

## CONSOLIDATED STATEMENT OF NON-FINANCIAL INFORMATION

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# 1. ABOUT THIS REPORT

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This report contains the non-financial information of Coral Homes Holdco, S.L.U. (hereinafter, “**Coral Homes Holdco**”) and its subsidiaries (hereinafter, jointly, “**Coral Homes Group**” or indistinctly, the “**Group**”) for the year ended 31 December 2021<sup>1</sup>. By virtue of this document, the Coral Homes Group provides a response to the non-financial reporting and diversity requirements under Law 11/2018, of 28 December, which amended the Commercial Code, the Consolidated Spanish Companies Law approved by Royal Decree Law 1/2010, of 2 July, and Spanish Audit Law 22/2015, of 20 July, on non-financial reporting and diversity (the “**Non-Financial Reporting Law**”).

The report has been prepared based on the “Standards” version of the **GRI** (Global Reporting Initiative). The comparability, reliability, materiality and relevance principles under the Non-Financial Reporting Law have been applied as well:

- **COMPARABILITY CRITERION:** “The reporting organisation should select, collect and disclose the information in a consistent fashion. The information should be provided in a manner that allows stakeholders to analyse the changes in the organisation’s performance and supporting the analysis concerning other organisations.”
- **RELIABILITY CRITERION:** “The reporting organisation should gather, record, collect, analyse and disclose the information and the processes used to prepare the report, so that they may be reviewed and to set the information quality and materiality.”
- **MATERIALITY AND RELEVANCE CRITERIA:** “The reporting party should analyse matters that reflect the material economic, environmental and social impacts of the organisation and affect significantly the opinions and decisions of stakeholders.”

According to the materiality and relevance criteria, Coral Homes Group’s activities have been analysed to become aware of the significance of the aspects related to its real estate sector strategy. In line with the analysis performed, material aspects have been identified for Coral Homes Group for accountability purposes before its stakeholders in relation to non-financial information.

The material aspects identified have been structured on the basis of six spheres: Corporate Governance, Environmental, Labour, Social, Economic, and Product and Service Management. Below is a description of each item identified in each sphere:

| MATERIAL ASPECT                    | DESCRIPTION   |
|------------------------------------|---|
| <b>CORPORATE GOVERNANCE</b>        |   |
| Transparency, ethics and integrity | Policies aimed to guarantee that business activities are performed in a transparent, ethical and integral manner.                           |
| Risk management                    | Due diligence procedures, policies and other procedures communicated to staff to ensure proper risk management.                             |
| Corruption and bribery             | Measures adopted to fight against corruption and bribery.   |
| Regulatory compliance              | Policies and procedures to ensure the strict compliance with applicable regulations, monitoring all regulatory changes on an ongoing basis. |

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<sup>1</sup> Whenever the data provided refer to a period other than 2021, it will be indicated in the relevant section.

| ENVIRONMENTAL                     |  |
|-----------------------------------|--|
| Effective management of resources | Proper management of water, materials and energy use and supply.   |
| Circular economy                  | The organisation opts for waste prevention, recycling, reuse and other forms of waste recovery and disposal.   |
| Climate change                    | Emission management and efficiency.  |
| LABOUR                            |  |
| Work-life balance                 | Driving measures to guarantee a proper balance in labour, personal and family life.  |
| Equality and diversity            | Measures implemented at the organisation to promote diversity, ensure equal opportunities and inclusion and guarantee a fair remuneration for all staff members.   |
| Talent training and retention     | Programmes to improve the development of staff skills through ongoing training tailored to individual needs.   |
| Employees' health and safety      | Ensuring that job conditions guarantee staff health and safety.  |
| Human rights                      | Measures defined and implemented to guarantee the human rights of all Group staff and the people having a labour relationship with it.   |
| SOCIAL                            |  |
| Social commitment                 | Contributions to the sustainable development of the community in which the Group operates. Setting bidirectional communication channels to promote relationships and cooperation with the local community. |
| ECONOMIC                          |  |
| Supply chain                      | Opting for a responsible supply chain.   |
| Long-term business sustainability | Measures to ensure long-term profitability and business continuity.  |
| PRODUCT AND SERVICE MANAGEMENT    |  |
| Customer relationship             | Well-established communication channels to guarantee a transparent and fluid communication with customers.   |
| Customers' health and safety      | Commitment to safeguard customers' health and safety throughout the Group's supply chain.  |

This report contains all the aspects identified as material, in line with the requirements under the Non-Financial Reporting Law.

## 2. BUSINESS MODEL

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### 2.1. Introduction

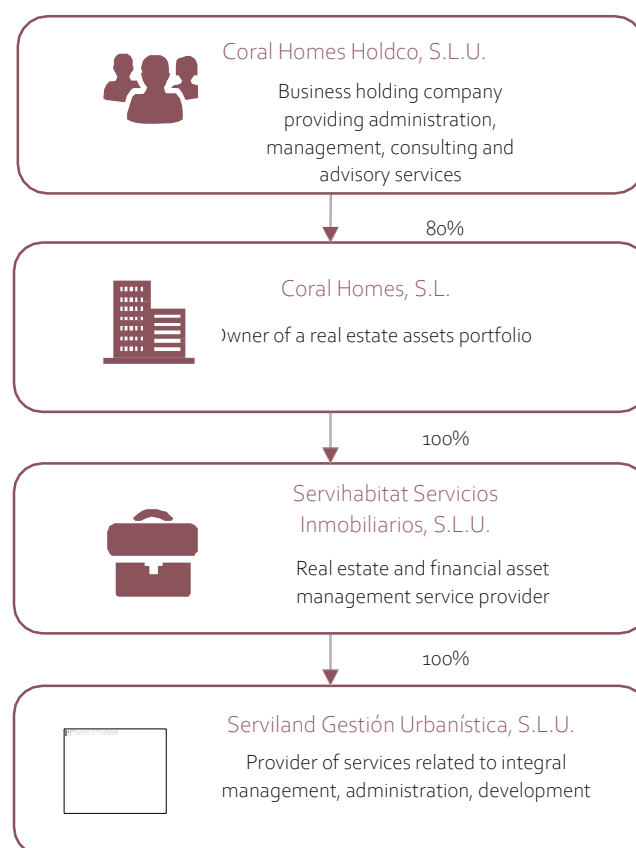
Coral Homes Group is made up of Coral Homes Holdco (parent company), Coral Homes S.L. ("**Coral Homes**"), Servihabitat Servicios Inmobiliarios, S.L.U. ("**Servihabitat**") and Serviland Gestión Urbanística, S.L.U. ("**Serviland**").

Coral Homes Group was incorporated on 20 December 2018 through the execution of a sale agreement whereby CaixaBank, S.A. ("CaixaBank") sold 80% of its real estate business to Coral Homes Holdco.

This transaction was structured in 2 (two) phases: (i) on 16 November 2018, BuildingCenter, S.A.U. (a 100% investee of CaixaBank) transferred to Coral Homes a portion of its real estate business, as well as 100% of the share capital of Servihabitat; subsequently (ii) on 20 December 2018, Coral Homes Holdco acquired 80% of the equity interests of Coral Homes, keeping the remaining 20% under the ownership of BuildingCenter, S.A.U.

During the current year 2021, a new company was incorporated within the Group, Serviland, a company fully controlled by Servihabitat.

Coral Homes Holdco, in its capacity as the Group's parent company, stated since its incorporation in 2018 its firm commitment to develop policies and procedures regarding the matters included in this report, so as to provide the Group and all its member companies with a framework of internal regulations ensuring the highest regulatory compliance and corporate social responsibility standards.



Apart from its activity as holding company (holding, management, administration, acquisition, subscription, assumption, disbursement, transfer, disposal, contribution or encumbrance of real estate assets or securities), Coral Homes Holdco renders administrative, management, consulting and advisory services concerning accounting, tax, trade, real estate, financial, labour and administrative matters.

Within the Group, the activities performed by each subsidiary include:

- Coral Homes: acquiring, holding, managing, exchanging, leasing and selling all types of real estate assets and their associated fixtures and fittings, and the promotion and execution of all types of property development.
- Servihabitat: rendering real estate services (administration, management, operation and marketing, through a sale or lease, of all types of own or third-party real property) and financial services (management of the real estate loan and mortgage loan portfolios of owner companies).

Note that Coral Homes forms part of Servihabitat's customer portfolio, with which it signed a servicing agreement (integral management of its real estate assets portfolio). Therefore, many of the processes and procedures described in this document, as well as the applicable measures related to the management, promotion, development and marketing of such portfolio, are carried out by Servihabitat (or third parties subcontracted by the latter) in the name and on behalf of Coral Homes.

- Serviland: provision of services specialised in urban management and land development and marketing for certain plots of land owned by a third party.

It should be noted that Servihabitat has also signed servicing agreements with Serviland; therefore, many of the processes and procedures described in this document, as well as the applicable measures related to the management, promotion, development and marketing of the portfolio managed by Serviland, are carried out by Servihabitat (or third parties subcontracted by the latter).

In developing its strategy and as part of its goals, Coral Homes Group works to ensure that its member companies are a reference in their sectors. For that purpose, ensuring a proper application of the Group's values is key. In this sense, the Group's governing bodies promote a commitment to excellence with its customers, suppliers and associates, responsibility for their objectives and needs, and an advanced model of governance and control. This is driven by a specialised team and a strong financial structure.

## 2.2. Evolution of the context caused by the COVID-19 crisis

The emergence of coronavirus ("COVID-19") in China in January 2020 and its global expansion to a large number of countries led to a viral outbreak that was classified as a pandemic by the World Health Organization on 11 March 2020.

Since the pandemic began disseminating, the Boards of Directors of Group companies made a thorough follow-up at the different meetings held throughout 2020 and 2021 of the effects of the health crisis, both on each individual entity and on the Group as a whole, so as to guarantee the efficacy and adequacy of the different measures put in place.

In this regard, Servihabitat –as a Group service provider company– set up a **Crisis Committee** as an extension of its Business Continuity Committee in the event of an alarm, holding regular weekly meetings and implementing the strategies adopted in the **Pandemic Continuity Plan**, in order to manage the crisis and follow up both the market and the actions and strategies in place to continue operating, defining the guidelines to resume activities, such as monitoring critical processes and evaluating the impacts; developing specific action plans upon future mobility and infrastructure restrictive measures; following up suppliers' financial position; adapting and easing certain internal processes; launching new marketing campaigns, etc.

In view of the pandemic evolution in 2021, when successive waves of the disease hit, Coral Homes Group continued to adopt different measures to protect the health of its staff, based on a **Staff Safety Plan** focused on a gradual return to the workplace following prudence criteria (see section 4.2 on *Health and safety*), and worked to ensure and guarantee the Group's liquidity.

In this sense, when the health crisis broke out, the Group's financial statements were solid, had a good liquidity position and long-term borrowings thanks to the development of prudent management by the Group's different Boards of Directors.

Therefore, Coral Homes Group companies did not make any changes to the business models, as a result of the health crisis derived from COVID-19, nor were the services rendered to customers interrupted at any time. All Coral Homes Group staff have worked remotely (teleworking) during 2021 when the health situation required so, which favoured the smooth continuity of activities, keeping service and work activity levels.

In this sense, the Group will continue to take appropriate measures with its available resources to maintain a strong position and protect its interests, as well as those of its staff, suppliers, customers and investors.

### 2.3. The Group in figures

Coral Homes Group performs its activity throughout the Spanish territory.

While its main work centres are located in Madrid and Cornellá de Llobregat (Barcelona), its activity is managed locally through an office network distributed in the main cities of Spain: Valencia, Seville, Malaga, Alicante, La Coruña, Las Palmas de Gran Canaria and Santa Cruz de Tenerife.

At 31 December 2021, the total value of the Group's assets is 3,346,946 thousand euros, out of which 2,939,446 thousand euros refer to real estate assets. During the year ended 31 December 2021, Coral Homes Group's net revenue reached 1,033,950 thousand euros.

### 2.4. Impacts, risks and opportunities

For Coral Homes Group, risk management is one of the key pillars of the Group's Internal Control System and, therefore, of its own strategy.

Coral Homes Group has risk **identification, assessment and management procedures** in place (under the Integrated Internal Control Framework of COSO (Committee of Sponsoring Organizations of the Treadway Commission)), whereby all the risks that are inherent to its activity should be: (i) identified, (ii) analysed, (iii) assessed, (iv) managed, (v) controlled, and (vi) updated.

To ensure proper risk management, the following governance model has been defined within the Group, which distinguishes three lines of defence:

- The first line of defence is exercised by those responsible for each area (department directors or heads), who are the owners of the controls (policies, procedures, protocols, etc.) within the framework of the Criminal Compliance Management Systems in charge, in the first instance, of the effective compliance thereof.

- The second line of defence is exercised by the Corporate Compliance Committee<sup>2</sup>, the Internal Control Body<sup>3</sup> of Coral Homes Group (“ICB”), the Internal Control Area of Servihabitat and the Chief Compliance Officers of Group entities, who are responsible for overseeing the compliance with the Group’s Criminal Compliance Management Systems, as expressly appointed by Coral Homes Holdco’s Board of Directors.
- Finally, the third line of defence is exercised by an internal or external independent third party, who verifies the compliance function and control efficacy. In Coral Homes Group, this third line of defence is formed by Servihabitat’s Internal Audit function, which verifies control efficacy in an independent manner and reports to Servihabitat’s Audit Committee, directly reporting to its Board of Directors, and by the different external providers that Group entities hire to verify the efficacy of such controls.

