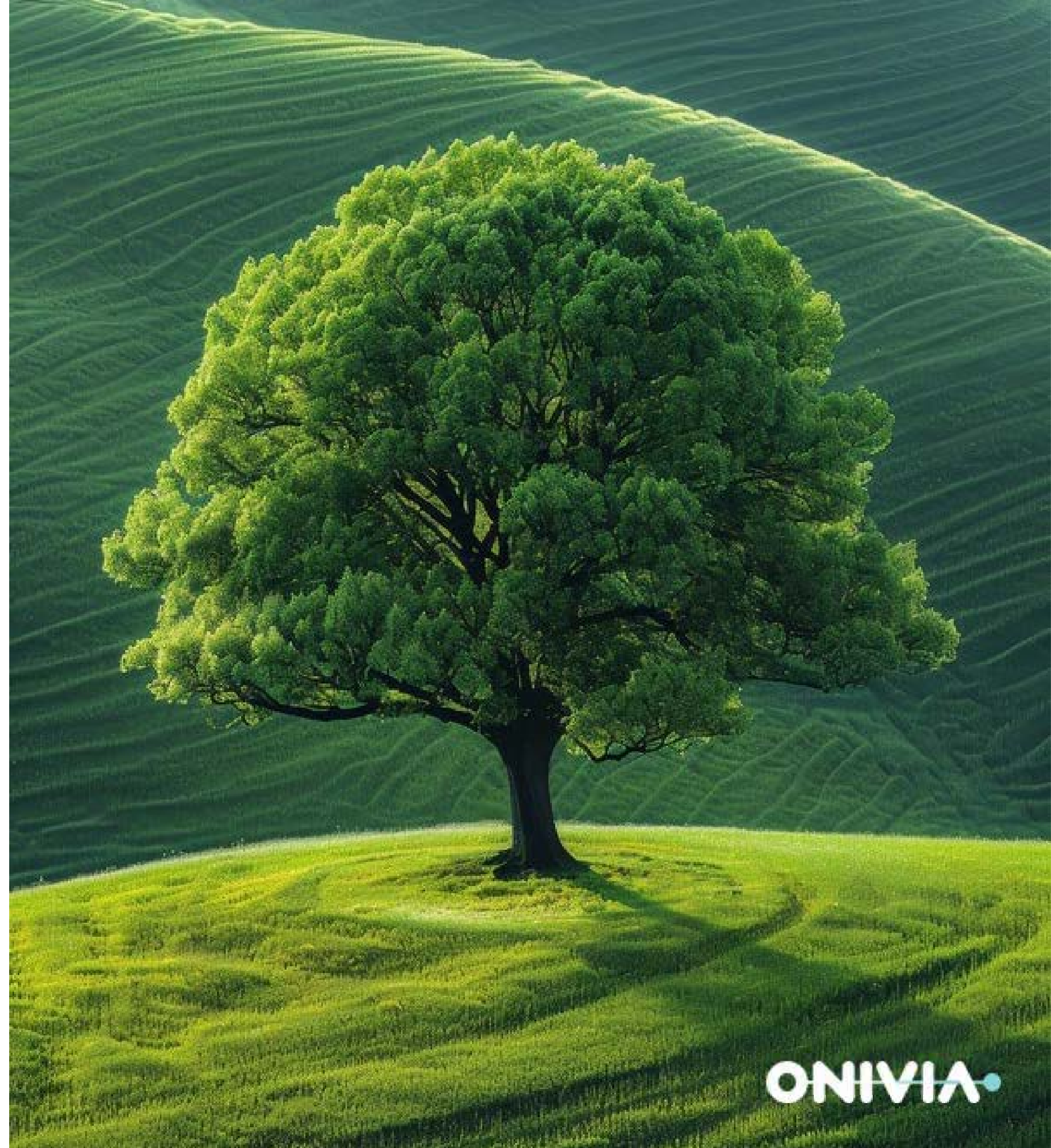


# Sustainability Report

February 2026





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# Letter from the CEO

This year we present **Onivia's first Sustainability Report prepared in accordance with GRI standards 2021**, a decisive step that reflects our commitment to transparency, accountability, and the creation of sustainable value. At Onivia, we work to ensure that connectivity is an element of progress accessible to everyone. Our open and neutral network enables companies and operators to drive digitalization in their territories, contributing to a more cohesive and competitive society. We firmly believe that technology creates value when it serves people, accompanies them, and facilitates their development. That is why we continue to move forward responsibly and consistently to reduce gaps and expand opportunities.

2025 has been a year to consolidate this vision with tangible progress that has had an impact both inside and outside the company. We have completed our **first GHG emissions inventory**, initiated the **SBTi validation process**, and made progress on our **Net Zero Transition Plan**. In terms of good governance, we have strengthened our ESG governance model with the creation of a **weekly ESG Commitment Monitoring forum**, in which I personally participate alongside different teams across the company, all working with a shared purpose: to make Onivia a company that is increasingly committed to people, the environment, and the highest standards of governance. We have also obtained **ISO 27001 certification in cybersecurity** and updated our anti-corruption and risk management policies, as well as implemented a **Business Continuity Plan (BCP)** to ensure the resilience of our infrastructure and the continuity of our services in the face of natural disasters. Our commitment to people has been reinforced with the arrival of our new People & Culture Director, who is leading a **long-term, comprehensive people-focused plan**. This plan is centred on the development of ad hoc training programmes, genuine work-life balance policies, and the promotion of a holistic wellbeing model that supports the physical, mental, and emotional health of our team. In addition, we have approved our **Diversity, Equity and Inclusion Policy**, strengthening a more equitable, diverse, and accessible professional environment.

