable times, the **greatest social value that the company contributes is its own viability, because if it does not exist, neither does its ESG.** In this connection, it is worth highlighting the organic growth that the company has experienced, as a result of its exceptional results that generate enormous value to the environment, giving positive results every year and increasing them from one year to the next, which is vital for the creation of direct and indirect employment (one of the major problems nationally).

the greatest social value that the company contributes is its own viability, because if it does not exist, neither does its ESG.

In addition to this organic growth, Neinor Homes has also grown inorganically through the acquisition of other companies in order to diversify the business (SDGs 8 and 11), ensuring activity by creating the construction line and to consolidate existing business lines to ensure the continuity of its activity:

RENTAL¹ With the consolidation of a large portfolio of homes for rent (both its own and acquired through corporate transactions) and the integration of the company Renta Garantizada (acquired in 2020).

CONSTRUCCIÓN. The acquisition of Quabit has allowed us to incorporate all its experience in the construction business into our Neinor Wors line.

ESSENTIAL². We have created a line of housing that is accessible to more social groups.

PUBLIC-PRIVATE PARTNERSHIP for the construction of social rental housing in Barcelona.

EXPANSION OF THE LAND PORTFOLIO through the acquisition of Quabit and other corporate transactions.

JOINT VENTURES for the development through co-investment of developments for sale, rental, senior living, noteworthy in 2024 being the corporate operation of entering the capital of real estate company Habitat, with Neinor Homes taking over its overall management.

¹ Extended in section 5.3

² **Housing at affordable prices** for groups with difficulty in accessing housing and offering housing for less than €200,000, reinforcing this type of housing.

- **ESSENTIAL:** Unsubsidised housing
- **Subsidised housing**

06

OUR BUSINESS
IS BASED ON A
**MODEL OF
RESPONSIBLE
GOVERNANCE**



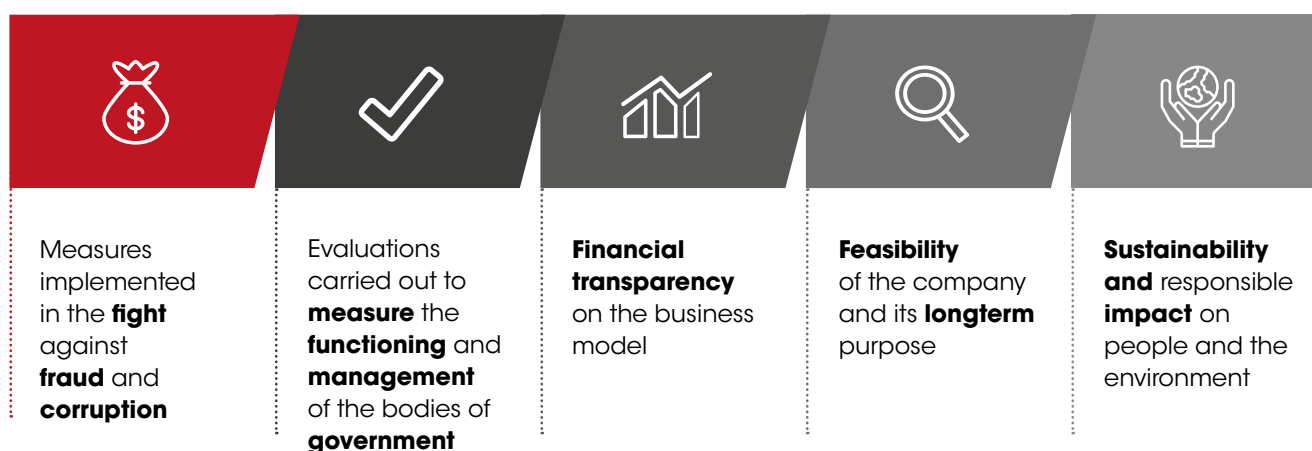
At Neinor Homes when we talk about **Corporate Governance we are talking about people and decisions**, with the understanding that these people are the right people and that they take the right decisions. We firmly believe that how we do things determines who we are and who we want to be. That is why we are governed by ethical, upright and transparent performance standards, so that our words are consistent with our actions.

6.1. PRINCIPLES OF CORPORATE GOVERNANCE

The company understands corporate governance to be the set of mechanisms at the service of generating value in a simultaneous and sustained manner for all of the organisation's stakeholders. Therefore, Neinor Homes carries out its activity in a **transparent and responsible manner, with good corporate governance** as one of the objectives of its Sustainability Policy.

The aim is to provide an efficient response to one of the aspects that arouses most interest among investors, shareholders and other companies in the sector. Good corporate governance is a key trend nowadays, and **stakeholders** are increasingly **demanding more information** on various related aspects, to which Neinor Homes **responds in different ways**:

Neinor Homes is the benchmark in the real estate sector in terms of good governance and responsible and sustainable management.



In addition, Neinor Homes monitors all good governance recommendations and trends, orienting its practices to achieve the highest standards of compliance and competitiveness. A regular **corporate governance diagnosis** is also carried out, analysing, among other aspects, compliance with the **CNMV's Unified Code of Good Governance**.

GOOD GOVERNANCE REGULATIONS AND POLICIES

- Articles of Association
- Internal Audit Function Articles
- Code of Ethics
- Third Party Code of Conduct
- Code of Good Practice in Real Estate Brokerage
- Anti-Corruption, Fraud and Bribery Policy
- Diversity and non-discrimination policy
- Book of good practices in Health and Safety on construction sites.
- Occupational Health and Safety Policy
- Regulations of the General Shareholders' Meeting
- Internal Code of Conduct for Securities Markets
- Rules of Procedure of the Compliance Function
- Rules of operation of the Electronic Shareholders' Forum
- Corporate Governance Policy
- Sustainability Policy
- Policy on Communication and Contact with Shareholders, Institutional Investors and Proxy Advisors
- General economic-financial and corporate communication policy
- Internal manual for the disclosure of privileged and other relevant information
- Human Rights Policy
- Tax Risk Control and Management Policy. Adherence to the Tax Agency's Code of Good Practices
- Director Selection Policy
- Remuneration policy for members of the Board of Directors
- Sustainable Investment and Financing Policy
- Treasury Stock Policy
- Tax and good tax practices policy
- Conflict of interest and related party policy
- Policy on non-audit services to be provided by the auditor
- Employment policy for former auditors
- Corporate criminal liability prevention model
- Equality plan

All the policies we develop are based on an in-depth study and analysis of our needs and the regulations in force, and are developed with a focus on continuous improvement. In this sense, most of them are published on our website, where anyone interested can consult their detail, depth and description, as well as the associated responsibilities and elements.

6.2. GENERAL SHAREHOLDERS' MEETING

The General Shareholders' Meeting is the **highest decision-making and control body** of Neinor Homes in the matters within its competence, through which the shareholder has the right to intervene in decision making.

The convening, preparation and conduct of the General Shareholders' Meeting is governed by the **Regulations of the General Shareholders' Meeting**. All of this in turn is subject to the provisions of current legislation and the **Articles of Association**. All shareholders have the **right to attend** the General Shareholders' Meeting irrespective of the number of shares held and all have the **right to vote**.

The Board of Directors of Neinor Homes has informed the GRC, Internal Audit and ESG Management, as well as the Investor Relations Management that **one of its main objectives is to increase shareholder participation in the AGM**.

On 17 April 2024, the **seventh General Shareholders' Meeting of Neinor Homes was held with a quorum of 70.13% of the share capital** (0.63% present and 69.49% represented). **All the items (11) on the agenda were approved with a percentage of votes in favour of more than 98%**, except for two items corresponding to the modification of the remuneration policy and the annual remuneration report, which were approved with a percentage of 88.31% and 96.31% votes in favor, respectively, which shows the support of the shareholders for the decisions of the Board of Directors put to the vote.

We must highlight the support of the General Shareholders' Meeting for the company's track record in sustainability and good governance,

with the examination and approval of the non-financial information statement and sustainability report for 2023 being one of the items with the highest percentage of approval at the General Shareholders' Meeting, with **99.98% of votes in favour**, making it the non-financial information statement with the highest support among all listed companies in Spain.

The Shareholders' Meeting was broadcast live on the corporate website and could be followed later in streaming on a delayed basis. In addition, all the documents generated from it have been posted publicly on the website.

Neinor Homes also has an **Electronic Shareholders' Forum** where proposals for inclusion on the agenda or **offers or requests for voluntary proxies can be posted**.

On 18 December 2024, the Extraordinary General Shareholders' Meeting was held, at which it was agreed to reduce the company's share capital in order to return contributions to shareholders by reducing the nominal value of the shares and redeeming treasury shares, and consequently amend Article 5 of the Articles of Association, thereby increasing the maximisation of the return to the company's shareholders.

Moreover, during the 2024 financial year, the company published various memorandums of inside information and other relevant information to show the most important milestones of the 2024 financial year, such as the dividend distribution agreements, compliance with the strategic plan, the issuance of a second green bond for 325 million or the 10% stake in the company Habitat, in which an agreement was reached to transfer the management of the entire company to Neinor Homes, which **will act as Delivery Partner Manager**, supervising the design of the projects, the granting of licences, their marketing, their construction and all back-office areas.

POWERS OF THE GENERAL SHAREHOLDERS' MEETING

Approval of company management

Approval of the annual accounts, both individual and consolidated

Appointment and dismissal of the members of the Board of Directors and ratification or their appointments

Appointment and removal of the company's auditors

Agreement on the increase and the reduction of share capital

6.3. BOARD OF DIRECTORS

The Board of Directors is the highest governing body within the company and has **the broadest powers and authority to manage, direct, administer and represent** Neinor Homes. It therefore approves the company's strategy and general policies. Its functioning is governed by the **Regulations of the Board of Directors and by the Articles of Association**. The Board of Directors **meets as often as is convenient** for the proper performance of its functions, at least every three months. In 2024 the Board of Directors met on 15 occasions, and on 4 of these, ESG issues were dealt with.

At the 2024 close of business the composition of the Board was as follows:

44%
INDEPENDENT
DIRECTORS

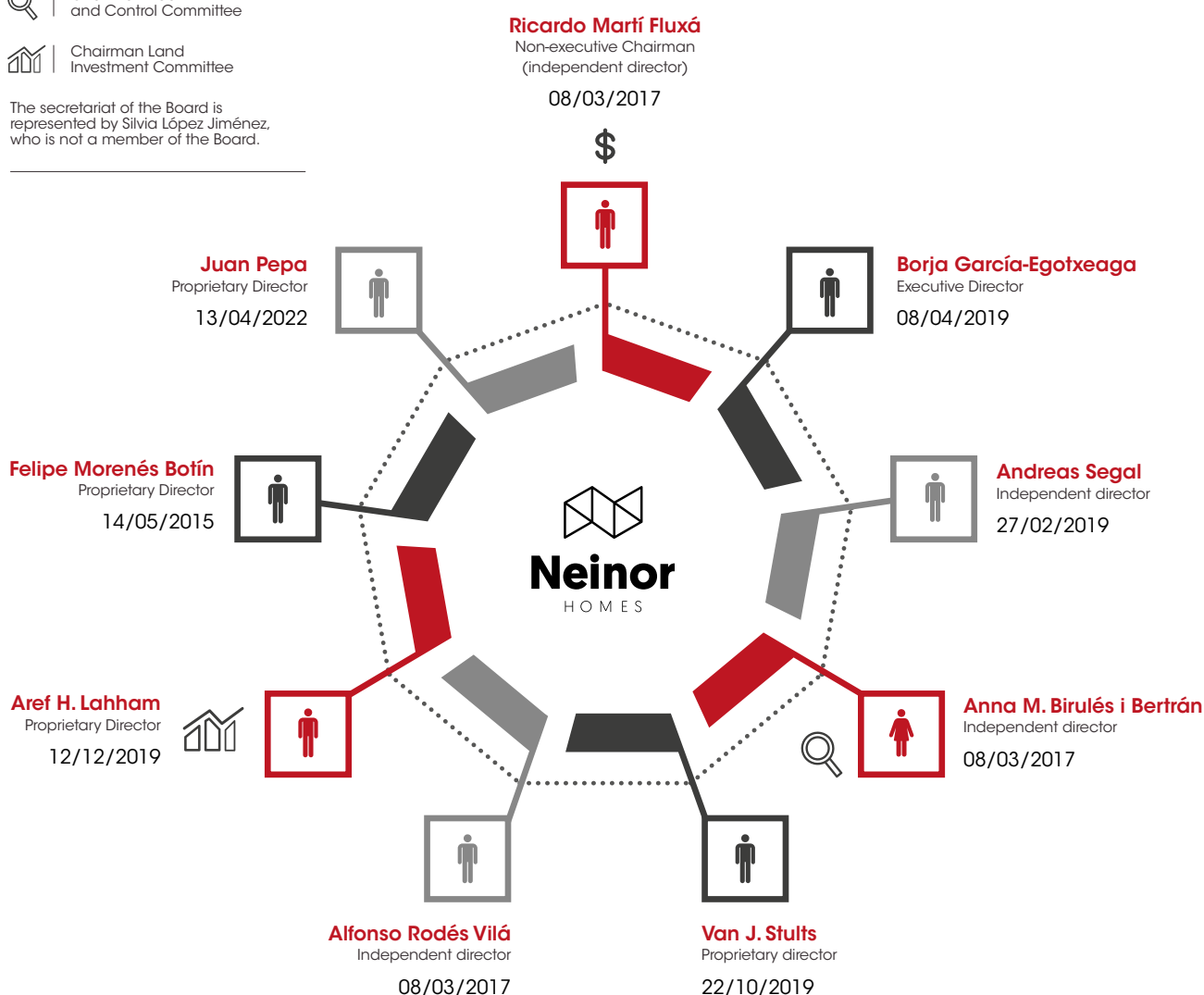
11%
WOMEN

\$ | Chairman Appointments and Remuneration Committee

Q | Chairman Audit and Control Committee

🏠 | Chairman Land Investment Committee

The secretariat of the Board is represented by Silvia López Jiménez, who is not a member of the Board.



Neinor Homes **evaluates the quality and efficiency in the functioning and performance of its Board of Directors and its respective Committees** on an annual basis, following the best national and international market practices. Once every 3 years, the Appointments and Remuneration Committee is assisted by an external expert in carrying out this evaluation, as was the case in 2020 and also that carried out in this exercise.

In the 2024 financial year, the Board and its committees were evaluated internally.

The conclusions of the external and internal evaluations of previous years were very positive, with the following paragraphs being expressly mentioned:

"Following the analysis of the results of the self-assessment process carried out by PwC through interviews with the directors, the analysis of the documentation and internal regulations, as well as the comparative analysis, the efficiency and proper functioning of the Governing Body of Neinor Homes is generally reflected, with a very positive assessment obtained in relation to the following aspects':

- Board structure, diversity of its members, internal functioning, decision-making processes, interaction with senior management, compliance policies, functioning and evaluation of committees, performance of the Chairman, CEO, Board secretary and GRC and Internal Audit Management.

"Neinor Homes maintains a solid governance model, a Board of Directors characterised by its unity, activity and dedication, with high professional and human values, which treasure complementary knowledge and experience that allows them to enrich debates and contribute to the correct and efficient functioning of the various governing bodies'.

In all the evaluations of the Board carried out both internally and externally, with the exception of diversity in terms of the presence of the gender with the lowest representation, the company has **achieved evaluations well above its competitors and in line with the best international companies** in terms of corporate governance.

Similarly, in the 2024 financial year, some opportunities for improvement were identified, such as the opportunity to work on gender equality within the board, to increase the detail and depth of the Succession Plan, to continue increasing training for the board, to monitor the results of the JVs created in which Neinor participates and, if the opportunity arises, to increase the percentage of independent directors on the Board.

In all the previous years in which an internal evaluation has been carried out, a multiple work approach has been followed with the aim of obtaining **greater visibility and objectivity**.

1

Review by internal audit of documentation and **internal functioning**, as well as measurement of the level of dedication, commitment, involvement and knowledge of the directors and analysis of the fulfilment of responsibilities.

2

Conducting a **self-assessment**: The Directors themselves evaluated and give their views on the effectiveness of the Board's performance and functioning, through anonymised questionnaires of questions prepared specifically taking into account the situation of the company and the director taking the questionnaire.

3

Conducting individual interviews: In addition to the self-assessments, individual interviews were also conducted with the four independent Directors to further enrich the evaluation results. The interviews lasted one hour, were conducted mainly through virtual meetings and the views and comments shared by Board members have been treated anonymously.

4

Corporate Governance Benchmark: Comparative analysis of Neinor Homes' Corporate Governance practices, with the aim of identifying the level of alignment of Neinor Homes' corporate governance practices with the main standards:

- **National standards**, set against the performance of comparable companies in the sector and benchmark companies in the field of good governance, as well as against the Good Governance Code of listed companies (CNMV).
- **International standards**, analysing the degree of alignment with the governance issues most in demand by major institutional investors and the main concerns of proxy advisors.

5

Diagnosis of the company's situation in terms of Good Corporate Governance based on the conclusions obtained throughout the evaluation process.

In this exercise the evaluation has been based on the experience of our team in corporate governance, knowledge of the company, comparison with regulations, review of other companies, analysis of meeting minutes, attendance at some Committee meetings, analysis and review of the documentation presented and conversations with the members of the Council.

The areas of review that have been considered have been:

Compliance with good practice

Analysis of the tone at the top, awareness of and interest in, on the part of the Board and its Committees, ethics, compliance, transparency and continuous improvement for the implementation of best practices in corporate governance.

Board Trainings

Diversity

Analysis of the number of women on the Board and its Committees. Number of foreign members on the Board and its Committees.

Experience and expertise of directors

- Analysis of the directors' sector experience based on the information contained in their CVs.
- Analysis of experience in Corporate Governance based on the number and type of Boards on which they participate other than that of Neinor Homes.
- Analysis of the training given to directors, within the framework of their membership of the Board and its Committees, in sectorial aspects and Corporate Governance.

Succession of directors

Analysis of the existence of a succession plan for the CEO and other directors.

Quality and availability of information

- Analysis of the level of adequacy and quality of the information supplied to directors for decisionmaking.
- Analysis of the availability, in due time and form, of the information supplied to the directors for decision-making.

Operation

- Analysis of the planning of the calendar of meetings and of the actual meetings.
- Analysis of the time taken to send out notices of meetings, as well as the agenda for the sessions.
- Analysis of the duration of meetings of the Board and its Committees.
- Board Effectiveness.

Composition

- Analysis of the number of members of the Board and its Committees.
- Analysis of the number of directors by type: executive, proprietary, independent and other external.
- Analysis of the number of years in office of each director.

Liaison with Senior Management and/or external parties

Analysis based on the information in the minutes of the Board and its Committees of the participation of General Management and/or external auditors in the meetings of the Board and its Committees without the presence of the CEO.

Dedication / involvement of board members

Analysis of the number of absences of directors from meetings of the Board and its Committees, also considering the analysis of non-executive directors in accordance with Art. 11a) of the Regulations of the Appointments and Remuneration Committee.

Remuneration of directors

Analysis of the use of comparative market studies carried out by external experts on directors' remuneration.

Evaluation of the different commissions

BOARD TRAINING

Neinor Homes has defined a **training plan for its Board of Directors and its Committees**, in which offers a programme of update of knowledge for its directors. During 2024, the directors have received training on the following:

- ESG strategy and sustainability regulations.
- Macroeconomic situation and evolution of the real estate sector.
- Artificial intelligence. Introduction into the real estate sector.
- Prevention against money laundering and terrorism financing.
- **Regulatory update:** Technical Guide 1/2024 on Audit Committees of public interest entities.

> DELEGATED COMMITTEES OF THE BOARD OF DIRECTORS

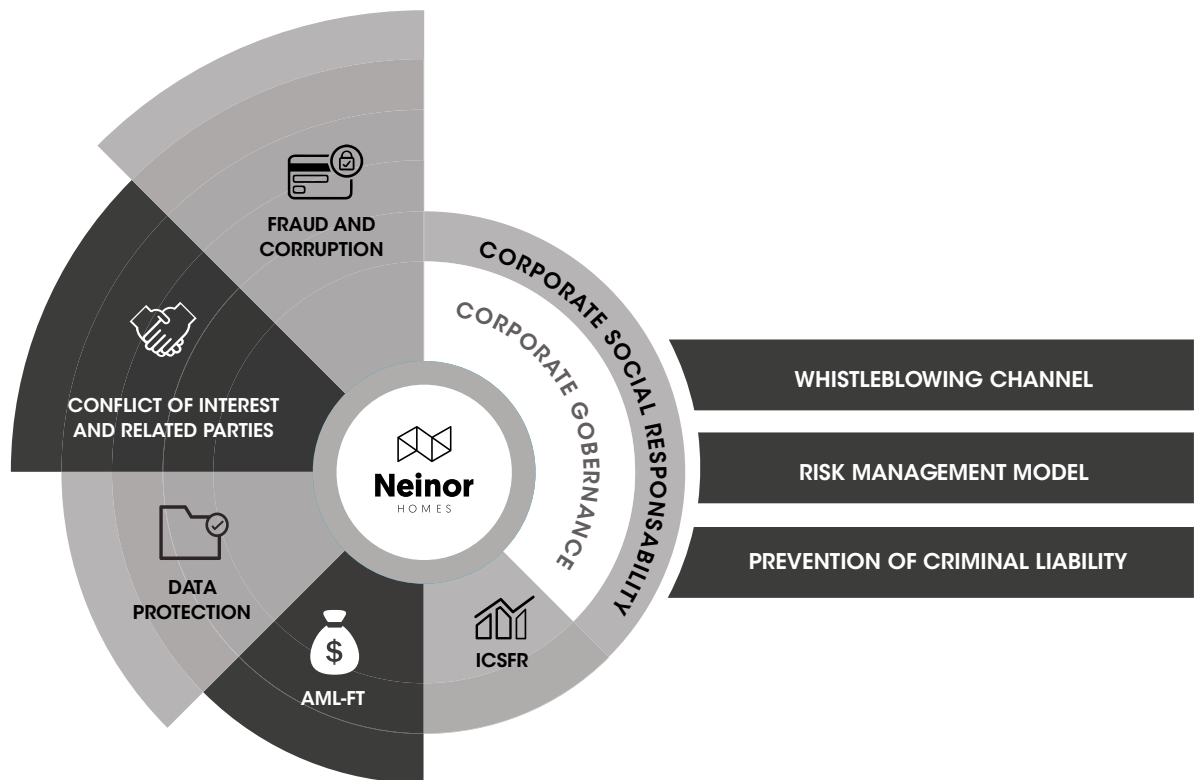
For **greater efficiency in the exercise of its functions**, the Board has the following delegated committees, the functioning of which is governed by the Regulations of the Board:

BOARD OF DIRECTORS		
		STEERING COMMITTEE Composed of the CEO, all directorates general, the territorial directorates and the head of the legal division.
Audit and Control Committee ¹	Appointments and Remuneration Committee ¹	Land Investment Committee
<ul style="list-style-type: none">• Monitor financial and non-financial reporting.• Monitor and evaluate compliance with the Sustainability strategy and practices.• Monitor the effectiveness of internal control.• Propose to the Board of Directors the appointment of the auditors.• Review the adequacy and effectiveness of the Company's arrangements for its employees and contractors to report any possible irregularities.• Oversight of the crime prevention model.	<ul style="list-style-type: none">• Assess the skills, knowledge and experience required on the Board of Directors.• Establish a representation target for the underrepresented gender on the Board and develop guidance on how to achieve this target.• Propose to the Board of Directors the remuneration policy for directors.	<ul style="list-style-type: none">• Define overall investment policies and strategies, investment objectives.• Evaluate and take the final decision on the possible acquisition of real estate assets, property developments and the financing thereof.• Analyse and monitor the company's investment performance results in relation to investment strategies, objectives, policies, standards and constraints,

¹ Bodies in which the majority of its members are Independent Directors.

6.4. A COMPREHENSIVE CONTROL, COMPLIANCE AND ASSURANCE MODEL

Neinor Homes has developed a **comprehensive Control, Compliance and Assurance model**, also called **Combined Assurance**, based on best practices in the sector and other sectors, which is a system that allows the **integration and alignment of assurance processes** so that senior management and the audit and supervisory committees obtain a **comprehensive and holistic view of the effectiveness of the governance, risks and controls** of their organisation. At the same time, it allows for **prioritisation and identification of necessary actions**.



With this system, a new integrated organisation chart was developed for the Audit, Risk and Compliance functions. With this, everything is subject to the same Governance, Risk and Compliance Management (GRC) and the main priority is the **integration of the Corporate Social Responsibility strategy** in the business, thus achieving an increase in its exposure and dissemination. With all this system, it is possible to **respond to the expectations of stakeholders**, to the requirements of legislation in terms of good governance policies and to the need to be based on an effective and dynamic risk management system.

Furthermore, thanks to the effort and excellent work of Neinor Homes' Control of Management and Controllers team, the internationally prestigious Global Chartered Controller Institute (GCCCI) awarded it the **'Excellence in Innovation in Management Control Award'**, helping to position the company as a benchmark for the transformation of the real estate sector in Spain.

This comprehensive model also establishes an **internal regulatory framework**, establishing a series of specific management models for each area (fraud prevention, anti-money laundering, ICFR, conflicts of interest and data protection and privacy) which in turn define policies, procedures and responsibilities.

MODEL	POLICIES/RESPONSIBILITIES	
FRAUD AND CORRUPTION PREVENTION MODEL	<ul style="list-style-type: none"> • Spending and reporting policy • Ethical channel management procedure • Supplier Selection, Approval and Evaluation Policy • Code of good practice for real estate brokerage 	<ul style="list-style-type: none"> • Code of Ethics • Monitoring and Control Committee • Code of Conduct for Third Parties • Complaints channel and log • Gift policy and log
ANTI-MONEY LAUNDERING MODEL	<ul style="list-style-type: none"> • AML/CFT Manual • Internal Control Body • Specific AML Unit • Practical guide to AML • KYC files: natural and legal person • Trade Compliance Form and Questionnaire 	<ul style="list-style-type: none"> • AML procedure for management of unique assets and retail • AML procedure for management of new builds • External audit
INTERNAL CONTROL SYSTEM FOR FINANCIAL REPORTING	Adaptation of the information to the contents required by the CNMV (matrix of risks and controls of the processes in operation and responsibilities assigned, accounting policies manual, evidence repository, among others).	
CONFLICT OF INTEREST AND RELATED PARTIES MODEL	<ul style="list-style-type: none"> • Conflict of Interest and Related Party transactions log • Review and approval of related-party transactions • Reporting to the Board and the Audit and Ratification Committee 	<ul style="list-style-type: none"> • Conflict of interest and related party transactions policy • Communication channel for transactions
DATA PROTECTION AND INFORMATION PRIVACY MODEL	<ul style="list-style-type: none"> • Privacy Policy • Incident Management Procedure • Stakeholder Rights Procedure • ISMS Procedure • Personal Data System Management Procedure Committee • Personal Data Privacy and Regulation 	<ul style="list-style-type: none"> • Procedure for personal data processing life cycle • Regulator consultation procedure • PIAC procedure • Information Security • Communication Channel Policy

> CODE OF ETHICS

One of the commitments and essential values for Neinor Homes in the area of good corporate governance is to **act in accordance with the strictest corporate standards in relation to ethics and transparency**, ensuring and demanding that all staff, members of the governing bodies and related entities act in accordance with the company's ethical principles and moral criteria.

In 2015, Neinor Homes approved the **Code of Ethics**, which establishes the ethical principles, values and rules of conduct that should guide the actions of all companies and individuals that form part of the company and its third-party collaborators. For this reason, all employees receive regular in-person and online training on the Code, as do some suppliers.

In addition, in 2017 the **Code of Conduct for third parties** was approved, which defines the highest ethical standards that must be met by all **third parties that provide any type of service to Neinor Homes**, and the company undertakes to publicise this Code. The **principles and values** contained therein are based on best market **practices** and the **principles of the United Nations Global Compact**.

Neinor Homes ensures compliance with human rights in all areas related to our business. To mitigate the risk of human rights vulnerability we have published on our website a code of conduct for third parties that our suppliers or subcontractors must accept and comply with, our Code of Ethics, which includes the principle of managing human rights vulnerability and the complaints management procedure which describes how to manage complaints or claims received through the company's whistleblowing channel.

In addition, we regularly review our ethical values and related policies and codes, as well as our other compliance and corporate governance policies, to ensure that they are always up to date.

WHISTLEBLOWING CHANNEL AND MANAGEMENT PROCEDURE

In 2022, Neinor Homes completely renewed its Whistleblowing Channel both to comply with regulations, with the entry into force this year of European Directive 2019/1937, and to address certain aspects of improvement detected, being more useful and secure for anyone who wants to report possible irregularities or conduct that goes against the Company's code of ethics, allowing completely anonymous communications, without the need to enter any personal data on the part of the reporter.

Although the channel is managed internally, its data is hosted on an external, thirdparty encrypted server, shielding the security of the communications received.

This communication system helps to detect and prevent risks and violations at an early stage, before they can materialise and impact the company. In this way we are also promoting a strong compliance culture inside and outside the company, in line with our Code of Ethics.

[Ethics Line | Neinor Homes](#)

The GRC, Internal Audit and ESG Department is responsible for processing and managing the complaints received, ensuring strict compliance with the Code of Ethics and promoting the use of the Whistleblowing Channel. Mechanisms are in place to ensure impartiality in the event that communications are received about the GRC Management or persons or bodies with responsibility for it.

The Board of Directors is regularly informed about the management of **complaints through the Audit and Control Committee**. In 2024, no complaints were received areas related to human rights violations, and most of the communications dealt with issues that affected our clients when purchasing their home or after purchasing it, which were included in the complaints that are allowed to be reported in accordance with the channel management procedure. All complaints were dealt with in the manner and within the deadlines established in the channel's management procedure.

During the financial year, a complaint was received relating to a possible case of workplace harassment, which was referred to an Investigative Committee following the Action Protocol against Harassment. This committee determined that no harassment had taken place, and proposed certain measures aimed at building a good working environment and resolving the situation in a friendly manner.

Neinor Homes refrains from working with third parties who do not comply with the provisions of the Code of Conduct, reserving the right to terminate the business relationship with those who fail to comply with any of the stipulated points.

Mandatory **training** is given to all Neinor Homes **employees** on an annual basis to guarantee knowledge and encourage the application of all the regulations and internal tools in force in the ethics and transparency area.

In 2024, 100% of Neinor Homes employees and those of the subsidiaries Quabit Construcción and Renta Garantizada received this compulsory annual training, which on this occasion was carried out asynchronously and concluded with a written test.

In addition, all Neinor Homes employees received optional training on developments in ESG and related regulations, introduced by the CEO and delivered by the GRC and ESG and Product and Innovation managers, which covered topics such as the new European Taxonomy, CSRD and CSDD regulations.

> RISK MANAGEMENT MODEL

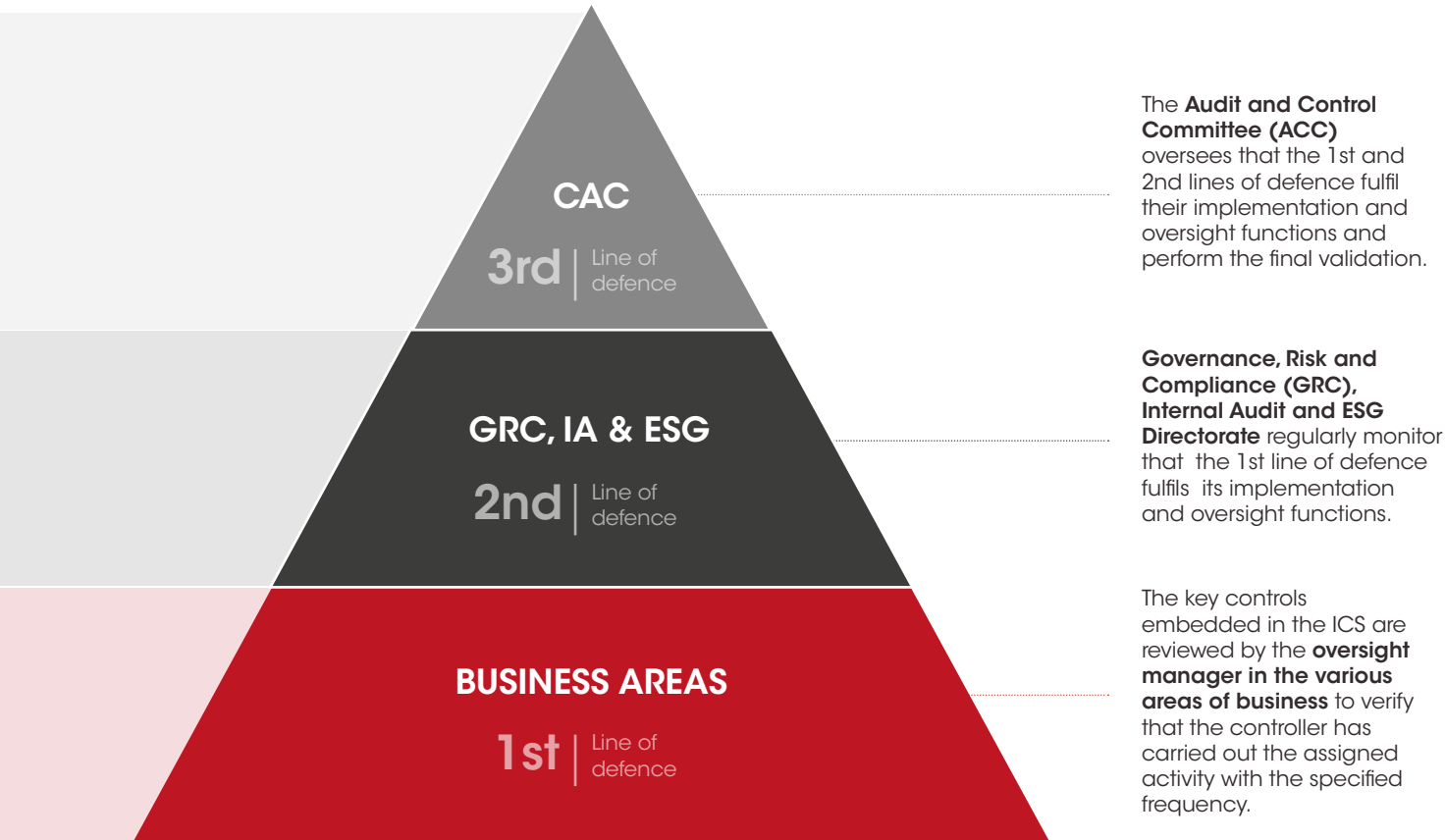
Neinor Homes continuously manages its risks under an **Integrated Internal Control System (ICS)**. This **comprehensive scorecard** associates risks with **strategic objectives, processes** and **control activities** in which those responsible for their execution and supervision are incorporated, as well as the evidence that supports the system. The objectives of the ICS are:



In order for the ICS to have **ongoing updates**, it is essential to have internal and external communication channels and to be able to count on the commitment of all those who make up Neinor Homes. **External updates** are mainly provided by legal experts, advisors, forums, networks and suppliers.

The model monitoring can be summarised in **three lines of defence**:

Neinor Homes has a management model for ongoing and dynamic risks.



The **main inputs** to the ICS are **compliance, corporate and business risks and controls**.

In 2022, as an essential part of updating its risk map, Neinor Homes has **identified its corporate risks through** an analysis of the company and the real estate sector, taking into account the experiences of Neinor Homes’ executives and other external experts in the sector. In addition, in 2023 and 2024, the company carried out a review of its corporate risks, breaking them down into those that had not changed or remained in the initial situation, such as environmental, operational or compliance risks, and those that may have been affected by the market situation and stakeholder expectations, such as financial and market risks, strategic risks and climate change risks, areas in which measures had been taken, which we explain below in the details of Neinor Homes’ risk groups.

The Internal Audit Department participates in the risk identification phase, together with the Compliance Department and all the people responsible for risks and controls in the various areas of the company. Neinor Homes has thus classified the various risks to which it is exposed **6 categories**:

1

ENVIRONMENTAL RISKS

Related to the real estate sector and the cyclicity of the business. Correlation of our sector to macroeconomic cycles. Business structure/resources not aligned to changes in the cycle / diversification of activity: Property / 1 Rental / Construction. Administrative impact of the sector. New fiscal and regulatory policies in the sector, land policies, management and licensing periods. Increased construction and land acquisition costs due to higher raw material costs and inflation. Shortage of third parties necessary for the development of our activity, such as construction companies, due to their insolvency. Changes and impact on consumer demand and the environment as a result of climate change.

2

OPERATIONAL RISKS

Management of customer expectations and satisfaction. Excessive dependence on suppliers and sometimes limited capacity of suppliers to provide in due time and form. Loss of business knowledge due to outsourcing of essential services in the value chain. Retention and succession of key persons. Inadequate adaptation to the industrial model. Being alienated from the transformation and digitalisation of the sector. Business stoppages due to external agents.

3

COMPLIANCE AND ETHICS RISKS

Failure to comply with deadlines and quality of homes delivered. Illegal acts / criminal offences established by regulations carried out by the company or its employees. Non-compliance with the rules and regulations to which the company is subject.

4

FINANCIAL AND MARKET RISKS

Management of the capital market and all those related to the fulfilment of the expectations agreed with the shareholder / market. Excessive linkage to the financial sector. Non-compliance with the margins and profit expected by investors and the market.

5

STRATEGIC RISKS

Failure to meet deadlines or cost targets for strategic (not ready for development) land development / and for land acquisition. Asset valuation and lack of discipline, consistency and reasonableness in land acquisition. Failure to meet the sales forecast in the business plan. Lack of diversification of the company's activity in a single line of business. Conflicts of interest in the strategic development and viability of the company in the long term versus expectations of investors and the market with a more short-term vision.

6

CLIMATE CHANGE RISKS

Following the main risks and opportunities identified by theTCFD (Task Force on Climate-related Financial Disclosures) in its recommendations for disclosures on climate-related risks and opportunities for financial institutions and non-financial companies, recommendations that were published in 2017 and are widely recognised internationally as guidelines on the subject. Transition risks (Political/Legal, Technology, Market, Reputation) and acute and chronic physical risks. The nature of the development activity means that Neinor Homes must assess and, where appropriate, mitigate both the risks inherent in the transition to a low-emission economy and those related to the physical impacts of climate change. See note on Environmental Impact in the financial statements.

In the financial years **2023 and 2024**, the **operational update/risk** review was carried out on those risks that the company considered to have undergone a substantial change in impact or probability. Below, we present a brief summary of the change that may have occurred in certain risk groups (considering these risks to be gross or inherent) and the measures taken to convert these risks into residual risks.

Thus, with regard to the first three risk groups, environmental, operational and compliance, although their scope had been affected by the increase in the group's business perimeter, there were no factors arising that affected the management of these risks, so the measures and controls adopted by the company were considered sufficient.

With regard to financial and market risks, there was an increase in investment risk and expectations of profitability for shareholders/investors, given the reduction in operating margins as a result of increases in production costs that were not usually supported by price increases. This, together with a low stock market valuation with respect to GAV maintained by listed real estate companies, a lack of attraction to investors in the company, with a risk of investors leaving in the short term or liquidation of the company's portfolio.

For this reason, an attractive dividend plan was structured for shareholders, articulated through the company's profits, a lower capital contribution to the projects that we will explain later, a capital reduction and an improvement in the management of financing.

Regarding **financial risks**, reaching the ceiling of the rise in interest rates at the end of 2023, with the consequent greater dependence on credit, worse credit conditions and a worse balance sheet structure motivated by leverage, the company amortised and renegotiated the current debt in the first quarter of 2024 and obtained a new green bond in the last quarter of 2024.

In relation to **strategic risks** and closely linked to the aforementioned investor expectations, an increase in land prices and reduction in operating margins required a greater capital contribution to maintain the business, a situation incompatible with the return via liquidity or value required by investors. Therefore, the company considered a series of measures to ensure effective and efficient growth in the medium and long term, mainly through business diversification (integration of construction, operational management of companies, own and third-party rental, senior living, sales operations and BTR management) and co-investment with other investors and funds through investment vehicles with a minority capital contribution, but with the operational management of these vehicles for residential development and other forms of residence.

As of 31 December 2024, the company considered that the measures taken to mitigate or eliminate both groups of risks had performed satisfactorily in terms of ensuring the company's viability and meeting shareholders' expectations.

In the last two years (31/12/2022 to 31/12/2024), the company increased its stock **market value by 106%** if we look at the valuation of the share and by **143% as total return**, considering this revaluation, increased by the dividends distributed.