Finally, Coral Homes Holdco’s Board of Directors is responsible for the general oversight and control function, being ultimately in charge of the correct adoption and execution of Criminal Compliance Management Systems, both at the level of each entity under its charge and at corporate level. For that purpose, it relies on the special cooperation of the previously identified roles.



|   |  |
|---|--|
| Consejo de Administración<br>Coral Homes Holdco. S.L.U. | Board of Directors<br>Coral Homes Holdco, S.L.U. |
| Comité Corporativo de Compliance                        | Corporate Compliance Committee                   |
| Áreas operativas de las Sociedades                      | Companies’ operating areas                       |
| Chief Compliance Officer de las Sociedades              | Companies’ Chief Compliance Officer              |
| Auditoría Interna/Externa                               | Internal/External Audit Department               |
| Responsables funcionales del control de riesgos         | Functional heads of risk control                 |
| Guía, coordinación y seguimiento                        | Guidance, coordination and follow-up             |
| Evaluación independiente                                | Third-party assessment                           |
| Primera línea de defensa                                | First line of defence                            |
| Segunda línea de defensa                                | Second line of defence                           |
| Tercera línea de defensa                                | Third line of defence                            |

<sup>2</sup> The Corporate Compliance Committee is responsible for overseeing the Criminal Compliance Management Systems implemented at the entities that make up Coral Homes Group. This body performs basically the functions referred to in article 31 bis.2.2 of the Criminal Code.

<sup>3</sup> The ICB is responsible for enforcing the proper policies and procedures in terms of due diligence, reporting, retention of documents, internal control, risk assessment and management, as well as guaranteeing the compliance with relevant regulations and disclosures to prevent and avoid transactions related to money laundering and/or terrorism financing.



For the correct identification and assessment of risks, Coral Homes Group entities have developed their **Operational Risk and Control Matrixes**, which are reviewed and updated, as applicable, on an annual basis, unless any circumstance gives rise to an ad hoc review and/or update.

Note that, in view of the activities of Coral Homes Group, the risk with the greatest impact is the operational and reputational risk.

During 2020 and 2021, Coral Homes Holdco and Coral Homes (the "**Companies**") carried out a project with the cooperation of an external expert to update and develop the Companies' legal risk management and control system<sup>4</sup> (the "**Corporate Defence Project**").

The Corporate Defence Project was developed to prevent the commission of crimes inside the companies, pursuant to article 31 bis of the Criminal Code and Lone Star's internal policies.

Overall, the following items were defined and described in detail in this Project:

- (i) The criminal risks to which each one of the Companies' departments is exposed to;
- (ii) The general controls and global corporate policies, as well as the different procedures that the Companies rely on to prevent crimes;
- (iii) The roles and responsibilities entrusted to the Corporate Compliance Committee, as well as the Companies' Chief Compliance Officer and that of Servihabitats as a Coral Homes Group entity;
- (iv) The financial resources management system;
- (v) The oversight design and structure, the monitoring and verification model, which includes Servihabitats' activity and its Criminal Compliance Management System;
- (vi) The application of a disciplinary system;
- (vii) The Companies' own whistleblowing channel; and
- (viii) The training on and dissemination of the system to the Companies' whole staff, including directors and key associates.

As a result of the Corporate Defence Project, in July 2020 Coral Homes Holdco's Board of Directors approved: (i) the Companies' **Criminal Risk Prevention Manual**; (ii) the **amendment to the Corporate Compliance Policy**; and (iii) the **ratification of the Corporate Compliance Committee's creation**.

Furthermore, in December 2020, the Board of Directors of Coral Homes Holdco approved the **Monitoring and Reporting Procedure of the Criminal Compliance Management System**, which is structured at Group level.

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<sup>4</sup> See section 6.2. on *Identified risks* – the different elements implemented to mitigate the risks identified during the project to reinforce the Companies' Criminal Compliance Management System.

On the other hand, during last year Servihabitat reviewed its Criminal Risk Matrix. Specifically: (i) all the crimes included therein were reviewed; and (ii) the controls in place were examined, identifying new controls to mitigate risks.

All the manuals and procedures previously mentioned were reviewed in 2021 and continued to be fully effective over the period.

## 3. INFORMATION ON ENVIRONMENTAL MATTERS

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### 3.1. Group policy

Coral Homes Group understands its environmental responsibility as a synonym of the commitment to the environment; therefore, it observes the essential principles of respect, conservation and preservation of the environment.

In this regard, Coral Homes Group is committed to the correct implementation of the internal regulations, both at Group and entity levels, that encompasses its commitment to the environment.

In this regard, in accordance with its **Code of Ethics**, Coral Homes Group observes the duty to act respectfully towards the environment at all times, also committing to *"keeping and preserving the environment, in compliance with legislation on this matter, adopting procedures to reduce the environmental impact in performing its activities"*. The rational use of resources, the respect for the environment and sustainability shall be safeguarded across the Group entities.

In this sense, Coral Homes Group has controls over any activity that may create, either directly or indirectly, a risk for collective safety and public health, for which Servihabitat approved the **Quality and Environmental Management Policy**, setting forth the commitment to protect and respect the environment at its own level and as mutually agreed with its customers within its managed portfolios, including Coral Homes.

Additionally, in promoting continuous improvement, Servihabitat, as the company having the most significant management activity within the Group and the largest headcount, implemented an Environmental Management System in compliance with **ISO 14001 Environmental Management Certification**<sup>5</sup>, adhering along with its central offices to the Community eco-management and audit scheme (EMAS), pursuant to EMAS Regulation (EU) 2017/1505.

The EMAS has an officer in charge of the Integrated Management System, who is responsible for Servihabitat's environmental management, with the participation of the Executive Committee and the support of the People and Culture Area. In line with the commitment to ensure the proper implementation of the management system, an internal audit of the whole system is conducted every year, as well as a review by Management.

In order to communicate its commitment towards the environment to the different stakeholders, Servihabitat has made an **Environmental Statement of activities and services at its central offices**<sup>6</sup>, indicating its environmental policy and the most significant environmental matters, apart from reporting on environmental goals and the fulfilment of legal requirements.

To continue promoting the long-term commitment of the value chain, Servihabitat has also continued to develop the following initiatives:

- "Good Environmental Practices": delivery of knowledge pills to its staff concerning good environmental practices in their daily work.
- Environmental aspects matrix containing all of the entity's environmental aspects and their importance.
- Identification of applicable legal requirements.

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<sup>5</sup> Currently ISO 14001 covers the Madrid and Cornellá de Llobregat office premises (see section 3.3.1).

<sup>6</sup> The Environmental Statement was issued in 2020 and reviewed in April 2021.

- Supplier approval under environmental criteria.

Servihabitat also includes in the Environmental Statement of activities and services the mandatory environmental legal requirements that are applicable to the European, state, regional and local spheres. They are subsequently incorporated into a follow-up log indicating the access, identification and assessment of the fulfilment of legal requirements. After those assessments, no legal non-compliance was recorded.

### 3.2. Identified risks

To identify the main impacts and risks within the environmental sphere, different stages are taken into account in the life cycle of the products and services offered by Coral Homes Group.

As a result of this process, 2 (two) material areas were identified: (i) the activity performed at the offices; and (ii) the activity performed with the real estate units.

#### Offices:

| ASPECT  | IMPACT                                       |
|---|--|
| Power consumption   | Resource depletion and atmospheric pollution |
| Use of printing paper                                     |  |
| CO <sub>2</sub> emissions related to commuting and travel |  |

#### Properties:

| ASPECT   | IMPACT   |
|--|--|
| Waste generation   | Soil contamination, resource depletion and atmospheric pollution |
| Use of raw materials   |  |
| Use of resources   |  |
| Energy performance of buildings  |  |
| CO <sub>2</sub> emissions related to commuting and travel and work machinery |  |

Coral Homes Group has a policy whereby it is committed to reducing any environmental impact identified. In particular, Servihabitat had set annual targets for 2021 to reduce paper use and CO<sub>2</sub> emissions caused by commuting and travel by 4% and 6%, respectively, per employee.

The state of alarm and extreme lockdown, as well as the subsequent teleworking policy adopted by the Group as a preventive measure in response to COVID-19 throughout 2020, had a very positive impact on the Group's environmental matters, as it reduced employees' commuting and travel rates and the use of paper and other consumables at the office.

In this sense, the gradual return to normal in 2021 caused certain indicators to show a negative evaluation of 2020 reported figures, which was extraordinarily marked by the pandemic. The Group's commitment to reducing environmental impacts led to a positive evolution of all 2021 indicators vis-à-vis pre-pandemic consumption, i.e. when compared to 2019 and previous years.

Paper use decreased by an additional 5.3% year-on-year, while telematic document management, review and exchange was consolidated.

With respect to commuting and travel emissions, even though they increased in 2021 due to the greater freedom of movement with respect to 2020, 45% remains under pre-pandemic levels, and alternatives were implemented to replace in-person meetings with collaborative work tools.

As to risks, Coral Homes Group identifies the aspects related to emergency conditions, such as uncontrolled fires or spillages, for which preventive measures or performance protocols were implemented upon any occurrence.

As an additional line for environmental risk control, the compliance with applicable legal requirements is monitored at European, state, regional and local levels, which allowed preventing any breaches during the reporting period.

### 3.3. Environmental management and performance

#### 3.3.1. Pollution

Coral Homes Group is aware of and committed to the environment; therefore, it has a strong intention to promote sustainable management in its environment, setting the goal to reduce the environmental impact caused by the land and real property held in portfolios or managed for sale and by the offices where activities are performed.

Within this context, Coral Homes Group understands that it has a high environmental impact resulting from the activities of the real estate portfolio that it owns and which is managed by Servihabitat. In this sense, Servihabitat, in its capacity as servicer and according to its customers, has procedures aimed at reducing the environmental impact at the different stages related to the life cycle of real property.

As expressed in Servihabitat's Environmental Statement previously mentioned, in performing activities during the life cycle of the real property (project, construction, use of real property, maintenance and/or demolition works), the company should carry out activities related to development and promotion, technical remediation, real property marketing, community management, etc., whereby it assumes the task of performing awareness and environmental service control parameters, thus contributing an additional factor for service value to customers, regardless of whether they are the owners of real estate portfolios, Coral Homes or end customers.

In this regard, the Group carries out procedures, under Servihabitat's management, at the different real property management, development and marketing stages mentioned above, so as to ensure the proper management of potential environmental impacts:

- Land acquisition: Apart from the environmental due diligence measures to acquire land, Servihabitat conducts an individualised study of the quality of each plot of land in question, which contains information from different public and independent bodies' databases to analyse the land risk. If the land has a latent risk, a specific action plan is developed to mitigate it. As this procedure is completely discretionary, it could allow organising the actions required to perform a more thorough analysis subject to customer requirements and the resulting environmental risks.
- Land management: At 31 December 2021, Servihabitat manages 2,976 plots owned by Coral Homes and distributed throughout the Spanish territory, as compared to 3,538 at 31 December 2020.
- Work development and promotion: A previous geotechnical study is carried out in all new works to verify soil quality and composition and thus ensure the proper preventive management of environmental risks.

- Real property marketing: Servihabitat, in its capacity as servicer and on behalf of the owners of the portfolios of assets that it markets, including among others Coral Homes, adds an environmental summary to the commercial information provided to end customers in the real estate marketing process, highlighting the main advantages of each property in terms of energy saving, energy efficiency, etc.

In this regard, it should be noted that while Servihabitat carried out its activity in relation to the real estate assets owned by Coral Homes, it fulfilled the highest Group standards, ensuring at all times the proper management and monitoring of pollution-related aspects.

With respect to the environmental aspects relating to office activities, the Group's main work centres (Cornellá de Llobregat and Madrid) are located in leased offices, and the management and maintenance tasks performed on the office buildings are borne by the owner.

Finally, note that the Group's main work centres are ISO 14001 certified.

### 3.3.2. Circular economy: waste prevention and management

Coral Homes Group understands that shifting from a linear economy to a circular economy is essential in improving and taking care of the environment, as it results in a considerable reduction of waste by making an optimal use of available resources.

The activities related to land management and development and the development/promotion, refurbishment and maintenance of real estate assets are performed pursuant to Law 22/2011, of 28 July, on polluted waste and land, in addition to the remaining applicable legislation on environmental matters. Within this context, Servihabitat, as manager of the real property owned by the Group, as well as those of other customers, guarantees that:

- All the documentation evidencing waste treatment and management and the certificates required are timely collected and monitored; and
- The contractor/subcontractor has been registered as waste producer.

In the case of work development and execution, where waste volumes are considerably larger than in the rest of the aforementioned activities, a **Construction and Demolition Waste Management Plan** is prepared on an ad hoc basis and tailored to the needs of each real estate development.

Such Plan identifies the most common waste generated by these activities, apart from setting a management hierarchy, prioritising their minimisation and reuse.

It also contains the operations to be carried out depending on whether waste is inert, non-hazardous, hazardous or a result of office activities.

This Plan also includes minimisation actions to be considered at the work sites to prevent the generation of waste at the work stage or to reduce it at the production stage:

- Appointing an environmental technician to plan waste storage areas and thus reduce transportation.
- Once the area is dismantled, the recovery tasks are performed by the company.

- For this purpose, the following operations are carried out: area cleaning, surface scarification, as required, and verification to determine whether the restoration has been effective.

Notwithstanding the lower environmental impact, actions were also taken to reduce the impact of the activity performed at Group offices. In this sense, both at Coral Homes Holdco and Servihabitat offices, the following initiatives have been developed and implemented in the last few years:

- Reduced use of plastic, replacing plastic cups and bottles with glass cups and bottles.
- Paper/cardboard, plastic, toner, batteries, organic waste and common waste recycling.
- Printers are configured to oblige staff members to use a code to print documents after they are sent to printers, so as to prevent documentation from being printed more than once if they forget they have done so.

In addition, the following practices have been carried out at Servihabitat's offices in the last few years:

- Removal of individual bins to be replaced with a single waste collection point at each plant, with the corresponding container.
- Generalised use of recycled paper.

### 3.3.3. Sustainable use of resources

In view of the state of alarm declared by the Spanish Government through Royal Decree 463/2020, of 14 March, and the approval of a series of urgent extraordinary measures to face the economic and social impact of COVID-19, by virtue of Royal Decree-Law 8/2020, of 17 March, Coral Homes Group established the teleworking method for all its staff from March through June 2020, then implementing a system of shifts to control the capacity at its offices, thus reducing the use of paper, plastic and other supplies at its offices considerably. In 2021, staff returned to on-site work on a gradual basis, while the Group adapted to the different measures ordered or, as applicable, recommended by the Government as a result of the successive waves during the year.