We have also been closer than ever to society. More than 70% of our team took part in a volunteer day at the **Comedor Social Santa María Josefa**, we carried out a solidarity initiative with **Fundación Aladina** and, for the first time, we launched a technology project to support companionship for older people using AI and Wi-Fi signals. This initiative has received an award for its potential impact, and we hope to develop it further together with **Fundación Grandes Amigos**.

At the same time, we continue to extend connectivity where it is most needed. We are present in rural municipalities, directly contributing to closing the territorial digital divide. Through our infrastructure, we help enable local digital public and private services, strengthening territorial cohesion. We have also promoted solutions aimed at the local business ecosystem, allowing SMEs to access a robust and reliable fibre network with specialized support, fostering their digitalization, competitiveness, and sustainable growth.

None of this would be possible without the trust of our shareholders, customers, suppliers and, especially, without the commitment of the Onivia team. I thank them all for their dedication and their conviction that **sustainability is not a requirement, but a path that defines who we are**.

We look ahead to 2026 with determination. We will continue to drive responsible innovation, strengthen our operational resilience, and advance the sustainable transformation of the telecommunications sector.

Thank you for joining us on this journey.

**José Antonio Vázquez**  
CEO of Onivia





# 2025 Summary

- We completed the first GHG emissions inventory by initiating the SBTi validation.
- We defined the Net Zero Transition Plan.
- We continue working to improve our impact on the planet, with new policies such as the biodiversity policy.

- We received the Macquarie Foundation's Shared Value Award for a program supporting older people together with Fundación Grandes Amigos.
- We continue to promote our volunteering efforts; this year we have supported Comedor social Santa Maria Josefa and Fundación Aladina.
- We connect the educational and professional world through guidance, with a visit to Onivia's premises from an educational center.



- We've moved to more sustainable and environmentally friendly offices. They're designed to promote well-being and teamwork.
- We have launched our Onivia Experience plan, designed to promote the well-being, health and growth of our people.
- We achieved gender parity on the Onivia management committee.
- We are among the Top 10 best companies to work for in the Spain's ICT sector, according to Great Place to Work®.