Finally, in the 2024 financial year, the company focused on the review and development of climate change risks and global ESG areas, for which it analysed the risks and opportunities arising from various environmental, social and governance issues and sub-issues defined by the CSRD's ESRS 1 standard, in order to anticipate the mandatory report that the company would have to make the following year.

The basis for the preliminary record of the risks and opportunities identified has been identified internally by the company's sustainability department, also taking into account various contributions from ESG consulting companies of recognised standing.

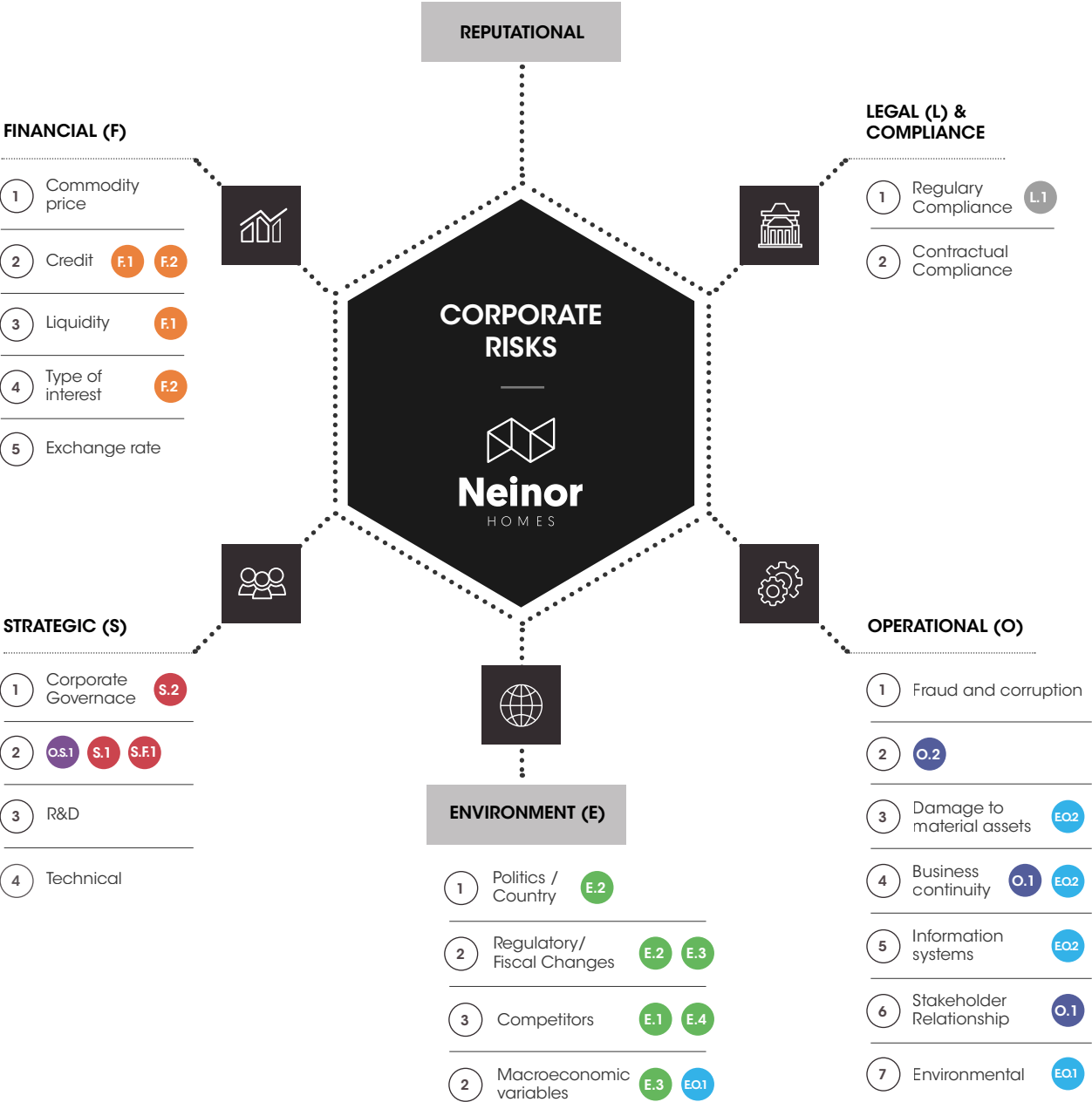
This preliminary analysis was enriched by taking into account the latest market trends, the review of regulatory and environmental disclosure frameworks, and the expectations of stakeholders, who had the opportunity to evaluate sustainability issues and express their opinion on possible issues not considered. Among the regulations and disclosure frameworks, the TCFD recommendations and Law 7/2021, of 20 May, on climate change and energy transition, stand out for the identification and assessment of both physical and transition risks. In addition, the criteria of the main rating agencies, such as MSCI and S&P Global, were considered, as well as Neinor Homes' contribution to the United Nations Sustainable Development Goals (SDGs), allowing the identification of material issues with an impact on long-term sustainability.

The definition of risks and opportunities maintains a close link with the impacts generated by Neinor Homes and its dependence on society and the environment. Therefore, during this process, the relationship between impacts/dependencies, risks and opportunities was mapped, taking into account their origin within the activities of the value chain. This exercise is crucial for defining future courses of action and establishing a well-founded strategic plan, as it allows us to know in which phases the material impacts originate and the nature of the financial effects.

As a result, a total of **76 impacts, 69 risks and 41 opportunities were identified, grouped into 37** sub-themes:

THEME	SUBTHEME
Climate change	Adaptation to climate change
	Mitigation of climate change
	Energy
Pollution	Air pollution
	Water pollution
	Soil pollution
	Substances of concern
	Substances of very high concern
	Microplastics
Water and marine resources	Water
	Marine resources
	Water discharges
	Water discharges into the oceans
Biodiversity	Factors directly affecting biodiversity loss
	Impacts on the status of species
	Impact on ecosystem services and dependence on these services
Use of resources	Resource inputs, including resource use
	Waste
Own workforce	Working conditions
	Equal treatment and opportunities for all
	Other employment rights
Workers in the value chain	Working conditions
	Other employment rights
Affected communities	Economic, social and cultural rights of groups
	Civil and political rights of groups
	Rights of indigenous peoples
Consumers and end users	Incidents related to information for consumers or end users
	Personal safety of consumers or end users
	Consumer preferences
	Social inclusion of consumers or end users
Governance	Corporate culture
	Corruption and bribery
	Whistleblower protection
	Political engagement and lobbying activities
	Management of supplier relationships, including payment practices
Specific to Neinor Homes	Alignment with European Taxonomy
	Cybersecurity

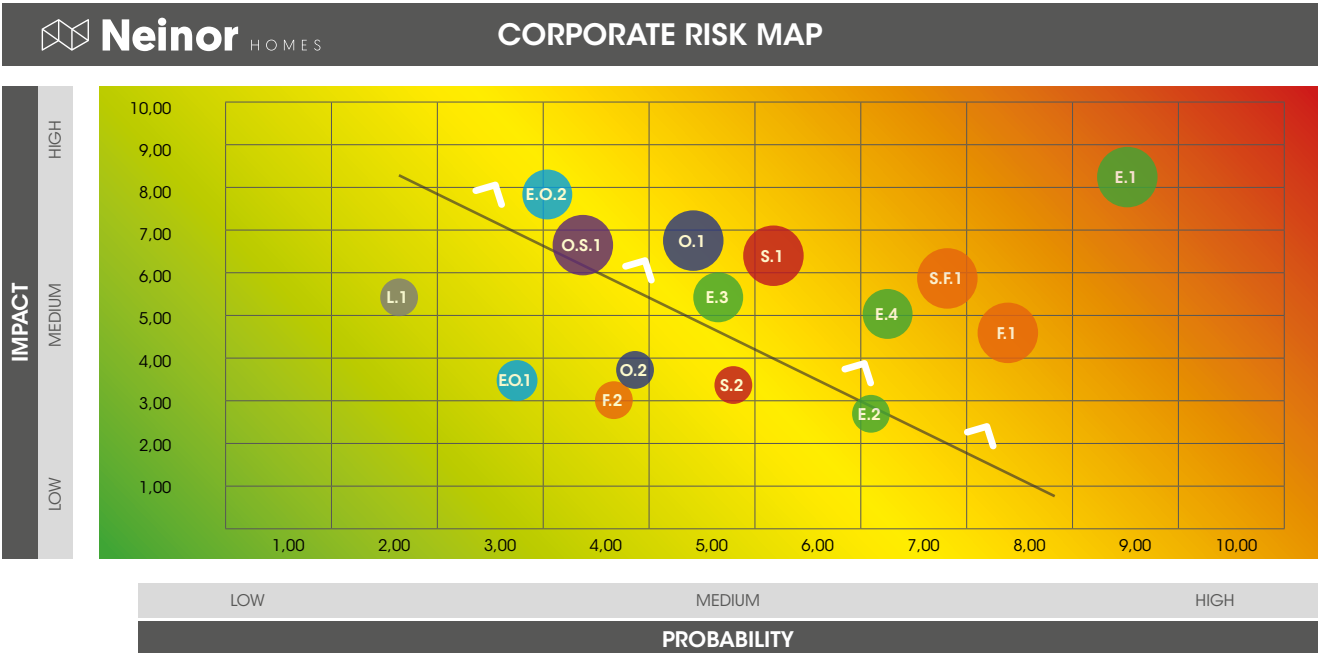
Given that the Integrated Control System (ICS) implemented is a dynamic tool, which aims to provide updated and continuous information on the possible risks faced by the company, Neinor Homes periodically compiles, from the various risk detection sources defined, the events that could become a risk, in order to facilitate their analysis and continuous monitoring and to take measures to remedy them, as well as if appropriate, the incorporation of a control mitigation activity, or the analysis of the effectiveness and efficiency of one already existing within the ICS.



The Risk Management methodology used by Neinor Homes is based on the latest version of **"Enterprise Risk Management"** (also known as COSO III), which enables the contribution of added value through the identification, management and monitoring of business risk management.

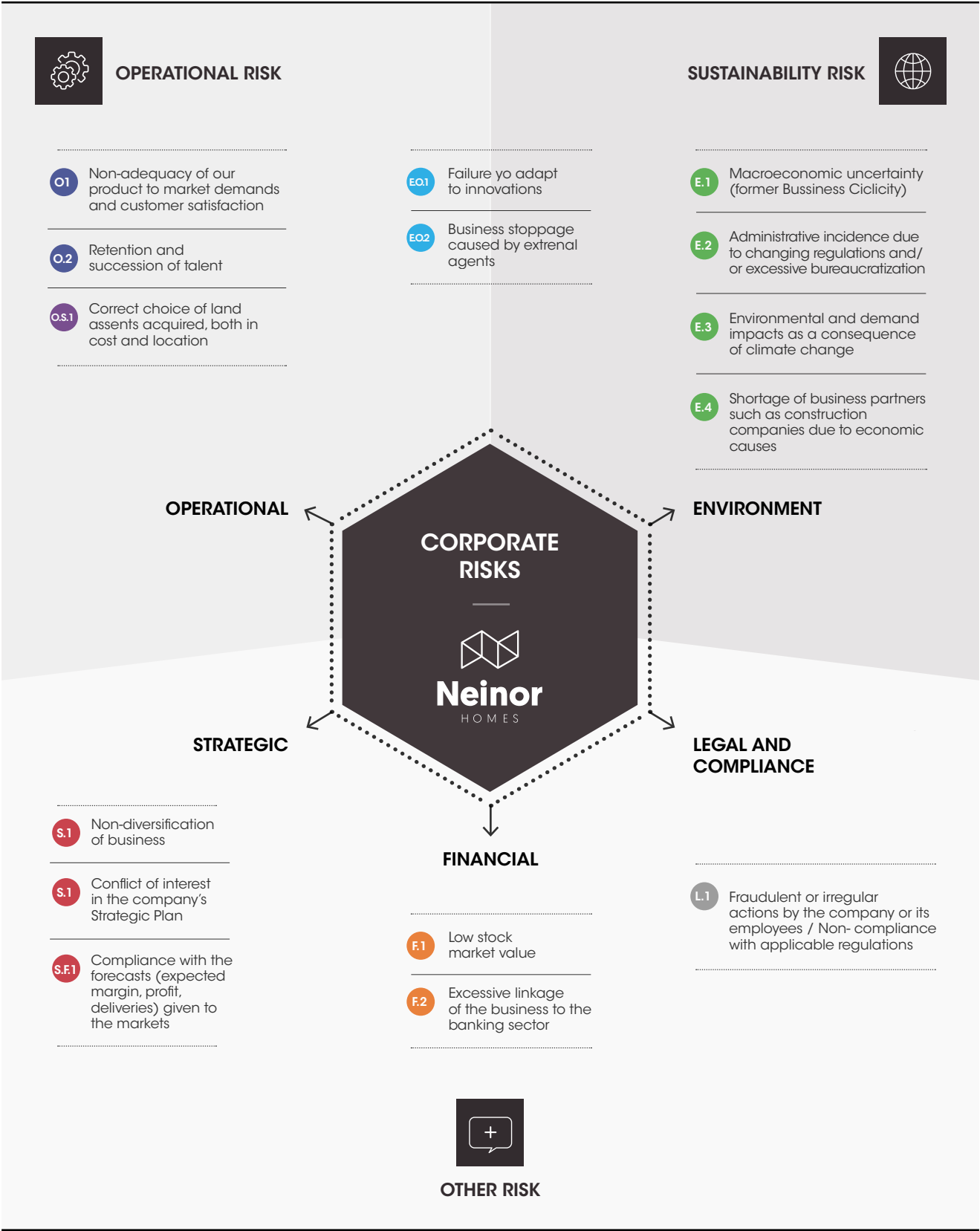
As mentioned at the beginning, Neinor Homes has updated its Corporate Risk Map three times, producing a partial review of the risks in 2023 and 2024, focusing in part on ESG risks, continuing the analysis of environmental and climate risks that the company carried out at the end of 2022, the year from which it has been analysing the physical impact of climate risks in all the company's developments (see point 8.5).

15 strategic and operational risks have been identified for the company and **classified according to their likelihood, impact and size**, thus forming the risk map.



Neinor Homes has classified the various risks to which it is exposed into 6 global categories, which are set out in Section E.3 of the ACGR.

The risks identified, for which corresponding management measures have been proposed, are as follows:



> PREVENTION OF CRIMINAL LIABILITY

All the people who form part of Neinor Homes must maintain strict observance of the legal regulations in force. In this regard, the company develops the necessary internal policies and procedures to comply with this principle and makes every effort to **prevent the commission of criminal offences** to which it is exposed in the course of its activities. In the event that any of these offences were to take place, Neinor Homes would investigate the perpetrator, cooperate in repairing the damage caused and denounce the perpetrators, cooperators or accessories.

The **Criminal Risk Prevention Manual** is the framework in which the principles of management and crime prevention within Neinor Homes are detailed and its main objective is to define the rules of action and behaviour that regulate the company's activity, as well as the control systems it has in place in order to prevent the commission of crimes defined in the Spanish Criminal Code.

If it is detected that a crime is being committed by any of Neinor Homes' managers, employees or those under its auspices, there is a **protocol that sets out the guidelines for action**.

The **Manual** and its principles are **disseminated** via the website and by e-mail to all staff. Likewise, new recruits receive it together with the Code of Ethics in the welcome pack. Finally, Neinor Homes has a **specific training plan** for the Prevention of Criminal Risks, ensuring knowledge and dissemination of the rules of conduct with regular training and an aptitude test on their content.

> ZERO TOLERANCE FOR CORRUPTION

Neinor Homes applies the principle of “zero tolerance” towards corruption. The company’s commitment against corruption and bribery is materialised through the provisions of the Code of Ethics and through the **Anti-Corruption, Fraud and Bribery Policy**, both documents published on the website.

ANTI-CORRUPTION, FRAUD AND BRIBERY POLICY

This governs and prohibits the following cases:

- Making and offering gifts, favours and services on advantageous terms.
- Receiving and soliciting gifts, favours or services on advantageous terms.
- Donations, sponsorships and other non-profit contributions: Donations made must have a social purpose and must be earmarked for entities with an acknowledged track record. All donations must be reported to the Compliance Department.
- Professional meetings, congresses, conventions, seminars and other events: attendance at these must be authorised by the Compliance Department, which keeps a record of the expenses incurred.
- Trading in influence: it is prohibited to exert any kind of influence on a public official for the purpose of taking advantage of the exercise of the powers of his or her office.
- Recruitment of advisors, agents, intermediaries and suppliers: this must be subject to a verification and valuation procedure and their remuneration must be in line with the market.

Employees and members of the governing body periodically confirm their commitment to complying with the Code of Ethics and group policies, with specific training provided in 2024 for employees and Directors. In addition, new hires are provided with both confirmation documents and specific ethics and compliance training upon joining the company.

> CONFLICT OF INTEREST MANAGEMENT

At Neinor Homes there is a **Policy for Managing Conflicts of Interest and Related Party Transactions** that is applicable to all parties concerned and that establishes the criteria and procedures for approving transactions involving related parties, which is defined as when one of the parties has significant influence in the financial or operational decisionmaking of the other.

Other types of transactions that may involve a conflict of interest are those carried out by the company with companies related to directors and/ or members of senior management. These transactions are reviewed internally by the Internal Audit Department, and these persons confirm such transactions in a declaration.

The GRC management shall keep a **register of related-party transactions and conflicts of interest** and shall report annually to the Audit and Compliance Committee and the Board on transactions carried out under the terms established, requesting explanations from the directors, should they deem it necessary. In addition to all the analyses carried out on conflicts of interest and related parties, 4 full investigation reports on conflict of interest transactions were carried out this year.

In line with the company's strategy of co-investing with partners for the development of housing developments, due to the materiality of these operations and the implications that an alliance with partners who do not share the same performance guidelines in terms of matters such as regulatory compliance, business ethics or the fight against corruption and criminal offences could have for Neinor Homes, the GRC Department has developed and implemented the **Potential Investor Self-Assessment Form**, which all potential partners must complete. The self-assessment form requires information on topics such as their economic activity and their development in **areas such as compliance, business ethics, human rights, environmental management and cybersecurity**.

Once the completed form has been received, **the GRC Department performs independent due diligence on these potential partners** and subsequently, if there are indications of compliance risk, prepares an **Internal Assessment Report** presenting the conclusions obtained and associating a risk level to each potential partner, issuing a recommendation of nonassociation with the investor if the risk is unacceptable.



Are any of the directors or executives of the potential investor relatives, related to, or have any conflict of interest with any employee, executive or director of the Neinor Homes Group? (If yes, please identify)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does the company or fund conduct employee training on ethics, sustainability, corporate governance and/or compliance?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does the society or fund have a policy or public statement that expresses its commitment to respect human rights?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are there independent bodies or departments within the company or fund that perform internal audit and/or compliance functions?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does the society or fund have a policy or procedure against discrimination (on the basis of sex, race, religion, etc.)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does the company or fund have a sustainability or environmental policy?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does the company or fund have a team or individual responsible for managing cybersecurity and responding to incidents that may occur?	<input type="checkbox"/> Yes <input type="checkbox"/> No

> ANTI MONEY LAUNDERING AND COMBATTING TERRORIST FINANCING

Neinor Homes maintains a firm commitment to anti money laundering and combating terrorist financing (AML/CFT), with an **AML/CFT Manual** that establishes rules that all members of Neinor Homes and its external sales agents must be cognizant of and strictly comply with, as failure to comply with it could result in the corresponding disciplinary or employment sanctions. It is the responsibility of each member to be familiar with it, and the company also provides face-to-face and online training for both employees and sales agents, in which attendance must be duly accredited and a test of the knowledge acquired must be passed.

The **Anti Money Laundering and Combating Financing of Terrorism Model** is monitored by an in-house internal Control and Communication Body, with the Board of Directors being the most senior body responsible.

In addition, and in order to comply with the relevant regulations, an annual internal and external audit is carried out. It should be noted that, in all the mandatory annual reviews carried out by external experts, the conclusions have been unqualified, with the overall conclusion being that 'the Neinor Homes Group has an adequate, efficient and constantly evolving and improving model for combating money laundering and the financing of terrorism'. The audit reports carried out by AENOR also highlight as strengths the 'support in terms of PBC/FT in the marketing and delivery processes, as well as the training provided to these internal and external channels. Development of guidelines and procedures', also being a benchmark for companies in the sector.

Similarly, the PBC/FT Unit is engaged in a process of continuous improvement with a view to implementing measures that will allow for greater control, effectiveness and efficiency in the procedure. Of particular note during 2024 was the creation of a WF for the formalisation of new construction operations, with a view to avoiding the mass sending of emails and ensuring that the documentation is integrated directly into the company's control module (Prinex). This procedure will be implemented in the first quarter of 2025.

The Prevention for the Prevention of Money Laundering and Financing of Terrorism is audited annually.

In addition, we carry out an annual Risk Self-Assessment Report to gain a more effective understanding of our customer typology, with a view to adapting our AML mechanisms accordingly.

In 2024, the AML Unit analysed a total of 3,420 transactions, including both assets registered during the year and assets for which a reservation or sale and purchase contract has been signed and not yet delivered, as well as housing and other assets (garages, land, etc.). Of these 3,420 transactions, alerts were generated for 1,216, for which the AML Unit carried out enhanced due diligence, increasing the requirements necessary to be able to approve their formalisation.

With regard to the homes delivered during the year, the AML Unit again analysed the situation of the customers prior to and close to the deeds, the situation of a total of 963 operations, in order to request the necessary documentation to ensure that they continued to comply with current legislation on AML/FT, and thus detect possible alterations since the date of reservation of the home.

Promotion **Santa Clara Homes**



> DATA PROTECTION, CONFIDENTIALITY AND INFORMATION SECURITY

Neinor Homes is aware of the importance of the **confidentiality of the information** that it handles on its customers and those working with it, which is why the Code of Ethics establishes the obligation of all professionals not to disclose, cede or distribute confidential and sensitive information.

In addition, Neinor Homes has a Privacy Policy on Personal Data Protection which sets out the different uses of personal data and the purposes for which the company uses them. There is also a **Procedure for the fulfilment of the rights of data subjects** approved in March, 2018, which provides the minimum guidelines necessary to ensure that data subjects are provided with the necessary mechanisms to exercise their rights with respect to the processing of their personal data.

Neinor Homes has a Data Protection Officer (DPO), responsible for supervising, coordinating and disseminating the data protection policy both inside and outside the company.

A voluntary data protection audit similar to the one carried out in 2023 is planned for 2025, in order to assess the status of the recommendations made in that audit, and to review the group's situation in this area, following the changes in it with the entry of Habitat into the capital.

In this regard, aware of the **importance of raising awareness** of data protection and cybersecurity. In 2024, **specific training courses were again provided for employees and users of the Neinor Homes network** in both areas. In addition, specific training on cybersecurity has also been given to the Board of Directors. Furthermore, simulations of phishing attacks are carried out on an occasional but recurring basis.

Neinor Homes considers **cybersecurity** to be a key part of its digital strategy and has **ISO/IEC 27001** certification that guarantees the robustness of the information security management system, whose validity and compliance is reviewed annually by an external expert.

The **Regulatory Framework** of the Neinor Homes Information **Security Management System** aims to achieve adequate protection of information assets, preserving the security principles of **confidentiality, integrity and availability**. Furthermore, in the event of a possible threat of cyber-risks, Neinor Homes has developed a **Cybersecurity Management Model** that aims to guarantee the protection of assets, operations and the integrity of information. The security requirements and objectives are determined by the **Information Security Committee**.

Neinor Homes
has the



certification.

In 2024, an internal audit of the ISMS was carried out, in accordance with the Audit Plan approved by the Commission, which evaluated the system's compliance status with ISO 27001, also reviewing the status of the incidents detected in the latest controlled penetration tests, which were again carried out only on those systems with possible risks or vulnerabilities to a potential attacker.

The result of this audit has shown an **improvement with respect to the observations made in the audit carried out in 2023**, with those aspects that posed a potential risk at the time of the audit being solved immediately, and no new issues of relevance being found.

Throughout the year, several controlled phishing tests were carried out on company employees using social engineering techniques, in order to alert and raise awareness of possible real attackers who could try to access corporate servers or obtain sensitive information.

➤ INTERNAL CONTROL SYSTEM FOR FINANCIAL REPORTING

Neinor Homes has various mechanisms that make up the **internal control and risk management systems in relation to the process of issuing financial information (ICSFR)**. The implementation of this ICSFR is the responsibility of the company's own business areas, which are in charge of putting into practice the control mechanisms and activities to ensure the reliability of the company's financial information. For its part, the Board of Directors oversees the proper development and implementation of the system, with the support of the Audit and Control Committee.

The General Financial Management is responsible for the preparation of financial information, although all areas of the company must ensure the **transparency and veracity** of the information handled and supplied to the market.

In addition, Neinor Homes voluntarily submits the information relating to ICSFR included in its annual Corporate Governance Report to an **independent external verification**.

In addition, the effectiveness and model of the ICSFR is reviewed each year by Internal Audit. In the current year, an internal assessment has been carried out on the compliance of the ICSFR in terms of the development, design, effectiveness and functioning of the existing controls and the need to redesign some of them.

In relation to the control of tax risks, Neinor Homes has adopted the necessary control mechanisms to ensure compliance with tax legislation as part of appropriate business management. It also dedicates adequate and sufficiently qualified human and material resources to this end.

In particular, in the tax area, on an annual basis, the entity's head of tax matters reports to the Board of Directors, either directly or through the audit committee, on the tax policies applied by the company.

In tax matters, Neinor Homes ensures strict compliance with the tax regulations in the various territories in which the Group operates, paying the taxes that are payable in accordance with the legal system on the basis of a reasonable interpretation of the applicable regulations, without prejudice to any legitimate disputes that, in accordance with its policy of good tax practices, may arise with the tax authorities regarding the interpretation of the applicable regulations.

In relation to tax risks, Neinor Homes has implemented control mechanisms to ensure due compliance with tax regulations and its commitment to the application of good tax practices, in particular:

- Approval of tax criteria in line with the company's tax policy and its commitment to the application of good tax practices. These criteria are reviewed and validated annually by the head of tax matters;
- Ongoing monitoring and control of the proper implementation of the agreed criteria. Such monitoring is carried out both internally, by those responsible for tax matters, and externally, by an independent tax expert;
- On a regular basis, the head of tax matters of the entity reports to the Board of Directors on the outcome of the tax risk control mechanisms.

“

On an annual basis, all employees are informed of changes to our compliance, ethics and internal control codes and policies. In addition, each employee receives a packet of letters to confirm receipt, understanding and acceptance of these codes and policies.

”

07

WE OFFER A
**PERSONALISED
SERVICE TAILORED
TO THE NEEDS
OF THE
CUSTOMER**



We are aware that our customers rely on us for one of the most important decisions of their lives, and that is why **we take great care** in the service we provide. In all our processes we try to continuously improve by applying new technologies and implementing specific measures aimed at greater satisfaction.

Neinor Homes' commitment to customers is total and is its main raison d'être, with **customer-oriented quality** as its hallmark and seeking to achieve customer satisfaction as its main objective. For this reason, it always strives to offer excellent customer service that meets the real expectations of its customers, so that they become the best ambassadors of the Neinor Homes brand.

A customer-centric culture must be at the heart of our Company and therefore the objective on which to base our strategies for growth both internally and externally.

We have various **measures aimed at getting to know better the customers** who are interested in Neinor Homes:



We have implemented **CRM and Customer Centric** tools that are unique in the real estate sector and allow for a very detailed knowledge of the customers. The aim is to build developments that are more in line with what customers expect from their homes.

For Neinor Homes, each customer is unique and we offer a **personalised service**, endeavouring to be their travelling companion at all times and keeping them continually informed. Furthermore, Neinor Homes designs all its projects with the customer's needs in mind and for all its developments it carries out a thorough prior analysis of the market and the target buyer.

Aware of the importance of sustainability and energy efficiency for our customers and the arrangements that must be made when they move into their new home, Neinor Homes has made available to customers the **PAPERNEST service, a free service to help with the contracting of individual utilities**, with the aim of speeding up the move into their new home as much as possible. Neinor Homes assumes the costs of this service, avoiding the days established by the companies to activate the supplies.

In turn, when the homes are handed over, the company offers customers the possibility of scheduling meetings with them to provide them with training and advice on the correct use of home automation, domestic appliances and the rest of the systems installed in their homes, so that they are aware of how they work and can optimise energy consumption.

These actions are complemented by the service provided by **HOBEEN**, a company dedicated to home energy management, so that once the property has been registered, the client has access, completely free of charge, to their innovative app, where they can consult their utilities usage, and optimise and save to contribute to the environment with a more sustainable **management of their home**.

By the end of 2024 Neinor Homes had more than 24,452 customers.

> VALUE-ADDED SERVICES



FAMILY HOMES PROTECTION (FHP) INSURANCE

Neinor Homes was the **first developer to offer a payment protection insurance policy for its customers that covers the capital outstanding on the property** from the signing of the purchase contract until the 1 keys are handed over, in the event of death due to accident or absolute permanent disability (IPA) due to accident. It also insures the payment of the outstanding periodic amounts, with a maximum of 6-12 monthly payments, in the event of involuntary loss of employment, temporary disability or hospitalisation.

In 2023 we incorporated a new insurance, which has been offered free of charge to the customer, covering absolute permanent disability and death for any cause of the purchasers (including non-occupational accidents). In this way, their heirs receive help to be able to pay for the property.

> PERSONALISATION OF HOUSING

For Neinor Homes it is essential that the user is satisfied with their own home. For this reason, it offers the possibility for the customer to **personalise their home** to their taste with a predefined catalogue to adjust it to their needs.

To manage this, there is a process that allows personalisation to be carried out systematically. Neinor Homes offers customers a series of alternatives that they can see physically at the points of sale or through the NEX website where their options appear, and they have the option to save, modify their selection and, once confirmed, formalise their choice with the sales team.



STANDARD CUSTOMISATION

The proposals are divided into 3 core packages:

- **Bathrooms:** there is a choice of two possible alternatives for the layout, if the bidet is to be removed or kept, and if the bathtub is to be replaced by a shower tray.
- **Kitchen:** there is a choice of two possible alternatives for the layout, and the combination of furniture and kitchen worktop from three possible options.
- **General housing:** the flooring is chosen from two options and the wall paint from three possible shades.
- **Always adjusting to the marketing plan and commercial needs of each branch.**
- **Standard customisation** is always offered where possible based on technical feasibility.



WITH-COST PERSONALISATION PACK

In some developments, due to commercial needs, customers are offered more advanced personalisation options in the form of packs at a cost.

SOME OF THE POSSIBLE PACKAGES ARE:

- **Home Automation Pack:** Allows home automation at a cost depending on commercial needs.
- **Partition Wall Pack:** Allows elimination of the partition wall between the kitchen and living room to unify the spaces.

The Commercial Department, Neinor Experience, Product, Personalisation Manager, and the Technical Team of the construction participate in the **process of personalising** the homes in order to coordinate the customer's choice.

7.1. NEINOR EXPERIENCE

Neinor Experience is the **exclusive customer service** offered by Neinor Homes to all its customers, to accompany them from the moment they sign the reservation of the property until the keys are handed over and the subsequent after-sales service, guaranteeing maximum transparency. Customers can request information by e-mail or telephone. In addition, a newsletter is sent every month informing them of the progress of the construction work. All this is coordinated by a Neinor Experience manager in each development, who can also respond to the customer and look after their interests whenever necessary.

The services offered by *Neinor Experience* can be broken down into 7 stages that occur during the purchase of a home:



WELCOME PACK WITH THE RESERVATION

When the client signs the Reservation Contract, the Neinor Experience service is activated, sending a Welcome email, explaining each of our areas:

- Access to the website and the Neinor Experience App, which includes content on the project, the team involved in the project, the home, documents, information on financing, consultations, surveys, etc.
- Neinor Experience personal manager's contact details: email address and telephone number.

COMMENCEMENT OF WORKS/ MANAGEMENT OF THE CONTRACT OF SALE

The process of signing the Sale and Purchase Contract begins with the customer, where they are informed of any possible changes to the project and the **monthly Newsletters** are sent out which contain:

- Description of the monthly status of the work.
- General progress of the development.
- Details of the construction site including information on any construction process of interest or commercially relevant information on the development.
- Photos of the progress of the work in that month and the degree of progress by chapters.
- Corporate news about Neinor Homes.
- Culture Experience: cultural events in the city or province where the development is located.

PERSONALISATION OF THE HOME

Once the work on site has progressed and specific established milestones have been reached, the choice of customisation materials will be scheduled. All customers who have signed a Purchase and Sale Contract will be informed of the process and the NEX website will be enabled so that this milestone can be carried out together with the Marketing Company.

COURTESY VISIT PRIOR TO HANDOVER

Close to the handover and the signing for the property, Courtesy Visits are carried out with the customer. For this purpose, an agenda will be set up on the Neinor Experience website, where each customer will select their appointment and they will receive an explanation of what the visit will consist of in order to meet their expectations for their first contact with the properties they have purchased.

MONITORING THE HANDOVER PROCESS

- Coordination and management of the entire process with all the parties involved, ensuring that the established deadlines are met and that all the documentation required to complete the transaction is correct.
- Control and monitoring of the state of the property for its correct handover and signing.

OTHER ACTIONS

Satisfaction surveys. Several satisfaction surveys are conducted at various milestones of the developments:

- App / Reservation / Buying and selling / Showroom / Courtesy Visit / Signing.

The Covid-19 pandemic changed the way we interact with our customers, digitising part of our procedures:

- Virtual tours to learn about housing developments.
- Online reservations.
- Electronic signatures of documents.

In 2024, **519 buyers were protected** under Neinor Homes policies against possible contingencies that would make it difficult to continue paying for their future homes:

- **FHP** insured 300 purchasers against unemployment, temporary disability or hospitalisation.
- **Vidacaixa** insured against absolute Permanent Disability and Death from any cause 159 buyers, with their heirs receiving assistance to help them pay for the property.
- **Coverliving** insured 60 buyers so that they could meet their mortgage or any other type of financing, including personal and family loans, in situations of unemployment, temporary disability or hospitalisation due to accident
- Payment flexibility

"Chosen Best service Attention to Customer 2025", in the category of Promoters Real estate.

We promote the digital transformation of the real estate process, in which the use of new technologies is key.

One of the strengths of **Neinor Experience's Customer Service** department is to have ascertained the **Customer Satisfaction Level** in order to implement corrective measures in the areas that need it.

To do this, certain parameters are measured at significant milestones in the homebuying process, in order to close the interaction circuit with the customer and determine whether all the dealings with the customer have been effective in generating the planned level of satisfaction.

The Company's overall figures for 2024 were as follows:

- Average CSI data **for the year: 3.40 out of 4 (3.34 out of 4 in 2023)**

The milestones on which we assess customer satisfaction are:

- App/Reservation/Showroom/Courtesy Visit/ Signing

Covering the whole process, from the moment the customer signs the reservation contract until he/she has been living in the property for a year.

In addition, Neinor Homes has reached a collaboration agreement with **Papernest**, a leading company in supply contract management, to provide customers with a **free sign-up service**, designed to facilitate their experience and save them time and effort.

This means that when the time comes to hand over the property, the customer does not have to worry about managing these services, as they have the following benefits:

- **The best price and without a fixed minimum term:** Endesa, TotalEnergies, Holaluz, etc.
- **A fast sign-up process** instead of having to spend an average of 8 hours on the phone to manage all the necessary formalities.
- **Faster activation** of household meters. This will allow for earlier availability of active and available supply.

Accessible at
www.neinorexperience.com
or via the App.

Neinor Homes has reached an agreement with Hobben, a company dedicated to home energy management. Once the property deeds have been registered, **the customer will have access, completely free of charge, to their innovative app**. They will be able to consult consumption, learn how to save in a quick and simple way and contribute to the environment with **a more sustainable management of their home**.

They will be able to **analyse their consumption by the hour, by the day and by type of device** to identify their highest consumption. They will learn to save energy and enjoy a more sustainable home, avoiding surprises.

In addition, the customer will be able to find out the price of energy and compare the best offers on the market. At the end of the year, an energy **audit of their home** will be carried out to find out if the power rating of their contract and the type of tariff are suitable for the needs of their home and if there are better options.

We work hard so that the customer can recommend our Company to his/her circle of acquaintances, since a satisfactory experience is also a recommendable one.

Our motto, customer satisfaction, can be defined as the feeling or attitude of the customer towards a product, company or service provided by the same, working to ensure that these three points meet customer expectations.

For the second year running, Neinor Homes has won the **award for Leaders in Service, 'Voted Best Customer Service 2025'**, in the REAL ESTATE DEVELOPERS category. Organised by Sotto Tempo, the main objective of this important award is to recognise and reward excellence in customer service in leading companies from various sectors at a national level, with previous winners including Samsung, Bosch, Leroy Merlin, Lidl, Hacer, DHL, Aegon and Eroski.

Specifically, **the quality of our Customer Service in the Pre-Sales and NEX Call Centre area has been recognised, achieving the highest rating of all the companies evaluated** in our category with a score of 9.83.

Active listening, response time and quality of service received were among the aspects taken into account in the final weighting and deliberation.

The results were measured based on 220 Mystery Shopper tests and 2,000 satisfaction surveys conducted through phone calls, emails, web interaction and social media, among other channels.

> COMMUNICATION CHANNELS OF
NEINOR EXPERIENCE

Neinor Homes offers its customers a wide range of two-way communication channels:



For each development there is a specific email address where the customer can contact the Neinor Experience manager directly, and through which the Neinor Homes staff responsible for the development can make personalised contact, or generic contact through press releases, to provide information on the progress of the development.



The **Neinor Experience website**, through which customers can consult the progress of everything related to the purchase of their home. Each customer has a **private web area** where all the documentation relating to the purchase can be found.



The monthly **newsletter** which includes a section called "the construction work in detail". As well as current news about the company.



The **Neinor Responde channel** is a corporate service offered to all non-new-build customers. It is a telephone consultation service via an internal un **call center**.



Neinor Experience call center service to answer customer incidents. During In 2024, 88,961 incidents have been resolved with an average response time of 1 minute.

MAIN FIGURES FOR 2024

44,687

Sessions on the
Neinor Experience
website

6,793

New contacts

1,026

APP
downloads

7.2. COMPLAINTS AND CLAIMS HANDLING

Neinor Homes acts with due diligence when faced with complaints and claims from its customers, having **specific procedures** in place and enabling **various accessible channels** through which the complaints received are logged and those responsible for their resolution are assigned. Understanding and evaluating customer complaints and claims is an opportunity to gain a more accurate understanding of their expectations and needs, allowing for progress and continuous improvement.

Likewise, once the title deeds to the properties have been signed, **after sales claims** begin, due to problems in the operation of the installations and faults in the finishes due to small knocks or stains on the paintwork, wood, etc. In this case, an agent will arrive to take note of the incidents, always before the customer moves in and, if possible, with sign-up to the various utilities already done.

The Neinor Experience manager of each development is in charge of processing all incidents registered through the **call centre** or the **exclusive email of the development**. In the case of urgent incidents, the incident is strictly monitored until it is completely resolved. All other incidents are handled on a case-by-case basis.

The improvement of digital transformation, which was accelerated by the COVID-19 pandemic, allowed the creation of pre-sales and postsales records during the same visit to the property in an agile way (with photographs and documentation), from a smartphone or tablet.

In 2024
Neinor Homes
received 88,961
communications
with an average
response time of
1 minute.

NEINOR HOMES AFTER SALES SERVICE

Neinor Homes establishes guarantee periods to attend and respond to customer recommendations, in compliance with current regulations

Finishes: 1 year from receipt of the construction

Installation faults, appearance of **dampness** or leaks:
3 years from receipt of the construction

Serious errors in the **structure**:
10 years from delivery of the dwelling

ENVIRONMENTAL IMPACT.

THE HOMES WE BUILD WILL
HAVE NO ADDED VALUE IF
WE FAIL TO THINK ABOUT
THE ENVIRONMENT WE ARE
LEAVING BEHIND FOR
THOSE WE CARE FOR.





In the design of our homes we take into account **demanding quality, sustainability and health criteria** so that our customers enjoy a product that they are satisfied with and allows them to live better. The environmental impact of our activity is non negotiable; it is one of our priorities in our decision-making.

According to UN figures, in total, the building sector typically produces around 40% of global energyrelated CO₂ emissions, if emissions from the construction industry and emissions linked to the operation of buildings are taken into account. These emissions have been increasing in recent years.