Below are the main resources that Coral Homes Group uses to perform its activities. In the case of water and energy consumed, the data reported refer to consumption at Servihabitat's central offices in Cornellá de Llobregat and Madrid, as they concentrate the highest number of employees and, therefore, of activities<sup>7</sup>.

#### CONSUMABLES

In view of the type of activity carried out by Servihabitat, the main consumable is paper. In this sense, as a result of the efforts carried out in the last few years to reduce paper consumption, as well as the teleworking policies implemented, it was possible to maintain consumption at a relatively stable level compared to 2020, considering that during the current year on-site work increased significantly against the prior year.

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<sup>7</sup> Energy and water consumption at the work site, for maintenance and completion tasks are borne by the contractor and it is not taken into account. In the completion processes, the consumption of materials is the contractor's responsibility. In addition, the use of energy, water and paper by Coral Homes Holdco has not been considered upon preparing this report because they are not significant in calculating the Group's total, as in the year in question such company has only 32 (thirty-two) employees, as compared to the 877 (eight hundred and seventy-seven) employees that Servihabitat and Serviland have at the end of this year. Neither have Coral Homes data been included because it has no staff.

In this sense, the paper consumption ratio per person decreased by 37%.

| Consumables (Tn) |                                | 2021   | 2020   |
|------------------|--------------------------------|--------|--------|
| OFFICE           | Non-recycled paper             | 0.17   | 0.02   |
|                  | Recycled paper                 | 2.46   | 2.53   |
|                  | Paper consumption per employee | 0.0030 | 0.0048 |
|                  | Toner                          | 0.11   | 0.03   |

## ENERGY

At the beginning of last year, Servihabitat transferred all its staff to the new offices at Puerta Cornellá. With regard to the Group's environmental commitments, these offices are fitted with photovoltaic panels that occupy a large portion of the rooftop, with a 20kW power output capacity. In addition, external light is used due to the layout of those offices, while the areas with less presence of people, such as toilets and stairs, have occupancy sensors.

|        |                          | 2021 | 2020 |
|--------|--------------------------|------|------|
| OFFICE | Energy consumption (MWh) | 984  | 897  |

|        |                                | 2021 | 2020 |
|--------|--------------------------------|------|------|
| OFFICE | Energy consumption (MWh/staff) | 1.90 | 2.86 |

In terms of total staff, Servihabitat has reduced the consumption of energy at its offices by 34%.

## WATER

Water is consumed by Servihabitat at its offices. In 2021 consumption totalled 2,305 m<sup>3</sup> as compared to 1,670 m<sup>3</sup> in 2020. This calculation was obtained from the company's utility bills. The increase in total consumption with respect to 2020 results mainly from the gradual return of staff to the offices during 2021.

The measures implemented at Servihabitat's work centres in Madrid and Cornellá de Llobregat to reduce water consumption include washbasins with timed mixer taps preventing the loss of unnecessary water by allowing it to flow only for a specific period of time, and limiting the overuse of hot water.

### 3.3.4. Climate change

To study the emissions associated with Coral Homes Group's activities, Scope 1 emissions were calculated, which arise directly from the activities performed by its member entities, as well as Scope 2 emissions, arising from electric power use, and Scope 3<sup>8</sup> emissions, related to indirect-source emissions.

| Greenhouse gas emissions (t CO <sub>2</sub> eq.) | 2021 | 2020 |
|--|------|------|
| Scope 1  | 0    | 0    |
| Scope 2  | 260  | 348  |
| Scope 3  | 312  | 240  |

The new offices in Valencia, Tenerife, Alicante and Seville have more efficient air-conditioning and lighting systems, thus improving the climate impact of the Group's activity.

<sup>8</sup> Scope 3 emissions include those referring to Group staff commuting and travel by train, airplane and car.



## 4. INFORMATION ON SOCIAL AND STAFF-RELATED MATTERS

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### 4.1. Identified risks

The main risks identified within Coral Homes Group in relation to its staff are focused on safety and health protection.

In this sense, due to the COVID-19 pandemic declared on 11 March 2020, different actions were taken at Coral Homes Group to prevent the dissemination of the virus in order to guarantee staff health and well-being. Those measures included tasking an external expert with an **Occupational Risk Assessment (ORA) specific to cases of exposure to COVID-19**, as established by the Ministry of Health and the WHO. Based on this ORA, a COVID-19 Prevention Plan was prepared for the safe return to Coral Homes Group's offices, which remained effective in 2021, the year in which all staff members returned to the workplace in a gradual manner, bearing in mind at all times the measures or recommendations set out by the Government in response to the different pandemic waves.

In addition, considering the activity performed by Coral Homes Group, the main staff risks include:

- Losses arising from actions that are inconsistent with legislation or agreements in terms of employment, health and safety at the workplace, payment of claims or discrimination events.
- Discontinuity of processes due to fires or other adverse natural phenomena, strikes, pandemics or other unexpected events.
- Failure to identify all labour risks.
- Risk of hiring a candidate with an inappropriate profile.
- Payroll processing errors.

In order to manage and implement the measures to control these risks, Servihabitat has set an **Occupational Risk Prevention Plan** specifying the methods to organise the different general activities in this regard. These organisation methods are divided into: (i) an **Internal Prevention Service**; and (ii) an **Outside Prevention Service**. An activity may be subject to one or both prevention service methodologies. The Internal Prevention Service has 3 (three) key officers: The Prevention Management Systems Head, the Health and Safety Committee, and the Prevention Officer, whose roles and responsibilities are defined in the abovementioned document. Outside Prevention Services are made up of different independent experts rendering services to Servihabitat; for instance, to mitigate the risk or errors in payroll processing, an external manager specialised in that activity is used.

## 4.2. Health and safety

In order to guarantee the health and safety of Group staff in view of the health crisis resulting from the COVID-19 pandemic, which continued to a large extent during 2021, Coral Homes Group requested the preparation by an expert of an **Occupational Risk Assessment (ORA)** specific to cases of exposure to COVID-19.

Based on the ORA, a COVID-19 Prevention Plan was created for the safe return to Coral Homes Group's offices. This protocol includes the prevention and control measures covering all key aspects:

- Reduced office occupancy, enhancing teleworking, implementing and developing the logistics and procedures required to guarantee the telematic performance of daily work.
- Providing individual protection kits to all staff members, including face masks, gloves and hand sanitisers.
- Sizing the maximum occupation capacity at each office to enable the minimum 1.5 to 2 metre distance among staff members.
- Enabling the staggered entry of staff to avoid crowds.
- Closure of common areas (meeting rooms, cafeterias, etc.) to avoid areas of high exposure.
- Signalling spaces with occupancy restrictions (reprography and vending areas, toilets, etc.).
- Reinforcing cleaning processes.
- Dissemination of basic office rules (use of face masks and gloves outside work stations, from building entry to exit), maximum occupation and use of lifts.
- Dissemination and communication of general good health and safety and prevention practices.

As these measures are directly applicable to the workplace, they are aimed at ensuring the health and safety of staff, customers and suppliers. The latter have a **COVID Protocol for Outside Parties**, stating the measures to be followed for visits at the premises.

According to the Occupational Risk Prevention Law and to carry out the preventive actions defined therein, Servihabitat, as the company having 95% of Group staff, is operating a **Prevention Management System** that is incorporated into the company's general organisation.

As part of this management system, the company has a **Prevention Policy** containing the following commitments:

- Observing occupational risk prevention legislation.
- Promoting the prevention culture at all organisational levels and embedding it into all its processes.
- Training staff and raising their awareness, involving them in prevention policies.
- Considering the preventive aspects from the beginning, at the design stage itself, in contracting works or services and in acquiring equipment or products.
- Assessing risks and taking the measures required to eliminate them and, if not possible, keeping them to a minimum, always treating the source of the risk and protecting staff.
- Management shall keep continuous planning and control mechanisms in relation to the preventive measures implemented to guarantee the maximum safety level.

For the correct integration of the Management System, an **Occupational Risk Prevention Plan** has been prepared, which is published in Servihabitat's intranet. This document is inspired in the concept of "integrated safety", so that the different organisation's levels assume occupational risk prevention duties. This Plan also includes the preventive activities performed, the functions and responsibilities of the different related groups, preventive procedures and practices, and procedure manuals and operating instructions.

In addition, the intranet contains a specific section for mandatory application and reading by staff, including:

- Occupational Risk Prevention Policy
- Building Evacuation Plan
- Annual Preventive Planning
- Basic information on occupational risks

Coral Homes Group has External Prevention Services in charge of drafting ORAs. The purpose of these documents is to provide information on Group entities' needs and planning labour protection and prevention matters, also identifying the following risks:

- Electrical contacts
- Fire
- People falling from height
- Accidents due to uncodified reasons

#### *Occupational accidents*

The following table shows the number of accidents occurred in 2021, as well as the frequency and severity rates:

|   | Men     | Women   |
|---|---------|---------|
| Number of occupational accidents with sick leave                  | 3       | 2       |
| Number of days lost due to occupational accidents with sick leave | 128     | 123     |
| Number of actual hours worked by employees                        | 754,992 | 762,048 |
| Frequency rate <sup>9</sup>                                       | 3.97    | 2.62    |
| Severity rate <sup>10</sup>                                       | 0.17    | 0.16    |
| Occupational diseases <sup>11</sup>                               | 0       | 0       |
| Number of deaths  | 0       | 0       |

<sup>9</sup> Calculated as (number of occupational accidents with sick leave x 1,000,000) / number of actual hours worked by employees.

<sup>10</sup> Calculated as (number of days lost x 1,000) / number of actual hours worked by employees.

<sup>11</sup> Due to the type of labour activity carried out in Coral Homes Group, there are no occupational diseases.

### 4.3. Group policy

The main commitment of Coral Homes Group consists in keeping the highest ethical standards and professional services upon rendering services.

In this sense, Coral Homes Group knows that to gain business success and sustainability people are key and it is essential to attract and keep talent within the company.

For that purpose, it carries out due diligence procedures consisting in identification, verification and acceptance processes prior to engaging in any relationship with its staff, (potential or current) customers, suppliers and third parties, in general, as well as due diligence procedures on the continuous follow-up of labour and business relationships.

In this regard, for 2021, as part of the update of the compliance policies implemented by Coral Homes Group, the last version of the **General Relationship Acceptance Policy**, reviewed in December 2020, continued to be effective, which is aimed at:

- Identifying all the people with whom labour or business relationships are established prior to engaging in such relationships.
- Preventing labour or business relationships with people or entities excluded from the criteria established in such Policy.

Within this context and in line with the commitment to have a framework of internal regulations guaranteeing the highest regulatory compliance and corporate social responsibility standards, during the current year Coral Homes Group reviewed its **Code of Ethics**, applicable to all the staff, executives and directors of its member entities, as well as to the third parties to which they may be related. This Code was amended to include Serviland as a new member entity of Coral Homes Group<sup>12</sup>.

By virtue of such Code of Ethics, the Group has the intention to set a framework to protect labour conditions and the basic rights of staff across the Group. Such document is the pillar and framework for the development of the remaining corporate policies and procedures, to which reference is made throughout this report.

In addition, Servihabitat, as a Group member company having the highest number of staff members (95% of Group staff), has different policies on this matter:

- The **Talent Acquisition Policy** sets forth the guidelines to fill vacancies at the company, either through internal transfers using the “Wanted” programme, external recruitment or the internalisation of outside services.
- The **Servihabitat Guide** collects all the information that may be important for staff once they have joined the company. It includes time schedules, vacation, paid leaves of absence, remuneration structure, training, the “Merit” programme on goals, achievements and career development at the organisation.
- The **Training Plan** includes cross-cutting and specific training courses that staff may follow. Such document is reviewed, updated and approved on an annual basis.

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<sup>12</sup> In its meeting held on 16 November 2021, the Board of Directors of Serviland resolved to adhere to the Code of Ethics of Coral Homes Group and further regulatory Corporate Compliance policies approved during its implementation.

- The **Equality Policies**, the **Equal Treatment and Opportunities Plan**, the **Harassment Prevention and Response Protocol** and the **Manual for the Use of Inclusive Language**, aimed at setting a framework to guarantee equal opportunities at the workplace.
- The **Occupational Risk Prevention Policies**, containing the commitments detailed in section 4.2 on “Health and safety”.

#### 4.4. Corporate management and performance

##### 4.4.1. Employment

This section contains information of Group staff<sup>13</sup>, in addition to the types of contracts and parameters that provide information on equality. At 31 December 2021, Coral Homes Group is made up of 912 (nine hundred and twelve) people. Out of them, pursuant to the criteria established by the Institute of Certified Public Accountants (ICJCE), 4 (four) of Coral Homes Holdco's employees are deemed to be part of Senior Management, as they are "key personnel of the parent company".

The Group's employees are broken down as follows by professional group, age and sex:

|       |       | Senior Management | Directors | Middle Management | Technicians | TOTAL |
|-------|-------|-------------------|-----------|-------------------|-------------|-------|
| <30   | Men   | 0                 | 0         | 2                 | 40          | 42    |
|       | Women | 0                 | 0         | 2                 | 33          | 35    |
| 30-45 | Men   | 1                 | 22        | 44                | 207         | 273   |
|       | Women | 2                 | 14        | 33                | 239         | 289   |
| 46-55 | Men   | 1                 | 27        | 31                | 73          | 131   |
|       | Women | 0                 | 11        | 16                | 83          | 110   |
| >55   | Men   | 0                 | 1         | 3                 | 11          | 17    |
|       | Women | 0                 | 4         | 0                 | 9           | 15    |
| Total |       | 4                 | 79        | 131               | 695         | 909   |

[Senior Management is made up of the key personnel of the parent company, Coral Homes Holdco.]

[The Directors category is made up of the Chief Executive Officer and the members of the Executive Committee, senior directors, area directors and the territorial directors of Servihabitat and Serviland.]