- We identified the material issues with our stakeholders and prepared the ESG report according to GRI standards 2021.
- We improved the quality of our ESG data in line with GRI principles.
- We created a space to monitor our ESG commitments.
- Our GRESB score in 2025 was 95/100.
- We have been certified to ISO 27001.
- The resilience of our infrastructure has been strengthened with the implementation of the Business Continuity Plan.





## 02. Meet Onivia

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# We are the first neutral and independent wholesale fiber operator in Spain

We promote the **shared use of existing physical infrastructure and the efficient deployment** of new infrastructure under equitable and reasonable access conditions. We are **committed to the social impact** of our solutions as a driver of growth.



## We are neutral

We are a purely wholesale operator specializing in the fiber network, which is our main asset.



## We are independent

We offer our network in an open model equally to all operators and companies that want to connect.



We increase the efficiency of networks while ensuring sustainability through infrastructure sharing.

We facilitate competition in the market with equal access to fiber and support for retail differentiation.

We innovate with different business models (flexible and scalable solutions) and through technological evolution.



## Mission

We facilitate our clients growth through a solid and competitive FTTH infrastructure, delivered-by a team of honest, and expert professionals who adapt to each client and their needs.

## Vision

We provide our clients with the tools, equipment, and attitude necessary to transform their potential into growth.

## Values

- People-centered
- Open
- Continuous improvement
- Resolutions

## Our story



<p><b>2019</b></p> <p>Onivia is born with the acquisition of 940,000 FTTH accesses in large cities</p>	<p><b>2020</b></p> <p>Launch of our commercial brand “Onivia” and our first product “Integra” for large and medium-sized operators</p>	
<p><b>2021</b></p> <p>First operators connected to the network already on our platform</p>	<p><b>2022</b></p> <p>Acquisition of a rural network of 1.1 million homes in more than 1,000 towns with fewer than 20,000 inhabitants</p> <p>Launch of “Impulsa”, a product designed for expanding regional and local operators</p>	<p>Expanding our network to reach up to 3,600,000 homes</p>
<p><b>2023</b></p> <p>Launch of our national deployment plan, expanding FTTH coverage to 500,000 homes</p>	<p><b>2024</b></p> <p>New mobile service plus national coverage agreement in convergence</p> <p>Acquisition of an urban network of 6 million homes in 12 provinces</p>	
<p><b>2025</b></p> <p>Launch of Fibra X, the new generation of ultra-fast</p>		



# We are Onivia

## Our value chain

### Customers

National and regional telecommunications operators that use bitstream services.

### Employees

Team members across all business units and locations.

### Suppliers and partners

Vendors and infrastructure partners involved in the provision of the service.