At Neinor Homes we believe that rising emissions in the buildings and construction sector clearly show an urgent need for a three-pronged strategy to aggressively reduce energy demand in the built environment, to decarbonise the energy sector and to implement materials strategies that reduce life cycle carbon emissions.

In addition, on an environmental level, we must not forget other factors that directly or indirectly have a significant influence on climate change and the emission of greenhouse gases, such as the circular economy, the use and exploitation of water or pollution in general.

In the following sections we will see how all these aspects are being managed, using a very procedural model, reaching agreements with third parties and carrying out a thorough risk analysis.

8.1. HOUSING EXCELLENCE AND QUALITY MANAGEMENT

The **quality of homes is a priority** for Neinor Homes, one of its main hallmarks and a source of pride. This responsibility begins before designing and building, through a process of market research. This is the only way to create innovative 21st century homes that are excellent in design and quality, and above all, sustainable.

Neinor Homes has an **Environment, Quality and Innovation Policy** that establishes the principles that have to guide the company's activity in terms of quality, minimising environmental impact and promoting innovation. In this regard, in 2024 the company continued for the eight year with the maintenance of the AENOR ISO 9001, ISO 14001 and UNE 166002 management certifications. Work has been carried out to improve procedures that directly involve the company's value chain, seeking out inefficiencies in processes and better work methodologies.

With the premise of achieving maximum quality and sustainability, Neinor Homes applies a **process of Research + Listening + Development** in the launch of all its developments and in the construction of its homes, which is a differentiating factor compared to the competition.

Therefore, after selecting the best ready-for-development plots, all developments begin with an indepth **analysis of the physical environment, an analysis of demand** and a market study to define the product to be offered in each development. **Benchmarking** is also carried out in other sectors to detect solutions that can also be implemented in the real estate sector.

Once the research and listening process has been carried out, the project is defined, adapting it to the demand and studying its **technical, social and environmental viability**, taking the utmost care with quality, after which construction begins. **Interaction with the customer** is present throughout the entire life cycle of the home.

CHARACTERISTICS OF NEINOR HOMES DEVELOPMENTS

- **Economy of maintenance:**

design, careful selection of materials and innovative technological solutions allow for savings in long-term maintenance costs.

- **Habitability and functionality:**

maximum use is made of every metre of floor space.

- **Attractive:**

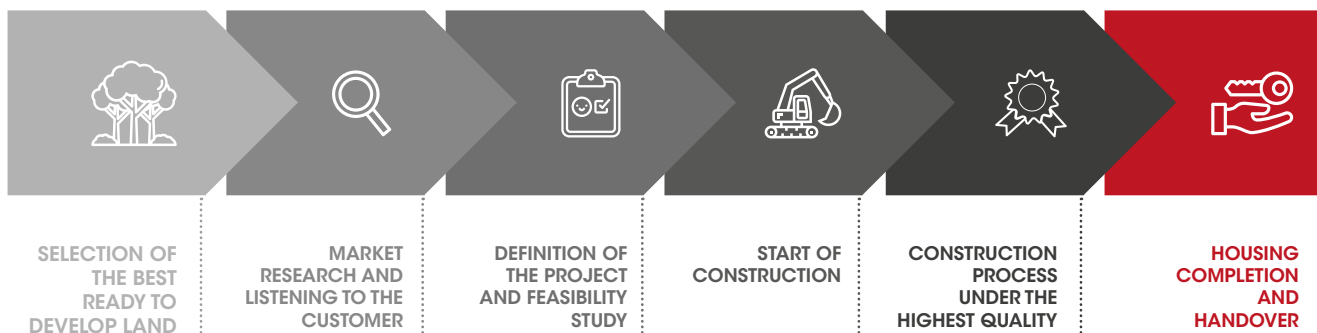
homes that adapt to the new lifestyle and environment in which they find themselves.

- **Acoustic comfort:**

thanks to the exterior insulation and interior layout.

- **Security:**

healthy and safe homes in the face of natural hazards.



> QUALITY IN HOUSING THROUGH THE WHITE BOOK

Neinor Homes is a pioneer in the development of a **design and construction manual** called the **White Book**. The main objective of this manual is to **standardise the quality, sustainability and design parameters** that define all the Company's property developments.

In this way, the Neinor Homes White Book ensures that all developments have **Neinor Homes' own design criteria and product attributes** and are adapted to the needs of the customer in each territory, which are always applied irrespective of the architectural firm developing the project. The standards it sets are independent of the design used and **each product is customised** for each development.

The White Book is a living tool and its success lies in the fact that it is **constantly being revised** to adapt to the conditions and trends of the sector and the company, to new systems or materials that arise and to the experience acquired. In addition, **the whole company has the possibility to suggest and contribute changes and updates**. Thus, the White Book allows Neinor Homes to **lead the transformation of the sector**, as it has an implicit know-how that allows the transfer of knowledge, capacities, standards and ways of doing things.

The White Book is a pioneering manual in the sector.

8.2. MEASURING THE CORPORATE CARBON FOOTPRINT

Firstly, it is worth remembering that **the construction sector is responsible** for 36% of global final energy consumption, **almost 40% of total direct and indirect CO₂ emissions**, and more than 45% of waste generation.

These emissions are directly linked to climate change and how this change negatively affects the environment and natural resources.

Achieving climate neutrality means comprehensively addressing the decarbonisation of the construction sector, considering both operational carbon and embedded carbon, and taking into account direct and indirect emissions from the entire cycle.

*In this sense, **the world we are going to leave to future generations is very important for Neinor Homes.***

which makes the goal of reducing its carbon footprint one of the three main objectives of its Strategic Sustainability Plan (along with making homes more energy efficient and increasing accessibility to housing in Spain).

For this reason, within its sustainability strategy, from 2022 Neinor Homes calculates the greenhouse gas emissions of its operations, taking 2021 as the base or reference year. The calculation of Scope 1 and Scope 2 emissions was performed following **the methodological guidelines of the GHG Protocol: A Corporate Accounting and Reporting Standard**, and the guidance for the calculation of Scope 2 emissions, accounting for **all activities over which Neinor Homes has 100% operational control**.

Neinor Homes published the Scope 1 and 2 CO₂ emissions for the 2021, 2022 and 2023 financial years in the reports for the previous years.

And with regard to **Scope 3**, Neinor Homes, analysing the specific activity data and using the GHG Protocol's Scope 3 technical guidelines as a reference, calculated its emissions in the 2021 and 2022 financial years, published in the reports of previous years. The company did not publish these emissions in the 2023 financial year, to avoid giving information that could confuse the market due to the great disparity of criteria and possibilities that gave very different measurements depending on the parameters assumed and chosen: namely, the selection of developments and their subsequent extrapolation, the consideration of homes delivered versus those built, the nonexistence of criteria in terms of metres of construction to be considered, years of useful life etc., and multiple factors detailed in the report for the 2023 financial year.

THE MAIN 3 PLAN OBJECTIVES SUSTAINABILITY

**Increase
accessibility to the
home in Spain**

**Reduce the
carbon footprint
of the sector**

**Make homes
more efficient
energetically**

In this connection, with a view to increasing transparency in the 2021 financial year, the premises and methodology that the company ought to use to measure its carbon footprint began to be defined and life cycle assessment was chosen as the most accurate and reliable method among the various current alternatives.

Since the 2022 financial year, all the company's projects have had an LCA and the attributes chosen for measurement have been analysed by the company based on an in-depth study and consultation with different stakeholders, sustainability experts, real estate companies, regulations, etc., comprising the attributes and characteristics of our LCA measurement, explained below in the section on Scope 3 emissions.

The company places a lot of emphasis on Scope 3, because in the development sector Scopes 1 and 2 are insignificant in comparison with Scope 3, which, in all the years that we have published our emissions, accounts for more than 99.8% of total emissions.

For this reason, in the **financial year 2024, the company is in a position to publish for the first time the emissions** of its developments completed in the current financial year (2024), using the LCA and the methodology explained in detail and development of Scope 3 below.

CARBON FOOTPRINT IN METRIC TONNES	FINANCIAL 2024	TONNES	% S/TOTAL
254,700	Scope 1	220	0.09%
	Scope 2	185	0.07%
	Scope 3	254,295	99.84%
		254,700	

EMISSIONS RATIOS FOR THE 2024 FINANCIAL YEAR	
Metric tonnes of carbon emitted per dwelling built*	185
Metric tonnes of carbon emitted per million € of economic value generated	489

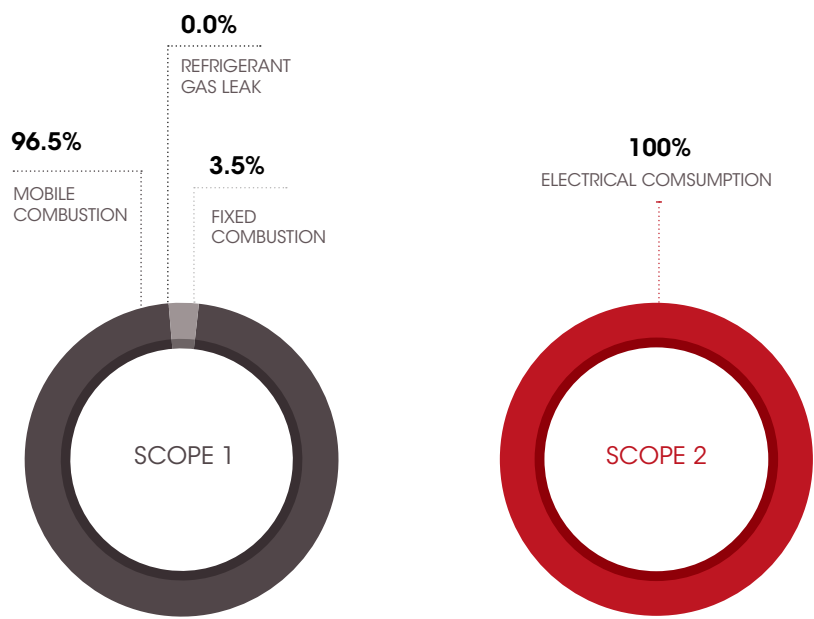
*We transfer the ratio of tonnes of CO2 per dwelling built, as it is directly related to the emissions calculated for the developments delivered, and we do not vary our type of housing annually, given that the average types and sizes of our homes, as well as the common areas, tend to be quite homogeneous each year.

We do not provide it per square metre given the multiple casuistry that can be involved in its consideration and that could generate confusion: built, useful, heatable, walkable surface, ground floor, basements, common areas, etc.

> **CARBON FOOTPRINT RESULTS 2024**
 [SCOPES 1 AND 2]

SCOPE / EMISSION SOURCE	EMISSIONS (tCO ₂ e)		
	EMISSIONS 2024	EMISSIONS 2023	EMISSIONS 2021
Scope 1	219.97	182.26	219.08
Fixed combustion	7.74	4.35	79.74
Mobile combustion (leasing vehicles)	212.23	177.91	137.25
Leakage of refrigerant gases	0.00	0.00	2.09
Scope 2	185.00	225.39	131.01
Electricity consumption	185.00	225.39	131.01
Total (tCO ₂ e)	404.97	407.65	350.09

EMISSION BY EMISSION SOURCE (%)



SCOPE 1

Mobile combustion, the main source of Scope 1 emissions, recorded a 54.6% increase in GHG emissions compared to the base year, as the increase in construction activity required the hiring of additional leasing vehicles to attend construction sites. Emissions associated with **stationary combustion** decreased by 90.3% compared to 2021 due to continued work on the elimination of generator sets (currently only one point of sale has generator sets). Finally, during the reporting year **no refrigerant gas recharges** were carried out, and therefore zero emissions are recorded under this category.

ALCANCE 2

Emissions associated with the **consumption of electrical energy** contributed to 45.7% of Scope 2 emissions during 2024. These **emissions have decreased by 17.92% during 2024** compared to 2023 thanks to the contracting of a 100% renewable energy supplier in one of its offices and points of sale, as well as the decrease in Neinor Stores (points of sale) open during 2024.

Furthermore, and with respect to the base year, **in 2024 it managed to reduce electricity consumption by 41.2%.**

Neinor Homes **maintains its commitment to reduce its Scope 1 and 2 emissions by 42% by 2030.**

Promotion **Creative Homes**



> CARBON FOOTPRINT RESULTS 2024

[SCOPE 3]

EMISSION TRENDS

PREMISES

Life Cycle Assessment (LCA) is based largely on Environmental Product Declarations (EPDs), which are different in each country since they are calculated according to the energy mix of each country and this varies according to the energy they consume. (For this reason there are different environmental databases.)

Although in Spain there is no environmental database with its emission coefficients, EPDs are regulated by ISO 14025.

There is no national or European standard to follow that indicates the parameters to be considered in an LCA, so there is no harmonisation at the European level in its analysis. Some examples:

- There are no standardised criteria regarding the metres to be considered that indicate the distribution of emissions in them.
- To measure the carbon footprint based on the LCA, depending on the country, certain phases of the LCA or all its phases can be considered.
- As for emissions in the construction phase, it also depends on the country whether all or some of the construction parts are considered: structure, façade, installations, finishes, urbanisation etc.

METHODOLOGY AND DETAILS OF THE SCOPE 3 EMISSIONS

2024				
A1-A3	A4-5	B1-5	C1-4	B6-7
123.599.245,24	7.914.187,04	69.598.742,20	18.086.156,28	35.096.447,41
EMBEDDED CARBON				OPERATIONAL CARBON
219.198.330,76				35.096.447,41
TOTAL (Kg) 254.294.778,17				

Below we present the considerations that have been taken into account when carrying out the LCA that allows us to quantify the environmental impacts of buildings in relation to GWP, Global Warming Potential.

In order to **evaluate the environmental** load of the various processes, an LCA is carried out in accordance with international standards ISO 14040 and 14044, 15804 and 15978 and the guidelines of the ILCD Handbook. The LCA methodology presents a **holistic approach** to estimating the environmental impacts related to the entire life cycle of a product or service. The limits of the study will comprise the chain that extends **from the manufacture of the products to the end of life of the works carried out**; from the cradle to the grave.

1. LIFE CYCLE ASSESSMENT (LCA)

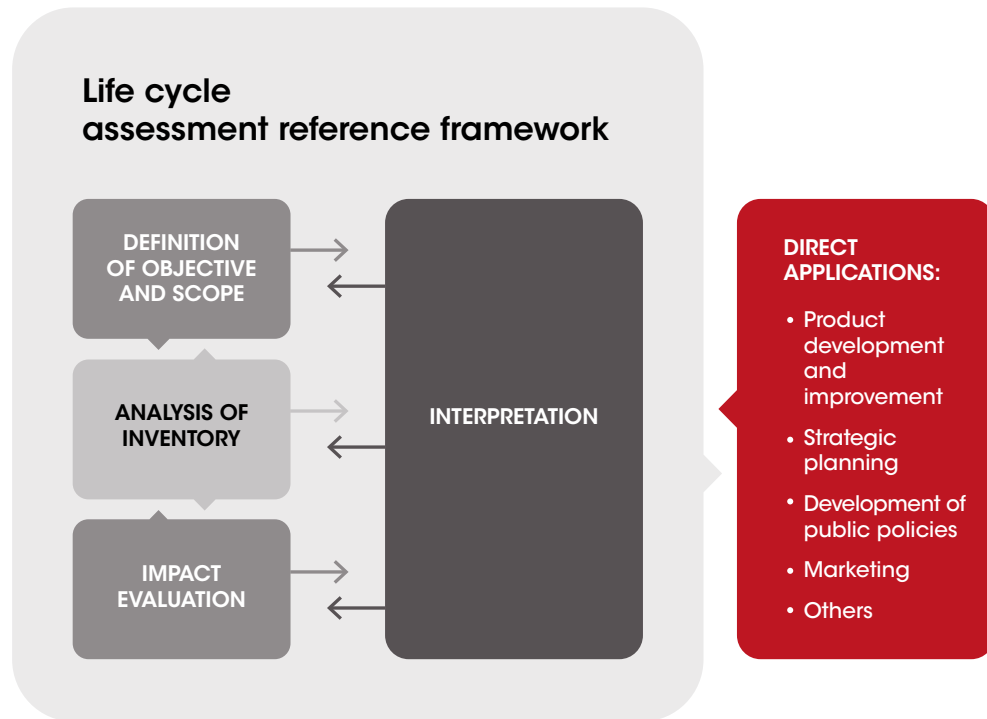
The UNE-EN ISO 14040 standard defines LCA as: 'a technique for evaluating the environmental aspects and potential impacts associated with a product, process or activity by means of: collecting an inventory of the relevant inputs and outputs of a system; evaluating the potential environmental impacts associated with those inputs and outputs; and interpreting the results of the impact analysis and evaluation phases in accordance with the objectives of the study'.

From this definition it follows that LCA is a tool that can be used to evaluate the environmental impact associated with a product, taking into account its entire life cycle. It is a methodology that attempts to identify, quantify and characterise the various potential environmental impacts associated with each stage of a product's life cycle. Therefore, for a given activity, the problem is not only limited to the industrial process, but it is also necessary to establish the proportional part of pollution from all the previous and subsequent activities that the product in question originates. Thus, LCA is a useful environmental tool in the design of alternative solutions that seek to reduce potential impacts and are oriented towards the search for sustainable development.

The life cycle approach takes into account all the resource flows and environmental interventions associated with a product or organisation from the perspective of the supply chain. It includes all stages from the acquisition of raw materials, through the processes of treatment, distribution and use, to the end of life, as well as all the associated environmental impacts, health effects, resource-related threats, burdens on society and relevant interactions. This approach is essential to highlight the possible interactions between the various types of environmental impacts associated with specific decisions, both political and managerial, and to prevent the unintentional shifting of burdens. This will contribute to the adoption of the most environmentally positive options.

The software chosen for the LCA is the TCQiGMA programme. This is a tool that allows the environmental, social and economic impacts associated with a product throughout its entire life cycle to be calculated. This software has databases containing libraries of data from different authors on energy, materials, transport and impact assessment methods.

The regulations used to carry out the LCA are those set out in internationally accepted standards, whose methodology establishes a series of fundamental principles for the LCA. According to ISO 14040, the LCA consists of four interrelated work phases in a more or less defined sequence: definition of objectives and scope, inventory analysis, impact assessment and interpretation of results (Figure 1).



a | Definition of the objective and scope of the study

The definition of the objective and scope of the study is the first phase in an LCA. In this phase, the intended application and the reasons for conducting the study are defined, in addition to specifying the people to whom the results are to be communicated and whether they will be used in comparative assertions for public disclosure.

Next, it is necessary to define the scope of the LCA by establishing the system boundaries that define the unit processes to be included in it, since due to its comprehensive nature a complete LCA could be really extensive. This includes a description specifying the system to be studied, the functions of the system, the functional unit, the system boundaries, the allocation procedures, the selected impact categories, the data requirements, the assumptions, the limitations and the type of report and critical review. The definition of the functional unit will seek to quantify the identified functions of the product in accordance with the objective and scope.

Figure 1. Stages of an LCA according to the ISO 14040 series of standards.
(Source: ISO 14040:2006)

b | Inventory analysis

This is the second phase, in which an inventory is made of the inputs and outputs for each unit process within the system boundaries. The main data collected corresponds, among other things, to energy inputs, raw material inputs, auxiliary inputs, products, co-products and waste, emissions and other environmental aspects.

The aim of this inventory is to obtain the data and calculation procedures to identify and quantify all adverse environmental aspects. Limitations in obtaining certain values or detection of data that was initially considered negligible, but which, as the study progresses, is found to have been wrongly assumed, may result in modifications to the objectives or the initially proposed scope of the study.

To guarantee the reproducibility of the study it is important that the data is representative, trustworthy and reliable, for which data validity criteria are defined. These must consider factors such as time and place of collection or technology used, among other factors.

a | Life Cycle Impact Assessment (LCIA)

The main objective of this phase is to provide information to address the calculation that allows the evaluation of the results of the life cycle inventory of a system and to detect potential environmental impacts.

This phase consists of obligatory elements such as the selection of impact categories, indicators for each category, classification and characterisation models, as opposed to others that are optional and can be used depending on the objective and scope of the LCA (standardisation, grouping, weighting and data quality analysis).

b | Interpretation of results

Interpretation is the phase of an LCA in which the results of the inventory analysis and/or impact assessment are discussed. The results of this interpretation form the basis for drawing conclusions, making recommendations and taking decisions in accordance with the defined objective and scope. It allows us to determine at which stage of the product life cycle the main environmental burdens are generated and therefore which points of the evaluated system can or should be improved. In cases where equivalent products are compared, it will be possible to determine which one has the best environmental performance.

2. SOFTWARE TOOL USED

The LCA study was carried out using TCQiGMA software. This tool, developed by ITeC, allows a complete Life Cycle Assessment to be carried out with multiple methods for impact assessment that allow impacts to be calculated following the recommendations of the ISO and ILCD Handbook standards.

The software is an online application that is constantly improving and will allow the user to update the information in the software on an ongoing basis at the same cost.

2.1 Database

The database used is that of Neinor's entries, with the environmental impacts database created by ITeC, based on Banco Bedec's entries. The structure of Neinor's creation is maintained, creating the necessary information to achieve the calculation of Life Cycle Analysis according to the Standard, and to ascertain the Carbon Footprint, among other impacts, related to waste management and the circular economy.

2.2 Data quality indicators

Another important element of TCQiGMA is the system of data quality indicators in accordance with the requirements set out in ISO 14044. This system evaluates the suitability of the data by assigning them a weighted score taking into account the defined profile and allows for uncertainty analysis using the Monte Carlo method. In this connection, the primary data used in this LCA are of the highest quality.

2.3 Life cycle inventory

Once the necessary data for the analysis has been identified, the life cycle inventory is prepared. First, data that is not contained in the tool's libraries is searched for and collected and entered in the process records, which allows for a level of information of over 90%, a feature that differentiates the tool's calculation from other calculations on the market.

TCQiGMA then automatically generates a process tree or flow chart linking all the processes.

2.4 Impact assessment

TCQiGMA also includes several recognised impact assessment methods. All use the characterisation procedure by which the relative contribution of a substance to a given impact category is calculated. Some of the methods mentioned also use other procedures such as damage assessment, normalisation or weighting.

Stages of the life cycle

In the UNE-EN 15804 standard, which distinguishes the following successive stages of the life cycle.

- **Product stage:** consisting, in our case, of the supply of raw materials, transport of raw materials and manufacture of the materials (the products) that will make up each section of pavement or subgrade.
- **Construction process stage:** consisting, in our case, of transport to the worksite and its installation.
- **Use stage:** consisting of everything related to the actions and functioning of the structure itself of the pavement or subgrade sections, such as maintenance, repair, replacement and rehabilitation.
- **End-of-life stage:** consisting of demolition, transport to the waste treatment site, treatment of the waste for reuse, recovery and/or recycling, or its disposal, also including the supply and transport of all materials and products, and the associated energy and water use.

> INFORMATION ON THE LIFE CYCLE OF THE CONSTRUCTION PRODUCT

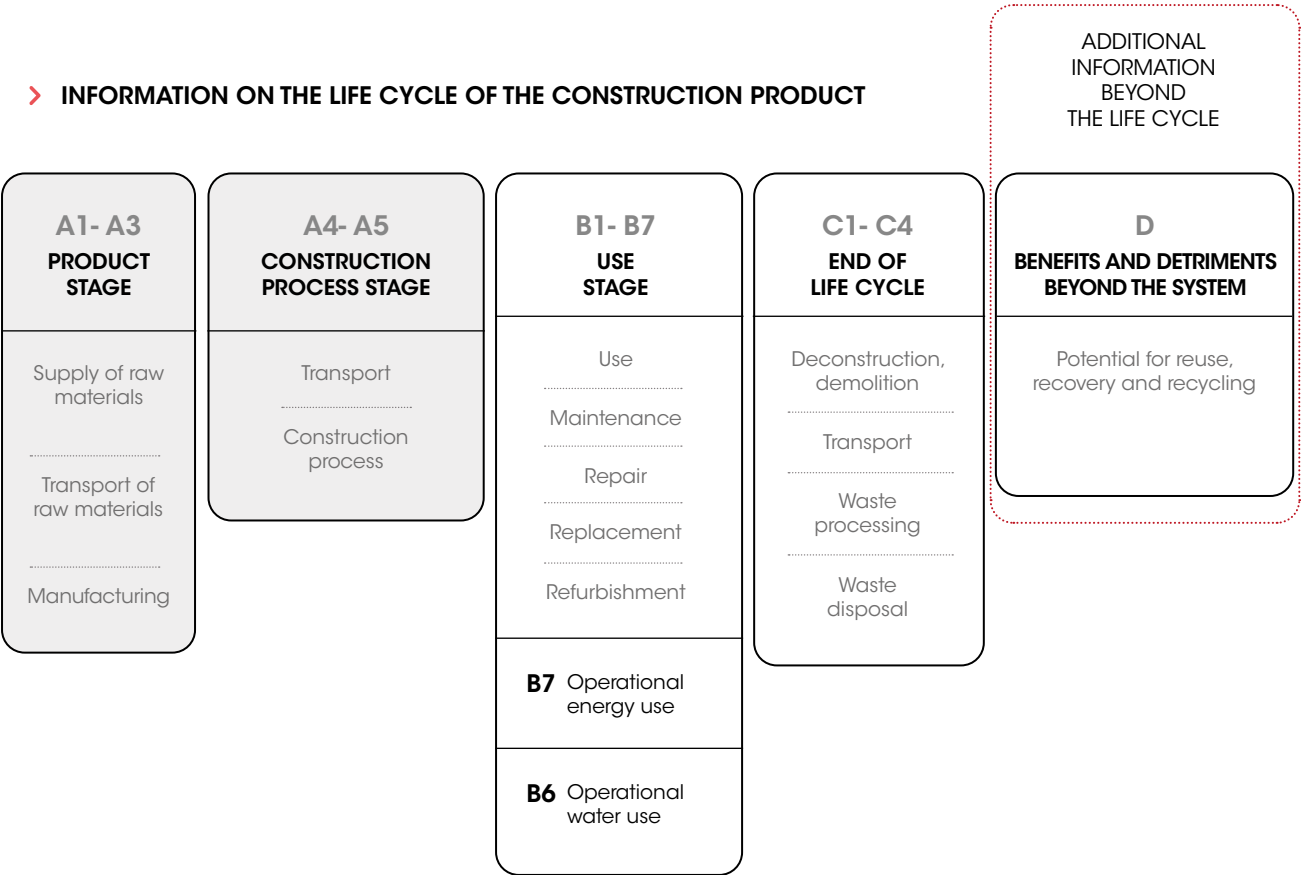


Figura 2: Stages in the cycle of a construction product according to UNE-EN 15804

To conclude and based on the above, we can report that at Neinor Homes the LCA calculation assumptions that have been considered are as follows:

- All the elements of the construction.
- All the phases of the LCA (from cradle to grave).
- All the metres of the development.
- A useful life of 50 years.
- The Itec Bedec database used by Neinor Homes is approved by the Levels framework.

We have considered these criteria with a view to aligning ourselves as much as possible with Level(s) given that the EPBD directive is the framework of reference for measuring sustainability in construction.

LEVEL(S) KEY INDICATORS

1	2	3	4	5	6
GREEN HOUSE GAS EMISSIONS ALONG A BUILDING'S LIFE CYCLE	RESOURCE EFFICIENT + CIRCULAR MATERIAL	EFFICIENT USE OF WATER RESOURCES	HEALTHY + COMFORTABLE SPACES	ADAPTATION + RESILIENCE	OPTIMISED LIFE CYCLE COST AND VALUE
Use stage energy performance	Bill of quantities	Use stage water consumption	Indoor air quality	Protection of occupier health + thermal comfort	Life cycle cost
Kilowatt hours per square metre per year [kWh/m ² /yr]	Unit quantities mass + years	m ² /yr water per occupant	Parameters for ventilation, CO ₂ + humidity Target list of pollutants: TVOC, formaldehyde, CMR, VOC, LCI ratio, mold, benzene, particulates, radon	Projected % time out of range in the years 2030 and 2050 [see also 4.2]	Euro per square metre [€/m ² /yr]
Life cycle Global Warming Potential	Construction + demolition waste + materials		Time outside of thermal comfort range	Increased risk of extreme weather events	Value creation + risk exposure Indoor air quality
KgCO ₂ equivalents per square metre per year	Kg of waste + materials per m ²		% of the time out range during the heating and cooling seasons	Level 1 checklist [under development]	Level 1 checklist
	Design for adaptability use		Lighting + visual comfort use	Increased risk of flood events	
	Adaptability score		Level 1 checklist	Level 1 checklist [under development]	
	Design for deconstruction, reuse + recycling		Acoustics + protection against noise		
	Deconstruction score		Level 1 checklist		

LEVEL(S) KEY INDICATORS



THE ROAD TO DECARBONISATION

In this regard, it is worth highlighting the partnerships that have been reached with various suppliers for the use of low-emission building materials in these last two years, such as:

CEMEX and Neinor Homes have developed in Madrid the first residential development in Spain built entirely with Vertua® 'green' concrete, an innovative product developed by CEMEX R&D and which, thanks to its technology, is able to confer sustainability characteristics on the construction site, both in the construction process and during its useful life.

The Torrejón Park Homes development has been built with concrete from the Vertua Plus range, which has been manufactured with between 50% and 70% less CO₂ emissions than concrete with similar traditional performance. It is a complex of 81 homes with almost zero consumption, with energy certification A, BREEAM Good certification and a recovery of construction waste of more than 80%. Neinor Homes was the first developer in Spain to use a product of these characteristics in the construction of its developments.

Cemex and Neinor Homes have reached an agreement to implement green concrete in all developments.

Alliance between Neinor Homes and Cortizo for the use of recycled aluminium and PVC. All Cortizo brand joinery, both aluminium and PVC, installed in the new Neinor Homes developments will be made from recycled materials, significantly contributing to the reduction of CO₂ emissions in their manufacture. The aluminium windows installed in the homes will be made from Infinity, a 100% recycled billet made entirely from post-consumer scrap. In addition, the joinery will include an innovative recycled polyamide thermal break, made from PA 66 thermoplastic and glass fibre, both reused and from post-industrial channels.

Neinor Homes and Saint-Gobain (construction materials) have signed an agreement to promote sustainable construction through the use of sustainable construction solutions manufactured by Saint-Gobain in Neinor Homes projects. The main objectives of the alliance are the decarbonisation of processes and the use of products with a low carbon footprint, the circular economy, water and biodiversity management, innovation and the promotion of a green economy.

Neinor Homes has signed an agreement for the incorporation of Porcelanosa's ECO products

The main objective of the agreement is to move forward in the construction of more sustainable homes with a full life cycle approach. With this, Neinor Homes aims to consolidate and increase the use of these sustainable materials and solutions available to Porcelanosa Group, some of which have already been used in the past in the developments of Evergreen Homes (Mijas), Sa Llosa Homes (Es Mercadal-Menorca) and Santa Clara Homes (Marbella).

Neinor Homes and Uponor are working together to reduce pollution in construction.

Neinor Homes will include sustainable solutions from Uponor's portfolio such as Uponor PEX Pipe Blue technology pipes based on bio-based materials and Uponor's 'Sustainable Invisible Climate' ecosystem in its new construction projects.

Neinor Homes and Heidelberg sign an agreement to implement low-carbon concrete: The objective of this strategic collaboration agreement is to continue promoting the incorporation of low-carbon products and solutions in developments. This alliance will give continuity to the implementation of low-carbon products and solutions from Heidelberg's eco build range in Neinor Homes' developments

<https://www.neinorhomes.com/en/noticia/neinor-homes-y-heidelberg-firman-unacuerdo-para-implantar-hormigones-bajos-en-carbono/>

<https://www.heidelbergmaterials.es/es/neinor-homes-y-heidelberg-se-alian-para-implantar-hormigones-bajos-en-carbono>

Neinor Homes will reduce the carbon footprint of its projects under an agreement with Holcim Spain.

Neinor Homes and Holcim Spain, part of the Holcim Group, a world leader in innovative and sustainable construction solutions, have announced the signing of an agreement under which the property developer will use ECOPact concrete in its developments. This range of concretes contributes to the reduction of the carbon footprint as it is capable of reducing, through optimised mixtures, the CO₂ content between 30% and 70% without offset, with respect to other concretes designed with type 1 cement.

Neinor Homes signs an agreement with TECHNAL to reduce its carbon footprint by up to 88%.

A collaboration agreement to promote the use of recycled aluminium in Neinor Homes' residential developments, a material that reduces the carbon footprint by up to 88%. Thus, Neinor Homes' new homes will have TECHNAL windows and doors, made with Hydro CIRCAL® 75R, the brand's recycled aluminium, which is produced with at least 75% post-consumer scrap and has a carbon footprint of 1.9 kg of CO₂/kg of aluminium, 88% less than the European average.

<https://www.estrategiasdeinversion.com/actualidad/noticias/empresas/neinorhomes-firma-un-acuerdo-con-technal-para-n-706193>

Furthermore, Neinor Homes is working on reducing emissions in Category 11 (use of products sold) in the following areas:

- Agreements with suppliers that guarantee energy from renewable energy sources.
- Customer solar panel installation initiatives (Neinor Smart Sun)
- Recognising the importance of promoting low energy buildings and greater energy efficiency, we are increasingly turning to aerothermal energy as a renewable energy source as opposed to fossil fuel based systems such as gas boilers.
- Agreements with suppliers of tools for reporting and improvement of energy consumption to customers (agreement with Hobeem, see point 5.8 (customers)).

Currently 53% of our developments have a BA/BB Energy Certificate and 34% have an AA Energy Certificate, a figure that will increase as the company meets its Sustainability Strategic Plan target, in which more than 70% of the homes launched by 2024 will have A certification.

Aware of the importance of taking action in the fight against climate change to limit the increase in the average global temperature to below 1.5°C, at the end of 2022 Neinor Homes submitted its emissions reduction targets to the Science Based Targets (SBTi) initiative, **committing to reduce its Scope 1 and 2 emissions by 42% by 2030**, with respect to 2021. The targets have been approved and validated by SBTi.



8.3. ENVIRONMENTAL SUSTAINABILITY AND HEALTH IN HOUSING

Neinor Homes is taking into account sustainability, health and quality criteria in its developments, so that the homes meet the increasingly demanding requirements of customers.

In this regard, it has been committed from the outset to green certifications for its homes, independently of environmental regulations. The company is currently focusing on compliance with the technical environmental criteria of the Taxonomy, on improving the energy efficiency of its homes and on reducing emissions during the construction period of its developments.

> BREEAM® CERTIFICATION

BREEAM® is the most visible part of a global project to transform the building sector worldwide.

It promotes more sustainable construction that results in economic, environmental and social benefits for all the people involved in the life of a building (tenants, users, developers, owners, managers, etc.), while at the same time conveying the company's Corporate Social Responsibility to society and the market in an unequivocal and very visible way. It is responsible for assessing certain requirements divided into categories, the weighting of which is adapted to the country in which it is implemented.

Since its inception, Neinor Homes has registered around 8,500 dwellings to obtain the BREEAM® seal.



Neinor Homes, from the outset, decided to start certifying a significant number of its developments with an environmental seal, as a first step and a benchmark with the aim of encouraging the sector to build developments with a better environmental impact, which is why it has certified many of its developments with the requirements of the **BREEAM®** sustainability **certification** at Good or Very Good level.

Currently our commitment to BREEAM certification has slowed down and **we are focussing more on taxonomy compliance and the reduction of emissions from our developments**. The main motive for this initiative was to provide developments that had a lower environmental impact, that were more energy efficient and had fewer emissions during their construction, so that this would benefit our customers and the environment. But on the other hand, we also wanted to serve as a guide and be a benchmark for other developers and property owners to follow. And, by doing so, to consolidate one of the most internationally recognised environmental seals of approval in Spain, having been the developer with the most certifications obtained at source and thus fulfilling one of our purposes of being a benchmark and marking the way forward.

In this regard, in 2024 we have made progress in fulfilling this commitment. **Of the total number of developments delivered since the company was founded (196), 82 have the final BREEAM®** certificate or are in the process of certification, which represents **40.81%**. Of these 82 developments, 68 are certified at the good level and 8 at the very good level.

When a building meets the **requirements of BREEAM® certification**, **this ensures that both the user and the environment benefit** from the following aspects:



HEALTH

- Use of **paints, varnishes and materials** with minimum harmful elements.
- Homes with **amenities to enjoy and relax**: swimming pool, communal leisure areas, etc.
- **Proximity to basic services** (less than 500m from a hub of bus stops, a school, grocery shops, health centres, etc.)



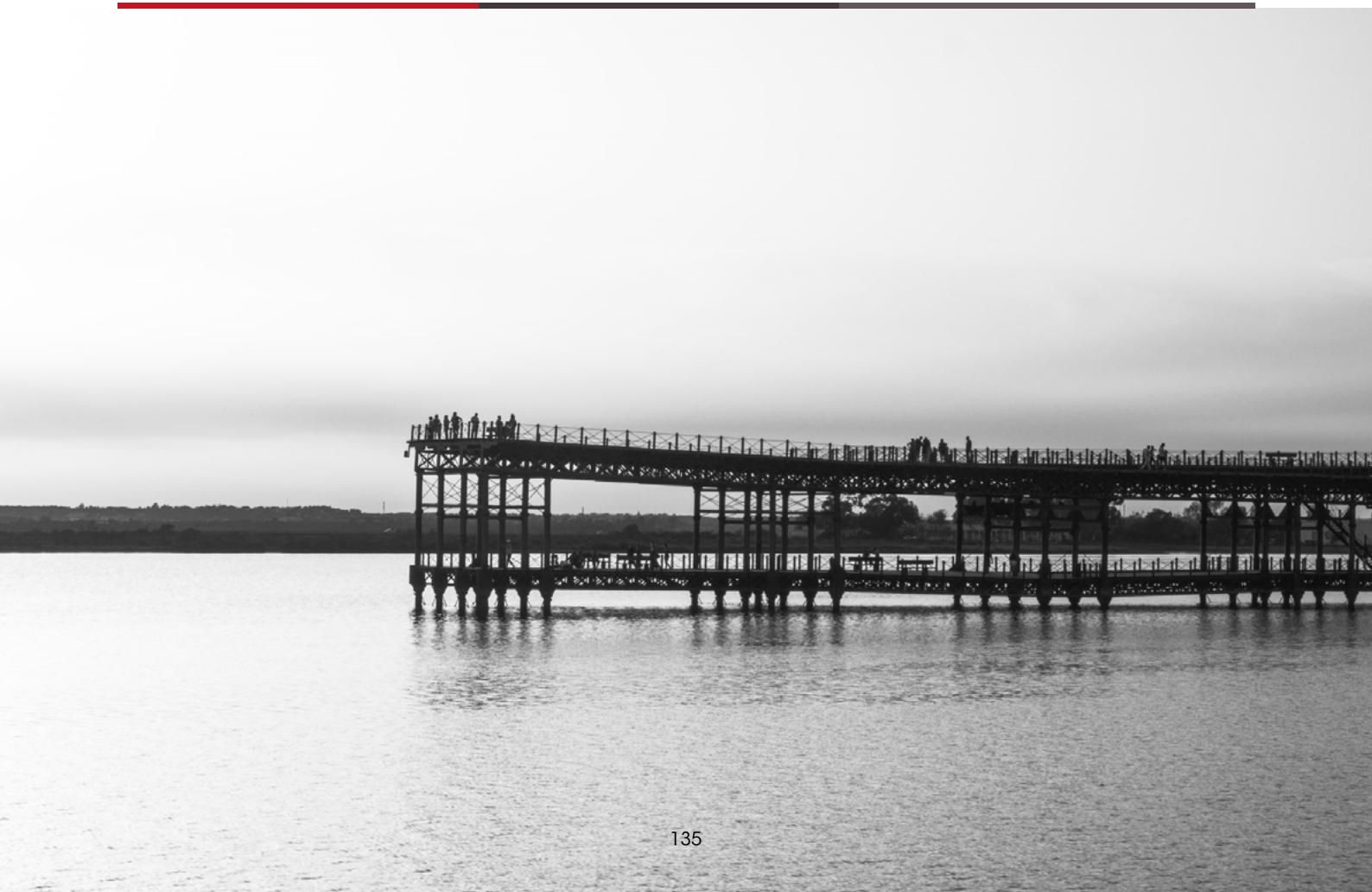
COST SAVINGS

- **Thermal envelope** design that saves on heating and air conditioning.
- Choice of **efficient lifts**.
- Use of **energy-saving** and efficient **lamps and lights**.
- Installation of **solar panels** to supply part of the demand for domestic hot water, resulting in significant economic savings and a reduction in greenhouse gas emissions.
- Installation of vegetation on roofs and in gardens to create a pleasant environment with low maintenance and water consumption, as they are **native plants** with low water requirements.