[The Technicians category is made up of the technicians and managers of Servihabitat, Serviland and Coral Homes Holdco.]

##### Employees by type of contract

|  | Women | Men | Total |
|--|-------|-----|-------|
| Headcount with a permanent employment contract | 440   | 458 | 898   |
| Headcount with a temporary employment contract | 6     | 5   | 11    |
| Total headcount                                | 446   | 463 | 909   |

In order to provide its staff with labour stability and security, the Group relies on indefinite contracts. As a result, most contracts are indefinite contracts, representing 98.7% of the contracts of its workers.

<sup>13</sup> In this regard, it is worth noting again that in the reference period of this report (2021), Coral Homes Holdco has 32 (thirty-two) employees, Coral Homes has no employees and Serviland has 12 (twelve).

|  | Senior Management | Directors | Middle Management | Technicians | Total      |
|--|-------------------|-----------|-------------------|-------------|------------|
| Headcount with a permanent employment contract | 4                 | 79        | 131               | 684         | 898        |
| Headcount with a temporary employment contract | 0                 | 0         | 0                 | 11          | 11         |
| <b>Total employees</b>                         | <b>4</b>          | <b>79</b> | <b>131</b>        | <b>695</b>  | <b>909</b> |

If we observe the types of contracts by age range, we may conclude that temporary contracts decrease as the age range increases, the range from 30 (thirty) to 45 (forty-five) years of age being the range with more temporary contracts, while the range <30 has a higher percentage (4%) of temporary contracts compared to the total number of employees in that range.

|  | <30       | 30-45      | 46-55      | >55       | Total      |
|--|-----------|------------|------------|-----------|------------|
| Headcount with a permanent employment contract | 74        | 554        | 242        | 28        | 898        |
| Headcount with a temporary employment contract | 3         | 7          | 1          | 0         | 11         |
| <b>Total employees</b>                         | <b>77</b> | <b>561</b> | <b>243</b> | <b>28</b> | <b>909</b> |

*Employees by type of workday*

|                               | Women      | Men        | Total      | Total       |
|-------------------------------|------------|------------|------------|-------------|
| Number of full-time employees | 443        | 458        | 898        | 98.79%      |
| Number of part-time employees | 6          | 5          | 11         | 1.21%       |
| <b>Total employees</b>        | <b>449</b> | <b>463</b> | <b>909</b> | <b>100%</b> |

Only 6 (six) women and 5 (five) men have worked on a part-time basis during 2021 out of the total headcount, accounting for 1.25% of the total.

|                               | <30       | 30-45      | 46-55      | >55       | Total      |
|-------------------------------|-----------|------------|------------|-----------|------------|
| Number of full-time employees | 72        | 526        | 237        | 28        | 898        |
| Number of part-time employees | 3         | 7          | 1          | 0         | 11         |
| <b>Total employees</b>        | <b>75</b> | <b>533</b> | <b>238</b> | <b>28</b> | <b>909</b> |

|                               | Senior Management | Directors | Middle Management | Technicians | Total      |
|-------------------------------|-------------------|-----------|-------------------|-------------|------------|
| Number of full-time employees | 4                 | 79        | 131               | 684         | 898        |
| Number of part-time employees | 0                 | 0         | 0                 | 11          | 11         |
| <b>Total employees</b>        | <b>4</b>          | <b>79</b> | <b>131</b>        | <b>695</b>  | <b>909</b> |

Number of redundancies throughout the reporting year:

The three tables below show that the Group's turnover rate is 0.17%.

|                        | Women | Men | Total |
|------------------------|-------|-----|-------|
| Number of redundancies | 23    | 29  | 52    |

|                        | <30 | 30-46 | 46-55 | >55 | Total |
|------------------------|-----|-------|-------|-----|-------|
| Number of redundancies | 4   | 24    | 15    | 9   | 52    |

|                        | Senior Management | Directors | Middle Management | Technicians | Total |
|------------------------|-------------------|-----------|-------------------|-------------|-------|
| Number of redundancies | 1                 | 5         | 15                | 31          | 52    |

#### Average remuneration

Coral Homes Group understands that remuneration is a tool to value and retain talent at the organisation. For this purpose, it has set measurable and objective criteria to prevent any type of bias or discrimination. Following this line, remuneration at the Group is based on three parameters:

- Individual performance
- Market
- Internal equity

Total remuneration comprises: (i) fixed remuneration and (ii) variable remuneration. The latter is set pursuant to the performance and goals attained (individually, considering an area or department, the company or a position).

In the particular case of Servihabitat, staff may also be compensated for the meal expenses incurred during working days. From the health point of view, all workers with indefinite employment contracts have an Adeslas full insurance policy. If requested, spouses and children may enjoy special rates if hiring this modality.

In 2021 the Group's average remuneration has been as follows, broken down by sex, age and professional category:

|                           | Women  | Men    |
|---------------------------|--------|--------|
| 2021 average remuneration | 50,182 | 65,146 |
| 2020 average remuneration | 49,783 | 67,602 |

|                           | Directors | Middle Management | Technicians |
|---------------------------|-----------|-------------------|-------------|
| 2021 average remuneration | 145,522   | 71,880            | 44,544      |
| 2020 average remuneration | 145,213   | 72,460            | 43,910      |

|                           | <30    | 30-45  | 46-55  | >55    |
|---------------------------|--------|--------|--------|--------|
| 2021 average remuneration | 36,487 | 51,784 | 75,523 | 77,008 |
| 2020 average remuneration | 35,939 | 53,014 | 79,936 | 71,750 |



### Salary gap

The salary gap is the difference between the salary earned by women and by men in the same work category.

|                               | Directors | Middle Management | Technicians |
|-------------------------------|-----------|-------------------|-------------|
| 2021 salary gap <sup>14</sup> | 22%       | 3%                | 15%         |
| 2020 salary gap               | 23%       | 6%                | 17%         |

### Remuneration of company's equal or average positions

|       | Initial salary | Local minimum salary | Ratio (initial/local) |
|-------|----------------|----------------------|-----------------------|
| Spain | 15,840         | 12,600               | 1.26                  |

### Average remuneration of directors and executives (Senior Management)

|                      | Directors | Senior Management |
|----------------------|-----------|-------------------|
| Average remuneration | 0         | 239,288           |

[Due to confidentiality reasons, Senior Management's mean remuneration is not broken down by sex.]

As to Senior Management's remuneration, on average, 70% represents fixed remuneration, while 30% represents variable remuneration.

### Employees with disabilities

At present the Group has 6 (six) employees with disabilities; therefore, it does not meet the requirement of having 2% of staff with a disability certificate. However, current legislation is observed by hiring special employment centres and through the donations made by the Group to promote the social and labour inclusion of people with disabilities.

The companies that receive the donations and their activities are as follows:

| Association               | Description of the association (its activity)   | Reason for the cooperation   |
|---------------------------|---|--|
| <b>Adecco Foundation</b>  | Its main purpose is to work with people and their families in an integral manner to improve their autonomy, social inclusion and access to the labour market. | Adecco Foundation Family Programme: counselling and intervention programme for disabled people |
| <b>Ilersis Foundation</b> | Special employment centre aimed at integrating people with disabilities.  | Christmas gifts  |

## 4.4.2. Work organisation

### Work time organisation

Coral Homes Group's workdays total 40 (forty) hours per week. Apart from the Public and Private Office Collective Bargaining Agreement, the Group provides time flexibility both upon arrival and departure and at the lunch break.

<sup>14</sup> Calculated as (Men average remuneration – Women average remuneration) / (Men average remuneration) x 100.

*Number of hours of absenteeism*

The total absenteeism rate in 2021 is low (4.16%), which implies 64,243 (sixty-four thousand, two hundred and forty-three) total hours of absenteeism including men and women.

|                                      | Women  | Men    | Total  |
|--------------------------------------|--------|--------|--------|
| Total number of hours of absenteeism | 42,423 | 21,820 | 64,243 |
| Work absenteeism rate <sup>15</sup>  | 2.75%  | 1.41%  | 4.16%  |

*Measures to facilitate family and work-life balance and promote its responsible exercise by both parents*

Coral Homes Group promotes the satisfaction of its staff by implementing measures that facilitate family and work-life balance.

In this regard, apart from the maternity and paternity leaves established by current legislation, Servihabitat has the following additional measures:

- workday reduction, with a proportional salary reduction, between at least 1/8 and 1/2 of the workday;
- breastfeeding from the birth of children until they are 9 (nine) months old: the mother or father will have a one-hour daily leave within their workdays;
- half-hour reduction of the workday (before or after); or
- accumulation of 15 (fifteen) working days, which may be enjoyed immediately after the maternity or paternity leave.

In 2021, a total of 62 (sixty-two) people enjoyed their parental leaves, out of which 52% were women. All of the men that made use of this leave returned to work after its conclusion, which implies a 100% return rate. As to women, out of the 32 (thirty-two) women that made use of the maternity leave, 25 (twenty-five) returned to work after its conclusion, which implies a 78.13% return rate.

|   | Men  | Women  |
|---|------|--------|
| Total number of employees entitled to parental leave  | 32   | 32     |
| Total number of employees enjoying the parental leave   | 32   | 32     |
| Total number of employees to work during the reporting period after conclusion of the parental leave  | 32   | 25     |
| Total number of employees returning to work after conclusion of the parental leave and continuing to be employees 12 months after returning to work | 32   | 25     |
| Return-to-work and retention rates of the employees that used the parental leave  | 100% | 78.13% |

<sup>15</sup> Calculated as (total number of days lost due to absence + total number of days lost due to leave) / (number of days worked) x 100.

Note that, in order to promote the professional and personal life balance of its staff, Servihabitat has implemented the "Servithday", offering them the possibility to enjoy a workday off to celebrate their birthdays.

#### 4.4.3. Social relationships

The total number of Group staff members covered by the **Public and Private Office Collective Bargaining Agreement** is 912 (nine hundred and twelve), representing 100% of headcount.

Servihabitat has a **Works Council** at its work centre in Cornellá de Llobregat. To implement the material operating changes that may affect staff and their appointed representatives significantly, Servihabitat sends communications to it 4 (four) weeks in advance. They include the prior notice and the provisions regarding potential inquiries and negotiations in relation to any collective bargaining agreement.

At present Servihabitat's trade union representation is as follows:

|     | Men | Women | Total | Total |
|-----|-----|-------|-------|-------|
| Yes | 5   | 8     | 13    | 2%    |
| No  | 437 | 427   | 864   | 98%   |

Servihabitat has a **Health and Safety Committee** made up of trade union representatives of Comisiones Obreras (CCOO) and Unión General de Trabajadores (UGT). This Committee is in charge, among other obligations, of enforcing the provisions on occupational risk prevention. It meets on a quarterly basis and whenever a worker requests so. In 2021 it included 100% of headcount.

In 2021 the Health and Safety Committee was comprised of 6 (six) people and met with the trade unions every four months to discuss the following matters:

- COVID-19 management: reporting the current situation and total cases.
- Occupational Risk Prevention Policies, Occupational Risk Assessment (ORA) and Self-Protection Plan.
- Accident rate: reporting the number of accidents occurred.
- Health and Safety Committee operating regulations model: inquiries are made on the situation of the regulations.

#### 4.4.4. Training

Coral Homes Group emphasises the importance of training all its staff in order to develop knowledge, skills and capacities.

In line with this commitment, the Group aims at developing a common training framework regarding compliance matters for all its staff, which may be adapted to the specific needs of subsidiaries. Such **Compliance Training Plan** is prepared on an annual basis by the Chief Compliance Officers of Group entities, with the approval of the ICB, to train on money laundering and terrorism financing prevention, of the Corporate Compliance Committee, to train on data protection and corporate compliance, and of the Board of Directors of Coral Homes Holdco, which approves all training courses.

In 2021 the members of the Boards of Directors of Coral Homes Group entities and ICB members received specific training on money laundering and terrorism financing prevention from well-known independent experts.

Training was also provided on this matter to all Group staff, which was reinforced in the case of groups with more exposure to the risk of money laundering and terrorism financing.

Similarly, training was provided to all Group staff on other matters, such as personal data protection, criminal compliance and the prevention and management of conflicts of interest.

Finally, Servihabitat has a **Training Policy** that is implemented through the **Training Plan**. Servihabitat's Training Plan is developed by the People and Culture Area based on the specific needs of each organisation management, as approved by the Executive Committee, as well as the Works Council of Cornellá de Llobregat, in relation to the staff at this centre. The Training Plan comprises three pillars:



#### Skills

Training is provided on languages (English) and communication and negotiation skills, among others.



#### Tools

Focus on the use of transversal software (Excel, PowerPoint) or area-specific software (SAP, VBA, SQL, Python, Tableau).



#### Knowledge

Workers are trained on 7 topics:

- Real estate business
- Compliance
- Legal, audit and internal control
- Financial assets
- Finance
- IT
- Operations

If a person within the Group requests specific training on his/her position that is not included in the Training Plan, he/she may apply for economic aid for such training.

Furthermore, knowledge pills are distributed among staff members on important matters that they should be aware of.

Below is a breakdown of the total number of hours of training received during the year:

|  | Senior Management | Directors | Middle Management | Technicians | Total         |
|--|-------------------|-----------|-------------------|-------------|---------------|
| Total number of hours of training received in 2021 | 6                 | 2,619     | 3,311             | 12,723      | <b>18,659</b> |

The total investment in training in 2021 by Coral Homes Group amounted to **252,547 euros** (two hundred, fifty-two thousand, five hundred and forty-seven).

#### 4.4.5. Equality

Coral Homes Groups works to guarantee diversity, equal opportunities and inclusion for all its staff by setting and developing concrete actions for equality promotion.

