

## HEALTH AND SAFETY POLICY

Prepared by	Reviewed by	Approved by
Human Resources Department	CEO	Board of Directors



**Neinor**  
HOMES

<b>Control of reviews</b>		
<b>Review</b>	<b>Date*</b>	<b>Description of changes</b>
1.00	23/07/2018	First version of the policy
2.00	27/01/2021	New Principles and Policy development
3.00	21/06/2022	Ethical channel data update and minor changes

\* Date of the Committee when the procedure was presented for approval (except in the case of immaterial changes that do not modify the established operations and protocols and that, in turn, are always made to increase the company's level of assurance, in which case they will be approved by the Head of Governance, Risk and Compliance, Internal Audit and ESG).

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## 1. Introduction

Through this policy, NEINOR HOMES, S.A. (hereinafter, “NEINOR HOMES”, the “Company” or the “Group”) undertakes to protect the health and safety of all its employees, the people who work with the Company and those who enjoy its homes. NEINOR HOMES has a firm commitment to zero work-related accidents, both among its own employees and those of third parties that work with the Company.

The Company assumes its role to meet the Sustainable Development Goals of the United Nations’ 2030 Agenda. The Sustainable Development Goals that NEINOR HOMES has identified as being most closely linked to people’s health and safety and to which it undertakes to make a contribution through this policy are:

- 3. Good health and well-being
- 8. Decent work and economic growth

## 2. Purpose

The objective of NEINOR HOMES’ Health and Safety Policy (hereinafter “the policy”) is to set down the general principles and the common action framework to protect the health and safety of its employees, suppliers, contractors and customers.

This policy complies with current legislation and the requirements and expectations of stakeholders, as well as other own requirements in health and safety. It is aligned with the Code of Ethics, Code of Conduct for Third Parties and Sustainability Policy of NEINOR HOMES. The Code of Ethics and the Code of Conduct for Third Parties can be accessed via the following link to the corporate website: <https://www.neinorhomes.com/en/responsible-business-and-innovation/ethics/>. The Sustainability Policy of NEINOR HOMES can be accessed via the following link to the corporate website: <https://www.neinorhomes.com/en/responsible-business-and-innovation/sustainability/>.

## 3. Scope of application

The Health and Safety Policy applies to all the companies forming part of NEINOR HOMES. All personnel of these companies (directors, representatives, senior management, employees, etc.) have a duty to comply with this policy.

Furthermore, NEINOR HOMES will promote knowledge of this policy and its application by the people and entities that have contractual and business relationships with NEINOR HOMES (suppliers, contractors, subcontractors and partners, etc.).

## 4. Guiding principles

For NEINOR HOMES, people are the Company’s most important asset, as they reflect its culture and values, and their performance contributes to achieving excellent corporate results, as well as the desired mission and vision.

NEINOR HOMES promotes a safe work environment and commits to continuously updating occupational risk prevention measures adapted to each job position, going beyond the levels required under current legislation. It will always be concerned with promoting ongoing improvements in health and safety conditions in all the activities it carries out.

Furthermore, all members of NEINOR HOMES have the duty to strictly comply with health and safety and hygiene standards.

NEINOR HOMES' commitment to health and safety is company-wide and is governed by the following principles:

#### **4.1. Health and safety in offices**

In general there is a lower risk of serious accidents occurring in offices. Nevertheless, the Company is aware that accidents and incidents can occur in any work environment. NEINOR HOMES has an absolute commitment to health and safety in its offices and its undertaking to have zero work-related accidents applies to any area.

The main lines of action in this respect are:

- Ensuring health and safety is an individual responsibility, which cannot be delegated.
- Ensuring decent working conditions, maintaining a safe and healthy workspace by analysing employment positions and their conditions, risk management and the adoption of prevention and mitigation measures.
- Reducing work-related accidents to zero and avoiding as much as possible health and safety incidents at work.
- Avoiding, in any circumstances, deterioration in employees' health in work centres and their area of influence.
- Performing health and safety audits in all the offices and branches based on more rigorous criteria than prescribed by sector legislation.
- Promoting a health and safety culture, through training and raising the awareness of all employees.

#### **4.2. Health and safety on worksites**

In the real estate sector most accidents and incidents occur during the building stage. For this reason, NEINOR HOMES puts particular emphasis on health and safety at worksites to fulfil its commitment to zero work-related accidents.

The main lines of action in this respect are:

- Complying with current legislation, with the most exacting international health and safety standards and the Company's Book of Best Practices in health and safety, which is more stringent than the legislation.
- Fostering compliance with the health and safety protocols in place, emergency plans on worksites, the use of personal protection equipment on and around worksites and carrying out exhaustive access controls to prevent any third parties being affected.