ECOLOGY

- Choice of **consumption saving taps**.
- Reduction of **private car journeys** due to the proximity of the dwelling to basic services.
- **CO₂ emissions reductions**.
- **Recycling of waste** generated on site.
- **Legal timber procurement**.
- Installation of **grease separators** to minimise contamination of watercourses.



> CIRCULAR ECONOMY AND POLLUTION

With regard to environmental sustainability, there are other very important fields, such as the circular economy and the reduction of pollution, in which the company is working through the exchange of experiences and solutions to improve the environmental impact on the environment. Some of the actions being carried out are as follows:

- **Neinor Homes, ACR, Cocircular and ROCKWOOL** have joined forces to achieve zero waste. Neinor Homes and the construction company ACR, working together with Cocircular, will implement ROCKWOOL's innovative Rockcycle service in the construction of the San Andrés Homes development in Mondragón. Rockcycle makes it possible to recover pallets and leftover rock wool on site, and take them back to the ROCKWOOL factory in Caparrosa (Navarra), where they are processed and recycled into new rock wool, maintaining the original performance, quality and durability, preventing them from ending up in landfill and moving towards zero waste.

<https://www.estrategiasdeinversion.com/actualidad/noticias/empresas/neinor-homes-acr-cocircular-y-rockwool-se-unen-n-646629>

Neinor Homes is currently meeting **its strategic objective of recovering more than 80% of construction waste**, with the **standard being 70%**. This means it is also meeting another of the main objectives **of our Strategic Plan** in terms of the Circular Economy.

Neinor Homes achieves 90% in construction and demolition waste recovery, 20% above the norm: The San Andrés Homes development in Arrasate-Mondragón is the first in Spain to achieve this milestone in the construction residential sector.

<https://observatorioinmobiliario.es/noticias/esg/neinor-homes-alcanza-el-90-en-valorizaci%C3%B3n-de-residuos-de-construcci%C3%B3n-y-demolici%C3%B3n/>

Likewise, recycling and recovery clauses are included in the contracts with suppliers in 100% of the developments. All these measures have enabled us to meet the various objectives relating to the circular economy detailed in the Sustainability Plan.

Moreover, at corporate level, the sustainability area is in continuous contact with the rest of the company's areas, influencing decisions that can reduce pollution and carrying out activities that benefit the environment.

In this respect, we know that innovation and technological progress are key to discovering lasting solutions to the economic and environmental challenges we face. We remain committed to **teleworking** (4 days as a minimum requirement for the company, which can be increased according to the face-to-face needs of each department and the personal circumstances of each employee) **and videoconferencing**, both inside and outside the workplace, which also avoids sometimes unnecessary travel and trips, and **digital signatures and virtual visits** to our developments, which also contribute to reducing pollution and greenhouse gases in our cities.

We remain more committed than ever to a clean, **green, safe and more resilient economy**. Our efforts to create a more sustainable world continue: In addition to plastic reduction, selective recycling, the use of green energy and the rational use of our resources, some of our employees are involved in campaigns to maintain and clean up our oceans.



8.4. CLIMATE RISK ANALYSIS OF OUR HOMES

In line with the requirements of Appendix A of the European Taxonomy Delegated Regulation 2021/2139, the assessment of physical climate risks is necessary to satisfy the Assessment of climate risk and vulnerability section, where vulnerability, sensitivity, adaptive capacity and areas of improvement thereof must be reported for an activity to be considered aligned with the European Taxonomy.

In this context, Neinor Homes has carried out a study to identify and integrate measures to adapt to climate change based on the best practices available and on Neinor Homes' business model, based on the identification of assets vulnerable to the risks of climate change in order to contribute to sustainable development and to the requirements of the European Union's Taxonomy of Economic Activities Regulation. To carry out the analysis, a multiple methodology was used, compiling bibliographic and documentary analysis, cartographic analysis, statistical analysis and compilation of Neinor Homes' own documentation and information.

For the study, two climate scenarios have been selected in line with the recommendations of the IPCC (Intergovernmental Panel on Climate Change) and the EU Taxonomy. These scenarios are SSP2-RCP2.6 for short-term economic activities and SSP2-RCP8.5 for long-term economic activities. In this way, the entire 21st century is covered and a sufficiently broad and short time horizon is established for the correct analysis of the set of climate vulnerabilities of Neinor Homes.

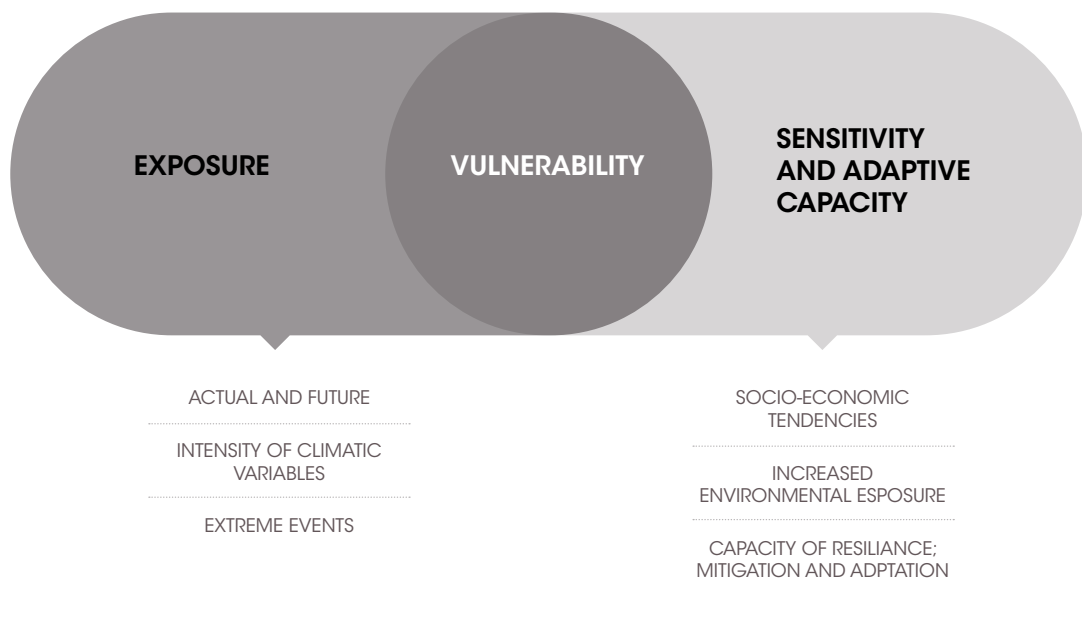
> VULNERABILITY OF INFRASTRUCTURES AND PROJECTS

The EU taxonomy determines a series of climate hazards that must be taken into account for the study of vulnerability¹. However, since Neinor Homes' activity is limited to the Iberian Peninsula and the Balearic archipelago, with little or no presence of property developments in high mountain areas, climate hazards such as avalanches or glacier overflows, among other hazards, are excluded from the analysis in questions.

¹ Delegated Act on Climate, Annex I, Appendix A.

Vulnerability is defined as the predisposition that a system or set of systems may be adversely affected². Vulnerability has been determined on the basis of a variety of concepts such as sensitivity, exposure and adaptive capacity of a system. Vulnerability thus depends on both the exposure and sensitivity of the system and its adaptive capacity. The higher the severity of the assessed risk and the lower the adaptive capacity, the higher the vulnerability of a system.

VULNERABILITY DIAGRAM



The climate hazards that represent the maximum value of climate vulnerability based on the 80% percentile, i.e. with a high or very high vulnerability index for Neinor Homes, are:

For real estate developments under construction and Neinor Stores

- Temperature variations (air, freshwater, seawater)
- Heavy precipitation (rain, hail, snow or ice)
- Floods (fluvial, pluvial, coastal and/or groundwater)
- Heat wave

For Neinor Homes offices and rental property developments

- Temperature variations (air, freshwater, seawater)
- Heat wave
- Drought
- Water stress

² Climate Change: Impacts, Adaptation and Vulnerability.

> ANALYSIS OF ACTIVITIES

Depending on the location and useful life of Neinor Homes' assets, a series of climate hazards have been identified that may be more accentuated in some locations in Spain than in others.

Due to the very significant climatic and geographical heterogeneity of the Spanish territory, 3 geographical areas have been identified at company level in Spain (Iberian Peninsula and Balearic Islands), in order to identify the main climatic hazards or threats that affect the economic activities of Neinor Homes in these geographical areas. These are the north of the peninsula (Cantabrian coast and Pyrenees), the interior of the peninsula (central area and areas far from the influence of the sea) and the Mediterranean coast (Andalusian coast, Levante and Balearic Islands).

Based on these three geographical areas, we have looked most closely at those climate hazards to which Neinor Homes' assets have the highest climate vulnerability index, corresponding in this case to the medium (V3), high (V4) and very high (V5) indices.

TIME HORIZONS - ECONOMIC ACTIVITIES	CLIMATE HAZARDS	GEOGRAPHICAL DIVISIONS		
		NORTHERN PENINSULAR	PENINSULAR INTERIOR (CENTRE)	MEDITERRANEAN COAST (SOUTH AND EAST)
Short Term (<10 years) SSP2-RCP2.6	Temperature variations (air, freshwater, seawater)	V3	V5	V4
	Heavy precipitation (rain, hail, snow or ice)	V4	V3	V5
	Floods (fluvial, pluvial, coastal and/or groundwater)	V4	V3	V5
	Heat wave	V3	V5	V4
Long-term (>30 years) SSP2-RCP8.5	Temperature variations (air, freshwater, seawater)	V4	V5	V4
	Heat wave	V4	V5	V4
	Drought	V3	V4	V5
	Water stress	V3	V4	V5

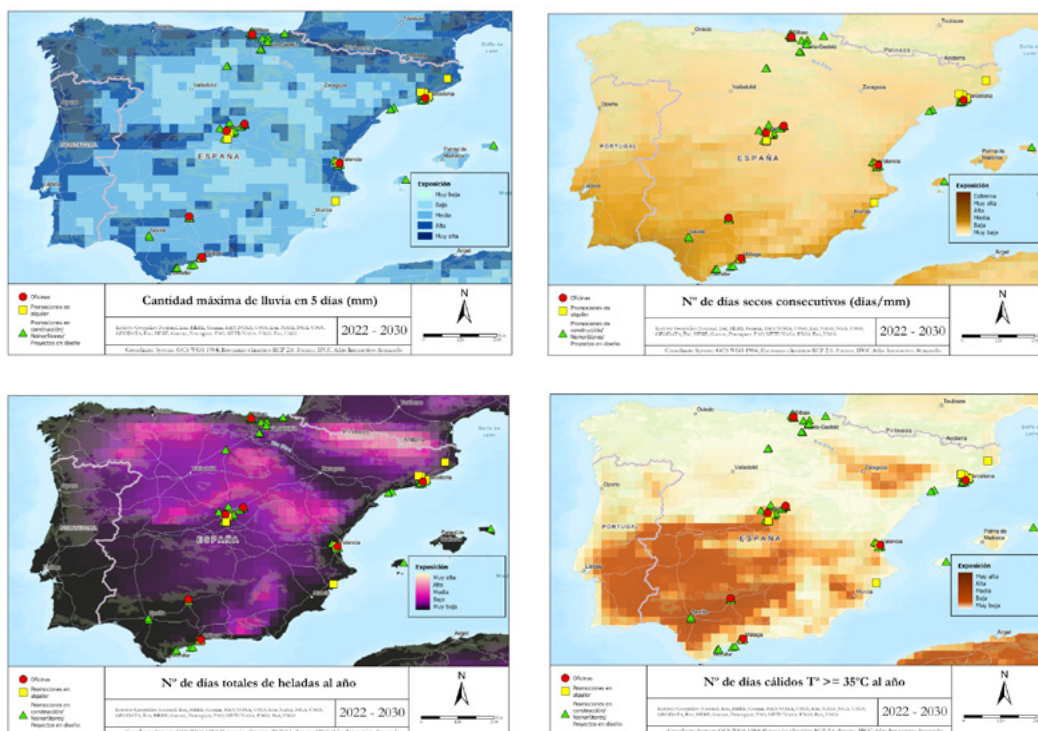
On the one hand, real estate assets under construction and Neinor Stores (short term) in the north of the peninsula have a medium vulnerability to temperature variations and heat waves. On the other hand, they are highly vulnerable to heavy rainfall and to river, rain and coastal flooding.

As regards the central peninsular area, real estate assets have a very high vulnerability to temperature-related climate risks (heat waves and temperature variations), in particular extreme heat events that are intensified as a result of the effect of continentality. In the case of the Mediterranean coast, it is observed that the assets have a very high vulnerability to both temperature and water-related climate risks, mainly due to the amount of heat energy absorbed by the Mediterranean Sea which leads to stronger storms and supercells and, therefore, increases exposure and sensitivity to severe flooding.

On the other hand, rental real estate assets and Neinor offices (long term) in the north of the peninsula show a medium vulnerability to periods of drought and water stress conditions; and a high vulnerability to temperature variations and heat waves.

As regards the central peninsular area, real estate assets have a very high vulnerability to temperature-related climate risks (heat waves and temperature variations), in particular, extreme heat episodes that are expected to increase in intensity and frequency. In the case of the Mediterranean coast, it can be seen that the assets have a high and very high vulnerability to both temperature and water-related climate risks, mainly due to torrential rainfall leading to severe flooding.

In this regard, all Neinor Homes developments have been analysed with their exposure to all the aforementioned climate riskse.



> ADAPTATION MEASURES FOR PROJECTS AND INFRASTRUCTURE

Finally, in order to adapt to or mitigate the impacts of climate hazards on Neinor Homes' activity, a series of solutions have been identified to address the most significant climate hazards.

Some of the proposed measures, shown in the Status of Implementation of Measures column in the table below, have already been implemented by Neinor Homes, and therefore present an adaptive advantage in the face of some of the risks that may materialise in the future. In addition, another series of adaptation measures for each of the hazards experienced by Neinor Homes' most vulnerable projects and infrastructures have been identified and are currently being analysed for implementation.

CLIMATE HAZARDS	ADAPTATION MEASURE	APPLICATION	STATUS OF IMPLEMENTATION OF MEASURES
Heat wave and heat stress	Creation and design of parks and green spaces	P	Implemented
	Installation of green roofs	E + P	Under review
	Strategic tree planting	E + P	Under review
	Implementation of early warnings for owners	E + P	Under review
	Location and solar orientation of the building	P	Implemented
Water stress and drought	Implement rainwater harvesting systems	E + P	Implemented
	Adjust watering schedules to periods of lower evaporation	E + P	Under review
	Use xerogardening techniques for the surrounding vegetation areas	E + P	Implemented
	Installation of individual meters to measure water consumption	E + P	Implemented
	Use of high-efficiency appliances	E + P	Implemented
	Design measures for water recycling	p	Implemented
Heavy precipitation	Installation of Sustainable Urban Drainage Systems	E + P	Under review
Floods - Avoidance	Establishment of watertight walls and permanent barriers	E + P	Under review
	Temporary flood barriers	E + P	Under review
	Landscape-integrated earthworks and embankments	E + P	Under review

CLIMATE HAZARDS	ADAPTATION MEASURE	APPLICATION	STATUS OF IMPLEMENTATION OF MEASURES
Floods - Resistance	Sealing of the external walls of the building with waterproof coatings	E + P	Implemented
	Raising door and window thresholds by means of automatic or manual, permanent or temporary protection measures	E + P	Implemented
	Protection of ventilation openings or similar	E + P	Implemented
	Checking of drains and pipes, together with the state of septic tanks	E + P	Implemented
Floods - Toleration	Establishment of a good drainage system	E + P	Implemented
	Design the building to locate facilities and services in elevated areas protected from the flood level, so that material losses are reduced	P	Implemented

Promotion **Artola Homes**



8.5. URBANISATION AND ACTIVATION OF THE ENVIRONMENT

Neinor Homes, aware of the need to improve and recover the most degraded areas, is committed to a new urbanism that transforms and generates wealth: investment in projects for the revitalisation and redevelopment of urban areas, and the remodelling of industrial areas.

Three standout key activities of which Neinor Homes is a part are:

BOLUETA AREA (Bilbao)

A strategic urban regeneration project framed within a set of decisions and measures aimed at recovering, for the benefit of society, disused industrial land in Bilbao's surroundings due to its potential value for completing and renovating the city.

This project represents an opportunity to reverse the initial situation of degradation associated with obsolete industrial facilities in favour of urban regeneration and environmental recovery that will enable the integration of this area of the city into the urban, social and environmental fabric of Bilbao, with plans for the rescue and enhancement of the natural landscape.

This operation combines the intrinsic value it has as a generator of protected housing with the environmental recovery of land and spaces, and is presented as an opportunity to adapt the habitability conditions and productive facilities of the residents and pre-existing economic activities, and all this from the promotion of citizen participation in decision-making and administrative power in urban planning matters.

Bolueta Homes Development



MONTESA STRATEGIC RESIDENTIAL AREA (Esplugues de Llobregat)

The Montesa SRA is the first major housing land reserve in the metropolitan area of Barcelona.

This project is located in an area where there was a progressive abandonment and decline of nonspecialised industrial uses, which began with the demolition of the Montesa factory and the moving away of its activities.

The proposed planning defines the land as a significant opportunity for metropolitan centrality, as it has very good links to major mobility infrastructures and adjacent municipalities, and will allow for a large number of social housing units.

The amendment to the development plans for the area envisages a redefinition of the urban planning to make the transformation of the area viable, reconsidering the delimitation of zones and systems and revising the housing typologies planned.



Before



After

Esplugues de Llobregat is the smallest municipality in the Baix Llobregat (Barcelona) region, covering just 4.6 km². It borders the municipalities of Barcelona, Cornellà de Llobregat, Sant Just Desvern, Sant Joan Despí and Hospitalet de Llobregat. In recent decades it has gone from being an eminently industrial town to a service city, which has managed to retain its identity. Its unique old town and its extensive network of parks and green areas, such as the Solidaridad, Torrent d'en Farré and Can Vidalet parks, among others, are particularly noteworthy.

With the launch of the NOBA HOMES developments, we are aiming to respond to the new needs that are emerging in society, specifically in Esplugues de Llobregat; new homes that will offer a new, young, family-friendly, sustainable and distinctive city experience.

Together with the private development of each plot, the planning sets out a green space/corridor with more than 26,000m² of green areas, squares, boulevards and gardens, with new facilities that will bring together and unite all the plots in the sector, generating a feeling of open space to enjoy the pedestrian promenade, street furniture and cycle lane. The importance of this circuit in the new sector is of unquestionable commercial appeal. In the private green areas, elements of potted plants and artificial grass will prevail given the existence of basements under the flooring.



ZORROTZAURRE (Bilbao)

The Zorrotzaurre project is the latest major urban regeneration operation to be launched in Bilbao.

This is a zone that experienced an era of industrial boom in the mid-1960s, with the consolidation of industrial activities related to port activity on both sides of the Deusto canal. However, the economic crisis of the time led to a decline in industrial activity and a deterioration in the standard of living in the area as a result of the ageing of buildings and public and private spaces. Today there are barely half a thousand residents.

The urban environs of Zorrotzaurre occupy an area of 838,781 m², of which more than half belongs to public entities (Basque Government, Bilbao City Council and the Port Authority of Bilbao), the rest being divided between various private owners.

The General Urban Development Plan of Bilbao, approved in 1995, changed the industrial use of Zorrotzaurre to residential. At the same time, it left the definition of the urban design of the area to the drafting of a Special Plan.

In 2001, public and private owners of Zorrotzaurre constituted the Management Commission for the Urban Development of Zorrotzaurre, with the objective of promoting and executing the urban regeneration plan for the area.

The Master Plan for the project was designed by the prestigious Anglo-Iraqi architect Zaha Hadid in 2004 and revised in 2007. It incorporates the complete opening of the Deusto Canal, which means the transformation of the Zorrotzaurre peninsula into an island, thus guaranteeing the nonflooding of the area.

The regeneration of Zorrotzaurre represents an integral and balanced project, defined under criteria of sustainability, which recovers a currently degraded area to convert it into a new district of Bilbao, well connected to the rest of the city, with affordable housing, areas for non-contaminating businesses, numerous social and cultural facilities, and large areas for the enjoyment of citizens. The work on the Zorrotzaurre I and II developments is currently underway and is scheduled for completion in 2025.

Zorrotzaurre Project



OTHER URBAN DEVELOPMENT INITIATIVES

Neinor Homes has also carried out urban and industrial regeneration initiatives in other projects in Spain:

- **ARRASATE (Mondragón, Guipúzcoa)**

Regeneration in residential use of industrial sector, demolishing and clean-up of the former industrial activity of Polmetasa. Work completed on the 2023 unsubsidised housing part.

- **ARRATE (Eibar, Guipúzcoa)**

Regeneration for residential use of an urban sector through a Special Development Plan that has enabled the demolition and clean-up of the land on which the former El Casco stapler factory stood. Work completed in 2023.

- **AMÉZOLA (Bilbao)**

Project for the rehabilitation of an existing industrial building, maintaining the protected D2 level façade in the inventory of the Bilbao City Council, in order to make residential use compatible.

- **LOS GUINDOS, SELENA HOMES (Málaga)**

Demolition and clean-up of land on which there are pavilions for urban tertiary use in the centre of Malaga. Project completed.

- **MUNGUÍA (Vizcaya)**

Demolition and clean-up of land on which the Mesa factory is located. Demolition and urbanisation pending. Basic project completed.

- **LA CATALANA R16 AND R17 (Sant Adrià de Besòs, Barcelona)**

Clean-up and regeneration for residential use of industrial land in the La Catalana Sector. Completed project.

- **OLARIZU IV (VITORIA)**

Clean-up to regenerate the industrial activity of the Esmaltaciones factory for residential use. Work in progress.

8.6. INNOVATION AS AN ENGINE OF TRANSFORMATION

Innovation, technology and digital transformation have been in the DNA of Neinor Homes since its inception, with the vision that its drive allows it to gain a **competitive advantage and maintain a leading position** in the transformation of the Spanish residential and real estate sector.

From a purely product point of view, new buildings are expected to be sustainable, smart, safe, adapted to new user lifestyles and different climate scenarios.

Neinor Homes has analysed the **trends forecast for the building sector** and the challenges it will face in the next 20 years, considering aspects such as ethics, transparency, customer focus, industrialisation, digital transformation, automation and new sustainable materials, among others.

In this context, innovation is one of the fundamental values that govern Neinor Homes, acting as a cross-sectional thread running through the company's three strategic pillars: Environmental, Social and Governance.

In **2024** Neinor Homes renewed the

AENOR Certification 166002:2021



it has been obtaining since 2016.

Neinor Homes is aware that the future of the sector involves a commitment to the trends and new technologies that will transform the homes of the future.

> COLLABORATIVE INNOVATION

Neinor Homes is committed to the **exchange of experiences and solutions** with the rest of the real estate sector and with other sectors, in order to **seek new solutions in innovation** and adapt them to the new needs of customers.

Neinor Homes
leads the way in
innovation in the
real estate sector.

- **Building Cluster:**

<https://clusteredificacion.com/>

The building sector is one of the strategic sectors in Spain due to its size and its economic, environmental and social importance. In this field, the Building Cluster operates as a non-profit association and is made up of companies, universities and research centres.

The objective shared by all is to innovate in the construction of existing and new buildings of any use or tenure.

- **PTEC: Spanish Construction Technology Platform:**

<https://plataformaptec.es/>

PTEC aims to contribute to the improvement of the construction sector through public-private cooperation in research, development and innovation, carried out between companies, business associations, universities, research centres, technology centres and customers.

- **Implementation of the Life Cycle in all works: LCA Neinor**

<https://itec.es/infoitec/sostenibilidad/neinor-homes-implanta-el-analisis-del-ciclo-de-vida-en-todas-sus-obras/>

Implementation of a digital tool in all works to carry out Life Cycle Analysis and quantify their environmental impact automatically, according to the different stages of the manufacturing process, construction, use and end of life.

Project backed by the independence of the Institute of Construction Technology, whose environmental database BEDEC Sustainability provides rigour and transparency.

This is an innovative initiative that confirms Neinor Homes' commitment to the environment and sustainability in its strategy to reduce the Scope 3 carbon footprint. Fundamental objectives to decarbonise the development sector and respond to the housing needs that exist in Spain without compromising the future of coming generations.

- **Hobeen (free-of-charge innovative app) and Neinor Homes cooperation agreement**

<https://www.estrategiasdeinversion.com/actualidad/noticias/empresas/neinor-homes-ayudaa-sus-clientes-a-ahorrar-hasta-n-704121>.

Neinor Homes is offering an innovative service that is a **#pioneer** in the sector, thanks to the signing of an agreement with **Hobeen** so that our customers can constantly monitor their energy consumption and ensure **#savings** in their day-to-day life, promoting a more **#sustainable** and environmentally responsible lifestyle.

- **Neinor Homes is participating in the international INDICATE project to quantify and establish limits on the carbon footprint of buildings**

<https://www.estrategiasdeinversion.com/actualidad/noticias/empresas/neinor-homescolabora-en-el-proyecto-indicate-n-724735>

An initiative, coordinated by the University of Seville and GBCE, which seeks to establish a unified methodology for calculating the carbon footprint in the construction sector.

Neinor Homes, as a pioneer in the LCA calculation of its projects, has provided the global warming potential (GWP) data of several of its developments throughout their life cycle. This cooperative effort underlines Neinor Homes' commitment to reducing the carbon emissions of its developments throughout their life cycle, marking a key milestone in the promotion of sustainability in the construction sector.

AGREEMENTS WITH SUPPLIERS

In addition, Neinor Homes is actively working through technology and research and development, together with many of our main material suppliers, to reduce our emissions and increase the recycling and reuse of waste (cases and agreements detailed in the environmental sections 8.2 and 8.3); the impact in the media is set out below:

<https://www.estrategiasdeinversion.com/actualidad/noticias/empresas/neinor-homes-consolida-sualianza-con-cemex-para-n-644675>.

<https://www.bolsamania.com/noticias/empresas/neinor-homes-alia-cortizo-uso-aluminio-pvc-reciclado-proyectos-14716524.html>

<https://www.estrategiasdeinversion.com/actualidad/noticias/bolsa-espana/neinor-homes-firma-un-acuerdo-con-porcelanosa-n-673523>

<https://www.europapress.es/economia/noticia-neinor-homes-saint-gobain-firman-acuerdo-impulsar-construccion-sostenible-20240109120811.html>

<https://www.bolsamania.com/noticias/empresas/neinor-homes-yuonor-colaboran-para-reducir-la-contaminacion-en-la-construccion-15923190.html>



COOPERATION AGREEMENT WITH CEMEX VENTURES

In 2024, a collaboration agreement between CEMEX will be maintained Ventures, the Corporate Venture capital of CEMEX and Neinor Homes with the objective of **establishing synergies** to improve the construction and promotion industry. With this collaboration both companies **will exchange information about startups** that may be of interest.



INNOVATION PROCESS IN CONSTRUCTION

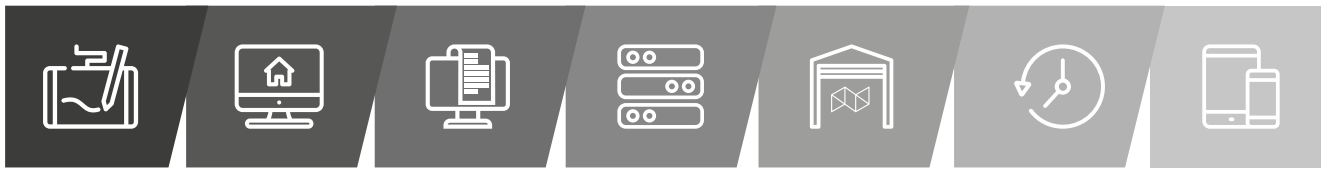
At Neinor Homes we understand industrialisation to be a **holistic process of integrating all the design, planning and construction processes** in which people, processes and technology play a fundamental role. That is why from the outset we have opted for the implementation of all its projects in **BIM**, a digital work environment that allows the degree of cooperation between agents and the flow of information and resources necessary for the development of industrialised construction. We are developing an open industrialisation that allows us to adapt to the needs and requirements of each project. Depending on the typological and morphological characteristics of the product, requirements and location of the plot, as well as cost, time and sustainability needs, we select the systems that best adapt to these circumstances. There are several projects in which we have incorporated industrialised construction processes and elements for the construction of the structure or façades.

> DIGITAL TRANSFORMATION

At Neinor Homes we understand digital transformation to be **part of our corporate culture**, as a vision and a way of doing things, rather than as one or several projects. For this reason, it is something that we imprint on all elements of the company.

We have various **internal applications for the use of the staff**, which digitally controls their shifts, their holidays or teleworking and allows them to access general information, such as the company's organisation chart.

Moreover, technology is something we apply throughout the entire real estate value chain, from the selection of land to the study of its suitability, to the feasibility of the project, to how we build.

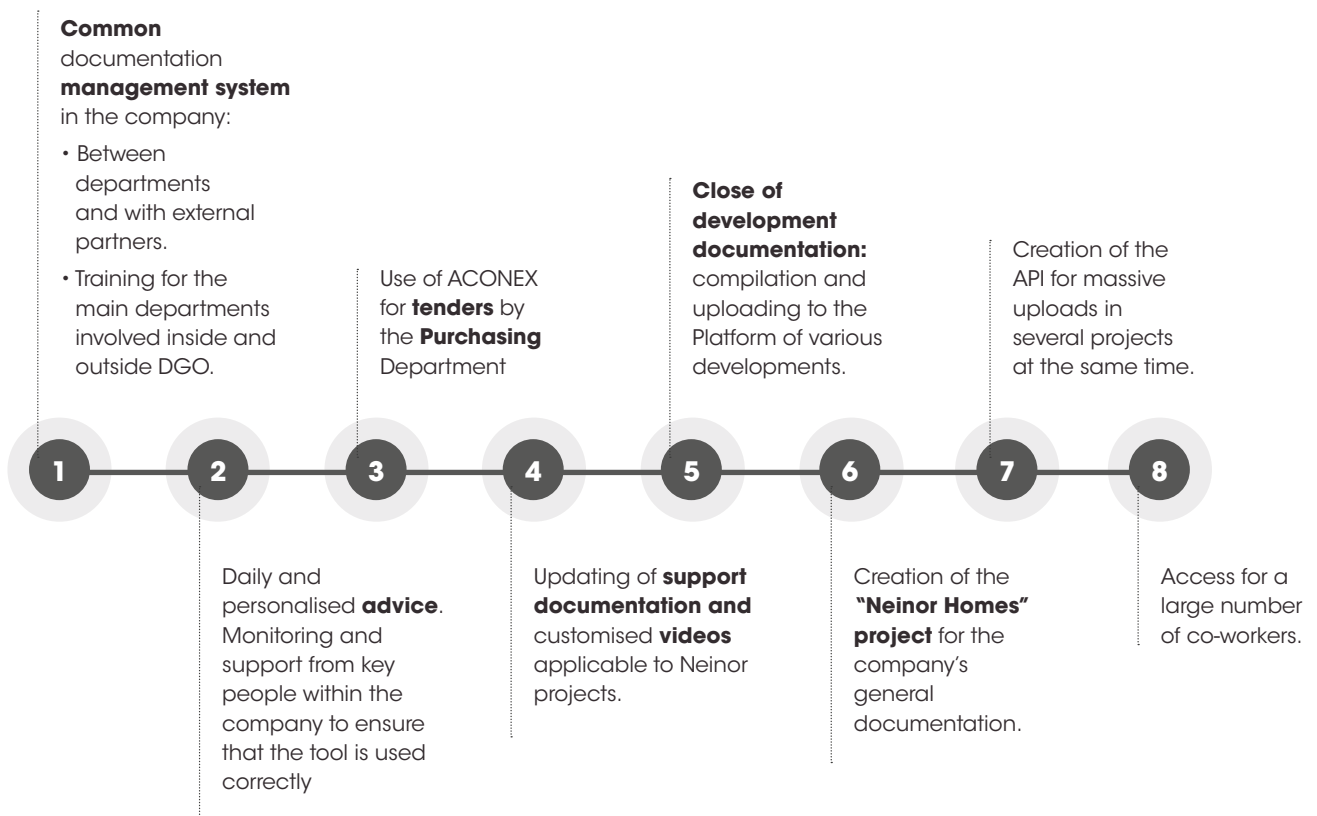


ACONEX

Having a document manager for the organisation is essential in order to promote communication, information and project management.

Aconex is working on the integration of this tool so that the information is organised and accessible, whatever the project, all in the same way.

WHAT HAVE WE ACHIEVED SO FAR?



WHAT ARE THE OBJECTIVES ACHIEVED WITH THE TOOL?

Creation of **workflows**:

- Commercial documentation.
- Project phases.
- [...]

- Single use for all documentation management (internally and externally).
- Correct file naming and labelling.
- Version management.
- Traceability.

Reducing the documentation load in F: **Upload all common company documentation to Aconex:** Upload procedures and templates

SUPPLIER PORTAL

- Ease of signing up of suppliers and receipt of invoices.
- Reduction of deadlines and costs.
- Increased visibility of invoice status.
- Avoiding risks of CEO-type payment attacks.

DIGITAL SIGNATURE

- Through digital signatures, contracts can be signed digitally without the need to sign them in person.
- Implemented in the purchasing area, for the signing of works contracts and framework agreements and for commercial for customer reservations.
- **+ 4,667 transactions signed in recent years.**

ONLINE SALE / RENTAL

- Immediate availability, with information updated in real time: a customer can purchase at any time.
- Reduced fees and commissions: as we are direct sellers we avoid commercial intermediation payments.
- Global reach: we are extending our borders and opening up to international buyers, who can buy from Spain and from any country.
- Competitive advantage over competitors: online sales are becoming more and more common in all sectors, including property development. Being the first to implement it reinforces our brand image and strengthens our track record, as well as putting us ahead of the competition.
- Low-cost sales channel: once the first technological investment has been made, it does not require significant amounts of maintenance. The investment in processes derived from its implementation is used to obtain synergies in other aspects; digital signature, automatic synchronisation with Prinex, WEB synchronisation, etc.

INVOICE APPROVALWORKFLOW

We have succeeded in automating the process of invoice endorsement and approval for real estate business anytime, anywhere and from smartphone or tablet.

This provides managers with an easy-to-use endorsement tool, for use in any location without having to be connected to the ERP.

This allows us among other things to:

- Endorse invoices with a choice of different routes for the final approval of each invoice.
- Authorise payments by providing remarks or reasons for refusal, if any.
- Consult all the information on an invoice, as well as the documentation associated with it.
- Know the budget allocations that each invoice line has.

PURCHASE REQUESTWORKFLOW

We manage all purchase requests from the time they are registered with each of the companies until they are approved.

This also allows us to monitor the quantities requested compared to those budgeted to immediately detect deviations.

It is possible to allocate invoices from the approved purchase requisition until fully consumed.

AFTER SALES APPS

Aimed at improving and providing a better service to our customers through complete functionality, to be able to carry out a proper management of after sales services as a key and stand-alone feature.

This is available via a mobile phone app for the visitor role, and via web app for the supervisor, allowing, among other things:

- Creation of pre-sales and post-sales incidents during the same visit to the property in a quick and easy way (with photographs, documentation and customer approval) and all from a smartphone or tablet.
- Incident management by the supervisor: assignment to suppliers, transit of incident statuses, etc.
- Issuance of work reports to suppliers.
- Creation of Big Data for exploitation.

CUSTOMER PORTAL

Improved customer service, allowing you to access all the information of your sales and rental contracts anytime, anywhere and from any mobile device.

- Strengthens and optimises your service to the customers of your real estate company.
- Allows buyers and tenants to immediately access their contract information.
- Accessible from anywhere.
- Easy access to your contractual details, financial data and images.
- Manages your payments, invoicing and property incidents.
- Finds information about your properties and real estate.
- Customises your experience with the options available on the Prinex Customer Portal.

DGO GUARANTEES

WEB application for the management of bank guarantees received, maturity calendar and automatic e-mail alerts management.

PURCHASING APP

Web platform for purchasing department management, divided into the following main modules:

- Developments
- Companies
- Recruitment (recruitment database)
- Framework Agreements (services)
- Approval notes (related to supplier evaluation)
- Tenders (ratios, savings tables)
- Price (database of items/references per development)

A series of Power BI files have also been designed to obtain interactive graphics.

APPROVAL OF SUPPLIERS

All suppliers working with Neinor, including Architects and Construction Companies, must be previously approved in line with the quality levels required by Neinor. The updated approval table can be found in the Purchasing App. Re-approval is annual.

EVALUATION OF SUPPLIERS AND SUBCONTRACTORS

- **Suppliers:** All approved suppliers working with Neinor are periodically evaluated through an app. Both scores (evaluation and approval) generate an overall score for the supplier which is recorded in the Purchasing App.
- **Subcontractors:** The subcontractors contracted by the builder are also evaluated in order to keep a record of each one and to avoid working with those, if any, that have not given good results on site.

FRAMEWORK AGREEMENTS

- **Web platform** for monitoring framework agreements with various manufacturers nationally. Access from two types of user profile.
- **Project Managers**
- **Neinor Purchases**

Entries for manufacturers with whom we have a framework agreement for the calculation of the agreed rebate are compiled by development. A PowerBI has also been designed to obtain graphs.

And, last but not least, we apply technology to the end of this chain, which is customer service for customers who have already bought a home with us. For this purpose, we have Neinor Experience, made up of a great team that responds to any incident or doubt that the customer may have, accompanying them at all times from the moment they reserve their home, while it is being built and even after delivery, all through both traditional and digital channels.

Our approach to innovation is aimed at covering the entire value chain of the company, from the study for the purchase of land to the after sales of the development delivered. Throughout the entire process, needs have been identified and cross-sectional projects have been defined to cover these needs.

In this way, as the leading residential platform in Spain, we apply our vision of digital transformation to all of the company's business lines.

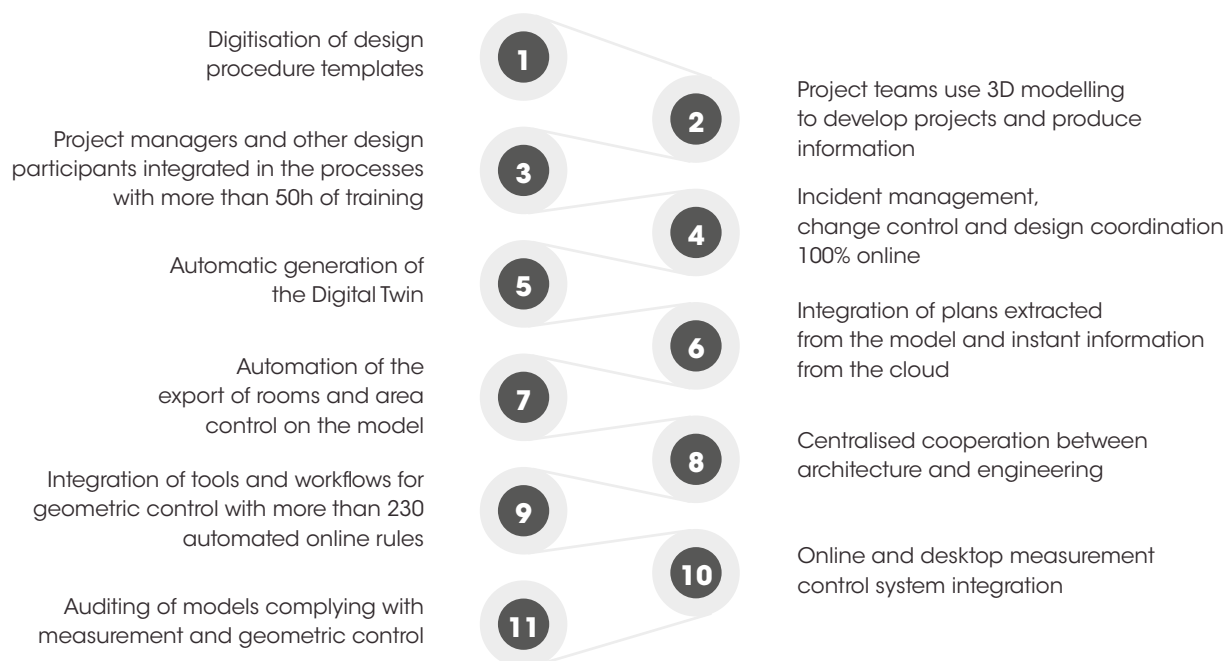
At Neinor Homes we use and have **incorporated technology and various digital enablers** throughout the entire product lifecycle.