Such commitment became a reality over the last few years through the review and update of the following documents:

- **Code of Ethics** of Coral Homes Group, which contains the commitment to promote equal opportunities and the prohibition to carry out discriminatory actions, abuses, harassment or mistreatment.
- Servihabitat's **Equality Policy**, aimed at communicating the company's commitment to establish and develop actions promoting equal treatment between men and women, with no direct or indirect discrimination for sex reasons.
- Servihabitat's **Equal Treatment and Opportunities Plan (2019-2022)**: It includes data (percentage) on payroll distribution, as well as training and awareness plans and promotion policies. It also provides for a consistent staff recruitment and selection study guaranteeing equal opportunities, as well as a study of outstanding aspects and areas of improvement in this regard.
- **Servihabitat's Manual for the Use of Inclusive (Non-Sexist) Language**: It includes guidelines to adapt language to a more specific and concrete language, and all possible efforts are made for documentation published in the company's name to observe the guidelines mentioned therein.
- Servihabitat's **Harassment Prevention and Response Protocol**: It defines the concepts, the type of sexual harassment and the procedure to be followed; in this regard, it establishes different options and advises that the investigation will be carried out by a person not belonging to the company to guarantee an unbiased and objective process. It also refers to the creation of a Mediation Committee to assess and process reports and defines the parties making up such committee. The protocol also includes a data protection clause.

## 5. INFORMATION ON THE RESPECT FOR HUMAN RIGHTS

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### 5.1. Group policy and identified risks

Coral Homes Group is strongly committed to defending human rights, in compliance with the International Labour Organisation (ILO) principles of non-discrimination, free association and the elimination of forced labour. In this sense, the Group keeps its Code of Ethics updated through an annual review. Such code is applicable to all its member entities and is the framework that contains the guidelines ensuring the observance of human rights.

Based on the Code of Ethics, both Coral Homes Group and particularly Servihabitat, due to its importance as the Group's servicer and provider of services to third parties, have developed different policies and reference documents guiding the performance of people and the organisation's activities to protect, remediate and respect human rights.

To prepare these documents, Servihabitat followed international standards and principles, such as the Universal Declaration of Human Rights, the UN Guiding Principles or ILO Fundamental Conventions.

Below are some of these documents:

- **Equality Plan**
- **Harassment Prevention and Response Protocol**
- **Training Plan**

Coral Homes Group has not detected any material risk of potential violation of human rights in the direct or indirect activities performed by its member entities. This is mainly due to the fact that all of the Group's activities are performed within the national territory; therefore, both the impact and the potential occurrence of a violation of human rights in any action or activity are significantly low.

In 2021 no complaints on human rights violations were received.

## 6. INFORMATION ON THE FIGHT AGAINST CORRUPTION, FRAUD AND BRIBERY

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### 6.1. Group policy

Coral Homes Group has zero tolerance towards fraud, bribery and corruption as part of its activities and business operations, either by its professionals or by the third parties with which it cooperates.

In this sense, in the last few years, the Group has reinforced its compliance structure, both at Group and member entity levels, in view of the commitments assumed in previous years in this regard. Therefore, in 2021, Coral Homes Group assigned sufficient personal and economic resources to its compliance systems and, particularly, to the Criminal Compliance Management Systems and the Privacy Management System.

Coral Homes Group has set up a model for prevention of and fight against corruption, fraud and bribery. As established in its Code of Ethics, the Group has developed the following policies and procedures applicable to all its member entities, as well as to all its staff and people having representation and administration powers therein. All of them should be aware of and comply with them, as well as with domestic and international regulations against bribery, fraud and corruption<sup>16</sup>:

- **Corporate Compliance Policy**, setting Coral Homes Group's principles and commitments on compliance matters, which are the cornerstone of the Criminal Compliance Management System. This policy contains the Group's control components both from an organic and a more functional and operating perspective. The ethical values and principles governing the performance of Coral Homes Group include integrity and transparency, excellence and professionalism, respect and confidentiality.
- **Policies for the Prevention of Money Laundering and Terrorism Financing**, which is mainly aimed at setting criteria and procedures of strict compliance for Coral Homes Group, so as to ensure in a responsible manner high capacity to face the threat of the laundering of assets arising from unlawful activities and terrorism financing. It is also aimed at describing and setting the Group's effective internal control mechanisms to prevent money laundering and the financing of terrorism, so as to reduce this risk as much as possible.

Furthermore, as Coral Homes, Serviland and Servihabitat are bound to applicable regulations on money laundering, Coral Homes has a Manual for the Prevention of Money Laundering and Terrorism Financing, with a representative in the Money Laundering Prevention Executive Service, authorised people appointed before such body, a Technical Unit and an Internal Control Body, all of them at Group level<sup>17</sup>.

- **Anti-Bribery and Fraud Prevention Policy**: as previously mentioned, it contains the zero-tolerance philosophy of Coral Homes Group in relation to fraud, bribery and corruption and is aimed at creating an environment minimising the risk of commission of these crimes.

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<sup>16</sup> Coral Homes Group's staff and directors sign a statement of compliance with the Code of Ethics and the Group's compliance policies on an annual basis.

<sup>17</sup> In its meeting of 16 November 2021, the Board of Directors of Serviland resolved as follows: (i) adhering to the Manual for the Prevention of Money Laundering and Terrorism Financing of Coral Homes Group; and (ii) appointing the Group's representative before the Commission for the Prevention of Money Laundering and Monetary Infringements (SEPBLAC), and its authorised parties.

This policy sets forth the measures required to minimise the chances of committing any type of fraud and to ensure the early detection of fraudulent acts. Thus, the policy states expressly as follows: *“All employees at Coral Homes Group are required to act in an ethical, honest, sincere and transparent manner, implementing actions and making decisions upon any act of fraud, corruption or bribery by employees and third parties acting on behalf of the Group or its entities”*.

Furthermore, the policy contains specific guidelines concerning gifts and hospitality. Thus it forbids Group staff to deliver or accept gifts or any hospitality to or from public officers or servants. In addition, all gifts or hospitality delivered or accepted shall be communicated to the Chief Compliance Officer of the relevant entity, who shall approve the delivery or acceptance of gifts for a value exceeding 200 euros and any hospitality for a value exceeding 500 euros.

It also contains a series of specific procedures designed to comply with its action plans through specific forms, approvals or reports to the different enforcement bodies.

- **General Relationship Acceptance Policy**, mainly aimed at:
  - Identifying all the people with whom labour or business relationships are established prior to engaging in such relationships.
  - Preventing labour or business relationships with people or entities excluded from the criteria set out in such Policy. In this regard, different procedures are carried out to become aware of the third parties, and the Group has a risk matrix allowing to classify third parties and apply the diligence measures required.
- **International Sanctions Policy**, which defines the principles to be followed in managing the compliance with international sanction systems, along with functional and governance aspects, the main associated processes and instruments enabling their proper development and implementation. It is also aimed at raising the awareness of all Coral Homes Group’s professionals, promoting a risk monitoring and management model, providing guidance on minimum standards and compliance expectations.
- **Policy for the Management of Conflicts of Interest**, which sets forth the mechanisms to identify, prevent, manage, record and properly follow up the conflicts of interest that may arise in the performance of business activities by Coral Homes Group’s professionals and member entities. The last update of this policy incorporated the general prohibition for all Coral Homes Group staff and real estate agents to acquire or lease assets managed by Servihabitat, except with the express authorisation of the Corporate Compliance Committee.
- **Privacy Management System**, which contains all material aspects evidencing the existence of a model to organise and manage appropriate oversight and monitoring measures to prevent and, as applicable, detect the occurrence of unlawful acts in relation to personal data protection and privacy inside Coral Homes Group entities. The **Privacy Management System** includes the main goals of the different functions that make it up, that is, the Corporate Privacy Committee, Servihabitat’s Information Security Committee and Coral Homes Group’s Data Protection Officer.



All these policies are comprised in the Criminal Compliance Management Systems of the Group's member entities, designed based on the best existing practices, pursuant to UNE 19601 and ISO 37001 standards, under which Servihabitat is certified.

Coral Homes Group also has a **Procedure for Monitoring and Reporting of Criminal Compliance Management Systems**, aimed at guiding the Corporate Compliance Committee and the Chief Compliance Officers of Group entities in relation to their functions in terms of oversight, surveillance and control in the operation of Criminal Compliance Management Systems.

All these policies are reviewed and updated on a continuous basis by the Corporate Compliance Committee, and the last update was approved by the Board of Directors of Coral Homes Holdco in December 2021.

It is also worth noting that Coral Homes Group promotes and encourages its staff, directors, suppliers and any third party to which Coral Homes Group entities may be related in performing their activities to use the channels created for that purpose to communicate any situation raising doubts about whether their own actions or those of third parties may violate the principles and values contained in the Group's Code of Ethics or the rest of the policies issued in implementing it, as well as any situation or behaviour violating the principles and values included in such Code of Ethics, current legislation or the Group's internal regulations, and any potentially relevant irregularity.

For that purpose, Coral Homes Holdco, Coral Homes and Serviland have a **Whistleblowing Channel** supported by an electronic mail address to advise these companies about any irregular action violating their ethical principles or internal regulations.

Servihabitat also has an **Ethics Hotline** to record all complaints of inappropriate behaviour, supported by a web application that may be accessed to by employees, shareholders, executives, suppliers, customers and, in general, any third party reporting any irregular behaviour that may violate the principles under its Code of Ethics and Anti-Bribery and Fraud Prevention Policy, among other internal policies. The Ethics Hotline is managed by an external provider to guarantee the strict confidentiality of potential complainants.

The complaints are resolved through a strict, transparent and objective procedure, safeguarding complainants' confidentiality. They are also protected by the duty of secrecy by the persons managing them.

Coral Homes Group entities and their members shall not adopt any retaliation, discriminatory or disciplinary action against the complainants filing complaints in good faith based on reasonable evidence.

In July 2021, the Board of Directors of Coral Homes Holdco approved the implementation of a joint Whistleblowing Channel for all the entities belonging to Coral Homes Group. The channel has been developed with the tool of a well-known international external provider.

During 2021, Coral Homes Group finished the design, along with such provider, of the channel tool, adapted to the Group's internal regulations, as well as the Whistleblower Directive and the Spanish regulations on data protection and the prevention of money laundering and terrorism financing.

The new channel, to be implemented in 2022, will allow Coral Homes Group to: (i) comply with applicable regulations and, in particular, the Whistleblower Directive; (ii) make users aware of the importance of the channel and promote its use to claim or report any issue that they may have knowledge of, contrary to current regulations and the Group's regulations; and (iii) obtain a more comprehensive vision of claims addressed to all Group entities.

In addition, the Chief Compliance Officers of Coral Homes Group, with the advice of an external expert, will prepare a new procedure to regulate the Group's Whistleblowing Channel, comprising, among others: (i) the objective and subjective scope of the channel; (ii) the behaviour that may and may not be reported; (iii) formal and material requirements to admit complaints; (iv) rights and duties of complainants and reported parties; (v) explanation of complaint management stages; and (vi) a catalogue of measures to prevent retaliation.

Similarly, they will reinforce training and awareness on the use of the channel for employees and executives and will improve dissemination among customers and suppliers.

Furthermore, in order to ensure the efficiency and efficacy of the model to prevent and fight against fraud and corruption, Servihabitat's Internal Audit, together with an external company, performs periodic reviews of the processes and controls in place.

## 6.2. Identified risks

The **Criminal Compliance Management Systems of Coral Homes Group** (hereinafter, the "**Systems**") to prevent the commission of crimes rely on four pillars: (i) prevention; (ii) detection; (iii) reaction; and (iv) follow-up and continuous improvement. The elements that form those Systems include:

- (i) Criminal risk matrixes and maps: Group entities have a criminal risk inventory that is inherent to their activities, as well as a valuation and prioritisation system for those risks. The resulting maps are mechanisms managed by the Chief Compliance Officers and a tool to measure the evolution of risks and existing controls over time. These maps are reviewed and, as applicable, updated on an annual basis and reported to the Corporate Compliance Committee.

Coral Homes Holdco and Coral Homes Criminal Risk Matrix

|                 | RIESGO PENAL   | RIESGO INHERENTE | RIESGO RESIDUAL |
|-----------------|--|------------------|-----------------|
| R.1   R.2   R.3 | Corrupción pública   |                  |                 |
| R.4             | Financiación ilegal de partidos políticos  |                  |                 |
| R.5             | Corrupción en los negocios   |                  |                 |
| R.6             | Estafa   |                  |                 |
| R.7             | Publicidad engañosa  |                  |                 |
| R.8             | Contra la intimidad personal y familiar  |                  |                 |
| R.9             | Contra el secreto de empresa   |                  |                 |
| R.10            | Fraude contra la Hacienda Pública  |                  |                 |
| R.11            | Fraude a la Seguridad Social   |                  |                 |
| R.12            | Incumplimiento y falsedad de las obligaciones contables                          |                  |                 |
| R.13   R.14     | Frustración de la ejecución   Insolvencias punibles                              |                  |                 |
| R.15   R.16     | Fraude de subvenciones   Fraude a los presupuestos Generales de la Unión Europea |                  |                 |
| R.17            | Manipulación de precios  |                  |                 |
| R.18   R.19     | Blanqueo de capitales   Financiación del terrorismo                              |                  |                 |
| R.20            | Contra la ordenación del territorio  |                  |                 |
| R.21            | Contra los recursos naturales y el medioambiente                                 |                  |                 |
| R.22            | Riesgos provocados por explosivos y otros agentes                                |                  |                 |
| R.23   R.24     | Contra la propiedad intelectual e industrial                                     |                  |                 |
| R.25            | Daños informáticos   |                  |                 |
| R.26            | Contra los derechos de los ciudadanos extranjeros                                |                  |                 |
| R.27            | Contra la Salud pública: tráfico de drogas                                       |                  |                 |
| R.28            | Prostitución, explotación sexual y corrupción de menores                         |                  |                 |
| R.29            | Obstrucción a la actividad inspectora  |                  |                 |
| R.30            | Alteración de precios en concursos y subastas públicas                           |                  |                 |
| R.31            | Contra los derechos de los trabajadores  |                  |                 |
| R.32            | Coacciones (*)   |                  |                 |
| R.33            | Allanamiento de morada (*)   |                  |                 |
| R.34            | Delitos Societarios (*)  |                  |                 |