### Regulators and public authorities

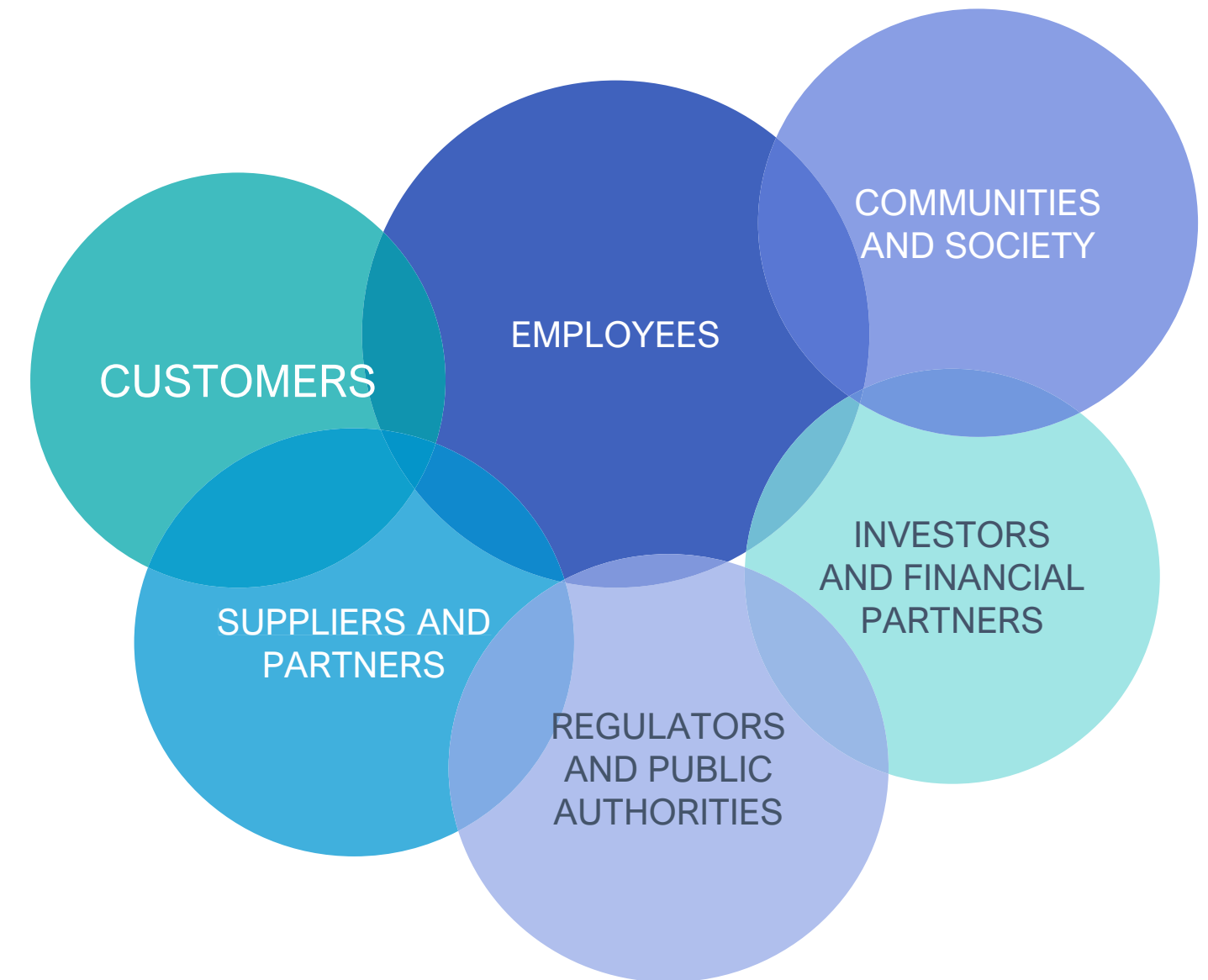
National and regional telecommunications regulators, competition authorities, and other government agencies.

### Investors and financial partners

Shareholders, lenders, and other providers of capital.

### Communities and society

Local communities where the company operates, NGOs and civil society in general.





## Team members

**32** People

**+9** People hired during the last year

## Societies

**3** Main Societies that make up Onivia:

- PENTACOM INVESTMENTS SPAIN OPCO SL
- UCLES INFRACO, SLU
- SOTA INVESTMENTS (SPAIN) OPCO, SLU

## We are part of...

**DigitalES** , AOTEC, Feceminte, ACUTELAN, FTTH Council, tmforum, ASOTEM, ASLAN

## Shareholders

**3** Investors with a strong commitment to sustainability

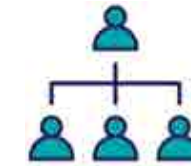


## Clients and Partners

**107** Onivia client operators

**8** Partners we work with

## Our organization



**CEO:** Jose Antonio Vazquez

- People&Culture Director  
Patricia Diaz
- Governance & Corporate Communications  
Director Iciar Martínez
- Chief Financial Officer  
Celma Pires
- Chief Information Officer  
Isabel Enríquez
- Chief Technology Officer  
Jorge Méndez
- Chief Commercial Officer  
Pedro Fernández Hernández