- We support land acquisition through our Big Data tool that allows us to take better decisions. This **Big Data** tool provides us with a great deal of data about a piece of land, an area, how prices are going to behave etc., which allows us to make decisions based on concrete data, not on intuition, and that ultimately allows us to mitigate risk. But data without knowledge is useless. We need the human factor and experience to know how to interpret this data, and that is where Neinor Homes provides stand-out value, thanks to the combination of technology with the best professionals in the sector.
- From the design to the construction of the homes, we incorporate **BIM**, which allows a cooperative work methodology that centralises all the information of a project in a digital model.

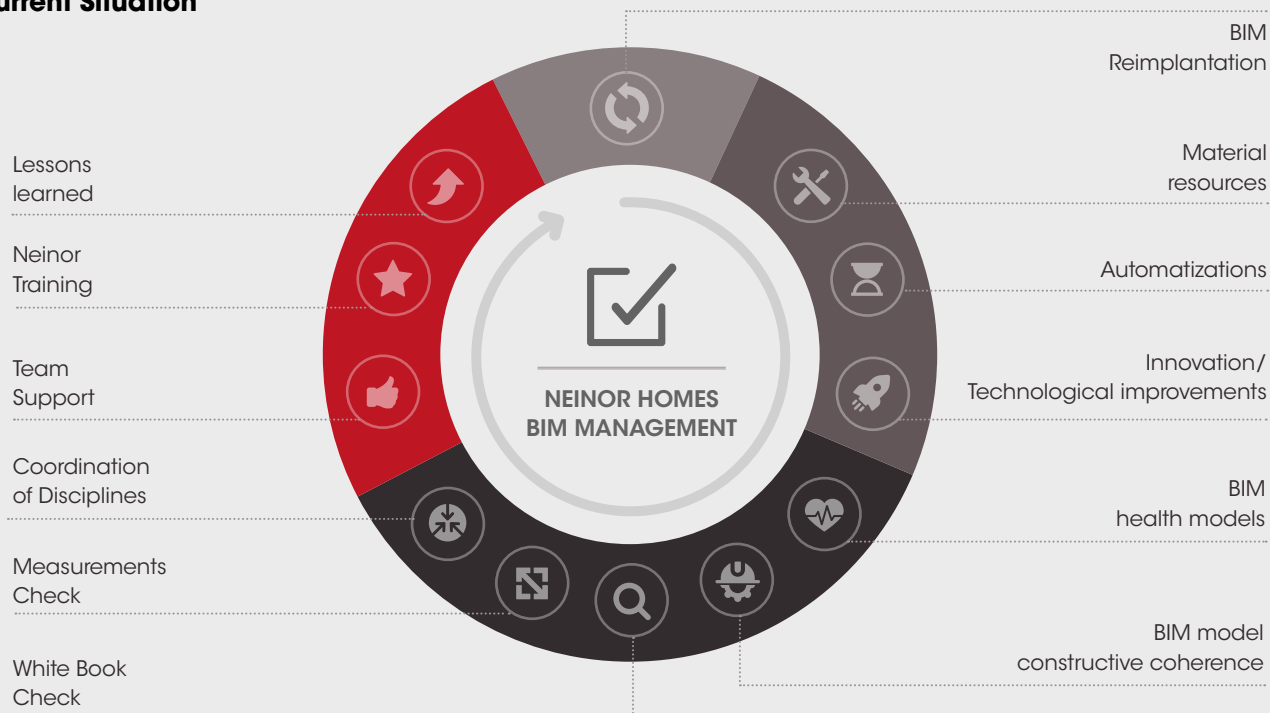
BIM

One of the most important projects within the Operations Area has been the commitment to the digitalisation of our developments in all their phases, starting with an integrated management of the project phase, in order to be able to close the circle with the construction phase in the near future.

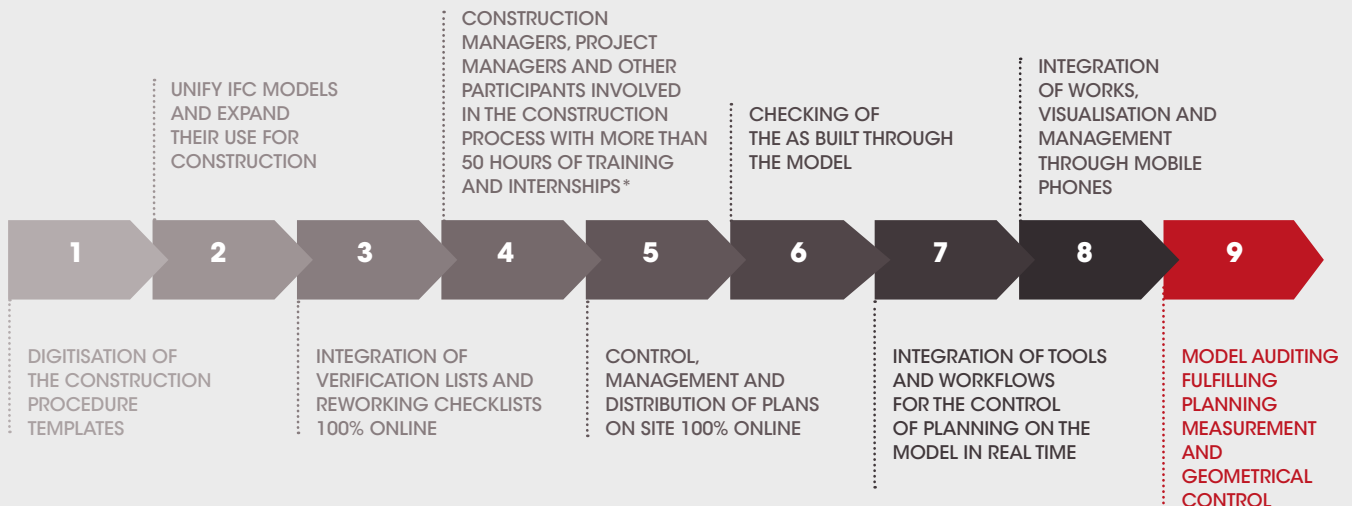
To date **we have achieved:**



Current Situation



2024 Objectives



* With more than 50 hours of training and internships.

TOOL DEADLINES

We have achieved:

- Optimisation of the company's internal processes
- In response to this, a Deadline Management tool has been built to improve the coordination and monitoring of our processes, leading to a reduction of internal efforts and an improvement in the delivery times of our developments.
- Knowledge in real time of the status of tasks and projects.

Territorial Director who wants to know when the draft infographics will arrive.

Marketing agent who needs to know when the marketing pack will be available.

Marketing manager who needs to know when the Basic Plans will arrive to send them to infographics and mock-ups, etc.

- Save **time by eliminating meetings** dealing with to-do's, status updates and spreadsheet updates.

Thursday meetings (Launch 1st GO).

Meetings in each territory to gauge the status of pending launches.

- Improves teamwork productivity irrespective of physical location.
- It has **task notifications**, so it is harder to miss something important.

Working with increasing volumes increases the possibility of forgetting things.

Notifications make it easier to organise the tasks to be carried out during the week.

- All persons assigned to a project can **consult project files and documents**, without having to request them by mail, which **speeds up work and decision-making**.

Back Office will not have to chase the various departments so that they send the information by mail.

Marketing agents will not be so insistent on knowing when the marketing pack will arrive.

- Allows comments to be **entered, partially eliminating the sending of emails** and logging a history of the conversation.

Possible oversights when copying someone involved.

Eternal searches for e-mails proving "I told you so" ...

- All **tasks and updates are synchronised and in the cloud**, so information is always backed up and secure.

This eliminates the possibility of not knowing what the final infographics are.

- For the marketing of our homes we apply various technologies both in the physical and online channels:
- On the one hand, we have created Neinor Stores, a technological sales space that allows us to increase the satisfaction and knowledge of our customers, where we combine Virtual Reality, interactive screens and real-time analysis tools to better understand the profiles and needs of our customers.
- On the other hand, we now allow online booking and are working to complete the home buying process in an online environment, increasing the accessibility, simplicity and intelligent conveyance of the property to increase and guarantee the confidence of our customers.
- In the delivery of our homes, our **Neinor Experience** digital platform allows us to control the entire process digitally, from the deed signing process to the after sales process.

It is also worth highlighting the developments we are implementing to promote our new **Neinor Rental** business line, with which we have the first platform capable of offering 100% of the rental services. In this regard, within this business line we are working on the development of online booking and rental.

09

WE HAVE A
**COMMITTED
TEAM**

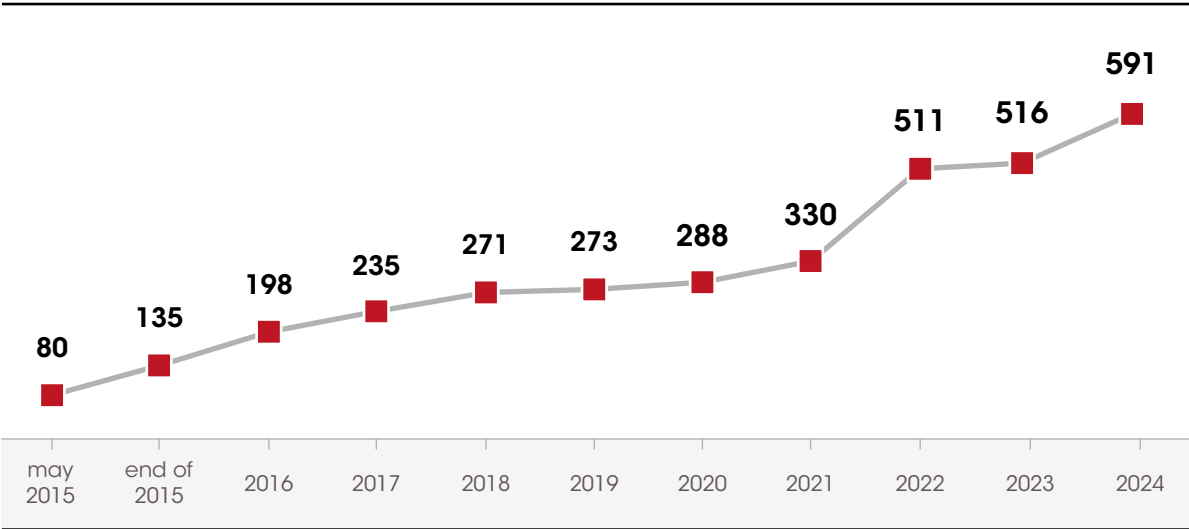


One of Neinor Homes’ priorities is to offer its human team an **attractive environment** where they can develop professionally and where they can reconcile their personal life with their work. All of this is based on **equal opportunities, transparency, health and safety**.

Neinor Homes is a benchmark company in the real estate sector, offering an **attractive environment in which to work**, generating quality employment, fostering the development of talent and continuous training and promoting well-being, work-life balance and safety. The company always seeks **maximum transparency in communication and involves the entire workforce in the innovation and growth** of the company. Only by working daily with all these values in mind can we be at the forefront in a sector that increasingly demands **greater dynamism and professionalism**.

Since its creation in 2015, Neinor Homes has grown exponentially increasing its workforce by a factor of 7.4 in those 9 years. This requires effective people management, which is determined by a **Strategic Human Resources Plan** closely linked to the company’s three strategic pillars.

STAFFING TRENDS



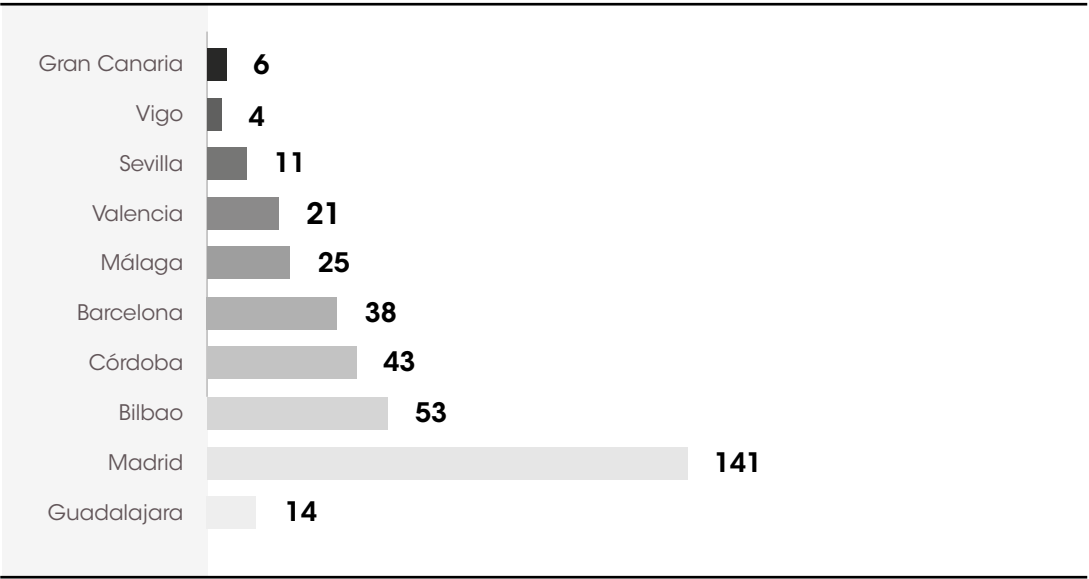
In 2024 Neinor Homes had a workforce of **356 employees***, **51.12% men and 48.88% women**. Neinor Homes is committed to talent and professionalism when it comes to putting together its work teams, which is why it has a great diversity of profiles. In this regard, the **average age** of employees in 2024 was **46.03 years**.

*Employees of Renta Garantizada (39) and Quabit Construcción (196) that are being integrated into the group are not included in these calculation.

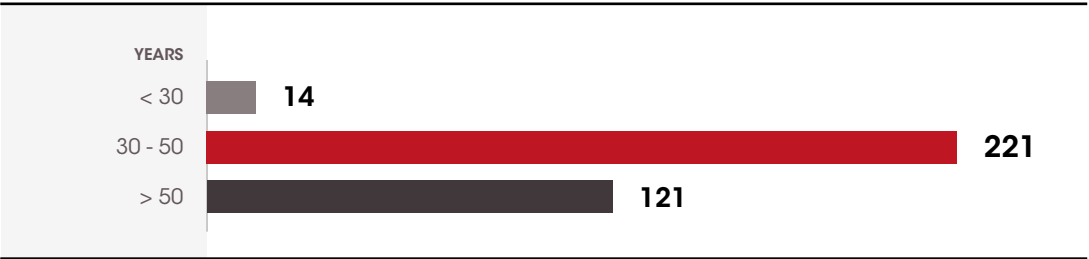
In 2022 the number of employees increased considerably due to the Group's inorganic growth through two corporate operations that incorporated Renta Garantizada and Quabit Construcción to the business. As mentioned earlier, in 2024 the company took on a new growth challenge by acquiring a 10% stake in the property developer Promotora Habitat, taking on 100% of its workforce and thus growing exponentially in terms of assets, personnel and workplaces.

Currently, it is located in **10 territories** throughout Spain: Madrid, Bilbao, Cordoba, Barcelona, Malaga, Valencia, Guadalajara, Vigo, Gran Canaria and Seville.

GEOGRAPHICAL DISTRIBUTION OF STAFF*



DISTRIBUTION OF THE WORKFORCE BY AGE RANGE*



Neinor Homes is a company committed to the differential value of its candidates/employees. In some cases, this is a given due to specific training and qualifications and, in many other cases, to years of experience in the sector.

As shown in the graph above, more than 62% of the workforce is between 30 and 50 years of age. In addition, 129 new employees joined the company in 2024, 75 of whom were over 45 years of age.

This is a very significant figure and is seen as a very important value in the company. In our opinion, in the future, age discrimination is going to be one of the biggest forms of discrimination in the business world and this is already becoming apparent. In this connection, Neinor Homes is taking advantage of the knowledge that these employees possess, thanks to their extensive working history: more than 33% of its workforce reflects this fact.

At Neinor Homes*, **99,45% of employees are subject to the construction industry collective bargaining agreement** in force in the autonomous community in which its headquarters are located, and 0.55% subject to the real estate management and mediation agreement. In addition, freedom of association is guaranteed and union representatives are provided with meeting rooms for their meetings, with trade union representatives affiliated to the ELA union in Bilbao, and in Cordoba to the UGT and CCOO unions. Collective agreements in the construction sector establish the health and safety aspects of the sector's activities, including issues such as the minimum safety provisions applicable on construction sites and health and safety training to be provided.

*Not including the employees of Renta garantizada (39) or Quabit Construcción (196) who are being integrated into the group.

We consider that measures at the social level and analyzes and information offered by the HR team in this matter, is representative of the majority of the staff that works at Neinor Homes.

Quabit Construction’s relevant staff data and information would distort the overall data, to the extent that the characteristics of the business and its peculiarities are totally different; for having the masculine gender as the most representative in the works (motivated by the type of sector), because the type of contracting is very different between construction companies and offices, due to the different accident rate that exists between construction companies and offices, and by multiple other factors.

In this sense, we believe that it is better to break down the information of Quabit Construction, taking into account the uniqueness they have construction companies. We show the main data of information corresponding only to the part of the construction company and we have considered that it is better to separate it in this way while that we are giving the detailed breakdown of Neinor Homes throughout the information provided by the HR team specifically with anteriority.

Given the materiality of said template, below we show the following data from the construction company that we consider relevant to HR matters.

As of December 31, 2024, the number of employees with whom Quabit Construction had 96. Among them, 2 of They had disability certificates.

- There have been 21 work accidents, of which 8 have been with sick leave and 13 without it. All of these 13 accidents without sick leave were minor accidents.
- The company carries out exhaustive and rigorous monitoring of the safety measures on site, providing training on this matter to their employees.
- The number of training hours has been 729 hours.
- The absenteeism rate has been 6.59%
- In fiscal year 2024, parental leave has been requested (maternity, paternity, breastfeeding...) for a total of 5 employees, assuming casualties due to said permits of 595 days.
- The average salary by **Quabit categories** is:

	AVERAGE SALARY
Senior Managers	190,280
Engineers and Technicians	46,446
Administra5ve	25,064
Produc5on Staff	32,982

9.1. EQUALITY AND DIVERSITY

Neinor Homes is firmly committed to **equal opportunities, non-discrimination and respect for diversity**, which is also reflected in the principles of its Code of Ethics and Code of Conduct with third parties and in its Diversity and Non-discrimination Policy. The best proof of this is that there is practically **parity between men and women** among its employees, which is remarkable considering the particularities of the sector in which it operates. There are currently 13 women in STEM (Science, Technology, Engineering and Mathematics) or similar positions, and 32% of management positions are held by women. However, at Neinor Homes, equality is applied in a broader concept than gender, as it aims to promote equal rights and obligations for all people. In this regard, the company's practices are aimed at complying with the **ten Principles of the United Nations Global Compact**, and the 17 Sustainable Development Goals (SDGs), particularly in this case those relating to **human rights, labour and equality**.

At Neinor Homes, there have been no complaints of human rights violations, respecting freedom of association and collective bargaining as evidenced by the interrelationships with workers' delegates and committees. There is no employment discrimination of any kind and no forced or compulsory labour is carried out.

The Board of Directors of Neinor Homes has approved a **Diversity and Non-Discrimination Policy** that establishes the criteria and guidelines to achieve equal treatment and opportunities and to eliminate any type of discrimination based on gender, origin, age, race, culture, ideology, religion or disability.

Moreover, no complaints of discrimination or inequality have ever been received.

In addition, in 2023, the **protocol for the prevention of sexual and gender-based harassment** was approved.

Diversity and non-discrimination policy **guidelines**:



PROMOTING EQUAL OPPORTUNITIES

Guarantee for all employees of equal treatment and equal opportunities in terms of access to employment, job classification, performance evaluation and promotion, remuneration, training and work-life balance.



RESPECT FOR DIVERSITY

Rejection of any discriminatory or intolerant behaviour in the organisation, considering diversity as a value that contributes different visions and promotes the generation of new ideas and creative and innovative alternatives.

Equality
Plan approved
in 2023.



INTEGRATION AND INCLUSION

Cooperation and teamwork so that all professionals, irrespective of their seniority in the company, previous experience or any other condition, can form part of the company, with a strong commitment to the inclusion of specific groups with different abilities.



CONDUCT OF THIRD PARTIES

Extending of commitments to respect diversity and non-discrimination to all stakeholders, particularly with regard to raising awareness among suppliers and contractors.



WORK ENVIRONMENT

Preserving a harassment-free environment at work, fostering an atmosphere of respect and acceptance, strengthening the company's diversity, inclusion and non-discrimination awareness and culture, and guaranteeing freedom of association rights as set out in international standards.

> EQUAL PAY

The Board of Directors of Neinor Homes strives to ensure that remuneration for positions of equal responsibility and functions is the same throughout the company. This is because avoiding discriminatory biases in remuneration is key to fostering an environment that promotes diversity, which is considered one of the main values of the company's human capital.

Neinor Homes guarantees respect for equal pay and has reflected this in its Diversity and Non-Discrimination Policy. Furthermore, in its 2022-2025 Sustainability Plan, it is committed to introducing measures to eliminate the wage gap, in line with the company's goal of achieving wage parity among employees. The Human Resources department is responsible for ensuring that this course of action is implemented between 2022 and 2025.

The remuneration structure of all professional and responsibility categories in the group is conceived under the criterion of gender neutrality. Furthermore, in order to promote wage parity, Neinor Homes monitors and compares the annual salary of women and men, at all management levels, during the salary review process that the company carries out annually, and which is based on the individual performance assessment and common criteria for both genders.

Based on the principle that men and women are entitled to equal pay for equal work (salary equality), the difference between the average pay received by men and women (pay gap) has been calculated.

In the area of remuneration, 100% of the company's employees are covered by general collective agreement terms, thus improving the minimum conditions established by the various employment regulations. The Collective Agreements govern the remuneration received by the employees subscribed to them, and in particular establish criteria of equity between similar jobs, thus avoiding the existence of gender discrimination and the wage gap between equivalent jobs. However, the mathematical calculation of the pay gap, understood as the difference between the average hourly remuneration of men and women compared to the average hourly remuneration of men, is 40.97%, the **average remuneration of the Group being €55,521: €69,472 for men and €41,009 for women.**

The information obtained from this analysis will be used to study the data by line of business and level of responsibility to define whether there is a gender gap in jobs of equal activity, or whether the difference is due to any other cause (seniority, performance, results, etc.). Neinor Homes' objective is to eliminate any cases of this type of inequality that may be detected.



GENDER PAY EQUALITY ANALYSIS¹

CATEGORY	AVERAGE REMUNERATION	N° OF PERSONS	AVERAGE AGE	AVERAGE LENGTH OF SERVICE	% VARIATION	ADJUSTED AVERAGE REMUNERATION	ADJUSTED % CHANGE
TOP MANAGEMENT					68,29%		
Men	259.980€	9	46,32	8,78			
Women	82.456€	3	44,97	10,85			
AREA MANAGERS					-0,79%		
Men	102.548€	36	54,41	10,30			
Women	103.359€	8	49,58	9,86			
MANAGERS							
Men	62.488 €	42	47,99	7,32	19,13%		
Women	50.534 €	30	45,7	8,91			
TECHNICAL STAFF							
Men	45.569 €	72	43,98	6,04	12,35%		
Women	39.943 €	68	42,69	6,89			
ADMINISTRATIVE							
Men	26.899 €	17	46,31	6,58	-0,44%		
Women	27.017 €	64	44,73	8,54			
SITE PERSONNEL							
Men	46.689 €	6	53,02	2,52			
Women	0 €	0	0	0			
GRAND TOTAL	55.521€	355	46	7,82	40,97%		

¹ Remuneration is calculated on the basis of the contractual conditions of each employee.

² In the Equity Analysis table we have 355 since the CEO is not taken into account.

COMPARATIVE SALARY GAP VARIATION

	%VARIATION		ADJUSTED % VARIATION	
	2023	2024	2023	2024
TOP MANAGEMENT	68.29%			
AREA MANAGERS	29.76%	-0.79%	19%	
MANAGERS	22.63%	19.13%		
TECHNICAL STAFF	16.11%	12.35%		
ADMINISTRATIVE	2.97%	-0.44%		
SITE PERSONNEL	40.89%			

The 68,29% pay gap in the Top Management category in the 2024 financial year is so high because it corresponds to the inclusion in Top Management of 4 female employees, who had less responsibility and were not part of Top Management in previous years.

However, in the rest of the categories a significant decrease is reflected, highlighting the category of Area Directors, where not only has the gap been reduced, but in 2024 the average remuneration of women is 0.79% higher in proportion to that of men.

It can be said that the company has had a positive effect on the reduction of the gender gap; a reduction substantially reflected in each different category and ratios.

The underlying cause of the pay gap existing in certain categories is the lower presence of women in the workforce, a situation common in the development and construction sector, and which is accentuated in senior management positions, area managers (the two areas with the highest remuneration) and site personnel.

A clear example of this is that, if we focus on the administrative category, the number of women in it was higher and the average salary was higher for women than for men (0.44%). By the end of 2024 there was greater equality between men and women, with the following figures: 48.88% women and 51.12% men.

The Sustainability Plan sets out a commitment to introduce measures to increase the number of women in management positions between 2022 and 2025.

This is a sector in which there is a greater presence of men than women and although in recent years greater equality is being achieved, the reality is that when it comes to hiring experienced professionals, equality here is much more difficult and sometimes practically impossible for some positions/categories, such as construction work, for example.

Neinor Homes defends salary equality and is committed to reducing the pay gap. To mitigate this situation, in 2023 Neinor Homes has approved its Equality Plan, for the preparation of which it has reviewed that the commitments and plans in terms of equality are aligned with the European Strategy for Gender Equality 2020-2025 and with national legislation.

The approval of the Equality Plan represents the attaining of a milestone of the 2022- 2025 Sustainability Plan. The next milestone to be reached, also included in this Plan, is to train in equality and diversity (as a minimum) the management team, those responsible for selection processes and the members of the Equality Committee (the composition of which is defined in the Equality Plan). This milestone has been materialized in 2024, training the entire workforce in equality and prevention of sexual and gender-based harassment, in addition to training to those responsible for selection in specific training in selection with a gender perspective.

With regard to **remuneration equality of the Board of Directors** of Neinor Homes, this is fully in place and there is no difference between the salary received by men and women, as detailed in the Remuneration Policy and in the Annual Remuneration Report.

The remuneration of non-executive Directors, who qualify as "independent" and "other external", is as follows:

Fixed remuneration:

- Pr-Chairman of the Board: €121,325 per year;
- Other independent and other external directors: €89,675 per annum each.

Per diems for attendance at meetings of the Board and its Committees:

- Board meetings: €3,000 per meeting;
- Committee meetings: €1,500 per session of each Committee.

The average amount received in 2024 by the 4 Independent Directors (1 woman and 3 men) was €132,212.

Given the above, the only thing that makes the salaries received by Directors different is the allowances for attending Board and Committee meetings, which in turn depend on the number of Committees on which the Director sits and the number of times they meet during the year.

In 2024, the Board met 15 times, the Audit and Control Committee 8

* The gap is explained by more work experience and more seniority in the company.

times, the Appointments and Remuneration Committee 4 times and the Land Investment Committee 4 times. Some of the meetings were held in writing, which did not give rise to any entitlement to attendance fees. The remuneration of each Director, both annual remuneration and attendance fees (per diems) are described in the Annual Remuneration Report.



EQUALITY PRACTICES AND MEASURES ADOPTED AT NEINOR HOMES

- **Access to employment:** definition of requirements in job offers that provide equal employment opportunities and non-discriminatory recruitment and interviewing processes.
- **Performance evaluation and promotion:** use of objective and egalitarian criteria when evaluating the performance of employees and their promotion. In addition, the presence of women on governing bodies is encouraged.
- **Remuneration:** seeking homogeneity by professional category to reward employees according to their development and performance evaluation, not encouraging the existence of unjustified inequalities.
- **Training:** Training courses for all members of the company to improve and broaden their knowledge for the development of their job.
- **Work-life balance:** definition and implementation of 13 measures that favour equality and that reconcile and integrate professional activity with family and personal responsibilities.

The Human Resources Department, together with the GRC Department, will ensure compliance with and application of this Equality Plan, in collaboration with the rest of the departments that make up Neinor Homes. For its part, the Internal Audit Department periodically reviews and reports on compliance with the guidelines of the Diversity and Non- Discrimination Policy. At Neinor Homes we **had 6 employees with different abilities during 2024**, in addition to directly working with **3 subcontracted cleaning workers** who provided services in our work centres for the correct maintenance of the offices.

9.2. PROFESSIONAL AND PERSONAL DEVELOPMENT OF THE EMPLOYEES

The achievements so far and the continued growth of the company have resulted in **129 new recruits in 2024, of which 118 became part of the workforce in October 2024, after the taking over of the management of the assets of the developer Habitat. Of the remaining 11 new recruits, these were technical and commercial positions where the company recruited 5 women and 6 men.**

Of the 129 new recruits, 65 have been women and 64 men, 10 are under 30, 70 are between 30 and 50 and 49 are over 50. This has been made possible thanks to **the search for the best professional training and the attraction of talent** in the recruitment process.

In 2024 the recruitment rate is **7.48% (it is important to have keep in mind that with the hiring rate we are doing reference to the % of incorporations as a consequence of a process of selection -11 hires- and not of personnel subrogation).**

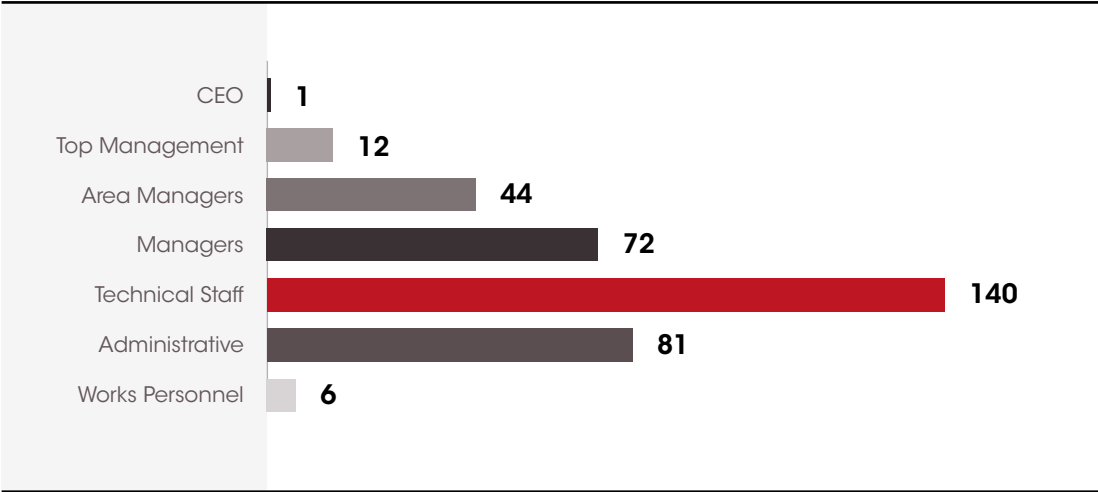
In 2024 we worked hard to **internalise the selection processes for as many positions as possible** in order to be able to rely on the valuable information that facilitates these processes having closed **100%** of new hirings by this means, despite it being a year in which the structure of the workforce has been consolidated, and the number of new hires in terms of promotional activity has been less than 5% and has mainly involved technical positions, where the requirements for the positions has made it impossible to evaluate internal candidates. Even so, the company remains committed to the talent of its teams and studies the possibility of growth and promotion on each occasion, with **two internal promotion having taken place in 2024.**

Neinor Homes defends **quality employment** and fosters a sense of belonging among its workforce and its consolidation, which is why practically the entire workforce, 99.44%, has a permanent contract, 98.87% of which are full-time, including medical insurance. Despite the fact that the competition is attracted to its valued workers, and it continues to be a focus for recruitment for head-hunters and recruitment experts, the **turnover rate** in the 2024 financial year was **11% (in 2023 turnover rate was 12%)**. We can affirm that each year we have more experienced staff, with greater seniority, which allows us to be without doubt a consolidated benchmark in the real estate sector.

Neinor Homes has a consolidated team of professionals with extensive experience in the industry who are committed to its growth as one of the leading developers in the market.

In 2024, the number **of non-voluntary terminations was 17**: 6 women (between 30-50 years old) and 11 men (5 between 30-50 years old, and 5 over 50 years old). The total number of dismissals, most of which were due to objective causes, continue to be the result of organisational restructuring processes. During the last two years we have tried to relocate as many colleagues as possible to other areas, but in 2024, despite the effort, we have had to dismiss some colleagues due to oversizing and a lack of workload in some departments.

DISTRIBUTION OF STAFF BY PROFESSIONAL CATEGORY



DISTRIBUTION OF STAFF BY TYPE OF CONTRACT

DISTRIBUTION OF STAFF BY TYPE OF CONTRACT												
	WOMEN	MEN				> 50 YEARS						
		< 30 YEARS		30 - 50 YEARS		TOP MANAGEMENT		MANAGERS		ADMINISTRATIVE		
						CEO	AREA MANAGERS	TECHNICAL STAFF	SITE PERSONNEL			
PERMANENT CONTRACTS	174	180	14	221	119	1	12	44	72	138	81	6
TEMPORARY CONTRACTS	0	2	0	0	2	0	0	0	0	2	0	0
FULL-TIME CONTRACTS	171	181	13	220	120	1	12	44	72	140	77	6
PART-TIME CONTRACTS	3	1	1	1	1	0	0	0	0	0	4	0

Neinor Homes is committed to the professional growth of talent within the company, favouring the evolution and development of its employees. In relation to this, **annual salary reviews** are carried out of fixed and variable salary, which are directly linked to the employee's performance and their ability to achieve the company's objectives.



ATTRACTIVE AND FLEXIBLE REMUNERATION

Neinor Homes has implemented a variable remuneration policy to ensure the sustainability of the company. The variable potential is linked to the achievement of EBITDA. It decreases if EBITDA falls below a certain minimum level and likewise increases if EBITDA exceeds a certain threshold. 100% of the resulting incentive is split between Departmental or Territorial targets and Individual targets. Once the bonus has been calculated using this formula, meritocracy is objectified and excellence in work is recognised according to performance.

Neinor Homes works with universities and schools; we offer internships in the company with the possibility of future recruitment. In 2024, 2 internships and 1 traineeship contract have been signed up.

9.3. TRAINING

Neinor Homes believes that training helps to increase the **work productivity** of employees, while at the same time improving the possibilities of individual promotion.

To draw up the 2024 training plan, we endeavoured to assess the **needs and interest of Neinor's employees** by means of surveys of departmental managers and the workers' legal representatives (RLT), as well as the entire workforce.

In the **RLT group (6 respondents)**, **specific training** in each department was evaluated rather than generalised training, in addition to the fact that everything was evaluated in an employee survey.

In the employee survey conducted at the beginning of 2024, all 118 participants were particularly interested in being able to proactively participate in the design of training for this exercise.

In the year 2024 it was noteworthy that, although English was not a habitual tool in everyday business for the majority of the work positions in Neinor, it was decided there should be a qualitative leap in the training plan in order to be able to respond to the demand from workers for language training. An interactive platform was chosen through which all workers would have the possibility to learn and improve both their level of English and other languages with the greatest possible flexibility in terms of employment management and work-life balance.

Once again, during the Ethics, Compliance and Sustainability course, employees were given and reminded of advice and tools to improve their energy efficiency both in the office and at home.

Set out below are further details about the training plan. It is important to bear in mind that this Training Plan was designed before the subrogation.

Neinor Homes provides its employees with a **training platform** where the various training courses are uploaded so that employees can access them at any time. In 2024 a total of **13,336 training hours** were given, with an average of **55.10 hours of training per employee** (we have managed to increase training hours per employee by 75.42% compared to 2023) and an average cost (investment) in these training sessions of **€218.48 per employee**. The **total cost** in 2024 has been **€52,872**. This has led to a 65% increase in investment in training compared to 2023.

For Neinor Homes, the training and professional and personal growth of its employees is key, and for this reason the identification of needs is carried out from all possible sources (workers, managers, DGs and RLT).

During 2024 the company aimed to make a qualitative and quantitative leap in training, to be able to meet the demand for languages and offering a wide range, with special emphasis on English. This project allowed all workers to invest more time in training with greater flexibility.

Neinor Homes is a company founded on the professional and personal growth of its workers, and for this reason, it not only focusses on developing an Annual Training Plan covering the needs of its teams, but also promotes and encourages the possibility of helping its employees to invest in Specific Training through Flexible Remuneration as well as helping them to manage grants and subsidies for these measures (sometimes considering the possibility that this training could be carried out partly during working hours).

Some of the training provided was in the form of courses on: **Equality Training and the prevention of sexual and gender-based harassment, Cybersecurity, Negotiation, Technical Training, Training in Management Tools, Training in Compliance, Fraud, PBC and Ethics**, among others. Training was offered to all employees, regardless of whether their contract was full-time, part-time or reduced hours.

This year, not including compulsory training for the entire workforce, **216 employees** received specific training, of which 53% (116) were women and 47% (103) were men.

Finally, there were initiatives to raise awareness and involve employees in Sustainability, fostering their pride in belonging.

9.4. WELL-BEING AND WORK-LIFE BALANCE

For Neinor Homes, the **wellbeing and quality of life** of its employees outside the workplace is also important, as a happy and content worker in their personal environment will also be happy in their working environment, favouring their effectiveness and their relationship with their colleagues. It therefore implements measures that seek to harmonise professional activity with personal needs, which are materialised in the **Work-Life Balance Plan**.

The work-life balance plan includes measures to guarantee disconnection: definition of workloads, intensive working hours during the summer months (last week of June, and the whole of July and August) in addition to having been able to extend the intensive working hours to other periods such as Epiphany or Easter.. Likewise, the clocking-in app developed by Neinor Homes where employees record their working hours allows for an analysis and monitoring of the hours worked.

The Compliance (GRC) and HR Departments worked together to develop the Work-Life Balance Plan, in which Neinor Homes was a pioneer. Work climate surveys from previous years and requests from employees to the aforementioned areas have served to update the initial measures and propose new ones, with **13 measures** currently in place **to favour work-life balance**:

TELEWORKING



The general minimum criterion for the company is 4 days of teleworking per month, and may increase it substantially, being able to double and triple it, and thus offer more flexibility for greater family conciliation according to the role played and the needs in person from each department. Moreover, the company carries out an individualised study and assessment of any special requests that may arise in the personal lives of its workers, trying to adapt as much as possible to the needs and personal circumstances of each employee, prioritising the well-being and equilibrium of both (company/worker; worker/company).

REDUCED WORKING HOURS ON NON-SCHOOL DAYS



The **working day may be adjusted** to the school calendar and may be reduced on **nonschool days**. A pool of hours will be created to compensate for these hours not worked on our children's school days.

PRE-BIRTH LEAVE



There is the option of requesting **paid maternity leave** during the last 15 days of pregnancy until the baby is born.



FLEXIBLE ENTRY AND EXIT TIMES

Flexibility to adjust the timetable for entering and leaving the workplace by one hour. Departments ensure that all responsibilities are always covered for the entire working hours and in cases where a manager refuses it, this has to be consulted with, and justified to, HR.



BREASTFEEDING

Paid breastfeeding leave is extended to **20 days** (instead of 13 days) or until the child reaches the age of 15 months (instead of 12 months).



PARENTAL LEAVE

A leave of absence is established for the care of children of **4 years** (instead of 3 years as stipulated in the statute).



FINANCIAL ASSISTANCE FOR CHILDREN WITH DISABILITIES

Employees with children with disabilities receive financial assistance of **€150 gross per month** until the child reaches the age of 15.



FLEXIBLE MEETING TIMES

Except in exceptional cases, the timetable for meetings and videoconferences must be between **10:00 and 18:00 hours**.



LEAVE DUE TO COMPLICATIONS IN CHILDBIRTH

Paid leave is extended to **15 days** (instead of 5 days) in the event of complications arising from childbirth or neonatal illnesses that require the baby to stay in hospital.



INTENSIVE WORKING DAY

Intensive working day in July and August with the possibility of extension (in 2024 this lasted from 26 June to 4 September). The working day will be from Monday to Friday from 08:00 to 15:00 hours.



WORKLOADS

In order to reduce as much as possible excess work outside the established working hours, there is a commitment to **define workloads**.