|                 |  |  |
|-----------------|--|--|
|                 | Riesgo penal   | Criminal risk  |
|                 | Riesgo inherente   | Inherent risk  |
|                 | Riesgo penal   | Criminal risk  |
| R.1   R.2   R.3 | Corrupción pública   | Public corruption  |
| R.4             | Financiación ilegal de partidos políticos  | Illegal funding of political parties   |
| R.5             | Corrupción en los negocios   | Corruption in business   |
| R.6             | Estafa   | Fraud  |
| R.7             | Publicidad engañosa  | Misleading advertising   |
| R.8             | Contra la intimidad personal y familiar  | Against personal and family privacy  |
| R.9             | Contra el secreto de empresa   | Against trade secret   |
| R.10            | Fraude contra la Hacienda Pública  | Fraud against the Tax Authority  |
| R.11            | Fraude a la Seguridad Social   | Fraud against the Social Security  |
| R.12            | Incumplimiento y falsedad de las obligaciones contables                          | Non-compliance and misrepresentation of accounting obligations               |
| R.13   R.14     | Frustración de la ejecución   Insolvencias punibles                              | Frustration of performance   Punishable insolvencies                         |
| R.15   R.16     | Fraude de subvenciones   Fraude a los presupuestos Generales de la Unión Europea | Fraud of subsidies   Fraud against the general budgets of the European Union |
| R.17            | Manipulación de precios  | Price manipulation   |
| R.18   R.19     | Blanqueo de capitales   Financiación del terrorismo                              | Money laundering   Financing of terrorism                                    |
| R.20            | Contra la ordenación del territorio  | Against land planning  |
| R.21            | Contra los recursos naturales y el medioambiente                                 | Against natural resources and the environment                                |
| R.22            | Riesgos provocados por explosivos y otros agentes                                | Risks arising from explosives and other agents                               |
| R.23   R.24     | Contra la propiedad intelectual e industrial                                     | Against intellectual and industrial property                                 |
| R.25            | Daños informáticos   | IT damages   |
| R.26            | Contra los derechos de los ciudadanos extranjeros                                | Against the rights of foreign citizens                                       |
| R.27            | Contra la Salud pública: tráfico de drogas                                       | Against public health: drug trafficking                                      |
| R.28            | Prostitución, explotación sexual y corrupción de menores                         | Prostitution, sexual exploitation and corruption of minors                   |

|      |  |   |
|------|--|---|
| R.29 | Obstrucción a la actividad inspectora                  | Obstruction of the inspection activity          |
| R.30 | Alteración de precios en concursos y subastas públicas | Price alteration in public tenders and auctions |
| R.31 | Contra los derechos de los trabajadores                | Against the rights of workers                   |
| R.32 | Coacciones (*)   | Coercion (*)                                    |
| R.33 | Allanamiento de morada (*)                             | Forced entry                                    |
| R.34 | Delitos Societarios (*)                                | Corporate offences (*)                          |

Servihabitat Criminal Risk Matrix

| Delitos   | RIESGO INHERENTE | RISGO RESIDUAL |
|---|------------------|----------------|
| Blanqueo de capitales   |                  |                |
| Delitos contra los derechos de los trabajadores                 |                  |                |
| Delitos de terrorismo   |                  |                |
| Delitos de Estafa   |                  |                |
| Delitos de Corrupción en los negocios                           |                  |                |
| Delitos contra el mercado y los consumidores                    |                  |                |
| Delitos sobre la ordenación del territorio y el urbanismo       |                  |                |
| Delitos societarios   |                  |                |
| Coacciones  |                  |                |
| Insolvencia punible   |                  |                |
| Tráfico de influencias  |                  |                |
| Delitos contra los recursos naturales y el medio ambiente       |                  |                |
| Delitos contra la propiedad intelectual                         |                  |                |
| Delitos contra la intimidad                                     |                  |                |
| Delitos contra la Hacienda Pública y contra la Seguridad Social |                  |                |
| Cohecho   |                  |                |
| Apropiación indebida  |                  |                |
| Allanamiento de Morada  |                  |                |

|   |  |
|---|--|
| Delitos   | Offences   |
| Riesgo inherente  | Inherent risk  |
| Riesgo residual   | Residual risk  |
| Blanqueo de capitales   | Money laundering   |
| Delitos contra los derechos de los trabajadores                 | Crimes against the rights of workers                     |
| Delitos de terrorismo   | Terrorist crimes   |
| Delitos de estafa   | Fraud crimes   |
| Delitos de corrupción en los negocios                           | Criminal corruption in business                          |
| Delitos contra el mercado y los consumidores                    | Crimes against the market and consumers                  |
| Delitos sobre la ordenación del territorio y el urbanismo       | Crimes against land planning and urban development       |
| Delitos societarios   | Corporate offences                                       |
| Coacciones  | Coercion   |
| Insolvencia punible   | Punishable insolvency                                    |
| Tráfico de influencias  | Influence peddling                                       |
| Delitos contra los recursos naturales y el medio ambiente       | Crimes against natural resources and the environment     |
| Delitos contra la propiedad intelectual                         | Crimes against intellectual property                     |
| Delitos contra la intimidad                                     | Crimes against privacy                                   |
| Delitos contra la Hacienda Pública y contra la Seguridad Social | Crimes against the Tax Authority and the Social Security |
| Cohecho   | Bribery  |
| Apropiación indebida  | Misappropriation   |
| Allanamiento de Morada  | Forced entry   |

In view of the recent incorporation of Serviland (13 September 2021), at 31 December 2021 it has no criminal compliance system of its own. It will be prepared and approved during 2022.

- (ii) Manuals, policies, procedures and protocols: They are aimed at ensuring an effective ethical and compliance culture at each Coral Homes Group member entity and at Group level, as well as effective control standards and procedures minimising the risk of unlawful behaviour by staff or third parties acting on behalf and account of Group companies. Chief Compliance Officers, together with area heads and their Boards of Directors, are in charge of keeping their procedures updated, as well as complying with them in a strict manner, particularly when dealing with Group guidelines.

- (iii) Corporate Compliance Committee: This is the body in charge of the Systems oversight and follow-up, so that the main criminal risks may be properly identified and managed internally. In addition, Coral Homes Group entities have a Chief Compliance Officer that is responsible for performing the functions under article 31 bis.2.2 of the Criminal Code. Apart from reporting internally to their respective Boards of Directors, each Chief Compliance Officer shall report to the Corporate Compliance Committee, which in turn reports to the Board of Directors of Coral Homes Holdco, as the Group's parent company.
- (iv) Financial resources management model: The Group has a series of financial and economic controls and procedures, ensuring full transparency in its accounting books, transactions and, in general, economic management. In addition, a budget item and/or resources are planned to cover the needs of the Corporate Compliance Committee and the respective Chief Compliance Officers in exercising their functions, thus guaranteeing that the Systems have sufficient human and financial resources.
- (v) Systems monitoring and reporting procedure: The main goal is to validate the proper execution of the Systems, allowing to verify periodically the efficacy of current policies, procedures and controls, as well as any changes thereof, so that the Group may have an overall vision of its Systems and take the actions required to ensure the appropriate performance of their functions for the prevention, management and control of criminal risks. For that purpose, the Corporate Compliance Committee has a single procedure including follow-up and verification tools, as well as the obligation to report to the Boards of Directors on an annual basis through an Annual Compliance Report including compliance tasks, detected incidents, regulatory changes affecting the Systems, improvement measures put in place, and the degree of follow-up of ongoing action plans.
- (vi) Disciplinary system: Through the Chief Compliance Officers, the Corporate Compliance Committee is in charge of the proper execution of the disciplinary system, in accordance with applicable regulations and notwithstanding the involvement of other functional areas of Group entities in imposing the correct penalties due to irregularities. In the event of any infringement, the disciplinary system established in the Code of Ethics of Coral Homes Group will apply.
- (vii) Whistleblowing Channel/Ethics Hotline: Through the Chief Compliance Officers, the Corporate Compliance Committee is in charge of the proper management of the Group's mechanisms to detect any violations.
- (viii) Systems training and dissemination: The Corporate Compliance Committee shall have an annual training plan aimed at all of the Group's staff, the external associates determined from time to time and the directors of Coral Homes Group's entities.

### 6.3. Managing the fight against fraud, corruption and bribery

#### 6.3.1. Measures to prevent corruption, bribery and fraud

In order to ensure that the identified risks are not materialised, Coral Homes Group has an **Anti-Corruption and Fraud Prevention Policy** that defines a series of actions and controls to minimise the possibilities of fraud, as well as to ensure the early detection of acts related to corruption and bribery.

Below are some of these **controls, which enable preventing, mitigating, discouraging or detecting fraud and corruption**:

- Identification of the persons with whom business relationships are established, prior to engaging in such business relationship, verifying whether the identification documents provided are effective and valid.

- Training and awareness of Group professionals, explaining what fraud, corruption and bribery are, as well as the most common practices and how to act upon any sign or suspicion of fraud or any other unlawful action.
- Segregation of duties, reducing the possibility for the same person to carry out all the activities in the same process. Existence of authorisation/approval circuits for certain transactions.
- Access to IT systems or transactions: limitation of the permits assigned to the different professionals, with specific assignments to certain applications and functions.
- Existence of global policies and procedures for the Group and each one of its member entities or even each one of their areas or departments.
- Existence of a process for the approval of suppliers and APIs to prevent hiring third parties involved in an investigation or in criminal proceedings due to corruption, bribery and/or fraud.

Also, specific policies are established in relation to (i) the acceptance and delivery of gifts; (ii) travelling and entertainment expenses; (iii) extortion and bribery; (iv) influence peddling and facilitation payments; and (v) donations, sponsorships and other not-for-profit contributions.

The design and efficacy of the controls mitigating fraud and corruption risks are evaluated periodically, and each unit and area of Coral Homes Group member entities, as the first line of defence, is in charge of identifying critical risks, as well as applying the relevant controls.

In addition, **Internal Control** (the second line of defence) reviews the **existence of controls, their correct design and adequacy**, so as to be ultimately reviewed by Internal Audit (the third line of defence).

Pursuant to the Corporate Compliance Policy previously mentioned, the Board of Directors of Coral Homes Holdco, as parent company, as well as the Boards of Directors of its subsidiaries, are ultimately responsible for the Systems and for promoting a compliance culture. Furthermore, the Board of Directors of Coral Homes Holdco has delegated to the Corporate Compliance Committee the oversight of the Anti-Bribery and Fraud Prevention Policy compliance, being in charge, among others, of making significant decisions in relation to the matters regulated by such policy.

In addition, Coral Homes Holdco and Coral Homes, on the one hand, and Servihabitat, on the other, have a Chief Compliance Officer<sup>18</sup>. Apart from reporting internally to their respective governing bodies, each Chief Compliance Officer shall report to the Corporate Compliance Committee.

Among other services, Servihabitat renders compliance services to Serviland; therefore, the latter has the support of Servihabitat's Chief Compliance Officer and the Compliance and Internal Control Department of such company.

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<sup>18</sup> The Chief Compliance Officer is the operating head in charge of coordinating and overseeing compliance within the companies under his/her responsibility. Each Chief Compliance Officer will perform basically the functions referred to in article 31 bis.2.2. of the Criminal Code.

## 7. GROUP INFORMATION

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### 7.1. Group management and performance

#### 7.1.1. Group commitments with sustainable development

Coral Homes Group is an organisation intended to participate actively in improving the company, so as to return what it receives from the community. In this sense, its contribution to the community is based on three pillars:



Continuing to build a better business group



Contributing to improving the company



Promoting the sustainable management of the environment

For this purpose, in 2021, the following actions were carried out at Coral Homes Group entities:

- Commitment towards employees: defining the Equality Policy and renewing the Equality Plan, good governance programmes (General Disability Law [LGD, Spanish acronym], Code of Conduct), the new talent retention programme, flexible work schedules, Servithday, Flexiwork, fruit at the office, Sant Jordi book, birth gifts, meal vouchers, Christmas gifts, and promoting health within the company.
- Positive social impact: food for charity centres, more actions in cooperation with special employment centres to contribute to social and labour inclusion, and donations to associations engaged in social and health protection.
- Sustainability: EU EMAS certificate; energy saving actions at the offices and actions for the reduction of waste and recycling.



Coral Homes Group is also affiliated to the following associations:

| Association                        | Description of the association (its activity)   | Reason for the cooperation   |
|------------------------------------|---|--|
| <b>Red Cross</b>                   | Its main activities are related to social and health protection services and programmes.  | <i>Plan Cruz Roja Responde</i> : it is intended to reduce the effects of the COVID-19 pandemic, adapting its regular activities and services |
| <b>Lleris Foundation</b>           | Special employment centre aimed at integrating people with disabilities.  | Christmas gifts  |
| <b>Sant Joan de Déu Foundation</b> | "Fundació Privada per a la Recerca i Docència Sant Joan de Déu" is aimed at contributing to the improvement of people's health and well-being, promoting, supporting and coordinating the research conducted at the Sant Joan de Déu centres. | Charity  |
| <b>Adecco Foundation</b>           | Its main purpose is to work with people and their families in an integral manner to improve their autonomy, social inclusion and access to the labour market.   | Adecco Foundation Family Program: counselling and intervention programme for people with disabilities  |
| <b>DreamIT</b>                     | The NGO is aimed at favouring the disappearance of the digital gap among the most disadvantaged people.   | Donation of laptops and desktop computers  |

#### DONATION OF COMPUTERS

As part of the Group's active involvement with the community, different communication channels have been established with its stakeholders. Depending on the communication theme, the recipient varies in order to provide the best possible response.

The Group also promotes good relationships with state, regional and local competent authorities.

All communications received from the local community or other stakeholders are analysed considering improvement management or incident procedures.

In addition, in 2021 a total of 430 laptops and desktop computers were donated to the NGO DreamIT, which is aimed at favouring the disappearance of the digital gap among the most disadvantaged people.