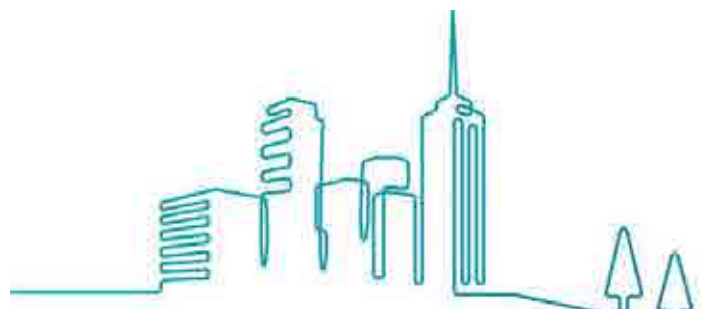
# The business model

## Our proposal

At Onivia, we facilitate the growth of operators and democratize access to high-quality fiber optics to increase network efficiency and ensure sustainability through infrastructure sharing. We aim to foster market competition (equal access to fiber and support for retail differentiation). We innovate with diverse business models (flexible and scalable solutions) and through technological advancements.

**Our clients** are telecommunications operators and companies from other sectors that want to offer telco services.

We rely on **partnerships with public institutions and leading technology providers** to expand our network and ensure efficient, high-quality service.



**Our long-term goal is to lead the transformation of the fiber optic landscape in Spain by extending advanced connectivity to all homes and businesses.**

We expanded across the entire telco value chain, providing new services and increasing our value proposition.





# Our services are designed to add value and democratize access to high-quality fiber optics

**Fibra FLEX** emerges as a wholesale solution aligned with the structural evolution of connectivity usage and a more efficient and responsible network model. The service allows fiber optic connections to be activated or deactivated based on the end customer's actual needs, preventing technical disconnections and unnecessary physical interventions.

In addition to flexibility, it fosters a more efficient, adaptable connectivity model geared towards intelligent service design. A modern network that supports more sustainable growth of the digital ecosystem.

Encender, apagar... así de sencillo.

**Fibra Estacional FLEX, el nuevo servicio de Onivia: más control para tus clientes, más valor para tu negocio.**

ON cuando lo necesitan. OFF cuando no.

**ONIVIA**

**Fibra X** offers next-generation connectivity with speeds of up to 3, 5 or 10 Gbps symmetrical, adapted to the real needs of each environment and customer profile.

A solution designed to help operators stand out by delivering ultra-fast speeds, high performance, and zero technical complexity.

**Fibra X**

eXpande tu velocidad, tu capacidad... y tu negocio.

hasta 3 Gbps    hasta 5 Gbps    hasta 10 Gbps

**ONIVIA**



# Onivia in the Media

EMPRESAS TECNOLÓGICAS

## Onivia desembarca en los servicios móviles gracias a una alianza con Vodafone

IGNACIO DEL CASTILLO. @ignaciocastillo Madrid. 28 NOV 2024



José Antonio Vázquez Blanco, CEO de Onivia. EXPANSIÓN

Onivia abre el servicio de 4,9 millones de hogares de la red de fibra adquirida a Digi

Onivia podrá dar servicios mayoristas de móvil sobre la red de Vodafone y eleva su huella de fibra de 10,2 a 18 millones de hogares.

Onivia, la mayor operadora mayorista española de redes de fibra óptica que sea independiente de las telecos -PremiumFiber es un poco más grande, pero está controlada por Masorange-, ha dado un salto estratégico en su actividad al desembarcar, además, como proveedor mayorista de red móvil.