RESPECT OF REST HOURS

A commitment is made to **respect rest times** outside working hours **as much as possible** and control measures are put in place to achieve this.



BIRTHDAY

A birthday will be a holiday and can be enjoyed on the Friday of that week, if preferred or if it falls on a weekend or public holiday.

The Human Resources department monitors the work-life balance measures, is open to the evaluation of new measures and is responsible for establishing, publishing and informing the staff of any new developments regarding these measures. In addition to these special measures, employees are entitled to all benefits established by law. In 2024, a total of **8 workers**, 5 women and 3 men, took **maternity or paternity leave**, of whom 100% have returned or will return to work after taking this leave.

Neinor Homes offers a **flexible remuneration package with tax benefits for employees**, where they can take out childcare, meal and transport vouchers, training, purchase of IT equipment and medical insurance for the whole family.

In addition, it also offers preference to employees when it comes to accessing a property in the developments launched by the company, although under no circumstances does this mean a reduction in the price.

Neinor is a company concerned not only with the well-being of its employees, but also with their happiness and concerns. For this reason, in recent years it has made an effort to be close to its employees and share those special moments when a shared smile takes on special meaning or a token of affection allows the pain also to be shared. On behalf of the entire workforce, the Management sends a baby basket for births and likewise conveys the condolences and affection of all colleagues for the loss of a first degree relative (father, mother and children) by sending floral arrangements to the appropriate morgue.

In 2024, Neinor Homes maintains teleworking, with the aim of improving the wellbeing and comfort of the time employees spend in the offices. For this reason, and with a view to promoting a healthy lifestyle, focusing the company on the “social” part of the ESG and considering the wellbeing of its employees as one of its main objectives, the area that coordinates sustainability (GRC) continues to promote healthy habits, maintaining free fresh fruit in all our delegations, which has been very well received by the staff. In this connection, in order to take a qualitative leap forward and with a view to caring for and having healthy and happy employees, during the last quarter of the year we have continued with these measures and have negotiated the implementation of Wellhub (formerly known as Gympass). Through this service, the company aims to help employees maintain a healthy lifestyle. This service allows for significant savings in many sports centres and also offers comprehensive wellness services. **It gives access to centres of all kinds** related to physical activity. Not only gyms, it also has centres for yoga, Pilates, swimming, martial arts, crossfit and more, as well as psychology practices, therapy centres, etc. In short, it offers its employees **physical and mental health**.

9.5. HEALTH AND SAFETY OF OUR EMPLOYEES

Neinor Homes promotes a safe **working environment** and is committed to ongoing updating of the occupational risk prevention measures appropriate to each job, beyond the levels required by law. By the nature of their work, Neinor Homes employees are exposed to the risks inherent in office work. In this regard, the Board of Directors is the main driving force behind the implementation of a health and safety culture, assuming the firm commitment to ensure that there are no accidents at work in the company. This commitment is also shared by the Senior Management.

Due to the nature of their work, Neinor Homes employees are exposed to the risks inherent in office work. In this regard, an external company is responsible for carrying out periodic health and safety and Occupational Risk Prevention (ORP) audits in all offices and branches, the result of which has been that the required standards are met in all of them.

With the aim of promoting a culture based on health and safety, Neinor Homes offers Occupational Risk Prevention courses to its professionals. **The 11 new recruits completed the compulsory training in Health and Safety policies and procedures and were informed and trained accordingly.**

Along these lines, in 2021 the company updated its Health and Safety Policy, which addresses health and safety in offices, on construction sites and for our customers, referring to the delivery of safe, quality housing that preserves the safety of people during use. This policy is included in the “Welcome Pack” for new recruits.

In 2024 there has been 1 occupational accident (a 31 year old man) in itinere with sick leave (9 days) but there have been no occupational accidents with sick leave in the work environment.

Neinor Homes in 2024 had an absenteeism rate of 4.13%, of which approximately 20% was due to maternity and paternity leave. It should be taken into account that NH is committed, as mentioned on more than one occasion, to facilitating a better work-life balance, especially in such special stages as the growth of the family unit. We are committed to ensuring that the period of adaptation and breastfeeding should be more generous than that set out in the regulations, allowing up to 20 working days to be taken and permitting, in the majority of requests, paternity/ maternity leave to be adapted to the time distribution requested by the worker (being able to accumulate/carry over this leave from one financial year to another).

During 2043, a total of 2,294 days were lost due to disability (of all types), among our employees. Since the beginning of the company's activity there have been no work- related fatalities among our employees.

In addition, and in order to guarantee the safety of all its employees, Neinor Homes has an accident insurance policy for all its employees that is improved on the one established by the collective bargaining agreement for each territory. In general, there is a life insurance policy in the event of death and Total Permanent Disability (IPA) due to an accident at work for a capital sum of €90,000, and in the event of death and Total Permanent Disability (IPA) for all other causes, equivalent to 4 monthly payments of the base salary according to the collective bargaining agreement.

9.6. EMPLOYEE COMMUNICATION AND SATISFACTION

In 2024 Neinor Homes continued to **promote internal dialogue and communication** between all employees, who have different mailboxes to deal with specific issues of health and safety, human resources, recruitment and sustainability, among others.

Employees have an application on the Ethics Channel to report any possible irregularity, non-compliance or behaviour contrary to ethics, legality and the rules that govern the group, and where employees can also see breaches of protocol, transmit improvements, etc.

In recent years we have seen a downward trend in the **voluntary turnover rate**, which currently stands at **5.63%**. There are probably many variables at play, but there is no doubt that the company is competitive, not only in terms of the team of professionals that make up the work teams, but also in the conditions and welfare it offers its employees. They value it and are committed to remaining in the leading property developer in the market.

Finally, **initiatives** aimed at fostering staff interaction, pride of belonging and satisfaction are carried out.

The most valued in recent years are those that allow colleagues to interact personally. **The Christmas party** was the event par excellence in which we all got together and shared anecdotes and day-to-day experiences, but in the last two years the high number of deadlines concentrated in these last weeks of the year have led to numerous lastminute cancellations. This is why, finally, it has been decided to move the date of this event to a quieter period in which **ALL THE STAFF** can enjoy a different kind of get-together. Currently the forecast is for this to take place in first half of 2025.

10

WE ARE **STRATEGIC**
PARTNERS OF
OUR SUPPLIERS

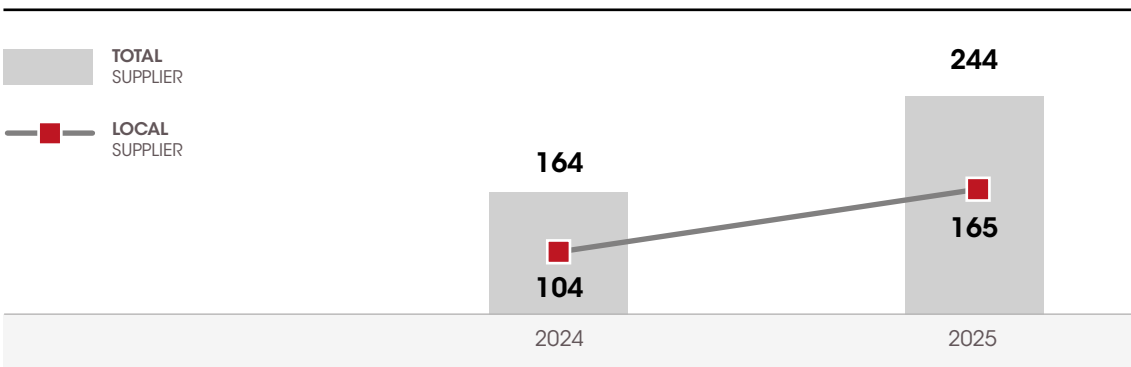


The **relationship** we establish with **our suppliers** and all the mechanisms we put in place to guarantee compliance with minimum criteria and requirements in terms of quality, deadlines and health and safety, among other aspects, is fundamental to the **success of our business**.

10.1. OUR SUPPLY CHAIN

Neinor Homes' values and commitments are also extendible to its entire supply chain, as it is aware that, in order to guarantee excellence and quality levels, it is important to work actively to **successfully manage the long-term relationship** with contractors, suppliers and collaborating companies. In this connection, we are working to promote a relationship of closeness and trust in which suppliers act as **strategic partners** of the company.

EVOLUTION OF THE TOTAL NUMBER OF SUPPLIERS AND LOCAL SUPPLIERS



Neinor Homes works mainly with **three types of suppliers**: construction companies, professionals (Architects, Construction Execution Directors, Project Managers, Health and Safety Coordinators, etc.) and companies providing various types of services (kitchen furniture, geotechnics, topography, OCT, BREEAM, quality control companies, etc.).

In total, Neinor Homes has worked with **244 suppliers in 2024**. Of these, 165 (68% of the total) have been local suppliers. This high percentage of local suppliers demonstrates our faithful **commitment to contracting local suppliers**, local being understood as suppliers that operate in the same autonomous region where the development for which they work is carried out.

In order to attract the best suppliers in the market, it is essential to establish **strategic relationships with suppliers** that benefit both parties. In 2024, we extended the contracting of the Prescription Framework Agreements in projects started in 2018. This year we have seven new collaborators in the areas of ceramics (Tau), ventilation (Zehnder, Soler&Palau, Aldes and Jeremías España), vinyl flooring (Grato), and exterior carpentry (Hydro Building Systems Spain-Tecnal), adding more companies to the list of direct collaborators with Neinor Homes.

On the other hand, Neinor Homes has negotiated **more than 65 framework prescription agreements** with manufacturers that strengthen the ties between the brand and the developer, both ends of the construction chain which, although they do not have a direct relationship, provide advantages such as preferential supply, support for the sales network, etc. To name but a few, there are agreements on ceramic finishes, wood flooring, exterior and interior carpentry, air conditioning, lifts, sanitary ware and taps, electrical mechanisms, etc.

10.2. RESPONSIBLE PROCUREMENT MANAGEMENT

Neinor Homes' procurement management is based on **principles that must be complied with** before, during and after contracting. Throughout the entire process, suppliers must comply with Neinor Homes' values and integrity policies based on the Code of Ethics, the specific clauses for contracting suppliers, the Code of Conduct for third parties sent to suppliers for their knowledge and signature, and the Anti-Corruption, Fraud and Bribery Policy. In addition, Neinor Homes guarantees the ethical and environmental standards of each of the links in the supply chain.

Neinor Homes has a **procurement management procedure** as a framework for action in the area of pricing that describes a systematic process and enables the work to be standardised for the entire organisation in order to avoid any type of risk in the value chain. The procurement management procedure has been approved by the Management Committee.

Suppliers must comply with Neinor Homes' values and integrity policies.

DEPARTMENTS INVOLVED IN PROCUREMENT MANAGEMENT

The following departments are involved in procurement procedures, performing various functions:

- **Purchasing Department:** in charge of the complete contracting process, from the selection of construction companies to the award proposal and signing of the contract.
- **Technical Department:** participates in the selection of construction companies, resolves any doubts that may arise and reviews the project.
- **Compliance Department:** is informed by the Purchasing Department of the bid opening tables during tenders with construction companies.
- **Directorate General Operations:** in charge of approving contracts.
- **CEO:** in charge of approving recruitment.
- **Management Committee:** approves major contracts.
- **Internal Audit Directorate:** conducts regular audits of the procurement management model and its compliance.

For work on **units and services**, which are similar in all developments, there are **Framework Contracts** with Suppliers and Prescription **Framework Agreements** with Manufacturers. These provide a prescription with specific conditions (prices, supply preferences, etc.) to be met by the developments. In general, the aim is to **optimise contracting** by emphasising the achievement of the deadlines set, compliance with the budget and, of course, without compromising the quality of the projects set by our standards and procedures. This results in a mutually beneficial relationship both for Neinor Homes, which achieves the best conditions in terms of quality and price, and for the manufacturers and subcontractors, who manage to increase their turnover and improve their own image by being prescribed by a developer of recognised prestige.

Finally, this relationship also results in an increase in quality by achieving a commitment to excellence on all sides.

In addition, these Framework Agreements also establish a sustainable environment of trust and loyalty with the supplier, and result in higher standard qualities and a better response of the supplier to complaints, which in most cases results in higher customer satisfaction.

Neinor Homes has created a computer application that allows the signed Framework Agreements to be controlled and monitored. In 2024, **7 new Framework Agreements** have been signed.

The Neinor Homes Purchasing and Contracting department has **19 performance procedures** that are updated annually to adapt them to the needs of the company. In 2024, the Supplier Evaluation Procedures, Engineering Approval, Architect Approval, Construction Company Approval and Construction Company Tendering have been updated.

Framework Agreements promote equal opportunities and the equitable distribution of developments.

GENERAL PURCHASING MANAGEMENT PROCEDURE	
Framework agreement procedure	
Approval procedure for architects	
Approval procedure for project manager	
Approval procedure for construction companies	
Approval procedure for intermediate works construction companies	
Approval procedure for partner companies and construction companies for minor works	
Approval procedure for DEO	
Approval procedure for engineering companies	
Tendering procedure for architects	
Tendering procedure for consultants	
Tendering procedure for construction companies	
Tendering procedure for intermediate works	
Tendering procedure for minor works - Other services	
Tendering procedure, approval and evaluation of suppliers of commercial channels	
Procurement procedure for kitchen furniture and electrical appliances	
Evaluation procedure for suppliers	
Evaluation procedure for subcontractors	
Kitchen reception procedure	
Contract management and implementation procedure	

One of the most important of these is the **Tendering Procedure for Construction Companies**, which aims to define the rules and documents necessary for selecting the companies that will carry out each of the developments. It details the phases of the tendering process: from the initial selection of construction companies, through the evolution of each of the selection processes, to the final award proposal based on a series of criteria related to the approval, technical and economic solvency, geographic footprint, sustainability and local experience of the ultimate construction company. This tendering process lasts 13 weeks.

The tendering period lasts for 13 weeks.

In 2024 Neinor Homes has contracted **procurements worth 237 million euros from suppliers** to carry out its activity, all of which are Spanish companies. 68% of the total procurement volume has been invested in local suppliers operating in the same autonomous region where the development they work for is being carried out, compared to 63 % in the previous year. The volume of procurement has increased by 12% due to an increase in the volume of contracting.

10.3. SELECTION, APPROVAL AND EVALUATION OF SUPPLIERS

Neinor Homes ensures compliance with the highest sustainability standards among its suppliers. In this way, it ensures that it offers its customers sustainable and eco-efficient buildings that improve their quality of life.

For this reason, it has implemented a **demanding selection and approval process** that establishes the aspects to be analysed for each supplier, depending on the sector of the company in question and the service or product to be supplied. During 2024, a total of 40 new suppliers (including architectural and engineering firms) were approved. All of them were analysed according to ESG criteria. However, all suppliers must comply with the principles and requirements of Corporate Social Responsibility, sustainability and ethics and compliance of Neinor Homes, as well as with the international agreements of the International Labour Organisation and the United Nations Global Compact. **100% of the contracts** that Neinor Homes signs with its suppliers **include ESG** (Environmental, Social & Governance) **clauses**. Similarly, guarantees are required in matters such as health and safety, sustainability, confidentiality, prevention of money laundering, antibribery or corruption and prevention of criminal offences.

Neinor Homes has identified the main potential **environmental and social risks** in its supply chain, such as accidents, inadequate waste management or impact on biodiversity. In the current approval process, these risks are detected in each supplier, **rejecting those with negative impacts and thus excluding them from contracting**.

All suppliers must comply with the environmental legal provisions in the contract and be liable in the event of non-compliance.

In addition, Neinor Homes requests documentation relating to environmental management, quality and health and safety:

- Ecolabelling, Environmental Self-Declaration or Environmental Product Declaration.
- Copy of certifications such as UNE-EN ISO 9001 (quality), UNE-EN ISO 14001 (environment), UNE-EN ISO 50001 (energy efficiency), and OHSAS (health and safety).
- BREEAM® certifications or others with similar characteristics.

Likewise, architects and builders are obliged to comply with the requirements of the White Book and the application of BREEAM® sustainability criteria (waste, pollution, energy, materials, etc.) is also positively valued. On the other hand, tax and employment responsibilities are guaranteed through remunerations consistent with the market and avoiding the hiring of third parties when there is a suspicion of tax fraud, influence peddling or any other symptom that goes against the company's policies and values.

In addition to aspects related to sustainability and the environment, Neinor Homes' contracting clauses include certain **clauses, declarations and commitments** related to different aspects that the contracted suppliers are obliged to comply with:



HEALTH AND SAFETY

- **Health and Safety Plan:** obligation to prepare a Health and Safety Plan that must be submitted to the Health and Safety Coordinator prior to the start of the works.
- **Law 31/1995**, of 8 November, on Occupational Risk Prevention.
- **Royal Decree 1627/1997**, of 24 October, on minimum health and safety provisions in construction works.
- **Employer obligations** on workers, information and training.



GIFTS AND PRESENTS

Express prohibition on soliciting gifts, favours, services on advantageous terms or invitations from suppliers, customers, intermediaries, agents, consultants or others.



BRIBERY AND CORRUPTION

- **Adequate in-house policy against bribery and corruption** or if not, must comply with that of Neinor Homes.
- Declaration of **knowledge and acceptance** of the rules contained in the **Anti-Corruption Protocol**.
- **Commitment to report** any case of bribery or corruption to the Neinor Homes Ethics Channel.



PREVENTION OF MONEY LAUNDERING

- **Law 10/2010**, of 28 April on anti money laundering and combatting terrorist financing.
- **Royal Decree 304/2014**, of 5 May, applicable to natural and legal persons involved in real estate development business.
- **Manual on the Prevention of Money Laundering and Terrorist Financing**.

Finally, Neinor Homes carries out a qualitative assessment of the subcontractors associated with its suppliers. The Procurement Department is in charge of monitoring, carrying out the evaluations using a computer application and taking into account criteria of quality, environment, health and safety, technical capacity and compliance with deadlines, among others. In this sense, during 2024 it has carried out 1,358 evaluations, all of which have obtained a favorable score, covering 100% of the works carried out.

10.4. HEALTH AND SAFETY AND AWARENESS REQUIREMENTS

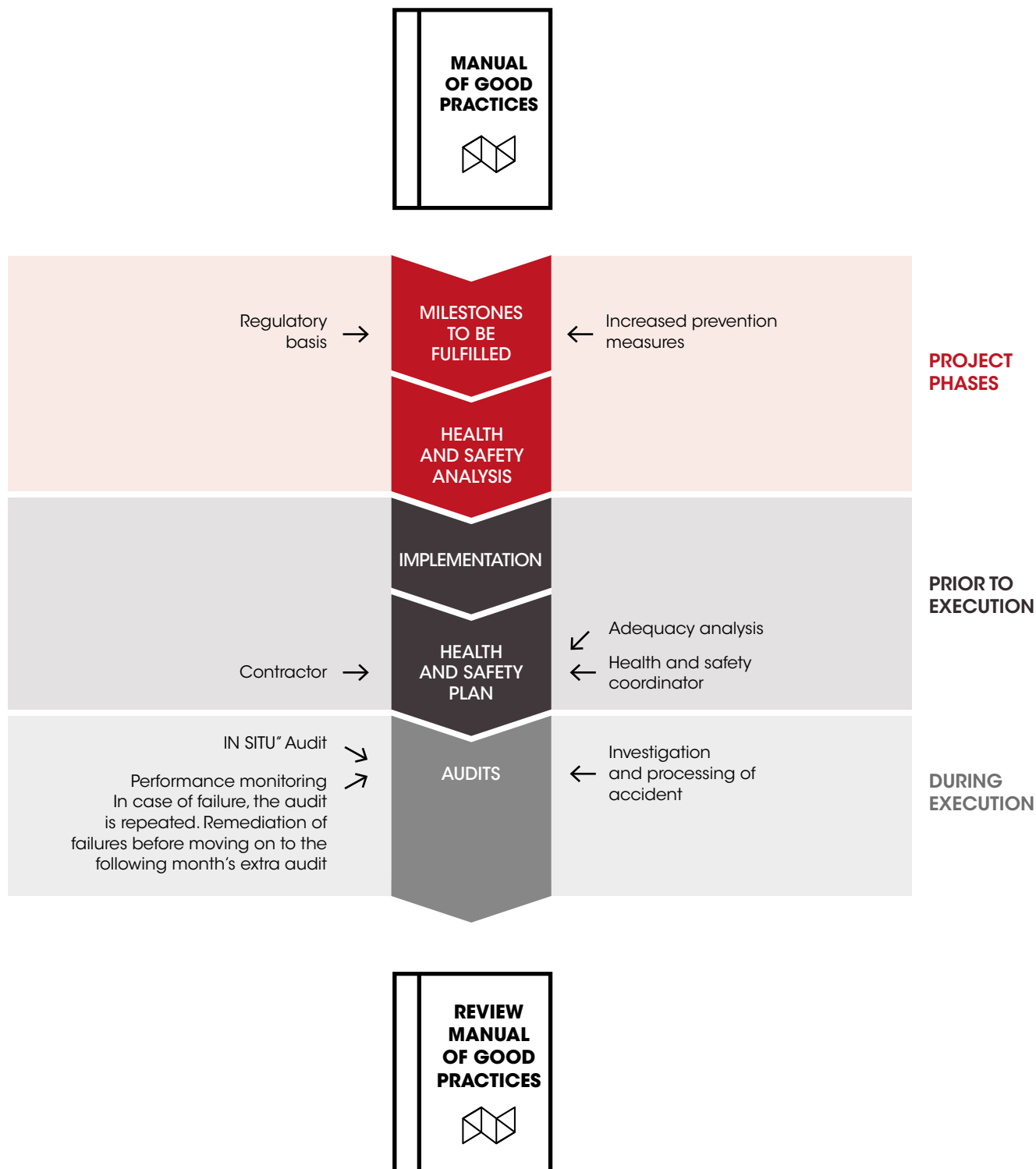
In the current market environment, there is a high demand for labour in a construction sector faced with **workers with limited experience**, low qualifications and, on occasions, an **increase in workplace accidents**. For Neinor Homes, safety and occupational risk prevention are two key factors in its developments.

Neinor Homes has a **Manual of Good Practices** to increase safety levels on the construction sites of its property developments, with the aim of minimising the risks to which personnel are exposed and thus achieving a **zero accident rate** on construction sites. The main measures include access control, the documentation required of contractors, subcontractors, workers and machinery, safety measures in the various phases of the work and the Emergency Plan for construction sites.

In each of the works, a **safety coordinator** is appointed in the execution phase of the work, who is responsible for ensuring compliance with the requirements established in the legislation in force and for ensuring compliance with the Occupational Risk Prevention Plan, as well as with the Manual of Good Practices. In addition, each contractor on site must designate at least one worker who is permanently present on site and whose part of the working day is devoted to preventive functions and at least one other worker responsible for the health and safety in their work.

In all the open sites, a leading consultancy firm in occupational risk prevention carries out audits that help raise awareness of Neinor Homes' importance and requirements in this area. Likewise, where necessary, **health and safety awareness courses are held in those areas where, according to the results of the audits, reinforcement may be needed.**

In addition, **health and safety audits** are carried out on all construction sites, based on very rigorous criteria established in the Manual of Good Practices and over and above the regulations established in the sector. At least three audits must be carried out on each site.

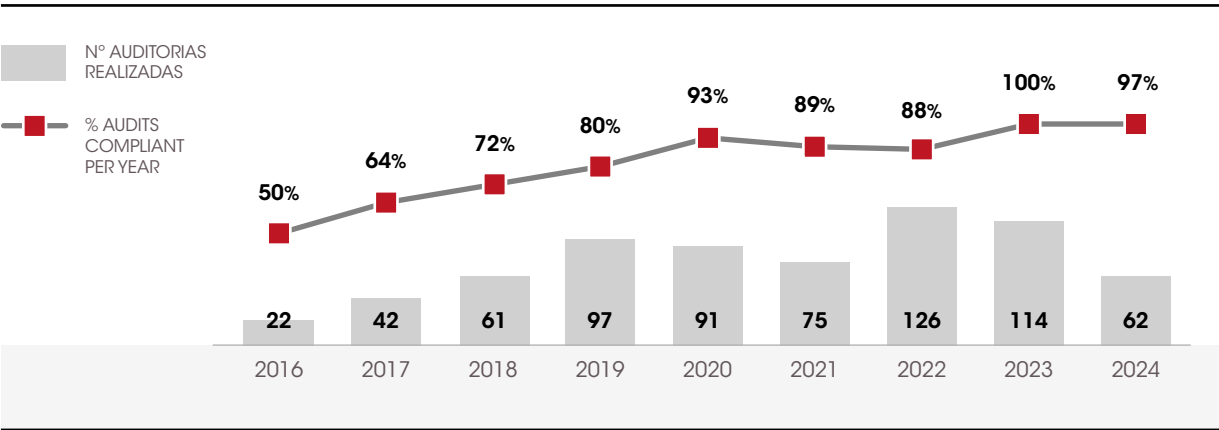


HEALTH AND SAFETY COMPLIANCE CRITERIA FOR CONSTRUCTION SITES

The health and safety audits carried out on construction sites consist of 2 parts. On the one hand, the status of the work is reviewed (compliance) with respect to **current legislation in force**, which must be 100% compliant. On the other hand, the **state of the work is reviewed with respect to the** Neinor Homes **Good Practices Manual**, with at least **75% compliance** being required in order to consider the audit as compliant. After three failed audits, the supplier will be automatically de-approved.

In 2024, **64 Health and Safety Audits** were carried out, which have shown that 99.4% complied with health and safety regulations and 91.66% complied with the Neinor Homes Good Practices Manual. In addition, the result of 96.7 % of these audits was "Compliant".

% AUDITS COMPLIANT PER YEAR AND N° AUDITS



In 2024 there were **74 accidents**, all of them involving men, with a frequency rate of 18.52 and a severity rate of 0.44.

Below is our data for the last 3 years with the indices used by the Ministry of Employment and Social Economy.

ACCIDENT RATES

TOTAL	CONST. SECTOR. 2022*	NEINOR 2022	CONST. SECTOR 2023*	NEINOR 2023	CONST. SECTOR Sep - 2024*	NEINOR NOV - 2023
Incidence	6131.13	5249,41	6085,22	5456,93	4362,79	3517,15
Frequency	39.64	38,65	Pending publication	36,12	Pending publication	18,52
Severity	1,32	0,91	Pending publication	0,98	Pending publication	0,44

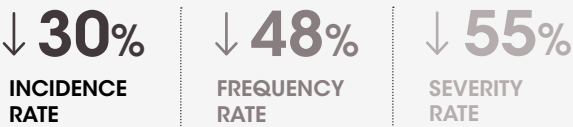
* Data from the Ministry of Employment and Social Security in the construction sector.

As reflected in the following graphics, we can feel proud of the improvement in one of the main points of our Strategic Plan: our commitment to health and safety on building sites and the risk that this entails.

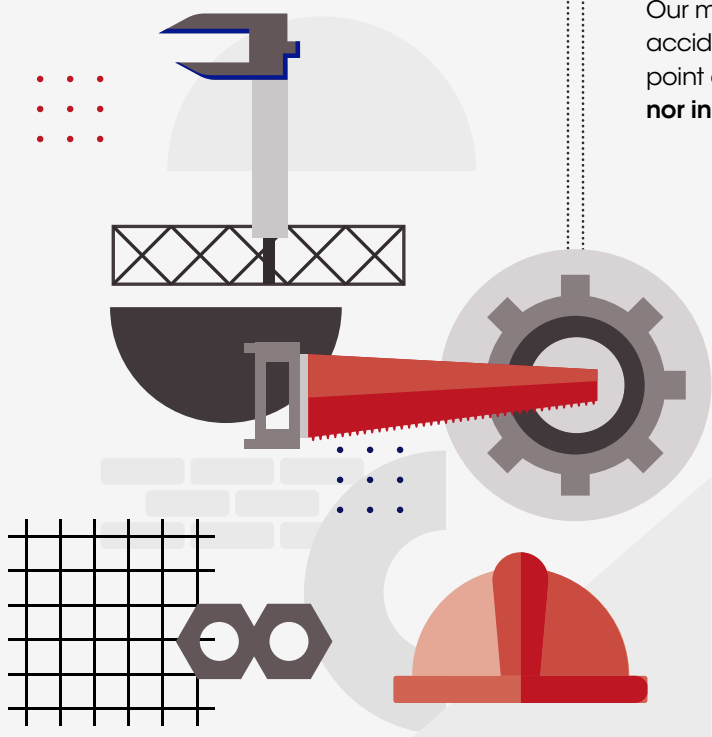
COMMITMENT TO THE SAFETY AND HEALTH ON WORKSITE

In this connection, every year we carry out **safety audits** and we prepare and update the Manual of Good Practices in this area.

Thanks to the audits and monitoring of developments, as well as the training that has been provided on certain key sites, **accident rates have been lowered significantly below the sector average****. In this regard, we emphasise that this year we have also improved by lowering the incidence rate by

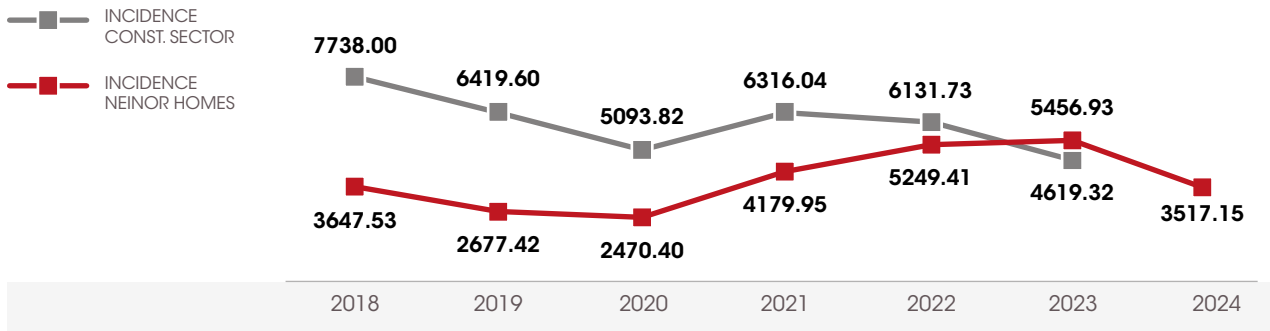


Our main objective is to have 'zero' serious accidents on site. In this connection, we should point out that there **were no fatalities in 2024, nor in the 2023 financial year**.

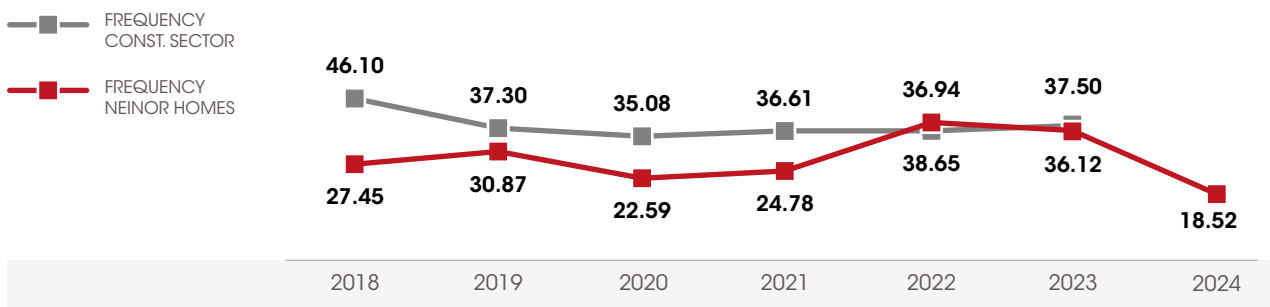


* The sector data is that published for 2023, data current to date.

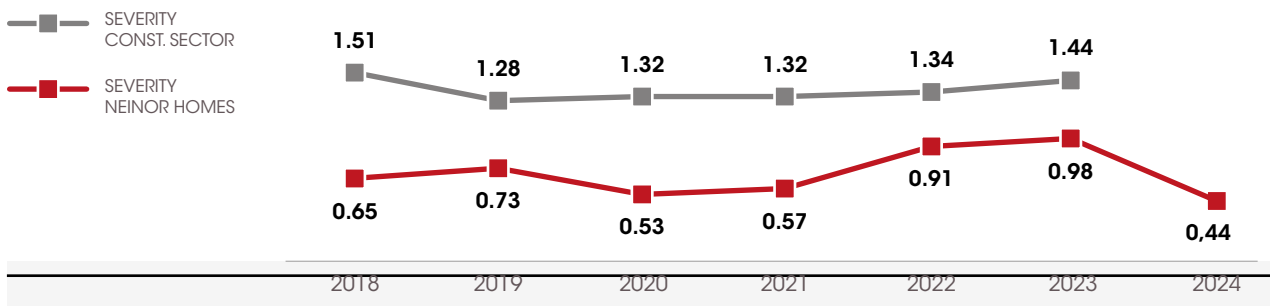
INCIDENCE



FREQUENCY



SEVERITY



Formula used for the calculation of the **frequency and severity rate**.

- **WORKERS MONTHLY (T)** = Average number of workers exposed.
- **H TRAB MONTH (H)** = Total N° of hours actually worked.
- **J** = days not worked in the month in which this report is drawn up, including Saturdays, Sundays and public holidays, during the period of sick leave, not taking into account the days not worked for accidents on the way to and from work but taking into account relapses.

Frequency index = $A * 1,000,000 / H$

Severity index = $J * 1,000 / H$

* Public data for 2023 published by the Ministry of Labour and Social Economy are not yet available.

10.5. COMMUNICATION, SATISFACTION AND COOPERATION WITH SUPPLIERS

As a sign of its commitment to quality and ongoing improvement, Neinor Homes continuously evaluates the suppliers it works with and the results of these evaluations are analysed with the collaborators themselves at regular meetings. In 2024, **490 evaluations** were carried out.

For Neinor Homes, the brand image it presents to all the suppliers it works with is also very important. For this reason, it makes the Whistleblowing Channel available to them so that they can report any breach of ethics and integrity.

Neinor Homes
maintains fluid
and continuous
communication
with its suppliers.



SUSTAINABLE FINANCING AND COMPLIANCE WITH THE EUROPEAN TAXONOMY



11. SUSTAINABLE FINANCING AND COMPLIANCE WITH THE EUROPEAN TAXONOMY

> OUR SUSTAINABLE FINANCE FRAMEWORK AND GREEN BOND

In the last decade, the financial sector has taken into account the importance it can play in the fight against climate change and in the transition to a carbon neutral economy, as it is key what kind of projects and companies are financed and where capital flows are directed. As a result, cleaner activities and financial assets that are considered sustainable are increasingly being financed. This change in direction is a response to the demands of society as a whole, but also to new regulations aimed at achieving a fairer and more sustainable economic environment, with the Paris Agreement of 2015 being key.

As part of its commitment to sustainability, Neinor Homes promotes the use of **sustainable financing**, which in the development business is mainly linked to the pursuance of sustainable and energy-efficient projects that promote the use of materials, designs, technologies and construction processes that respect the environment and people, while also improving the quality of life of the occupants.

In March 2021 Neinor Homes published **its first sustainable financing framework** (with independent third party opinion from DNV) linked to the United Nations Sustainable Development Goals and aligned with the ICMA (International Capital Markets Association) Green Bond Principles, Social Bond Principles and Sustainability Bond Guidelines, as well as the LMA (Loan Market Association) Green Lending Principles.

[Sustainable Financing Framework.pdf](#)

In this context and following the sustainable finance framework guidelines, **Neinor Homes issued its first green bond in April 2021**, thus becoming the first listed European property developer to issue a bond of this type.

The funds obtained through this green bond were used to repay corporate debt of Quabit Inmobiliaria and Neinor Homes. The bond issue was associated with a commitment from the company's to allocate a amount similar to the income from the bond (300 million euros) to residential projects with a positive impact on the environment. Objective and measurable criteria were used for this purpose, within the framework of sustainable financing.

The entire bond was justified by investments in green assets during its first year of existence and corroborated by an independent external auditor in its report published on 21 April 2022 (KPMG). [Link to the 2021 Green Bond Report.](#)

On 28 April 2023, the company announced a relevant fact, informing of the confirmation of the voluntary and early amortisation of all the simple bonds remaining in circulation issued by the Company in April 2021 under the issue called '€300,000,000 4.500% Senior Secured Notes due 2026', associated with the Green Bond. As a result, the bonds were fully amortised and cancelled.

In October 2024, the company published the first major update to this Sustainable Financing Framework.

<https://www.neinorhomes.com/corporate/esg/medioambiente/esg-financiacion-sostenible/marco-de-financiacion-sostenible/>

This new version of the Framework aims to reflect Neinor Homes' progress in sustainability, evidenced by stricter eligibility criteria for green assets and greater transparency in terms of alignment with the EU Taxonomy.

Under this Framework, Neinor Homes will be able to issue Sustainable Financing Instruments, such as:

- **Green Loans and Bonds:** where the net proceeds are exclusively allocated to green project categories.
- **Social Loans and Bonds:** where the net proceeds are exclusively allocated to social project categories.
- **Sustainable Loans and Bonds:** where the net proceeds are allocated to both green and social project categories.

This framework specifies, among other issues, how the funds obtained will be managed, the criteria for evaluating and selecting projects, the presentation of control reports and review by independent third parties. The sustainable financing framework also defines the criteria that a project must meet to be eligible to receive funds obtained through sustainable financing.

The new eligibility criteria for allocating funds obtained with the update from the first Sustainable Finance Framework with respect to the update of the new 2024 Framework are shown below:

CATEGORY	2021 ELIGIBILITY FRAMEWORK CRITERION	2024 ELIGIBILITY FRAMEWORK CRITERION	
GREEN BUILDINGS	Acquisition or development of buildings in Spain that meet recognised standards, such as BREEAM® "Good" or "Very Good" certification. Such projects or properties will have a positive impact on the environment. More specifically, in climate change mitigation, pollution prevention and control, and resource efficiency.	<p>Acquisition, development or refurbishment of buildings that are aligned with the requirements established by the regulatory framework of the European Taxonomy.</p> <p>New constructions:</p> <ul style="list-style-type: none"> Buildings with a primary energy demand at least 10% lower than the threshold established for the requirements of nearly zero-energy buildings in national measures. <p>Renovated buildings:</p> <ul style="list-style-type: none"> Residential buildings that have undergone renovation that meets the requirements applicable to a major refurbishment or that leads to a reduction in primary energy demand (PED) of at least 30%. 	<p>Substantial contribution:</p> <p>Climate change mitigation</p> <p>Taxonomically eligible activity:</p> <p>7.1. Construction of new buildings</p> <p>Substantial contribution:</p> <p>Climate change mitigation</p> <p>Taxonomically eligible activity:</p> <p>7.2. Building renovation existing buildings</p>
ENERGY EFFICIENCY	Acquisition or development of buildings that demonstrate above market performance energy efficiency (Energy Performance Certificates - CRE rating "B" or higher). This type of project or asset will have a positive impact on the environment. More specifically, on climate change mitigation, pollution prevention and control and on resource efficiency.	N/A	
AFFORDABLE HOUSING	<p>Acquisition or development of buildings for affordable rental housing. In Spain, affordable rental housing is defined in general terms by a reduction in rent of approximately 20% compared to the market price.</p> <p>Acquisition or development of buildings for social housing purposes. In Spain, the exact parameters may vary according to the autonomous region, but in general there are three commonly used definitions:</p> <p>i) Publicly Subsidised Housing (VPO);</p> <p>ii) Basic Publicly Subsidised Housing (VPPB);</p> <p>iii) Publicly Subsidised Housing at a Limited Price (VPPL).</p>	<p>Acquisition or promotion of buildings for residential purposes for subsidised housing according to commonly used definitions, including:</p> <ul style="list-style-type: none"> Official Subsidised Housing (<i>Viviendas de Protección Oficial: VPO</i>); Basic Public Subsidised Housing (<i>Viviendas de Protección Pública Básica: VPPB</i>); Price Capped Public Subsidised Housing (<i>Viviendas de Protección Pública y Precio Limitado: VPPL</i>), or as a function of the requirements established by national governments 	<p>Target population:</p> <p>Beneficiaries who need housing and who cannot rent or buy property on the local free market. Eligible beneficiaries are selected according to the socioeconomic requirements established by the national or regional governments that confirm their eligibility for decent and affordable/ social housing.</p> <p>These socioeconomic requirements, established by national or regional governments, usually include income level, number of family members, ownership of other real estate, etc.</p>
EMPLOYMENT	Housing development activity has a direct impact on job creation and local communities through the preferential use of local suppliers.	N/A	

In order to assess the criteria for evaluating and selecting green projects, Neinor created a Sustainability Committee, which includes the CEO and other members of senior management. This committee is responsible for certifying which assets meet the eligibility criteria, identifying and managing the material environmental risks associated with projects, as well as monitoring the portfolio of eligible projects and proposing updates to the sustainable financing framework.