- Having a health and safety plan in place, adapted to each worksite, before starting work.
- Performing exhaustive monitoring, by both the health and safety coordinator and Company personnel, to maintain health and safety.
- Carrying out strict health and safety evaluations of suppliers and contractors.
- Requiring contractors on worksites to designate at least one worker who is permanently on site to spend part of their workday on preventive duties and appoint at least one other worker as the person responsible for health and safety at the worksite.
- Performing *in situ* health and safety audits on all worksites based on more rigorous criteria than prescribed by sector legislation.
- Monitoring incidents and the results of audits on a monthly basis.
- Investigating the cause of accident rates and corrective action plans.
- Setting formal quantitative health and safety goals. Ensuring respect for the main health and safety indices, accidents per home under construction, audits performed and the percentage of satisfactory audits.
- Making safety and the prevention of work-related accidents key factors when contracting staff and suppliers, promoting a safe work environment by finding the most qualified professionals in this area.
- Facilitating and fostering coverage of all Company employees by the collective bargaining agreement for construction, which stipulates aspects related to health and safety.
- Promoting the implication, training and awareness of all workers, both own employees and those of third parties with a contractual relationship, regarding everybody's relevance in the prevention of occupational risks and health and safety on worksites.
- Hiring a benchmark company in the prevention of occupational risks to train and raise the awareness of our own employees and those of contractors in respect of health and safety.

#### **4.3. Health and safety for our customers**

In the real estate sector, the number of accidents and incidents in the marketing stage is very low, almost nil. Nevertheless, the final product - the home - should protect consumers' safety while using it. NEINOR HOMES is, therefore, fully committed to delivering safe and quality homes.

The main lines of action in this respect are:

- Complying with the highest quality and safety standards for homes.
- Ensuring the quality and technical security of the Company's developments.
- Assuring that the homes are designed with escape routes in the event of any emergency and have lighting and photoluminescent signs for emergencies.
- Making sure that the homes have the most advanced fire detection and extinction materials, equipment and accessories.

- Making sure that the homes have the most advanced materials, equipment and accessories to prevent the spread of fire, through the use of fire doors and dampers, and the insulation of structures and passages in the installations.
- Ensuring the physical integrity of people in the event of a fire, through the installation of fire escapes and the compartmentation of areas for fire protection, among other measures.
- Assuring that homes have ventilation on staircases and in common areas and garages.
- Ensuring control of the spread of radon gas.
- Promoting the installation or pre-installation of flood and gas sensors and detectors in homes, if possible controlled by home automation systems.
- Fostering the centralisation of fire, gas and flood detection.
- Promoting the installation or pre-installation of security alarms in the homes.
- Encouraging the installation of security grilles and shutters.
- Promoting the installation of surveillance cameras (CCTV).

## 5. Responsibilities

Details are provided below of the different responsibilities to ensure compliance with the Health and Safety Policy.

The Board of Directors is the main driver of the implementation of a health and safety culture throughout the Company, assuming the firm commitment that the Company will have zero work-related accidents. Furthermore, this policy has the express commitment of senior management, including the Steering Committee and the Chairman of NEINOR HOMES.

Human Resources is responsible for ensuring compliance with the policy and its application, as well as a periodical review of the policy, in collaboration with the other departments of NEINOR HOMES. The Governance, Risk and Compliance, Internal Audit & ESG department will review and periodically report on compliance with the health and safety guidelines.

## 6. Monitoring and control

Group companies will ensure the necessary instruments and resources are made available for the correct implementation, monitoring and assessment of the Health and Safety policy.

The Governance, Risk and Compliance, Internal Audit & ESG department will periodically review compliance with the guidelines set out in this policy.

NEINOR HOMES has an ethical channel, available to all stakeholders, including employees, suppliers, customers and other third parties, which can be used to communicate any doubts or suggestions and also report any conduct contrary to this policy, which is aligned with the Code of Ethics, Code of Conduct for Third Parties and the Sustainability Policy of NEINOR HOMES.

In the event of non-compliance with any of the commitments or principles outlined in this policy, NEINOR HOMES will take the corresponding measures pursuant to labour law and the applicable collective bargaining agreement.

Any report may be sent by letter or via the corporate website at any time, as the channel is available 24 hours a day, 7 days of the week.

If ordinary mail is used, the address is:

NEINOR HOMES  
Governance, Risk and Compliance, Internal Audit & ESG department  
Paseo de la Castellana 20, planta 5ª.  
28046 - Madrid.

If the corporate website is used, the link is <https://www.neinorhomes.com/en/responsible-business-and-innovation/ethics/ethics-line/> where the address of the channel enabled to deal with complaints in accordance with Directive (EU) 2019/1937 is indicated, guaranteeing the confidentiality of the parties and allowing the sending of anonymous communications when the informant so wishes: <https://neinorhomes.integrityline.com/frontpage>.

## 7. Training and dissemination

This policy will be included in the mandatory annual training subjects for all members of NEINOR HOMES, in both Spanish (the local language) and English. It will also be included in the welcome pack for new employees of the Company.

The policy will also be available on the intranet, common directories of NEINOR HOMES and will be available to the public on the Company's corporate website, in both Spanish and English.

## 8. Approval and entry into force

This policy has been approved by the Board of Directors of NEINOR HOMES in its meeting held on July 23, 2018, and will come into force on the same date.

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