**Paquete completo**

Este avance permitirá que las empresas de telecomunicaciones que alquilan las redes de fibra óptica de Onivia puedan prestar, además, servicios de telecomunicaciones móviles a los clientes finales, ofreciendo paquetes convergentes de fijo y móvil. El nuevo ámbito de actividad de Onivia, que está dirigida por José Antonio Vázquez Blanco, se facilita gracias a un acuerdo comercial mayorista que Onivia ha firmado con Vodafone España, la operadora que está controlada al 100% por el grupo financiero británico Zegona, según señalan a EXPANSIÓN fuentes conocedoras del proceso. Fuentes de Onivia y de Vodafone declinaron realizar comentarios.

## Refuerza su cúpula directiva con Celma Pires como nueva CFO

**ONIVIA** La mayor operadora neutra e independiente de fibra en España - participada por los fondos Macquarie Capital, Aberdeen Investments y Arjun Infrastructure Partners - ha cerrado la incorporación de la portuguesa Celma Pires como nueva 'chief financial officer' (CFO). Con más de dos décadas de experiencia en dirección financiera y planificación estratégica, recientemente ocupó el cargo de directora de 'corporate treasury' del grupo energético Iuso EDP, en el que trabajó durante los últimos 18 años en sus oficinas en Madrid, en EDP Renewables.

europa press

## Jorge Méndez, CTO de Onivia, gana el premio CTO of the Year Awards 2025



Jorge Méndez Prieto, CTO de Onivia

Madrid, 19 de septiembre de 2025.

La prestigiosa publicación internacional Mobile Europe ha reconocido a Jorge Méndez, CTO de Onivia, con el galardón CTO of the Year en los CTO Awards 2025 en la categoría Trailblazer.

Este premio distingue a los directores de tecnología que lideran con visión, desafían el statu quo del sector y abren nuevas vías de creación de valor más allá de la conectividad tradicional.

## Onivia y Nae impulsan el debate sobre la resistencia de las redes ante crisis y desastres naturales

Expertos del sector de las telecomunicaciones reclaman un marco sistémico para la resiliencia de las infraestructuras digitales



Por Redacción Capital 28 Octubre 2025

El III Foro #WholesaleSpain, organizado por Onivia, operador mayorista neutro e independiente de fibra en España, en colaboración con Nae, consultora tecnológica especializada en telecomunicaciones y transformación digital, reunió en Madrid a expertos del sector para analizar cómo reforzar la capacidad del ecosistema para resistir y recuperarse ante apagones, ciberataques o desastres naturales.

Bajo el título 'Resiliencia y futuro en las infraestructuras digitales', participaron Alfonso Juan Álvarez Villamarín (CEO, Cellnex Spain), Santiago Hernández Onís (Managing Director Iron Mountain Data Centers Spain) y Pedro Abad (CEO, Astero Red Neutra), en una mesa moderada por Joaquín Guerrero (Director, Nae).

## el INSTALADOR de TELECOMUNICACIONES SMART SOLUTIONS

FENITEL | NOTICIAS DE EMPRESA | CITAS DE INTERÉS | TEMA TÉCNICO | QUÉ HAY DE NUEVO | EDICIÓN IMPRESA



**Fibra X**  
hasta 3, 5 y 10 Gbps

ONIVIA

DESTACADAS | QUÉ HAY DE NUEVO

## ONIVIA lanza Fibra X, la nueva generación de conectividad ultrarrápida

6 octubre, 2025 by INNSS

Onivia, operador mayorista de fibra neutro e independiente, anuncia el lanzamiento de Fibra X, su nuevo servicio mayorista de conectividad basado en tecnología XGS-PON, que lleva la conectividad ultrarrápida al siguiente nivel. Con velocidades simétricas de hasta 3Gbps, 5Gbps y 10Gbps, Onivia se convierte en el primer operador mayorista del país en ofrecer esta tecnología a operadores de telecomunicaciones y empresas.



La conectividad ultrarrápida de Onivia ya está disponible para operadores y empresas en 12 provincias para cerca de 5 millones de hogares y negocios (FTTH).