In October 2024, the company successfully completed **its second issue of a green bond, with an amount of 325 million euros, maturing in 2030** and a cost of 5.875%, excluding the interest rate derivative signed in 2022; improving Neinor's overall cost of debt by 62.5 basis points. This bond was rated BB- by Fitch and Standard & Poor's.

Through the issuance of this bond, the company plans to allocate 175 million euros to repay its existing corporate debt facilities. In addition, it seeks to increase its corporate debt by an additional 150 million euros to finance new growth opportunities, whether through the company's own acquisition programme or through opportunities with its co-investors.

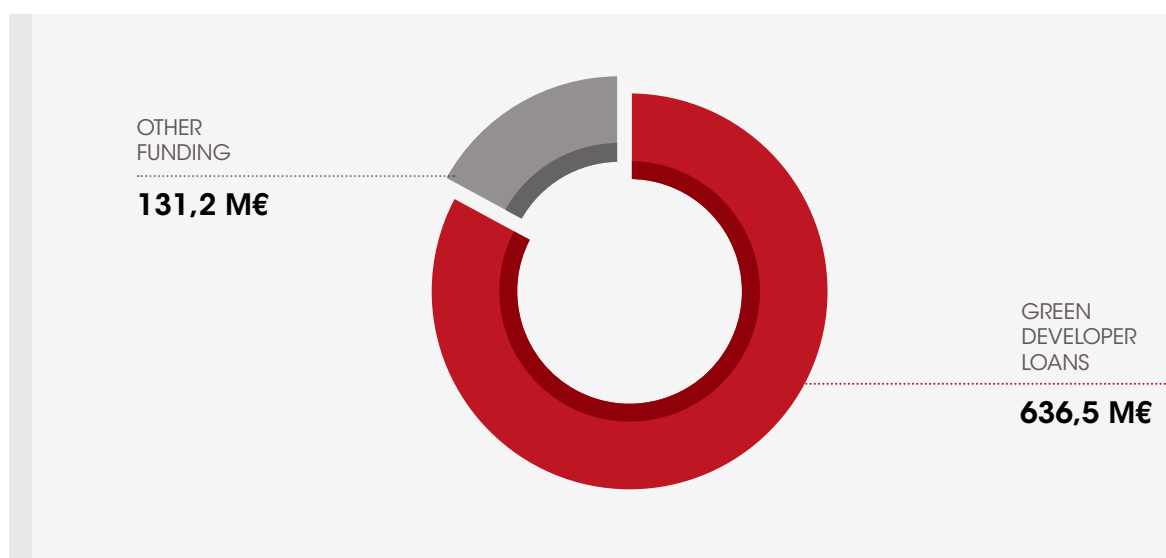
The company has committed to investing an amount equivalent to 100% of revenues in Eligible Green Projects. These projects will be fully aligned with the Substantial Contribution Criteria of the European Green Building Taxonomy - new construction activity and will contribute to the Sustainable Development Goals (SDGs), thus promoting sustainability through a reduction in the carbon footprint of buildings during the construction phase and state-of-the-art energy efficiency standards to reduce emissions throughout the life cycle. Furthermore, some of the projects will also fulfil social objectives by increasing the supply of both rental and sale properties in a market where there is a structural housing deficit, particularly in terms of affordable and social housing.

> COMPOSITION OF THE NEINOR HOMES DEBT PORTFOLIO

Neinor Homes' debt portfolio includes other forms of sustainable financing, such as Green Developer Loans, through which the company is currently financing most of its new property development projects.

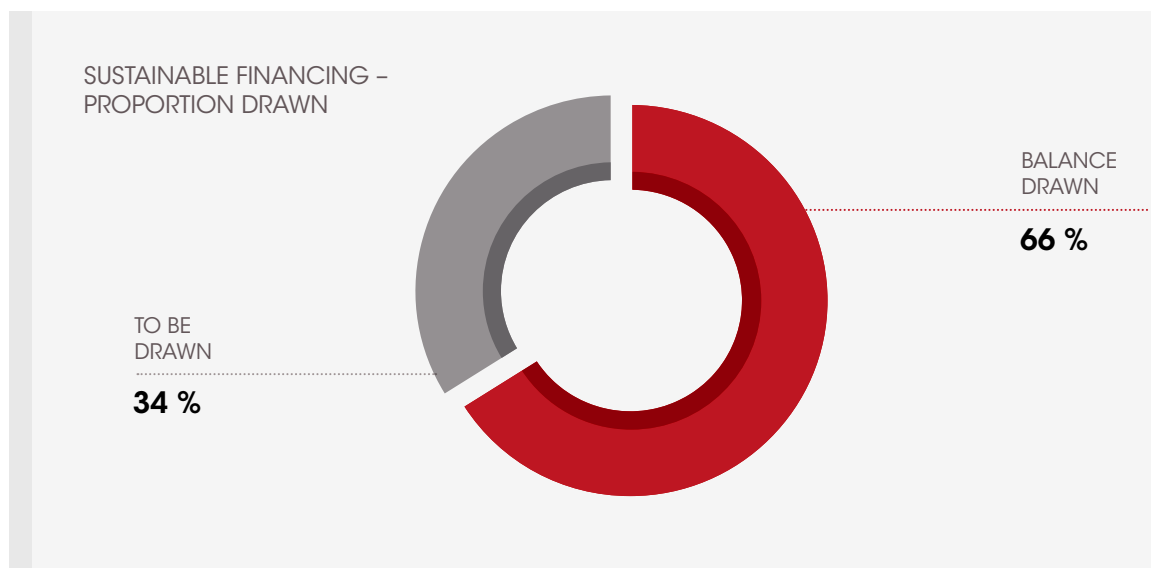
Green Developer Loans are considered to be those granted by banks that finance the development of sustainable buildings, and which generally have discounts on the interest rate with respect to other forms of financing.

The composition of **Neinor Homes' debt portfolio**, at 31 December 2024, considering both drawn down and undrawn debt, is as follows. Financing is considered Green both to the debt coming from the Green Bond and to the already mentioned Green Promoters Loans.



The company's debt at 31 December 2024 was 83% sustainable financing (86% of the total amount being drawn down) and it should be noted that all developer loans currently signed are green, representing Neinor's main source of financing for its projects, thus integrating sustainability into Neinor's business strategy and contributing to the wellbeing of society as a whole while generating added value for the investment community.

The proportion of the amount drawn down against the debt limits for the total sustainable financing is shown below, with €420.4 million drawn down out of a signed amount of €636.5 million:

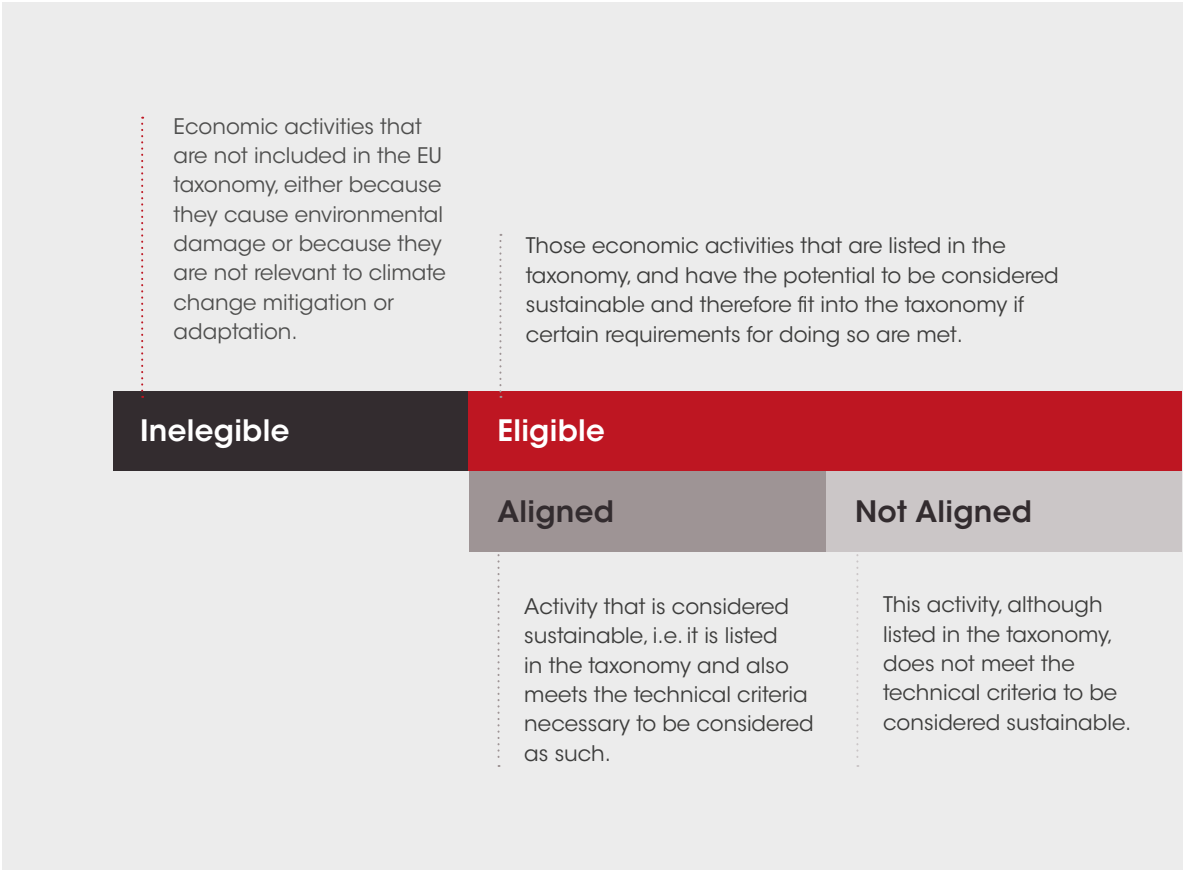


> OUR ALIGNMENT WITH THE EU TAXONOMY

The EU Taxonomy is a common **classification system for sustainable economic activities**, which will serve as a common language to talk about sustainability and to be able to define with certainty what we mean when we say that a company or a project is sustainable.

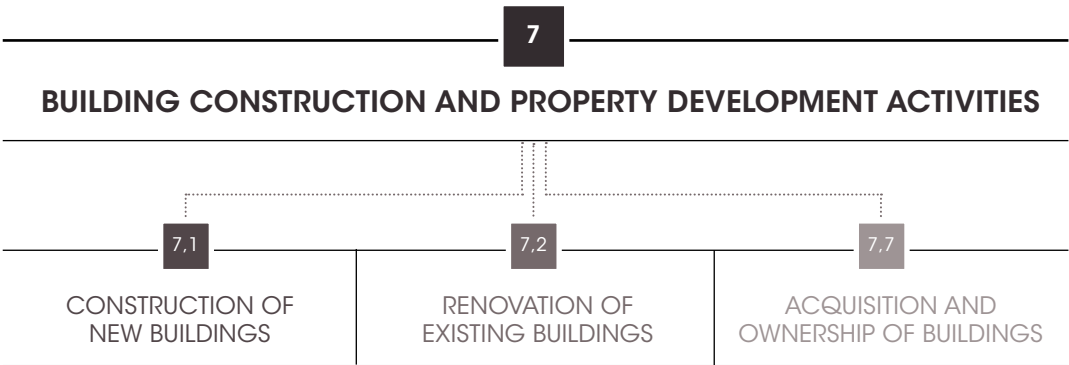
In order to achieve the environmental objectives defined in the European Green Pact and the Paris Agreement and the goals of the 2030 Agenda, it is vital that financial flows are channelled to activities, companies and projects with a positive impact on the environment, which is why the EU Commission has promoted this system. Thanks to this taxonomy, investors will be better protected from greenwashing and investments will be channelled to those companies and projects that are truly efficient in their use of natural resources.

The taxonomy classifies economic activities into eligible and non-eligible, and in turn, into aligned and non-aligned:



According to the EU Commission, buildings are responsible for 40% of energy consumption and 36% of carbon emissions in the EU, so the way new buildings are constructed and existing buildings are renovated plays a very important role in mitigating climate change. The real estate sector therefore has a major responsibility in moving towards a carbon neutral economy.

Due to the above, the real estate activity has been defined as eligible within the EU taxonomy, which is a great opportunity for Neinor Homes to attract responsible and sustainable financing and to be aligned with the issues that are really important in terms of sustainability.



To be **aligned with the taxonomy**, and therefore considered environmentally sustainable, **an economic activity must meet 3 conditions:**

1	2	3
SUBSTANTIALLY CONTRIBUTE	DNSH	MINIMUM SAFEGUARDS
<p>Contribute substantially to at least one of the six environmental objectives:</p> <ul style="list-style-type: none">• Climate change mitigation• Adaptation to climate change• Sustainable use and protection of water and marine resources• Transition to a circular economy• Pollution prevention and control• Biodiversity protection and restoration	<p>Do Not Significantly Harm (DNSH) the rest of these environmental objectives.</p> <p>The aim is to prevent an economic activity from being detrimental to the environment even though it substantially contributes to another objective.</p>	<p>Respect Minimum Social Safeguards (MSS), through a commitment to human rights, in accordance with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, as well as to the fight against corruption, tax evasion and unfair competition.</p>

Companies must identify and report the percentages of their economic activities that are aligned with the Taxonomy, based on key indicators such as Net Revenue, CAPEX (Capital Expenditure) and OPEX (Operating Expenses). In 2022, Neinor Homes carried out an analysis of its economic activities to determine their alignment with the EU Taxonomy, the results of which are published in this report.

This analysis is extremely useful for aligning the company's sustainability efforts with what society, investors and regulators demand and what contributes most to achieving an efficient use of material and energy resources. In addition, this initial assessment will serve as a baseline against which the company's sustainability performance can be monitored in subsequent years.

Therefore, **one of the main strategic objectives of the Neinor Homes Sustainability Plan is to increase the proportion of completed developments or homes aligned with the European Taxonomy in each financial year**, as we believe that the fact that a building is Taxonomy-aligned is the best indicator that it is environmentally sustainable. The evolution of the last two financial years is shown below, where we can see a clear **positive trend**:

	2024	2023	%
No. of developments aligned with taxonomy	10	15	(33%)
No. of developments not aligned with taxonomy	6	17	(65%)
% of developments aligned with taxonomy	63%	47%	+33%
No. of homes aligned with taxonomy	1.027	1.233	(17%)
No. of homes not aligned with taxonomy	351	1.435	(76%)
% of homes aligned with taxonomy	75%	46%	+61%

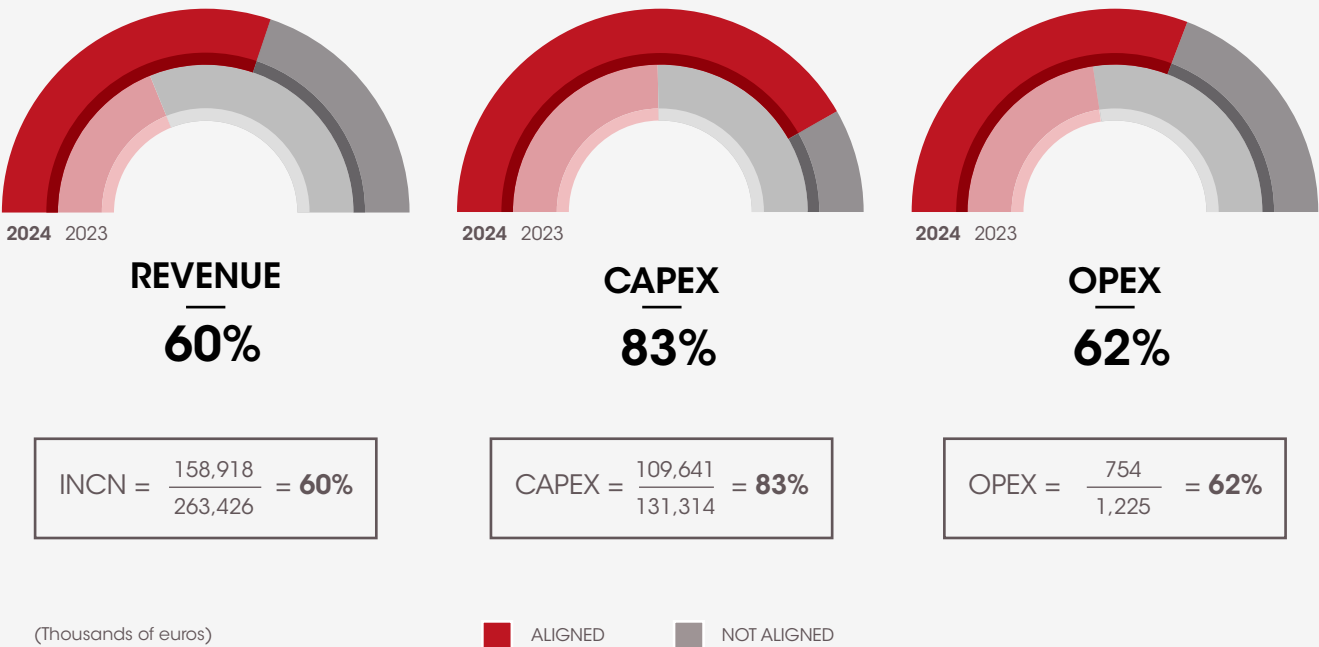
Furthermore, Neinor Homes is committed to ensuring that all developments intended for rental completed in each financial year comply with the requirements established by the taxonomy, since the company plans, designs and builds these developments implementing measures so that they meet all the taxonomy alignment criteria. **In the last three financial years, the company has fulfilled this commitment in its developments** intended for the Rental business line.

Below are the results of the calculation of the percentages of alignment with the Taxonomy for the three indicators described above (Revenue, CapEx and OpEx) of the developments completed in the 2024 financial year, not including other developments completed in previous years and delivered during this financial year or the figures resulting from other lines of business, calculated by dividing the number of promotions categorised according to the taxonomy by the total number of promotions completed during the financial year, as follows:

Developments delivered in 2024 *aligned with the taxonomy*

Total Developments delivered in 2024

The degree of alignment with the EU taxonomy for developments completed in 2024 was as follows:



In order to assess the eligibility of its economic activities and their alignment with the EuropeanTaxonomy, **Neinor Homes has implemented a five-step methodology**, which has yielded the above results. This methodology includes the following steps:

IDENTIFICATION OF ELIGIBLE ACTIVITIES	SUBSTANTIAL CONTRIBUTION ANALYSIS	DNSH	DUE DILIGENCE OF MINIMUM SOCIAL SAFEGUARDS	CALCULATION OF FINANCIAL METRICS
Classification of activities into eligible and non-eligible activities taking RD 2021/2139 as a reference	Assessment of compliance with the technical criteria for measuring substantial contribution	Verification of compliance with qualitative criteria for non-significant harm	Due Diligence process should be aligned with OECD	Calculation of the percentages of alignment of the indicators of business volume, CAPEX and OPEX for the activities eligible and aligned

The objectives against which the company would be able to measure its substantial contribution, in accordance with Neinor Homes' taxonomically eligible economic activities, are Climate Change Mitigation, Climate Change Adaptation and Circular Economy, and the objectives of substantial contribution Water and Marine Resources, Pollution and Biodiversity are therefore not applicable to the company.

A series of technical tests and corroborations have been carried out on the buildings completed throughout 2024, with the aim of verifying compliance with the substantial contribution guidelines for the Mitigation of Climate Change objective, as well as with the DNSH (Do No Significant Harm) criteria for the rest of the environmental objectives defined by the Regulation.

The projects within the portfolio of **projects completed in the 2024 financial year** that, once these analyses had been carried out, were determined to be **aligned with the substantial contribution objective of Mitigation of Climate Change** are:

DEVELOPMENT	ECONOMIC ACTIVITY	REVENUE	CapEx	OpEx
GRAN CAPITAN	Sell	8,835	4,531	85
RIBERA HOMES II	Sell	19,659	8,249	45
URBAN HOMES IV	Sell	18,413	1,701	51
OLARIZU HOMES IV	Rental	-	10,053	68
ALOVERA HOMES (M22)	Sell	15,446	10,229	73
SON PARC HOMES	Sell	9,763	14,874	110
LAS MESAS R4-R5-R19	Sell	24,294	13,044	95
ÁTICA HOMES (AUDITO)	Sell	7,879	11,645	-
SAN AGUSTÍN HOMES	Sell	20,619	17,998	113
PATRIARCA HOMES	Sell	34,010	17,318	114
		158,918	109,642	754

> MINIMUM SOCIAL SAFEGUARDS

Along with the verifications of compliance with the technical criteria, an analysis of the requirements for assessing compliance with the Minimum Social Safeguards has been carried out, verifying compliance with the following requirements in the company:

1. Firstly, a human rights due diligence process has been implemented in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises. The Group's Human Rights Policy, published in 2022, defines the principles applied for human rights due diligence.
 - For this reason, a series of commitments have been incorporated to safeguard human rights in the company.
 - Any impact or incident that may affect these safeguards is monitored and assessed.
 - Disciplinary action is taken for any behavior that undermines human rights compliance.
 - The entire compliance structure, the code of ethics and is structured with a view to reporting and preventing incidents of this nature.
2. The company has a Human Rights policy approved in the 2022 financial year by the Board of Neinor Homes and published on the corporate website.
<https://www.neinorhomes.com/en/corporate/esg/ethics/ethics-andtransparency/corporate-policies-and-procedures/human-rights-policy/>
3. The company has no knowledge or evidence that this process has not been properly implemented or that human rights violations have been committed.
4. The company has processes in place to prevent corruption such as adequate internal controls, ethics and compliance programmes, and measures to prevent and detect bribery. In this regard, we have a Code of Ethics, Whistleblowing Channel, Anti-Corruption and Fraud Policy, Corporate Criminal Liability Prevention Model and controls to mitigate or eliminate corruption risks.
5. On the other hand, the company has a whistleblowing channel, which is governed by its management procedure following the guidelines of the Code of Ethics through which employees can expose and report inappropriate behaviour. All communications made through this channel are treated in accordance with Directive (EU) 2019/1937, guaranteeing the confidentiality of the parties involved and allowing the sending of anonymous communications when the informant so wishes.
6. All active litigation of the company has been consulted, as well as litigation that has been ongoing since the company was incorporated, and no litigation and therefore no convictions have been detected on the following aspects:
 - Those related to corruption or bribery.
 - Related to tax evasion.
 - Related to the violation of competition laws.

7. In addition, Neinor Homes promotes employee awareness of the importance of compliance with all applicable competition laws and regulations. In this regard, compliance training is provided on an annual basis and, additionally, a series of letters / confirmations are issued which employees receive and must express their understanding and acceptance.
8. Finally, governance and tax compliance are important elements of oversight and there are appropriate tax risk management strategies and processes in place. In this regard, the company has a Tax Policy and good tax practices.

On the basis of the above and all that is explained in this sustainability report in terms of the company's governance and practices, we consider that, as far as the European taxonomy is concerned, we comply with the minimum social safeguards for all our activities.

> SCHEDULE. NEINOR HOMES' ELIGIBILITY AND ALIGNMENT RATIOS

Below are the percentages of eligibility and alignment of the economic activities of Neinor Homes with the EU taxonomy, based on the procedures and key indicators described in Annex II of Delegated Regulation (EU) 2021/2178. The figures and percentages presented here have been analysed for each of the Group's companies, although they are presented at a consolidated level.

The company has carried out a preliminary eligibility analysis in which it has compared the economic activities it carries out with the activities contemplated in Annexes I and II of Delegated Regulation (EU) 2021/2139, as well as in Annexes I to IV of Delegated Regulation 2023/2486. As a result of this preliminary analysis, Neinor Homes' eligible activities have been determined to be as follows:

7. Building construction and property development activities

7.1. Construction of new buildings

7.2. Renovation of existing buildings

7.7. Acquisition and ownership of buildings

Once these activities eligible for the company had been defined, the accounting items and figures were analysed, calculating the eligibility percentages for the three key performance indicators: Turnover, CapEx and OpEx. In the exercise, Neinor's eligibility percentages for these three key indicators were 96.1%, 99.6% and 99.2%, respectively.

Regarding the proportion of these activities considered to be aligned for the company, only the fulfilment of the requirements has been analysed and only those developments that have already been completed, whether for sale or for rent, have been reported, thus not including ongoing developments that the company expects to be aligned with the European Taxonomy. There are two reasons for this:

- We believe that it is only when the development is fully completed that we are absolutely certain that the technical criteria have been met and we do not rely on the study, intentions or what was foreseen in the project, given that there are many circumstances that produce unexpected results in the analysis or changes in the projects.
- This would lead to greater complexity in tracking the alignment of turnover, Capex and Opex, given that in one year that it might be aligned and the reality in the following year prove otherwise, which would lead to having to rewrite the amounts provided in previous periods should lead to having to rewrite the amounts provided in previous periods.

This consideration implies that, since 2022 was the first year in which compliance with taxonomy requirements was analysed for developments delivered in that year, and for reporting this data, in this year the figures considered aligned only include developments completed in 2022, 2023 and 2024. Therefore, the revenue generated by homes sold in developments completed before 2022 is not being considered, nor is the CapEx or OpEx generated by developments in progress in the production or design phases, even if they are developments that will be delivered in the future and meet the criteria and are aligned.

➤ **TURNOVER**

The taxonomy-compliant turnover ratio has been calculated as the share of net turnover derived from products or services, including intangibles, associated with economic activities that comply with the taxonomy (numerator), divided by net turnover (denominator) as defined in Article 2(5) of Directive 2013/34/EU. Turnover includes revenue recognised in accordance with International Accounting Standard (IAS) 1, paragraph 82(a), as adopted by Commission Regulation (EC) No 1126/2008(1).

For this, the numerator contains the sum of the turnover of those activities and projects eligible for the taxonomy, having performed an alignment analysis only on buildings completed from 2022 onwards. As this indicator is reported in subsequent years, the results of the alignment analysis on completed buildings in each financial year will be added.

> CAPEX

For the calculation of eligible and aligned CapEx percentages, the denominator includes additions to tangible and intangible assets during the year before depreciation, amortisation and possible revaluations, including those resulting from revaluations and impairments, for the year, excluding changes in fair value. As well as the costs detailed in 1.1.2.1. of Annex I to Delegated Regulation (EU) 2021/2178. Leases that do not result in the recognition of a right of use of the asset are not accounted for as Capex.

The numerator consists of the part of the investments in assets included in the denominator, related to assets or processes associated with economic activities that conform to the taxonomy.

> OPEX

For the calculation of the OpEx denominator, non-capitalised direct costs are included which relate to research and development, building renovation measures, short-term leases, maintenance and repairs as well as other direct expenses related to the day-to-day maintenance of property, plant and equipment assets by the company or a third party to whom activities are outsourced and which are necessary to ensure the continued effective operation of these assets.

The numerator in this case is composed of the part of operational expenditure related to processes or activities in line with the taxonomy, in accordance with the criteria set out in 1.1.3.1. of Annex I to Delegated Regulation (EU) 2021/2178.

Double counting has been avoided in the allocation in the numerator of key performance indicators relating to turnover, Capex and Opex of all economic activities, by following accounting rules that ensure that figures associated with the same account are not consolidated in different indicators; and by eliminating intercompany balances relating to work carried out for group companies, which might otherwise appear in two different indicators.

The Opex and Capex figures disclosed in this section may differ from those in the company's financial statements for the year ended 31 December 2024, as they have been calculated in accordance with Annex I of Delegated Regulation (EU) 2021/2178.

A. ELIGIBLE ACTIVITIES ACCORDING TO THE TAXONOMY																	
A.1. ENVIRONMENTALLY SUSTAINABLE ACTIVITIES (CONFORM TO TAXONOMY)																	
CONSTRUCTION OF NEW BUILDINGS	7.1	284,642,761	58.5%	58.5%	0,00%	0,00%	Y	Y	Y	Y	Y	Y	Y	58.5%	31.9%		
RENOVATION OF EXISTING BUILDINGS	7.2	7,115,940	1.5%	1.5%	0,00%	0,00%	Y	Y	Y	Y	Y	Y	Y	1.5%	0.0%		T
VOLUME TURNOVER (A.1)		291,758,701	59.9%	59.9%	0,00%	0,00%								59.9%	31.9%		
A.2.SUSTAINABLE NON-ENVIRONMENTAL ACTIVITIES (DO NOT CONFORM TO TAXONOMY)																	
CONSTRUCTION OF NEW BUILDINGS	7.1	171,266,161	35.2%														
RENOVATION OF EXISTING BUILDINGS	7.2	860,266	0.2%														
ACQUISITION AND OWNERSHIP OF BUILDINGS	7.7	3,835,515	0.8%														
VOLUME TURNOVER (A.2)		175,961,941	36.2%														
TOTAL (A.1+ A.2)		467,720,643	96.1%											59.9%	31.9%		
B. ACTIVITIES NOT ELIGIBLE ACCORDING TO THE TAXONOMY																	
VOLUME TURNOVER		18,972,501	3.9%														
TOTAL (A + B)		486,693,144	100,0%														

*This section does not include the possible substantial contribution to the Water and Marine Resources, Pollution or Biodiversity objectives, as they are not applicable to any of the company's taxonomically eligible economic activities.

	CODES	ABSOLUTE CAPEX (€)	SHARE OF CAPEX (%)	CLIMATE CHANGE MITIGATION (%)	CIRCULAR ECONOMY (%)	CLIMATE CHANGE ADAPTATION (%)	CLIMATE CHANGE MITIGATION (Y/N)	CLIMATE CHANGE ADAPTATION (Y/N)	WATER AND MARINE RESOURCES (Y/N)	CIRCULAR ECONOMY (Y/N)	POLLUTION (Y/N)	BIODIVERSITY AND ECOSYSTEMS (Y/N)	MINIMUM SOCIAL GUARANTEES (Y/N)	PROPORTION OF CAPEX THAT CONFORMS TO TAXONOMY, 2023 (%)	PROPORTION OF CAPEX THAT CONFORMS TO TAXONOMY, 2022 (%)	CATEGORY (ENABLING ACTIVITY) (F)	CATEGORY (TRANSITION ACTIVITY) (T)
A. ELIGIBLE ACTIVITIES ACCORDING TO THE TAXONOMY																	
A.1. ENVIRONMENTALLY SUSTAINABLE ACTIVITIES (CONFORM TO TAXONOMY)																	
CONSTRUCTION OF NEW BUILDINGS	7.1	99,588,023	34.0%	34.0%	0,00%	0,00%	Y	Y	Y	Y	Y	Y	Y	34.0%	30.0%		
ACQUISITION AND OWNERSHIP OF BUILDINGS	7.7	10,053,424	3.4%	3.4%	N/A	0,0%	Y	Y	Y	Y	Y	Y	Y	3.4%	0.0%		
CAPEX (A.1)		109,641,447	37.4%	37.4%	0,00%	0,00%								37.4%	30.0%		
A.2.SUSTAINABLE NON-ENVIRONMENTAL ACTIVITIES (DO NOT CONFORM TO TAXONOMY)																	
CONSTRUCTION OF NEW BUILDINGS	7.1	182,393,739	62.2%														
CAPEX (A.2)		182,393.739	62.2%														
TOTAL (A.1+ A.2)		292,035.186	99.6%											37.4%	30.0%		
B. ACTIVITIES NOT ELIGIBLE ACCORDING TO THE TAXONOMY																	
CAPEX		1,166,639	0.4%														
TOTAL (A + B)		293,201,826	100,0%														

* This section does not include the possible substantial contribution to the Water and Marine Resources, Pollution or Biodiversity objectives, as they are not applicable to any of the company's taxonomically eligible economic activities.

NO SIGNIFICANT INJURY CRITERIA ("DNSH" OR "NO SIGNIFICANT CAUSE OR INJURY")																	
SUBSTANTIAL CONTRIBUTION CRITERIA (%)																	
CODES	ABSOLUTE OPEX (€)	SHARE OF OPEX (%)	CLIMATE CHANGE MITIGATION (%)	CIRCULAR ECONOMY (%)	CLIMATE CHANGE ADAPTATION (%)	CLIMATE CHANGE MITIGATION (Y/N)	CLIMATE CHANGE ADAPTATION (Y/N)	WATER AND MARINE RESOURCES (Y/N)	CIRCULAR ECONOMY (Y/N)	POLLUTION (Y/N)	BIODIVERSITY AND ECOSYSTEMS (Y/N)	MINIMUM SOCIAL GUARANTEES (Y/N)	PROPORTION OF OPEX THAT CONFORMS TO TAXONOMY, 2023 (%)	PROPORTION OF OPEX THAT CONFORMS TO TAXONOMY, 2022 (%)	CATEGORY (ENABLING ACTIVITY) (F)	CATEGORY (TRANSITION ACTIVITY) (T)	
ELIGIBLE ACTIVITIES ACCORDING TO THE TAXONOMY																	
SUSTAINABLE ENVIRONMENTAL ACTIVITIES (CONFORM TO THE TAXONOMY)																	
CONSTRUCTION OF NEW BUILDINGS	7.1	3,029,264	68.8%	68.8%	0,00%	0,00%	Y	Y	Y	Y	Y	Y	68.8%	54.1%			
RENOVATION OF EXISTING BUILDINGS	7.2	14,860	0.3%	0.3%	N/A	0,0%	Y	Y	Y	Y	Y	Y	0.3%	0.0%		T	
ACQUISITION AND OWNERSHIP OF BUILDINGS	7.7	351,643	8.0%	8.0%	N/A	0,0%	Y	Y	Y	Y	Y	Y	8.0%	0.0%			
OpEx (A.1)		3,395,767	77.1%	77.1%	0,00%	0,00%							77.1%	24.1%			
A.2.SUSTAINABLE NON-ENVIRONMENTAL ACTIVITIES (DO NOT CONFORM TAXONOMY)																	
CONSTRUCTION OF NEW BUILDINGS	7.1	734,642	16.7%														
ACQUISITION AND OWNERSHIP OF BUILDINGS	7.7	238,098	5.4%														
CapEx (A.2)		972,740	22.1%														
TOTAL (A.1+ A.2)		4,368,507	99.2%										77.1%	24.1%			
B. ACTIVITIES NOT ELIGIBLE ACCORDING TO THE TAXONOMY																	
VOLUME TURNOVER		36,374	0.8%														
TOTAL (A + B)		4,404,881	100,0%														

* This section does not include the possible substantial contribution to the Water and Marine Resources, Pollution or Biodiversity objectives, as they are not applicable to any of the company's taxonomically eligible economic activities.

STRATEGY:
**WHAT NEINOR HOMES
UNDERSTANDS
BY SUSTAINABILITY,
WHAT WE ARE
TRYING TO
ACHIEVE**



12. STRATEGY: WHAT NEINOR HOMES UNDERSTANDS BY SUSTAINABILITY; WHAT WE ARE TRYING TO ACHIEVE

At the date of publication of this Statement of Non-Financial Information, and in accordance with the orientation set by the company in terms of diversification, growth, business continuity and commitment to sustainability, this point includes what sustainability means for our company, the main milestones achieved in the year in terms of sustainability and the next steps that we believe will contribute to the creation of value for the entire environment in which the company operates.

In this regard, we believe that this section can be a summary guide to our entire Report and more specifically to the company's ESG focus and concerns.

WHAT WE UNDERSTAND BY SUSTAINABILITY.

The definition of sustainability is 'that which can be sustained'. Based on the principle of ensuring the needs of the present without compromising the needs of future generations, a process is sustainable when it can be maintained by itself.*

Based on this and on what we believe to be important, we consider that it is unfeasible to talk about sustainability at Neinor Homes if Neinor Homes did not exist; therefore the most important thing when talking about the sustainability of Neinor Homes is the viability of the company over time and we believe that this is closely linked to the trust of its customers and investors, its adaptation and capacity to learn in the face of social and technological change, the growth of the company and the profit of the company.

Therefore, in Sustainability, our first premise will be assuring the business, because we 'have to ensure the needs of the present' and therefore this business and the promotion of housing will create employment, local wealth, contribute to the treasury and the payment of public services through its taxes, will make housing more efficient, allowing people to save more, will produce greater satisfaction in people for the conditions of their housing, its common areas, its natural lighting etc.; in short, the maintenance of this business activity improves the quality of life of people and of society in general.

And furthermore, in terms of 'not compromising the needs of future generations', the company is based on the commitments and *achievements outlined in the environment section*.

Below, we detail the main aspects on which we are working and for which we are most satisfied with our performance as a company.

> MAIN MILESTONES

REGARDING OUR TEAM

- Maintaining the security and economic well-being of our staff and suppliers by ensuring the continuity of the company, maintaining the development activity, diversifying businesses, creating coinvestment operations and making strategic financial decisions.
- Agreed upon, developed and approved the company's Equality Plan in fiscal year 2023. Plan that contemplates actions and measures that ensure complete gender equality in the company in all their areas and that ensure and monitor the same opportunities in talent acquisition, training, career development...
- Implementation of measures to promote a healthy lifestyle for our employees. Measures that we have taken such as the distribution of fresh fruit in offices, mindfulness workshops, working with sports centres for the practice of sport, access to therapy and healthy nutrition tools and training to ensure less energy consumption both in offices and in each private home, we believe promote the awareness of our employees and benefit their health.
- Relevant work-life balance measures implemented. (See Section 9.4, Worklife balance)
- For the tenth consecutive year we have improved the accident and injury rates that occur in the industry, in terms of physical safety in our developments, achieving incidence, frequency and severity ratios below the industry average in 2024 (see point 10.4).

REGARDING SOCIETY AND HOUSING ACCESSIBILITY

- The world's first listed real estate developer to measure and publish the social impact of all its developments. (See point 5.4)
<https://www.neinorhomes.com/corporate/esg/compromisosocial/medicion-del-impacto-social/>
- First national listed real estate developer to reach a public-private partnership agreement to build 4,500 social rental homes in Barcelona and its Metropolitan Area through the mixed company Habitatge Metròpolis Barcelona (HMB). (See point 5.3)
- First national listed developer to establish a business line dedicated to the development of affordable housing.
- Developer that has delivered the most social housing in the last three years and that complies with the requirement that at least 30% of its dwellings registered / in progress / or in the planning stage are social housing or have a significantly higher affordability than the average of the major urban centres of housing demand.
- Involved in the analysis and search for solutions with different entities, organisations and foundations to solve the problem of homelessness in Spain. (See point 5.3).

REGARDING CUSTOMERS

- We have been pioneers in trying to improve the process of acquiring a home for our customers, providing them with better information on the evolution of the construction of their home (monthly newsletters), as well as offering a completely free service of non-payment insurance before and after the purchase of their home, to be able to pay for their new home in the event of involuntary loss of employment, temporary disability or hospitalisation due to accident from the signing of their sales contract and also covering the payment of the mortgage instalment from the signing of the deed for up to a maximum of 5 years.
- A free of charge offer to our customers via an APP (Hobeen) through which they can monitor their consumption and energy costs and analyse the times and appliances that consume the most, as well as obtain environmental advice on how to be more energy efficient and take care of the environment. Furthermore, we also offer utilities sign-up services, which our customers can access in a simpler, more exclusive and personalised way.
- The quality of our Customer Service has been recognized in the Pre-Sales and Call Center NEX area, having been awarded, for second consecutive year, with the **“Best Customer Service” award to Client 2025’, in the category of REAL ESTATE PROMOTERS**. Where active listening has been taken into account, response time and the quality of care received, among other aspects.

REGARDING THE ENVIRONMENT

- First national real estate developer to annually measure its corporate carbon footprint in scopes 1, 2 and 3, establishing a commitment to reduce emissions with SBti. (See point 8.2).

In the 2024 financial year, the company's emissions amounted to 254,700 tonnes of CO₂, 99.84% of these being Scope 3 emissions. Neinor Homes is meeting its objective of reducing its Scope 1 and 2 emissions annually. The Scope 3 emissions published in the current financial year are not comparable with the Scope 3 emissions of previous financial years due to a change in methodology explained in this report and those of previous years.

- First national listed real estate developer to carry out a climate risk analysis of its homes. (See point 8.4).
- Company that performs life cycle analysis on all its developments launched since the 2022 financial year.
- First company in the real estate sector to publish data on eligibility and alignment with the European Taxonomy from 2022, thus fulfilling one of the main objectives of its Strategic Plan: to increase alignment in each financial year. The percentage of alignment in terms of completed developments has increased from 47% in 2023 to 63% in 2024, while in terms of completed dwellings it has increased from 46% in 2023 to 75% in 2024. (See point 11).