## 7.1.2. Subcontracting and suppliers

### 7.1.2.1. Incorporation into the procurement policy of social, gender-equality and environmental criteria

In exercising their functions, the staff of Coral Homes Group has a fluid and transparent dialogue with suppliers in order to enhance supplies and the contracts signed by Group entities.

In the first place, as previously mentioned, Coral Homes Group has reviewed during this year the **Relationship Acceptance Policy**, which is the basis to carry out due diligence procedures that imply identification, verification and acceptance processes prior to engaging in any relationship with its staff, (potential or current) customers, suppliers and third parties, in general, as well as due diligence procedures upon the continuous follow-up of labour and business relationships.

In addition, to materialise this commitment, Coral Homes Group makes available the Whistleblowing Channel of Coral Homes Holdco, Coral Homes and Serviland, as well as the **Ethics Hotline** of Servihabitat, as the channel to communicate potentially irregular situations, so as to report the commission of any action that is unlawful, criminal or contrary to the Group's internal regulations or current legislation.

Within the Group, most purchases and contracts take place through the entity acting as servicer, i.e. Servihabitat. Therefore, it has a **Procurement Policy** and a **Supplier Approval Process** of its own.

The relationship with Servihabitat's suppliers is governed by the guidelines under the **Procurement Policy**, to be applied to the products and services contracted on its behalf, as well as those subject to delegated management.

The principles on which it is based include:

- Transparency
- Competitive calls
- Ethical and responsible performance
- Non-discrimination
- Focus on results
- Continuous improvement

It should be highlighted that in 2021, Servihabitat operated only in the Spanish market, and 95.5% of its suppliers have been domestic suppliers.

7.1.2.2. Focus on social and environmental responsibility in the relationships with suppliers and subcontractors

The abovementioned policies related to relationships with third parties are supplemented with the **Supplier Approval Process**, whereby guidelines are established to evaluate and approve suppliers before they are contracted. Such procedure includes the obligation to study the technical and financial solvency and the degree of regulatory compliance of each supplier, including new suppliers and those already included in the system. The approval process is carried out on an annual basis; therefore, all suppliers must be subject to the approval process every year to maintain the business relationship with Servihabitat or with the companies that signs the contract on its behalf.

Note that environmental and social matters are included in the approval process, such as ISO certificates (9001 on Quality Management, 14001 on Environmental Management, 26000 on Social Responsibility, and 27001 on Information Security Management Systems), Risk Prevention and Environmental Management Systems, CSR policy, etc.

7.1.3. Customers

7.1.3.1. Measures for the security and protection of customers

In managing its customers' assets, including Coral Homes, Servihabitat guarantees the compliance with current legislation and, in particular, in managing real estate assets, with the Technical Building Code, ensuring basic safety and habitability requirements are met in all the buildings of its management portfolio. To evidence such compliance, 2 (two) documents are collected:

- Completion of works certificate by the architect, which evidences that the works for which the work licence was requested are completed.
- Permit for initial occupancy, issued by the municipality for municipal technicians to control whether the completed work is consistent with the project contained in the licence.

The Group is also committed to the safety and protection of its customers. As a result, in 2021 and in subsequent years, the following actions were taken:

- In developing the Privacy Management System, which contains information confidentiality, adequacy and availability, as well as controls subject to periodic review to identify, assess and mitigate risks, the Corporate Privacy Committee was formalised, which has its own regulations approved by the Board of Directors of Coral Homes Holdco, which also approved the legal status of the Data Protection Officer.
- The **ISO 27001 Certificate** was audited for information security management.
- In cooperation with an external expert, a project began to fully adapt Servihabitat to current regulations on personal data protection, involving the different key areas at the meetings to become aware of the actual situation. To execute such project, a GAP analysis of the existing situation was performed, used as basis to develop an action plan with specific actions and terms for implementation: 2021-2023 Strategic Privacy Plan (the "Plan").

The purposes of the Plan are, among others: (i) reaching the maturity required to allow SVH to guarantee the fulfilment of legal obligations; (ii) aligning the expectations in this regard to those of customers; (iii) keeping a continuous risk focus in line with Spanish Data Protection Agency (AEPD) guidelines; and (iv) promoting a data privacy and protection culture.

In 2021, Servihabitat implemented a total of 20 (twenty) measures, out of the 37 (thirty-seven) measures of the Plan.

#### 7.1.3.2. Claim systems, complaints received and resolution

In order to maintain a high level of customer satisfaction and to be able to assist them in the event of any claim or complaint, Servihabitat, as the only Group company rendering services to end customers, has a **Customer Care Centre ("CCC")**, which gathers and records customer complaints and/or claims for follow-up and proper management. The CCC has the following tasks:

- Assistance for customer inquiries and incidents
- Assistance for letters submitted to the director
- Assistance for lessees' incidents (rental property)
- Assistance for lessees' technical incidents (rental property)

The customer care service has been implemented to meet the requirements related to services rendered, such as:

- Legal, contractual and customer requirements
- Potential unexpected consequences related to its services, such as non-compliance or non-conformity
- Customer feedback, such as complaints, claims and/or suggestions

In 2021 a total of 64 (sixty-four) complaints were submitted through the Ethics Hotline, out of which 18 (eighteen) were managed as accusations while 45 (forty-five) claims were as submitted and managed through the CCC, as received through letters to the director or by electronic mail. No liability arose for Servihabitat or any of its customers in connection therewith.

Furthermore, Coral Homes Holdco and Coral Homes make available to all Group staff, and other third parties, a Whistleblowing Channel to help them keep an honest environment, giving them the opportunity to convey their concerns through secure channels, with the obligation to report any situation or behaviour that is contrary to the ethical principles of the Code of Ethics, the Corporate Compliance Policy, and the remaining internal regulations or current legislation. No complaints were submitted through this channel in 2021.

#### 7.1.4. Tax information

As to 2021 tax information, at the end of 2021 and 2020 Coral Homes Group disclosed losses for 132,489 and 144,635 thousand euros, respectively; therefore, no tax amounts were paid in either period. In this sense, none of the Group entities has received any subsidies.

## 8. APPENDIX I: TABLE OF CONTENTS OF LAW 11/2018 AND GRI STANDARDS

| Law 11/2018 contents concerning non-financial information and diversity | Standard  | Reference chapter | Observations                         |  |
|---|---|-------------------|--------------------------------------|--|
| <b>BUSINESS MODEL</b>   |   |                   |                                      |  |
| <b>Description of the Group's business model</b>                        | Brief description of the Group's business model, including its business environment, organisation and structure, the markets where it operates, its goals and strategies, and the main factors and trends that may affect its future evolution  | GRI 102-2         | 2. Business model                    |  |
|   |   | GRI 102-4         | 2.3. The Group in figures            |  |
|   |   | GRI 102-6         | 2.3. The Group in figures            |  |
|   |   | GRI 102-7         | 2.3. The Group in figures            |  |
|   |   | GRI 102-15        | 2.4. Impact, risks and opportunities |  |
| <b>INFORMATION ON ENVIRONMENTAL MATTERS</b>                             |   |                   |                                      |  |
| <b>Policies</b>   | Policies applied by the Group, including the due diligence procedures adopted to identify, assess, prevent and mitigate material risks and impacts, and verification and control procedures, as well as the adopted measures  | GRI 103-2         | 3.1. Group policy                    |  |
|   |   | GRI 103-3         | 3.1. Group policy                    |  |
| <b>Main risks</b>   | Main risks related to the Group's activities, including, as applicable and proportionate, its business relationships, products or services with potential adverse effects in these spheres, and how the Group manages those risks, explaining the procedures used to detect and assess them pursuant to domestic, European or international reference frameworks on the matter. Information should be included on the impacts detected, breaking them down, particularly in relation to the main short-, medium- and long-term risks. | GRI 102-11        |                                      | Not applicable to Coral Homes Group.   |
|   |   | GRI 102-15        | 3.2 Identified risks                 |  |
|   |   | GRI 102-30        | 3.2 Identified risks                 | The assessment of environmental aspects and legal requirements is carried out periodically to ensure efficacy and updates. |
|   |   | GRI 201-2         | 3.2 Identified risks                 | No risks or significant opportunities were identified in relation to climate change.                                       |
| <b>General</b>  | Current and expected effects of the company's activities on the environment and, as applicable, on health and safety  | GRI 102-15        | 3.2 Identified risks                 |  |
|   |   | GRI 102-29        | 3.2 Identified risks                 |  |
|   |   | GRI 102-31        | 3.2 Identified risks                 |  |
|   | Environmental assessment or certification procedures  | GRI 102-11        |                                      | Not applicable to Coral Homes Group.   |
|   |   | GRI 102-29        | 3.1. Group policy                    |  |

|   |   |            |  |  |
|---|---|------------|--|--|
|   |   | GRI 102-30 | 3.1. Group policy  | The organisation's risk and internal control management model is currently implemented.  |
|   | Resources dedicated to environmental risk prevention  | GRI 102-29 |  | Due to its type of activity, Coral Homes Group has civil liability, but no environmental clauses.  |
|   | Provisions and guarantees for environmental risks   | GRI 307-1  | 3.2 Identified risks                                     | There were no contingencies relating to environmental protection or improvement.   |
| <b>Pollution</b>  | Measures to prevent, reduce or remediate the carbon emissions affecting the environment severely, considering all types of activity-specific atmospheric pollution, including noise and light pollution | GRI 103-2  | 3.3.1. Pollution   |  |
|   |   | GRI 302-4  | 3.3.3. Sustainable use of resources                      | Energy consumption was reduced by 34%.   |
|   |   | GRI 302-5  | 3.3.3. Sustainable use of resources                      | The energy demanded by products was calculated in relation to the number of workers. In 2021 it was reduced by 1%.   |
|   |   | GRI 305-5  | 3.3.4. Climate change                                    | In 2021 GHG emissions were reduced as a whole.   |
| <b>Circular economy and waste prevention and management</b> | Waste prevention, recycling, reuse and other forms of waste recovery and removal<br>Actions to combat food waste  | GRI 103-2  | 3.3.2. Circular economy: waste prevention and management |  |
| <b>Sustainable use of resources</b>                         | Water consumption and supply pursuant to local limitations  | GRI 303-3  | 3.3.3. Sustainable use of resources                      | All the water consumed is received from the utility company.   |
|   |   | GRI 303-5  | 3.3.3. Sustainable use of resources                      | With regard to water consumption, the available data refer only to the whole building in which Servihabitat has its central offices in Cornellà de Llobregat and Madrid. Consumption was estimated based on the number of floors occupied by Servihabitat in relation to the whole building. |
|   | Use of raw materials and measures taken to improve use efficiency   | GRI 103-2  | 3.3.3. Sustainable use of resources                      |  |
|   |   | GRI 301-1  | 3.3.3. Sustainable use of resources                      |  |
|   |   | GRI 301-2  | 3.3.3. Sustainable use of resources                      |  |
|   |   | GRI 301-3  |  | Due to the activity performed, these data are not material for the Group.  |
|   | Energy: direct and indirect consumption; measures taken to improving energy efficiency; use of renewable energy   | GRI 102-2  | 3.3.3. Sustainable use of resources                      |  |
|   |   | GRI 302-1  | 3.3.3. Sustainable use of resources                      |  |
|   |   | GRI 302-3  | 3.3.3. Sustainable use of resources                      | 2.86   |
|   |   | GRI 302-4  | 3.3.3. Sustainable use of resources                      | Energy consumption was reduced by 34%.   |

|                                   |   |            |                                     |  |
|-----------------------------------|---|------------|-------------------------------------|--|
|                                   |   | GRI 302-5  | 3.3.3. Sustainable use of resources |  |
| <b>Climate change</b>             | Greenhouse gas emissions  | GRI 305-1  | 3.3.4. Climate change               | There are no Scope 1 direct emissions.   |
|                                   |   | GRI 305-2  | 3.3.4. Climate change               |  |
|                                   |   | GRI 305-3  | 3.3.4. Climate change               |  |
|                                   |   | GRI 305-4  | 3.3.4. Climate change               |  |
|                                   | Measures taken to adapt to climate change consequences  | GRI 102-15 | 3.2 Identified risks                | An overall environmental risk analysis was performed. No risks or significant opportunities were identified in relation to climate change. |
|                                   |   | GRI 103-2  | 3.2 Identified risks                |  |
|                                   |   | GRI 201-2  |                                     | No risks or significant opportunities were identified in relation to climate change.   |
|                                   | Reduction targets established voluntarily in the medium- and long-term to cut GHG emissions and the means set to that end | GRI 103-2  | 3.2 Identified risks                |  |
| <b>Protection of biodiversity</b> | Measures taken to preserve or restore biodiversity  | GRI 103-2  |                                     | This aspect is not material for Coral Homes Group.   |
|                                   |   | GRI 304-3  |                                     |  |
|                                   | Impacts caused by activities or operations in protected areas   | GRI 304-1  |                                     |  |
|                                   |   | GRI 304-2  |                                     |  |
|                                   |   | GRI 304-4  |                                     |  |