EMPRESAS / ESPECIAL

## Onivia aterriza la conexión ultrarrápida en la pyme española para una conectividad de última generación

- El operador mayorista de fibra brinda a operadores de telecomunicaciones la tecnología más puntera, sólo accesible hasta ahora para grandes corporaciones, con el objetivo de que ningún negocio quede atrás de la transformación digital.
- El lanzamiento de Fibra X, disponible ya en 12 provincias y más de cinco millones de hogares y negocios, supone un hito para la democratización de la mejor conectividad en España.
- Más información:** La digitalización de las pymes españolas: el reto pendiente para el 40% de estas empresas en un mercado global



ACTUALIDAD | EMPRESAS | SECTORES PRODUCTIVOS | ESPACIOS MD | OPINIÓN | SUSCRIPCIÓN

DESAYUNOS MD

## José Antonio Vázquez (Onivia): "La Región de Murcia tiene una posición privilegiada en cuanto a redes"

El CEO del operador de telecomunicaciones ha protagonizado el decimotercer encuentro informativo de los Desayunos de Murcia Diario, en el cual ha desglosado los cimientos de la empresa y ha analizado la situación de la conectividad en España y la Región, así como su papel como motor económico y social.



## 03. Our ESG commitment

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# ESG Commitment and Strategy

The ESG Strategic Plan 2024-2027 establishes three fundamental pillars:

- 1 Regulatory compliance** in all regulatory areas, including preparation for **CSRD** and European standards (ESRS).
- 2 Strengthening ESG policies** and internal objectives, aligned with the SDGs and the expectations of stakeholders.
- 3 Net Zero 2050 Commitment**, supported by the **Net Zero Board Paper**, which defines the roadmap for decarbonization and future validation of SBTi targets.

Since its foundation, Onivia has integrated sustainability and ESG management as an essential part of its corporate DNA, driven by its shareholders and aimed at reconciling business growth with responsible objectives. This commitment goes beyond regulatory compliance, seeking to adopt best practices in the market and position itself as a relevant player in the telecommunications sector.

This plan is implemented at the ESG policy level through a set of formalized documents that define Onivia's commitments, vision, and monitoring mechanisms regarding sustainability. Among these, the Risk Management Framework Policy (RMFP), approved by the Board, stands out. It establishes essential principles such as anti-corruption, cybersecurity, human rights, and a code of ethics. These policies are mandatory for employees, customers, and suppliers and communicate the company's ESG position to investors and other stakeholders, ensuring consistency and transparency in all operations.

Onivia's commitment is reflected in the high rating obtained in the GRESB assessment, which recognizes the strength of its ESG policies, processes and performance against international standards.

In 2024, Onivia internalized its ESG responsibility, marking a turning point in sustainability management and accelerating the deployment of its ESG strategy with concrete actions both inside and outside the company.

Internalizing ESG responsibilities has allowed the company's staff to be involved in the ESG Strategic Plan, which has resulted in improved performance of KPIs related to material issues.

ESG-related actions have been implemented in virtually all areas of the company, with designated personnel responsible for each. We have collaborated with almost the entire value chain, involving each department in one or more initiatives.

This fact has also been reflected, for example, in:

- Weekly ESG commitment follow-up meetings, with the participation of the CEO and key management, for plan monitoring and decision making.
- Integration of ESG considerations into the Board of Director's minutes and documentation, ensuring full transparency and accountability.
- Strengthening of criminal compliance and annual update of the RMFP to incorporate new regulatory requirements and best practices.

During 2025, Onivia completed its first GHG emissions inventory, initiated the SBTi validation process, and made progress in defining its Net Zero Transition Plan. Simultaneously, the processes for collecting and ensuring ESG data have been improved, in line with the GRI principles (accuracy, comparability, timeliness), and work is underway to integrate internal controls and prepare for future audits. This chapter reflects how Onivia articulates its sustainability model, aligned with GRI and in transition towards CSRD, consolidating its commitment to responsible innovation and the creation of sustainable value.