In the 2024 financial year, the company fulfilled its strategic objective of increasing the number of developments and homes aligned with the taxonomy in relation to the developments completed in the financial year.

- The company recycled/recovered at least 80% of the total waste generated in the construction of completed developments.
- Since the beginning of its journey, the company has been incorporating measures to reduce water consumption both in homes and in the communal areas of developments.

AT THE CORPORATE GOVERNANCE LEVEL.

- First national listed real estate developer to issue a green bond, fully justify it in full in the following financial year and launch a second green bond in the 2024 financial year, updating its sustainable financing framework (See point 11).

<https://www.neinorhomes.com/en/corporate/esg/sustainability/esg-sustainablefinancing/green-bond-report/>

- First national listed real estate developer to draw up and make public its Strategic Sustainability Plan and to report on its implementation and updating (see point 3).

<https://www.neinorhomes.com/en/corporate/esg/sustainability/sustainability-plan/>

- Real estate developer committed from the start of its activity to the transparency of its non-financial information, publishing its Sustainability Report since 2016 without being obliged to do so and verified by an independent third party.

<https://www.neinorhomes.com/en/corporate/esg/sustainability/reporting-andpolicies/sustainability-report/>

- Company that since its inception in all audits conducted in respect of financial accounts, non-financial accounts, compliance areas such as anti-money laundering, data protection and cybersecurity, has not received any qualifications, paragraphs of uncertainty or any other relevant or significant observations.

- A company that has taken measures to ensure the business, viability and sustainability of the company, such as its dividend distribution policy and the diversification of its business, as well as the creation of new co-investment vehicles to obtain efficient capital growth, which have led to the company having the highest dividend distribution in the Spanish continuous market, as well as being the company with the highest growth in market valuation in the last financial year (see point 5.2).



Even so...

But we have a long way to go.

Despite all these achievements, we still have a long way to go, especially at the sector level. The objective of Neinor Homes is not just to be a leader in sustainability, but to be a benchmark that facilitates the improvement of the sector in this area and the competition for the best practices in terms of sustainability, which will ensure the transition of real estate development towards sustainable development.

We know that many actors and factors are involved in the development activity, so there are many results that are not what we would like them to be and that have a degree of room for improvement. For this reason, we would like to express our most sincere apologies for any and all times when we have not been up to the mark in any of our areas of activity, such as execution, deadlines or customer service.

Alvaro Conde Herranz
Head of GRC,
Internal Audit and Sustainability of Neinor Homes S.A.

> THE NEXT STEPS SPECIFIED BY US LAST YEAR

Our commitment and goals are detailed in our Sustainability Plan. However, every two years we reveal the small tactical actions and the closest next steps we are working on.

Here's where we stand on the "next steps" we published in the last financial year.

• Improve customer service (after-sales).	✓
• Improve processes in the Human Resources area.	In progress
• Improve company processes related to attention and execution of projects.	In progress
• Carry out the third social impact measurement of all our promotions.	✓
• Search means of construction, materials and design, to reduce the carbon footprint of the company per square meter and reduce this footprint compared to the previous year.	✓
• Have more and more promotions with certification energetic A.	✓
• Offer our clients tools and measures to consider, regarding energy efficiency and care for the environment in their homes.	✓
• Try to comply with the European taxonomy in all the buildings that we are going to have in operation and increase the level of alignment year after year globally in all our promotions with regardless of your destination.	✓
• Participate in the analysis of problems accessibility to housing (ESADE).	✓
• Create a community and promote plans that facilitate local integration in areas where we have a high concentration of product (Alovera, Esplugues of Llobregat, Urduliz).	✓
• Make investors see that it is a company who thinks about people and the environment, who has a high return that creates wealth.	✓

ABOUT THIS REPORT



SCOPE OF INFORMATION

Neinor Homes is presenting its Sustainability Report for the eighth time, this time corresponding to the 2024 financial year, in accordance with the guidelines contained in the Global Reporting Initiative (GRI) Guidelines. The objective of the Report is to respond both to the commitment to disclose its activities, as well as to the desire to be accountable to its stakeholders and to society. The information included in the Report is limited to the 2024 financial year .

In order to facilitate understanding of the business and to evaluate Neinor Homes’ performance in various areas at present, reference is also made to the figures and events of the previous year, thus offering a broader perspective for analysis. The forward-looking information provided in this Report is based on an analysis of the current context and its expected evolution, and does not make a commitment to achieving these objectives.

The information included in the Report is complemented by other corporate documents that may be of interest for further information and which are available on the website **www.neinorhomes.com**

2024 ANNUAL
ACCOUNTS

2024 ANNUAL
CORPORATE
GOVERNANCE
REPORT

CODE OF ETHICS

SUSTAINABILITY
POLICY

2022-2025
SUSTAINABILITY PLAN

REPORTING STANDARDS USED

This Report has been prepared in accordance with the guidelines established in the *Global Reporting Initiative’s Sustainability Reporting Guidelines* in its GRI Standards version, in accordance with the essential conformity option. The selection of relevant aspects has been carried out based on the results of the new materiality (double materiality) analysis carried out in 2024, which is explained below.

Furthermore, in order for Neinor Homes to continue to be one of the benchmark companies in its sector, this Report has been prepared in line with the recommendations and best practices established by EPRA Sustainability (European Public Real Estate Association). The table of GRI performance indicators included at the end of the Report indicates the pages where the related information is provided.

Finally, most of the requirements established in Law 11/2018 of 28 December, on non-financial information and diversity, have also been taken into account in its preparation. Although in previous years this law was not applicable to Neinor Homes, the company has been publishing based on it and auditing itself, because it has considered it a good practice. 2024 is the fourth year in which this law applies to the company.

PROCESS OF PREPARING THE REPORT AND IDENTIFYING STAKEHOLDERS

Neinor Homes endeavours to understand the needs and expectations of its stakeholders through a materiality analysis using the GRI reporting standard. The company evaluated both internal and external sources to ascertain its needs and expectations, based on its 2022-2025 Sustainability Plan. Neinor Homes considers its stakeholders to be those who are directly or indirectly affected by its business activity and who may also have an impact on it. These groups include investors, customers, employees, suppliers and society in general. The company focuses on meeting the expectations of its stakeholders and improving its sustainability performance.

The Governance, Risk and Compliance (GRC) Internal Audit and Sustainability Department is responsible for coordinating the work of various areas of the company and for ensuring the accuracy and completeness of the information reported in the Annual Report. This document is published together with the financial information for the year to allow stakeholders to assess its performance in relation to the company's relevant information.

> MATERIALITY ANALYSIS STEP BY STEP



> RELEVANCE OF MATERIAL ISSUES

The environmental, social and governance issues that are material for the Group are those which, after an exhaustive analysis, have been identified as the most relevant both for their impact on the environment and for the Group's financial exposure to the risks and opportunities that they generate or may generate. These issues are the result of the double materiality analysis, which guarantees that the priority issues, defined on the basis of Neinor Homes' strategy, culture and business model, are not only important for the Group, but also for the environment in which it operates, including its stakeholders.

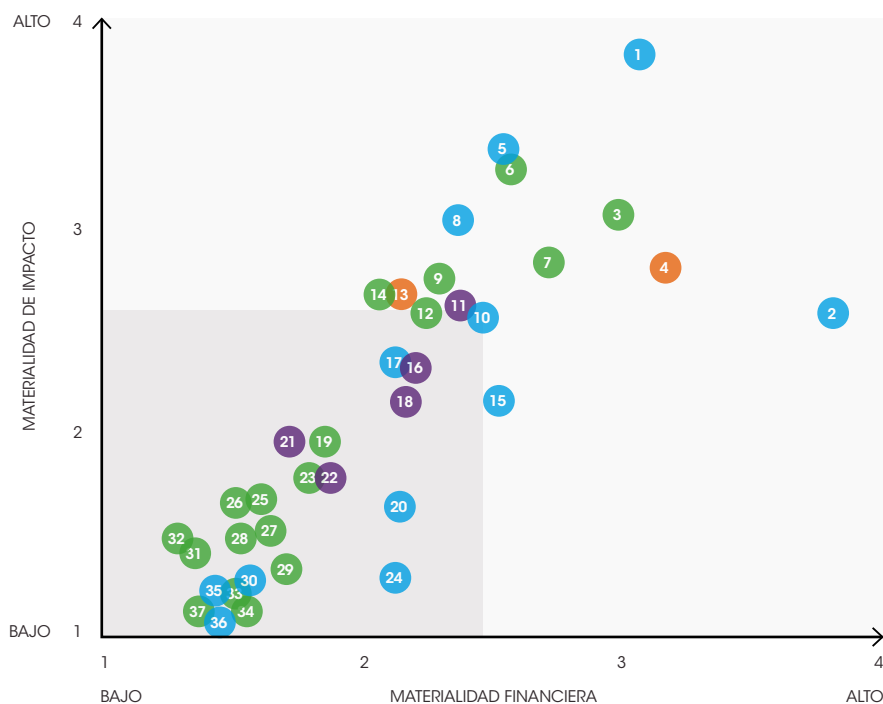
The materiality matrix reflects the result of this analysis, aligning the Group's objectives and priorities with sustainable challenges and opportunities. Among the most important issues is the commitment to generate a positive social impact by expanding the supply of affordable housing while meeting the highest standards of quality and sustainability and responding to customer expectations. In particular, this commitment focusses on promoting energy efficiency and guaranteeing the quality of the final product.

Based on its development and construction activity, Neinor Homes prioritises talent retention and care for its workers, both its own and those in the value chain, paying special attention to health and safety on site and maintaining good working conditions.

The commitment to sustainable development is another key pillar, focused on climate change adaptation and mitigation. The Group seeks to reduce its carbon footprint throughout its value chain, from the selection of raw materials with a low environmental impact to the design of energy-efficient and highly efficient products. In line with these objectives, it seeks to promote the use of recycled materials, proper waste management and the circular economy in all its operations, making these issues key priorities.

These issues summarise the 10 priority issues that are located in the upper right part of the double materiality matrix. In this financial year, the most significant issues for the consolidated Group, resulting from the double materiality process described in the following section (Double Materiality Analysis), are the following: Cultural, social and economic rights and preferences of consumers, Energy, Sustainable finance, Working conditions throughout the value chain, Resource input, Climate change mitigation and adaptation, Equal treatment and opportunities, Corporate culture, Water, Cybersecurity, Waste, Personal safety of consumers.

NEINOR HOMES - DOBLE MATERIALIDAD



E. MEDIO AMBIENTE

E1. CAMBIO CLIMÁTICO

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The 37 sub-themes evaluated in this financial year have been organised into two axes to reflect their materiality and level of priority. Each axis represents the type of materiality, impact or financial, on a scale of 1 to 4, where 1 corresponds to the lowest impact or financial effect and 4 represents the highest impact or effect. Some of these issues, such as pollution or biodiversity, although relevant, have not been identified as material for the reasons set out below. All of them appear in the grey area of the same graph.

Comparing the results with the previous year, no substantial changes have been identified, although the current analysis allows for a more comprehensive and holistic strategic approach, considering not only the origin of impacts, risks and opportunities and their potential effects, but also the direct opinion of stakeholders.

JUSTIFICATION OF NON-MATERIAL ISSUES

Despite the construction sector's high dependence on ecosystem services, the industry is strictly regulated by European, national and local regulations that ensure the protection of the environment and public health, prohibiting any unsustainable practices.

New housing projects are developed in urban areas and building plots that have been previously **decontaminated**, and are subject to environmental impact assessments (EIA) that safeguard protected areas and areas of high ecological value. In addition, the company incorporates environmental rehabilitation and improvement practices in all its developments, prioritising responsible land use, the circular economy and waste recovery, as well as the protection of **biodiversity**. All this is accompanied by strict internal controls designed to mitigate potential impacts, from accidental spills or noise and vibrations during construction to employees' health. These controls extend to the supply chain, aiming to minimise supplier- and subcontractor-generated risk. The company favours the contracting of local suppliers, who must commit to comply with the Code of Ethics for third parties.

In relation to **air pollution**, a sectoral analysis was carried out to minimise uncertainty, which found that the real estate sector - Construction and Real Estate - contributes 1% to the total emissions generated in Spain (SO_2 , CO, CH_2 , NO_2 , NH_2 , PM2.5, PM10, NMVOC). Moreover, the 'Transport and Storage' sector, although more significant, does not exceed 15% of the total[1]1.

The same argument extends to respect for **human and labour rights**, protected by our Internal Policies, aligned with the United Nations Guiding Principles and the ILO declaration, and Good Governance Practices, focused on the **prevention of corruption and bribery, the protection of whistleblowers** and the integrity of **business relationships** upstream and downstream.

› DOUBLE MATERIALITY ANALYSIS

As part of our commitment to transparency and responsibility, we follow the recommendations of the European Commission as set out in the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS), as well as the EFRAG guidelines, to ensure that our dual materiality analysis allows our reports to accurately and comprehensively reflect the impacts, risks and opportunities of the Group as a whole.

As a result, this year we have updated and improved our methodology by incorporating the concept of double materiality into the impact analysis, adopted in previous years by reference to the GRI (Global Reporting Initiative) standards and the Guide for the Preparation of Sustainability Reports of these standards.

The main objective of the Double Materiality Analysis is to identify the most relevant issues for the company and its stakeholder groups, through the evaluation of impacts, risks and opportunities (IROs), which will serve as the basis for the development of our plans and actions. Following this new methodology, the evaluation is carried out from two perspectives:

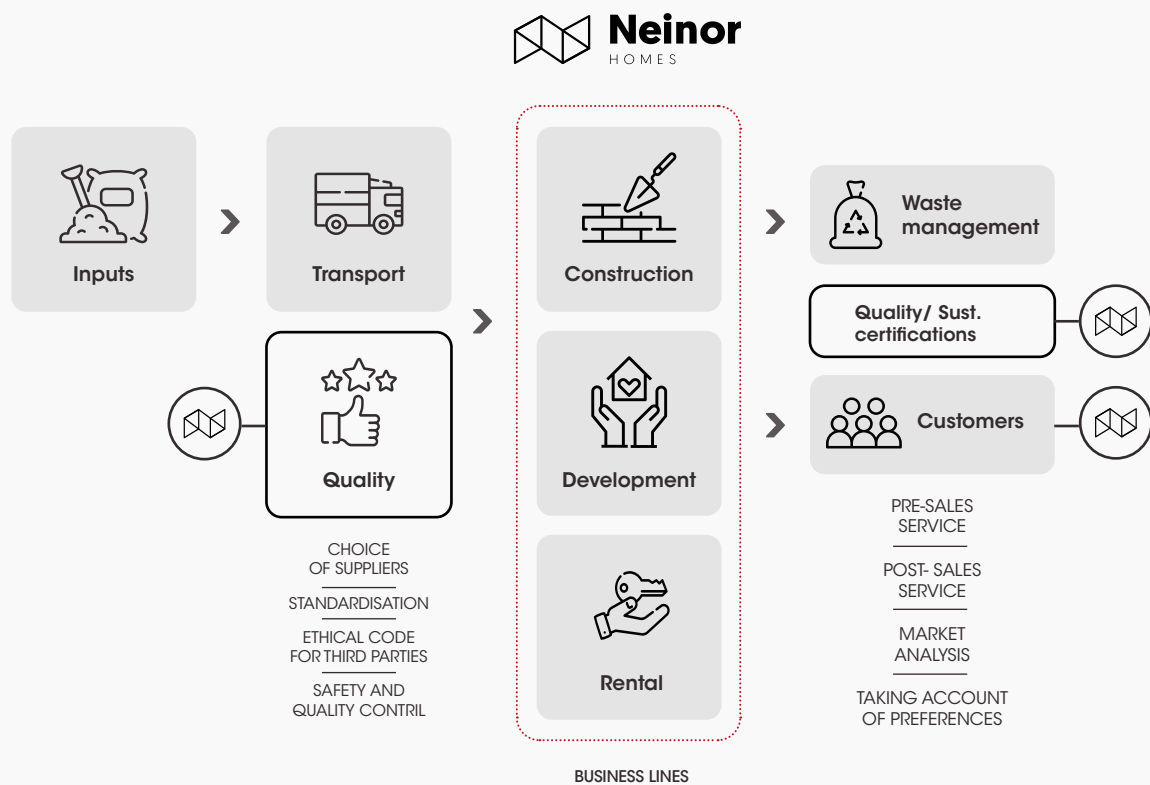
- **Materiality of impact** (from the inside out): this evaluates the company's impacts, positive or negative, current or potential, on people and the environment, in the short, medium and long term, taking into account both our internal operations and those along the value chain.
- **Financial materiality** (from the outside in): assesses how changes in society or the environment, whether or not they are derived from the impacts generated by business activity, can positively or negatively affect our financial position or our reputation.

This analysis takes into account the opinions and perceptions of stakeholder groups, for the purposes of understanding how they are or could be affected by our business activity or by the commercial relationships thereof, direct or indirect, throughout the value chain. It also allows us to assess the potential financial impact on the business, define risk control and mitigation measures, and develop initiatives to take advantage of emerging opportunities. By combining both perspectives, we can prioritise sustainability measures based on their relevance and align them with the Group's strategic initiatives.

¹ Analysis of temporal data from the construction, real estate and transportation and storage sectors on non-GHG emissions from 2008 to 2021, the last year available. Source, Eurostat.

ANALYSIS OF THE CONTEXT AND THE VALUE CHAIN

With the aim of offering a comprehensive view of the relevant sustainability issues of the consolidated Group and its stakeholder groups, the double materiality process begins with an exhaustive analysis of the environment in which it operates. Determining the set of activities throughout the value chain that are likely to generate material impacts and evaluating their level of dependence on the environment represent the starting point of this initial phase, which culminates in the definition of the scope of analysis and the identification of relevant stakeholder groups.



The nature of the construction and property development sector involves a complex value chain in which multiple actors are involved. Specifically, the key elements identified in this analysis are employees, shareholders, investors and coinvestors, relationships with suppliers and subcontractors, the supply chain, current and potential customers, the community, public authorities and regulators, and, finally, financial institutions.

Neinor Homes works with various types of suppliers: subcontracted construction companies, transport companies, specialised professionals (architects, construction managers, health and safety coordinators, consultants and auditors) and materials and service companies (extraction and supply of raw materials, kitchen furniture, technical certification issuers, quality controllers, waste management, APIs). Maintaining solid relationships with them is essential to guarantee the integrity and solidity of the business model. However, the impact they have on the business and the environment is neither uniform nor equally significant. Within the framework of this analysis, the purpose of which is to identify the most relevant aspects for the company, Neinor focuses on those subcontractors and suppliers linked to resource-intensive activities, such as logistics and waste management services, the extraction and supply of raw materials, and subcontracted construction companies, whose financial and environmental impacts are more significant.

Neinor Homes' current and potential customers span the entire country of Spain, the main market in which it operates. Understanding their expectations in terms of quality and sustainability, as well as the economic, social and demographic factors that may influence their behaviour and demand, is essential for the company. Poor project management or a lack of social and environmental commitment can erode the trust of both the community and investors, while the opposite can expand market opportunities and consolidate brand positioning.

Being aware of the importance of regulation in our sector, the public authorities, in particular, and international organisations, in general, are identified as key actors. Urban planning policies, housing concession processes and environmental and social regulations are closely linked to the code of ethics and good governance that Neinor Homes is committed to comply with. A lack of regulatory commitment and legislative obsolescence can result in fines and sanctions, as well as internal problems with shareholders, investors and the community in general. Similarly, the relevance of financial institutions is recognised, not only in our own operations but also for the agents involved, such as suppliers and customers, because they condition their credit and savings capacity or their financing and investment decisions. Likewise, financial institutions are implementers of the EU Taxonomy, which the company recognises as an opportunity to access better financing conditions while contributing to sustainable financing, attracting investors who prioritise projects aligned with environmental and social objectives.

In short, the following have been identified as the main stakeholders:

- **Internal groups:** Shareholders, Directors, Managers and Employees
- **External groups:** Suppliers and subcontractors, Customers, Logistics, Public Authorities and Financial Institutions.

All of them have been taken into account for the identification and mapping of potentially material impacts, risks and opportunities, which represents the next phase of this process.

The process of identifying IROS is explained in the section on the risk management model.

In the evaluation and prioritisation, the opinion of the stakeholder groups has been ascertained by means of an individual questionnaire that has a common structure in terms of the questions relating to the three major sustainability issues - environmental, social and governance - and a specific part, adapted to each group. In total, 40 questions were asked, of which 37 were thematic, in which the respondent assessed the magnitude of the potential impacts identified, as well as the financial impact that the risks and opportunities (whether or not derived from the business activity) could have on the business if they materialised, using a scale from 1 to 4 (1 being very irrelevant and 4 being very relevant). The stakeholders, both internal and external, who participated in this evaluation process are tier 1 suppliers, current customers, shareholders, investors, directors and employees from various departments.

The methodology also establishes that impacts and risks should be evaluated from both an inherent and a residual point of view. Inherent risk refers to the probability and severity of an impact or risk before control measures are applied, while residual impact or risk is that which persists after the implementation of internal controls and mitigation actions. Taking into account the company's strategy, regulatory compliance and business model, the main stakeholders have evaluated the materiality of the IROs from this perspective, considering that internal practices reduce the inherent risk associated with each potentially material issue.

IMPACT MATERIALITY

The materiality of the 76 impacts identified in the double materiality analysis has been determined based on the following criteria:

M

Magnitude (M): refers to the relevance of the impact generated. In the case of positive impacts, the magnitude of the social or environmental benefit generated is assessed, while in the case of negative impacts, the severity of the damage caused is evaluated. For this purpose, we have used a scale from 1 to 4, with 1 being very irrelevant and 4 being very relevant.

S

Scope (S): this refers to the breadth of the impact generated in terms of its extent. Neinor Homes' operations are national in scope; however, there are impacts which, by their nature, extend beyond their origin, such as GHG emissions or water pollution. To assess the scope, four ranges are established: local, provincial, national and international. This information has been transformed into quantitative terms using a scale that assigns 25% to local impact, 50% to provincial, 75% to national and 100% to international.

I

Irremediable nature (I): only negative impacts are evaluated, with the aim of assessing the company's capacity to remedy the damage caused. Irremediability is classified into four levels: highly remediable, remediable, not very remediable and non-remediable, quantified on a scale of 25% to 100%, taking into account that the materiality of the impact is greater the lower the company's capacity to resolve it.

P

Probability of occurrence (P): used to assess the likelihood of a potential impact materialising in the short, medium or long term. In this assessment, 100% is assigned to the expected probability if it is high, 75% if it is medium, 50% if it is low and 25% if it is very low. These results have been weighted, assigning a weighting of 50% to the probability of it occurring in the short term, 30% to the medium term and 20% to the long term.

The materiality of **current positive impacts** is calculated based on magnitude and scope ($M \times A$), while **current negative impacts** also take into account the irremediable nature of the damage caused ($M \times A \times I$). The materiality of **potential impacts**, both positive and negative, also considers the probability of occurrence ($M \times A \times P$ in the case of **positive impacts** and $M \times A \times I \times P$ in the case of **negative impacts**).

The time horizon considered to evaluate the probability of occurrence in the short, medium and long term is in line with European regulations. In this connection, short term is considered to be the reference period of the financial statements, equivalent to one year, medium term covers 1 to 5 years and long term more than 5 years.

The assessment of the materiality of the impact involves all the aforementioned stakeholder groups and the internal opinion of a group of experts with specific knowledge of ESG matters and extensive experience of Neinor Homes' strategy, business model and commercial relations. To avoid internal bias in the responses, the materiality criteria of external sources such as 'S&P Global' and 'MSCI' in the Real Estate and Homebuilding sector have also been taken into account, in addition to the United Nations' evaluation of the level of national performance in achieving Sustainable Development Goals linked to these issues.

The relative weighting of the parties involved in the evaluation has been defined taking into account the interaction of each group with the company, their level of knowledge of sustainability issues and their experience in the business. As a result, the following weightings have been assigned:

- **Internal group:** Shareholders, Directors and Managers (20%); Group of experts (40%); Employees (10%)
- **External group:** Suppliers (10%); Customers (5%)
- **External sources:** DJSI (5%); MSCI (5%); ODS (5%)

The materiality of each issue has been calculated taking into account the scores that each stakeholder group has assigned to each identified impact in terms of scope, magnitude, probability of occurrence in the short, medium and long term, and irremediability, as applicable. These scores have been weighted according to the weight assigned to each stakeholder group.

FINANCIAL MATERIALITY

Financial materiality assesses the effect that the risks and opportunities arising in the environment may have on the company's performance, results or continuity. The 110 potentially material risks and opportunities identified derive from the impacts generated by our operations and by the value chain, as well as from dependencies with the environment and commercial relationships.

Taking into account their potential nature, the materiality of the risks and opportunities is determined based **on the probability of occurrence and the potential magnitude** of their financial effect, both valued in the **short, medium and long term**.

As a result of the above, a matter will be considered material if the effect of the associated risks or opportunities is expected to have a significant effect on Neinor Homes' financial position, positioning or cash flows

Taking into account the nature and characteristics of the identified risks and opportunities, the metrics selected for their evaluation were:

- **EBITDA** (Earnings Before Interest, Taxes, Depreciation and Amortisation)
- Variation in **net cash flows** from operating, investment and financial activities (**Cash Flow**)
- **Leverage**, which includes bank borrowings, other short- and long-term financial liabilities and short-term loans payable to associate companies,
- **Turnover**
- **Investment property**, which includes the value of land, buildings and other constructions
- **Stock market price** (annual average of the opening value)

The thresholds for assessing financial magnitude have been defined based on the results of the financial statements for the last two financial years and the stock market price of the shares. These thresholds are aligned with the company's current risk map.

REFERENCE THRESHOLDS FOR THE CALCULATION OF FINANCIAL MATERIALITY			
MAGNITUDE	SCALE	CONVERSION	DESCRIPTION OF THE FINANCIAL EFFECT
High	≥ 20%	4	Deviations greater than or equal to 20% in EBITDA, net cash flows, leverage, turnover, value of tangible fixed assets and share price.
Medium	15%-19%	3	Deviations of between 15% and 19% in EBITDA, net cash flows, leverage, turnover, value of tangible fixed assets and share price.
Low	6%-14%	2	Deviations of between 6% and 14% in EBITDA, net cash flows, leverage, turnover, value of tangible fixed assets and share price.
Very low	≤ 5%	1	Deviations of up to 5% in EBITDA, net cash flows, leverage, turnover, value of tangible fixed assets and share price.

As with the materiality impact assessment, the assumptions for weighting the responses of stakeholders regarding the assessment of financial effects are the relationship with the company, the level of knowledge of ESG matters and knowledge of the business. As a result of the above, the opinion on the valuation of the financial effects of Directors, Board Members and Shareholders has a weighting of 30%, Employees and Suppliers 10% each, Customers 5% and the Group of Experts 45%.

Finally, as indicated, the score for the materiality of risks and opportunities is obtained by considering the evaluation of the magnitude of the stakeholder groups and the probability of occurrence, weighted according to their time priority, which assigns a weight of 50% to the short term, 30% to the medium term and 20% to the long term.

IDENTIFICATION AND PRIORITIZATION OF MATERIAL ISSUES

The identification and prioritisation of material issues represents the final phase of the Dual Materiality Analysis process and constitutes the basis on which the content of the Sustainability Report will be prepared.

The resulting score for the set of impacts, risks and opportunities has been grouped into 37 sub-themes - defined by the regulations and expanded according to Neinor Homes' characteristics - and ordered along two axes to reflect their materiality and level of priority. This exercise gives rise to the consolidated Group's double materiality matrix, which has been re-evaluated and validated by the expert criteria of the areas involved in this process.

All sustainability issues that exceed the materiality threshold, from an impact or financial point of view, and not only from the synergy of both, will be considered material for the Group. In this case, the threshold has been set at 2.5, corresponding to the average of the scale used in the evaluation.

STRATEGIC INTEGRATION AND VALIDATION

The material issues identified and prioritised through the methodological process have been validated by the Management Team to ensure that the findings and conclusions accurately reflect the reality of Neinor Homes. This validation process not only guarantees internal alignment, but also facilitates the effective incorporation of these results into the strategy and action plan.

As new material issues are identified or some cease to be so, the approaches and priorities are adjusted to ensure a response to the changing trends and expectations of the environment. These changes in materiality are integrated into the management processes, ensuring that strategic and operational decisions, as well as ESG objectives, are fully aligned with the company's activities and environmental needs.

The unique and cross-cutting nature of the impacts, risks and opportunities of a sustainable nature requires the coordinated integration of the Group's Control, Audit and Risk Management Systems. This is guaranteed by the **comprehensive Control, Compliance and Assurance** system, which uses the sector's best practices as a reference.

14

GRI CONTENTS



> GRI CONTENT INDEX

Neinor Homes has presented the information cited in this GRI content index for the period January 1st, 2023 - December 31st, 2023 with reference to the GRI Standards.

GRI STANDARDS	CONTENT	Page localitation or direct answer
GRI 1: Foundation 2021	This report	This report
	2-1 Organizational details	P. 4-10, 27-30
	2-2 Entities included in the organization's sustainability reporting	p. 31, 60, 67-68, 80, 84
	2-3 Reporting period, frequency and contact point	Neinor Homes has presented the information cited in this GRI content index for the period between January 1st, 2024 and December 31st, 2024 with reference to the GRI Standards. This report is annual. For any information about this report yo may contact Neinor Homes corporate responsibility email: sustainability@neinorhomes.com alvaro.conde@neinorhomes.com The publication of this report is expected during the first quarter of 2024.
	2-4 Restatements of information	No relevant information han been restated with respect to last year
	2-5 Externa assurance	Verification report
	2-6 Activities, value chain and other business relationships	P. 5, 41-45, 57-59, 186-188
	2-7 Employees	P. 5, 162-163, 173-174
	2-8 Workers who are not employees	P. 5, 162-163, 173-174
	2-9 Governance structure and composition	P.6, 78-81, 171
	2-10 Nomination and selection of the highest governance body	P.6, 78-81, 172
	2-11 Hair of the highest governance body	P.5, 76-83, 172
	2-12 Role of the highest governance body in overseeing the management of impacts	P. 12, 63-66, 89-94, 133-147, 186-188
	2-16 Communication of critical concerns	P. 28, 31, 54, 114
	2-20 Process to determine remuneration	P. 171
GRI 2: General disclosures 2021	2-22 Statement on sustainable development strategy	P. 5-7, 57, 67, 72, 80, 84-85
	2-23 Policy commitments	P. 63-66

GRI STANDARDS	CONTENT	Page localitation or direct answer
GRI 2: General disclosures 2021	2-27 Compliance with laws and regulations	No fines or sanctions were received in 2024
	2-28 Memberships associations	P. 62, 72-73
	2-29 Approach to stakeholder engagement	P. 61
	2-30 Colective bargaining agreements	P. 186-186, 178-180
GRI 3: Material topics 2021	3-1 Process to determine material topics	P. 224- 227
	3-2 List of material topics	P. 227
	3-3 Management of material topics	P. 224- 227
GOOD GOVERNANCE		
GRI 3: Material Topics 2022	3-3 Management of material topics	P. 76-77, 99-101
GRI 408: Child Labor	408-1: Operations and suppliers at significant risk for incidents of child labor	Neinor Homes has not identified centers or suppliers likely to have significant risks in relation to child exploitation and, upon entering into business with us, all suppliers accept the Code of Conduct for Third Parties, which includes zero tolerance for situations of child exploitation.
GRI 409: Forced or compulsory labor	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	Neinor Homes has not identified centers or suppliers likely to have significant risks in relation to forced labor. All suppliers, upon entering into business with us, accept the Code of Conduct for Third Parties, which includes zero tolerance for forced labor.
ECONOMIC SUSTAINABILITY AND RESPONSIBLE INVESTMENT		
GRI 3: Material Topics 2022	3-3 Management of material topics	P. 60-61
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	P. 58-59
	201-2 Financial implications and other risks and opportunities due to climate change	P. 91, 138-143
SUSTAINABLE SUPPLY CHAIN		
GRI 3: Material Topics 2022	3-3 Management of material topics	P. 185-190
GRI 204: Procurement practices	204-1: Proportion of spending on local suppliers	P. 185-190
GRI 407: Freedom of Association and Collective Bargaining	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Neinor Homes has not identified centers or suppliers likely to have significant risks in relation to the right to freedom of association and collective bargaining
CORPORATE REPUTATION		
GRI 3: Material topics 2022	3-3 Management of material topics	P.6, 76-77, 99-100
GRI 206: Anti-competitive Behavior 2016	206-1: Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	In 2024, no cases of corruption have been detected. In 2023, no claims for anti-competitive behaviour have been received. The Neinor Homes Code of Ethics and the Anti-Corruption, Fraud and Bribery policy prohibit any type of contribution to political parties and/or political representatives. In 2023, no breaches of the Code of Ethics have been identified in relation to these aspects.

GRI STANDARDS	CONTENT	Page localitation or direct answer
CORPORATE REPUTATION		
GRI 415: Public Policy 2016	415-1 Political contributions	P. 99 Neinor Homes does not accept any contributions to political parties and/or representatives.
TRANSPARENCY AND CORPORATE REPORTING		
GRI 3: Material topics 2021	3-3 Management of material topics	P. 4, 6, 13, 15, Verification report
GRI 306: Waste 2020	306-3 Waste generated	P.66
	306-4 Waste not intended for disposal	P 5, 136
GRI 303: Water and wastewater 2018	303-5 Water consumption	P.66
GRI 302: Energy 2016	302-1 Energy consumption within the organization	P.66
GRI 305: Emissions 2016	305-1 Direct GHG emissions (scope 1)	P.119-132
	305-2 Indirect GHG emissions (scope 2)	P.119-132
	305-3 Other indirect GHG emissions (scope 3)	P.119-132
PROMOTION OF SUSTAINABLE DWELLINGS		
GRI 3: Material topics 2022	3-3 Management of material topics	P. 133-135, 142-148
HOUSING ACCESIBILITY		
GRI 3: Material topics 2022	3-3 Management of material topics	P. 38-50, 149
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of products and service categories	P. 8, 59, 103, 107-113
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	P. 114
INNOVATION STRATEGY		
GRI 3: Material topics 2022	3-3 Management of material topics	P. 63, 149-160
OCCUPATIONAL HEALTH AND SAFETY		
GRI 3: Material topics 2022	3-3 Management of material topics	P. 162, 163, 164, 175-176
GRI 403: Occupational Health and Safety 2018	403-1, 403-2, 403-3, 403-4, 403-5, 403-6, 403-7, 403-9	P. 181-182
LEADERSHIP AND SECTORIAL INFLUENCE WITH GGI		
GRI 3: Material topics 2022	3-3 Management of material topics	P. 52, 62, 67-68, 85, 225-226

GRI STANDARDS	CONTENT	Page localitation or direct answer
MANAGEMENT OF HUMAN CAPITAL		
GRI 3: Material topics 2022	3-3 Management of material topics	P. 106-114
MANAGEMENT OF HUMAN CAPITAL		
GRI 3: Material topics 2022	3-3 Management of material topics	P. 183
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	P. 171
	405-2 Ratio of basic salary and remuneration of women to men	P. 168-171
GRI 406: Non-Discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	P. 167-168, 178-181

Translation of a report originally issued in Spanish. In the event of a discrepancy, the Spanish-language version prevails.

INDEPENDENT LIMITED ASSURANCE REPORT ON THE CONSOLIDATED NON-FINANCIAL INFORMATION STATEMENT OF NEINOR HOMES, S.A. AND SUBSIDIARIES FOR 2024

To the Shareholders of Neinor Homes, S.A.,

In accordance with Article 49 of the Spanish Commercial Code, we have performed a limited assurance engagement on the accompanying Consolidated Non-Financial Information Statement ("NFIS") for the year ended 31 December 2024 of Neinor Homes, S.A. and subsidiaries ("the Neinor Homes Group"), which forms part of the Group's Directors' Report.

The content of the NFIS includes information, additional to that required by current Spanish corporate legislation relating to non-financial reporting, that was not the subject matter of our attestation engagement. In this regard, our work was confined solely to verifying the information identified in sections "14. GRI Contents" and "11. Sustainable financing and compliance with European taxonomy" included in the accompanying NFIS.

Directors' Responsibilities

The preparation and content of the NFIS included in the Neinor Homes Group's Directors' Report are the responsibility of the directors of Neinor Homes, S.A. The NFIS was prepared in accordance with the content specified in current Spanish corporate legislation and with the criteria of the selected Global Reporting Initiative Sustainability Reporting Standards (GRI standards), as well as other criteria described as indicated for each matter in sections "14. GRI Contents" and "11. Sustainable financing and compliance with European taxonomy" of the aforementioned Statement.

These responsibilities of the directors also include the design, implementation and maintenance of such internal control as is determined to be necessary to enable the NFIS to be free from material misstatement, whether due to fraud or error.

The directors of Neinor Homes, S.A. are also responsible for defining, implementing, adapting and maintaining the management systems from which the information necessary for the preparation of the NFIS is obtained.

Our Independence and Quality Management

We have complied with the independence and other ethical requirements of the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants (including International Independence Standards), which is based on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies the international standards on quality in force and, accordingly, maintains a system of quality that includes policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Our engagement team consisted of professionals who are experts in reviews of non-financial information and, specifically, in information on economic, social and environmental performance.

Our Responsibility

Our responsibility is to express our conclusions in an independent limited assurance report based on the work performed. We conducted our work in accordance with the requirements established in International Standard on Assurance Engagements (ISAE) 3000 Revised, Assurance Engagements other than Audits or Reviews of Historical Financial Information, currently in force, issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC), and with the guidelines published by the Spanish Institute of Certified Public Accountants on attestation engagements regarding non-financial information statements.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement and, consequently, the level of assurance provided is substantially lower.

Our work consisted of making inquiries of management and the various units of the Neinor Homes Group that participated in the preparation of the NFIS, reviewing the processes used to compile and validate the information presented in the NFIS, and carrying out the following analytical procedures and sample-based review tests:

- Meetings held with Neinor Homes Group personnel to ascertain the business model, policies and management approaches applied, and the main risks relating to these matters, and to obtain the information required for the external review.

- Analysis of the scope, relevance and completeness of the contents included in the 2024 NFIS based on the materiality analysis performed by the Neinor Homes Group and described in section "13. About this report" of the NFIS, taking into account the contents required under current Spanish corporate legislation.
- Analysis of the processes used to compile and validate the data presented in the 2024 NFIS.
- Review of the information relating to risks and the policies and management approaches applied in relation to the material matters presented in the 2024 NFIS.
- Verification, by means of sample-based review tests, of the information relating to the contents included in the 2024 NFIS, and the appropriate compilation thereof based on the data furnished by information sources.
- Obtainment of a representation letter from the directors and management.

Conclusion

Based on the procedures performed in our verification and the evidence obtained, nothing has come to our attention that causes us to believe that the NFIS of the Neinor Homes Group for the year ended 31 December 2024 was not prepared, in all material respects, in accordance with the content specified in current Spanish corporate legislation and with the criteria of the selected GRI Standards, as well as other criteria described as indicated for each matter in sections "14. GRI Contents" and "11. Sustainable financing and compliance with European taxonomy" of the aforementioned Statement.

Emphasis of Matter

Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, based on the Delegated Acts adopted in accordance with the provisions of that Regulation, establishes, for the first time for 2024, the obligation to disclose information on how and to what extent an undertaking's activities are associated with aligned economic activities in relation to the environmental objectives of the sustainable use and protection of water and marine resources, the transition to a circular economy, pollution prevention and control and the protection and restoration of biodiversity and ecosystems (the other environmental objectives), and in respect of certain new activities included in the climate change mitigation and climate change adaptation objectives, in addition to the information referring to eligible activities required in 2023 in relation to the aforementioned activities. However, as indicated in section "11. Sustainable financing and compliance with

European Taxonomy” of the accompanying NFIS, none of the Company’s activities are associated in either 2023 or 2024 with eligible economic activities in connection with the environmental objectives or the new activities included in the climate change mitigation and climate change adaptation objectives referred to above. In this regard, the directors of the Neinor Homes Group have included information on the criteria that, in their opinion, make it possible to best comply with the aforementioned obligations and which are defined in section 11 of the accompanying NFIS. Our conclusion is not modified in respect of this matter.

Use and Distribution

This report has been prepared in response to the requirement established in corporate legislation in force in Spain and, therefore, it might not be appropriate for other purposes or jurisdictions.

DELOITTE, S.L.



Alicia Izaga

25 February 2025



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