| INFORMATION ON SOCIAL AND STAFF-RELATED MATTERS |   |                   |   |   |
|---|---|-------------------|---|---|
| Policies  | Policies applied by the Group, including the due diligence procedures adopted to identify, assess, prevent and mitigate material risks and impacts, and verification and control procedures, as well as the adopted measures  | GRI 103-2         | 4.3. Group policy   |   |
|   |   | GRI 103-3         | 4.3. Group policy   |   |
|   |   | GRI 102-35        | 4.4.1. Employment   |   |
| Main risks                                      | Main risks related to the Group's activities, including, as applicable and proportionate, its business relationships, products or services with potential adverse effects in these spheres, and how the Group manages those risks, explaining the procedures used to detect and assess them pursuant to domestic, European or international reference frameworks on the matter. Information should be included on the impacts detected, breaking them down, particularly in relation to the main short-, medium- and long-term risks. | GRI 102-15        | 4.1. Identified risks   | An overall risk analysis was performed to prepare the Statement of Non-Financial Information.               |
|   |   | GRI 102-30        |   | As part of the Internal Control System processes, the model efficacy verification is one of the guidelines. |
| Employment                                      | Total number and distribution of employees by sex, age, country and professional classification   | GRI 102-7         | 4.4.1. Employment   |   |
|   |   | GRI 102-8         | 4.4.1. Employment   |   |
|   |   | GRI 405-1b)       | 4.4.1. Employment   |   |
|   | Total number and distribution of types of employment contracts  | GRI 102-8         | 4.4.1. Employment   |   |
|   | Annual average of indefinite-term, temporary and part-time contracts by sex, age and professional classification  | GRI 102-8         | 4.4.1. Employment   |   |
|   | Number of redundancies by sex, age and professional classification  | GRI 401-1b)       | 4.4.1. Employment   |   |
|   | Average remuneration and variations, broken down by sex, age and professional classification or equal value   | GRI 405-2         | 4.4.1. Employment   |   |
|   | Salary gap  | GRI 405-2         | 4.4.1. Employment   | Salary gap calculation = (Gross salary of men – Gross salary of women) / Gross salary of men.               |
|   | Remuneration of company's equal or average positions  | GRI 202-1         | 4.4.1. Employment   |   |
|   | The average remuneration of directors and executives, including variable remuneration, allowances, severance pays, and long-term social security savings systems, as well as any other amount earned, broken down by sex  | GRI 102-35        | 4.4.1. Employment   |   |
|   |   | GRI 102-36        | 4.4.1. Employment   |   |
|   |   | GRI 201-3         |   | This aspect does not apply to Coral Homes Group.  |
| Implementation of labour disconnection measures | Qualitative   |                   | The Group does not apply labour disconnection measures beyond the applicable collective bargaining agreement. |   |
| Employees with disabilities                     | GRI 405-1b)   | 4.4.1. Employment |   |   |
| Work organisation                               | Work time organisation  | GRI 102-8c)       | 4.4.2<br>Work organisation  |   |



|                      |  |                             |                             |  |
|----------------------|--|-----------------------------|-----------------------------|--|
|                      |  | Qualitative                 | 4.4.2 Work organisation     |  |
|                      | Number of hours of absenteeism   | GRI 403-9                   | 4.4.2 Work organisation     |  |
|                      | Measures to facilitate family and work-life balance and promote its responsible exercise by both parents   | GRI 401-3                   | 4.4.2 Work organisation     |  |
|                      |  | GRI 103-2                   | 4.4.2 Work organisation     |  |
| Health and safety    | Health and safety conditions at the workplace  | GRI 103-2                   | 4.2. Health and safety      |  |
|                      | Occupational accidents (frequency and severity), broken down by sex  | GRI 403-9                   | 4.2. Health and safety      |  |
|                      | Occupational diseases (frequency and severity), broken down by sex   | GRI 403-10                  | 4.2. Health and safety      |  |
| Social relationships | Social dialogue organisation, including the procedures to inform and inquire staff and negotiate with them | GRI 102-43                  | 4.4.3. Social relationships |  |
|                      |  | GRI 402-1                   | 4.4.3. Social relationships |  |
|                      |  | GRI 403-4                   | 4.4.3. Social relationships |  |
|                      | Percentage of employees covered by collective bargaining agreements by country                             | GRI 102-41                  | 4.4.3. Social relationships | All staff positions are covered by collective bargaining agreements.   |
|                      | Analysis of collective bargaining agreements, specifically concerning health and safety at the workplace   | 403-1                       | 4.4.3. Social relationships |  |
| 403-4                |  | 4.4.3. Social relationships |                             |  |
| Training             | Policies implemented in the training field   | GRI 103-2                   | 4.4.4. Training             |  |
|                      |  | GRI 404-2                   | 4.4.4. Training             |  |
|                      | Total number of training hours by professional category  | GRI 404-1                   | 4.4.4. Training             |  |
| Accessibility        | Universal accessibility for disabled people  | GRI 103-2                   |                             | To promote accessibility, the access to workstations is approved and prepared as established by current legislation. |
| Equality             | Measures taken to promote equal treatment and opportunities between men and women                          | GRI 103-2                   | 4.4.5. Equality             |  |
|                      | Equality plans   | GRI 103-2                   | 4.4.5. Equality             |  |
|                      | Measures taken to promote employment   | GRI 103-2                   | 4.4.5. Equality             |  |
|                      |  | GRI 404-2                   | 4.4.4. Training             |  |
|                      | Protocols against sexual and sex-related harassment  | GRI 103-2                   | 4.4.5. Equality             |  |
|                      | Universal accessibility and integration of disabled people   | GRI 103-2                   | 4.4.5. Equality             |  |
|                      | Policy against all types of discrimination and, as applicable, for diversity management                    | GRI 103-2                   | 4.4.5. Equality             |  |
| GRI 406-1            |  |                             |                             |  |

| INFORMATION ON THE RESPECT FOR HUMAN RIGHTS |   |            |  |   |
|---|---|------------|--|---|
| Policies                                    | Policies applied by the Group, including the due diligence procedures adopted to identify, assess, prevent and mitigate material risks and impacts, and verification and control procedures, as well as the adopted measures  | GRI 103-2  | 5.1. Group and company policy and identified risks |   |
|   |   | GRI 103-3  | 5.1. Group and company policy and identified risks |   |
|   |   | GRI 412-2  |  | The Group did not provide any specific training on human rights.  |
| Main risks                                  | Main risks related to the Group's activities, including, as applicable and proportionate, its business relationships, products or services with potential adverse effects in these spheres, and how the Group manages those risks, explaining the procedures used to detect and assess them pursuant to domestic, European or international reference frameworks on the matter. Information should be included on the impacts detected, breaking them down, particularly in relation to the main short-, medium- and long-term risks. | GRI 102-15 | 5.1. Group and company policy and identified risks |   |
|   |   | GRI 102-30 |  | As part of the Internal Control System processes, the model efficacy verification is one of the guidelines. |
| Human rights                                | Application of due diligence procedures on human rights   | GRI 103-2  | 5.1. Group and company policy and identified risks |   |
|   |   | GRI 414-2  |  | No studies were performed on the negative social impacts of the value chain.                                |
|   | Prevention of human rights violation risks and, as applicable, measures to mitigate, manage and redress potential abuses  | GRI 103-2  | 5.1. Group and company policy and identified risks | The suppliers shall sign off the Code of Ethics of Coral Homes Group in the approval questionnaire.         |
|   |   | GRI 412-1  |  | No human rights impact reviews or assessments were performed.   |
|   | Reports on human rights violations  | GRI 102-17 |  | The organisation has no human rights mechanisms.  |
|   |   | GRI 103-2  | 6.3.1. Measures to prevent corruption and fraud    |   |
|   |   | GRI 411-1  |  | This aspect is not material for Coral Homes Group.  |
|   |   | GRI 419-1  |  | There were no infringements in this regard.   |
|   | Promotion and compliance with the provisions under ILO fundamental conventions in relation to the freedom of association and the right to collective bargaining, employment and occupation non-discrimination, the elimination of forced or bonded labour and the effective abolition of child labour   | GRI 103-2  | 5.1. Group policy company and identified risks     |   |

| INFORMATION ON THE FIGHT AGAINST CORRUPTION AND BRIBERY |   |            |   |  |
|---|---|------------|---|--|
| Policies  | Policies applied by the Group, including the due diligence procedures adopted to identify, assess, prevent and mitigate material risks and impacts, and verification and control procedures, as well as the adopted measures  | GRI 103-2  | 6.1. Group policy                                       |  |
|   |   | GRI 103-3  | 5.1. Company policy                                     |  |
|   |   | GRI 205-2  | 6.3.1. Measures to prevent corruption and fraud         |  |
| Main risks  | Main risks related to the Group's activities, including, as applicable and proportionate, its business relationships, products or services with potential adverse effects in these spheres, and how the Group manages those risks, explaining the procedures used to detect and assess them pursuant to domestic, European or international reference frameworks on the matter. Information should be included on the impacts detected, breaking them down, particularly in relation to the main short-, medium- and long-term risks. | GRI 102-15 | 6.2. Identified risks                                   |  |
|   |   | GRI 102-30 |   | As part of the Internal Control System processes, the model efficacy verification is one of the guidelines.                    |
|   |   | GRI 205-1  |   | No risk assessment was performed for any specific transaction.   |
| Corruption and bribery                                  | Measures adopted to prevent corruption and bribery  | GRI 103-2  | 6.3.1. Measures to prevent corruption and fraud         |  |
|   | Contributions to foundations and not-for-profit organisations   | GRI 103-2  |   | Contributions are made to foundations or not-for-profit organisations, such as Adecco and Randstad.                            |
|   |   | GRI 201-1  |   | No contributions are made to foundations or not-for-profit organisations, and there is no specific regulation in this regard.  |
|   |   | GRI 203-2  |   | Indirect economic impacts were not analysed.   |
|   |   | GRI 415-1  |   | The Code of Ethics states that it is not allowed to make donations to political parties or to the foundations related to them. |
| COMPANY INFORMATION                                     |   |            |   |  |
| Policies  | Policies applied by the Group, including the due diligence procedures adopted to identify, assess, prevent and mitigate material risks and impacts, and verification and control procedures, as well as the adopted measures  | GRI 103-2  | 7.1.1. Company commitments with sustainable development |  |
|   |   | GRI 103-3  | 7.1.1. Company commitments with sustainable development |  |
| Main risks  | Main risks related to the Group's activities, including, as applicable and proportionate, its business relationships, products or services with potential adverse effects in these spheres, and how the Group manages those risks, explaining the procedures used to detect and assess them pursuant to domestic, European or international reference frameworks on the matter. Information   | GRI 102-15 |   | The Group did not consider d any significant risk in this regard.  |

|  |   |                                     |  |   |
|--|---|-------------------------------------|--|---|
|  | should be included on the impacts detected, breaking them down, particularly in relation to the main short-, medium- and long-term risks. | GRI 102-30                          |  | As part of the Internal Control System processes, the model efficacy verification is one of the guidelines.                   |
| Company commitments with sustainable development | Impact of the company's activity on employment and local development  | GRI 203-1                           |  | The Group makes no investments in infrastructure and supported services.  |
|  |   | GRI 203-2                           |  | The Group did not factor in any indirect economic impacts.  |
|  |   | GRI 204-1                           | 7.1.2.1. Incorporation into the procurement policy of social, gender-equality and environmental criteria |   |
|  |   | GRI 413-1                           | 7.1.1. Company commitments with sustainable development  |   |
|  |   | GRI 413-2                           |  | The Group performs no transactions with material negative impacts on local communities.                                       |
|  | Impact of the company's activity on local population and the territory  | GRI 203-1                           |  | The Group makes no investments in infrastructure and supported services.  |
|  |   | GRI 203-2                           |  | The Group did not factor in any indirect economic impacts.  |
|  |   | GRI 413-1                           | 7.1.1. Company commitments with sustainable development  |   |
|  |   | GRI 413-2                           |  | The Group performs no transactions with material negative impacts on local communities.                                       |
|  | Relationships with the stakeholders of local communities and dialogue methods   | GRI 102-43                          | 7.1.1. Company commitments with sustainable development  |   |
|  |   | GRI 413-1                           | 7.1.1. Company commitments with sustainable development  |   |
|  |   | Association and sponsorship actions | GRI 102-13   | 7.1.1. Company commitments with sustainable development   |
|  |   |                                     | GRI 203-1  |   |
| GRI 201-1  |   |                                     |  | No contributions are made to foundations or not-for-profit organisations, and there is no specific regulation in this regard. |

|                              |   |           |  |  |
|------------------------------|---|-----------|--|--|
| Subcontracting and suppliers | Incorporation into the procurement policy of social, gender-equality and environmental criteria         | GRI 103-2 | 7.1.2.1. Incorporation into the procurement policy of social, gender-equality and environmental criteria |  |
|                              | Focus on social and environmental responsibility in the relationships with suppliers and subcontractors | GRI 102-9 | 7.1.2.1. Incorporation into the procurement policy of social, gender-equality and environmental criteria |  |
|                              |   | GRI 103-2 | 7.1.2.1. Incorporation into the procurement policy of social, gender-equality and environmental criteria |  |
|                              |   | GRI 308-1 |  | All of the suppliers are subject to checks to be approved, including environmental criteria. |
|                              |   | GRI 308-2 |  | No negative environmental impacts were identified in the supply chain.                       |
|                              |   | GRI 407-1 |  | None was identified.   |
|                              |   | GRI 409-1 |  | None was identified.   |
|                              |   | GRI 414-1 |  | All of the suppliers are subject to checks to be approved, including social criteria.        |
|                              |   | GRI 414-2 |  | No studies are performed on the negative social impacts of the value chain.                  |
|                              | Oversight and auditing systems and their results  | GRI 308-1 |  | All of the suppliers are subject to checks to be approved, including environmental criteria. |
| GRI 308-2                    |   |           | No negative environmental impacts were identified in the supply chain.                                   |  |
| GRI 414-2                    |   |           | No studies are performed on the negative social impacts of the value chain.                              |  |
| Consumers                    | Measures for the security and protection of consumers   | GRI 103-2 | 7.1.3.1. Measures for the health and safety of consumers   |  |
|                              |   | GRI 416-1 |  | Impacts were not quantified by the Group.  |
|                              |   | GRI 416-2 |  | The Group did not receive any requisition.   |
|                              |   | GRI 417-1 |  | Not applicable to the Group.   |

|                        |   |            |  |  |
|------------------------|---|------------|--|--|
|                        | Claim systems, complaints received and resolution | GRI 102-17 | 7.1.3.2. Claim systems, complaints received and resolution |  |
|                        |   | GRI 103-2  | 7.1.3.2. Claim systems, complaints received and resolution |  |
|                        |   | GRI 418-1  |  |  |
| <b>Tax information</b> | Proceeds obtained by country                      | GRI 201-1  | 7.1.4. Tax information                                     |  |
|                        | Proceeds obtained by country                      | GRI 201-1  | 7.1.4. Tax information                                     |  |
|                        | Public subsidies received                         | GRI 201-4  | 7.1.4. Tax information                                     |  |