# Process for identifying material topics

 **Climate change and energy**  
**Biodiversity**  
**Circular economy and electronic waste management**

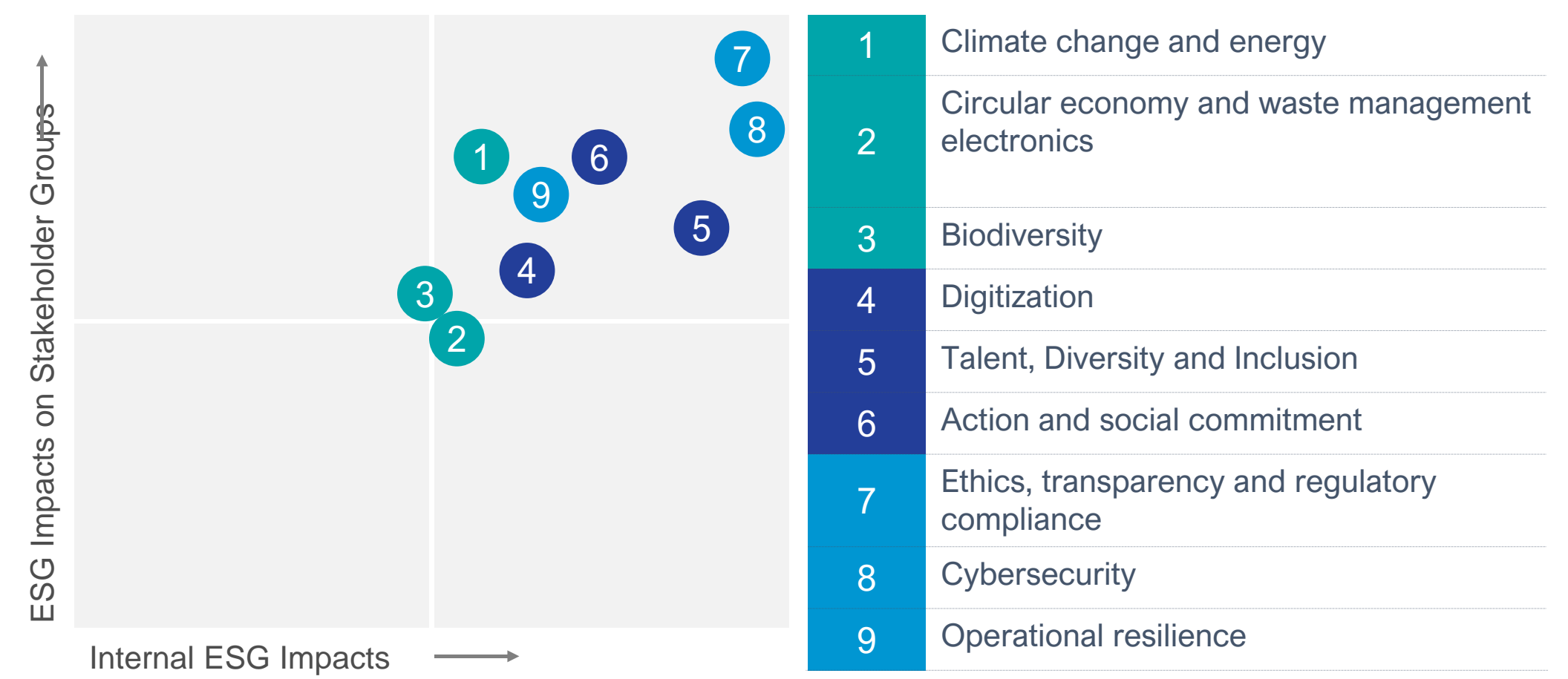
 **Talent, diversity and inclusion**  
**Digitization**  
**Action and social commitment**

 **Ethics, transparency and regulatory compliance**  
**Cybersecurity**  
**Operational Resilience**

This report was prepared in accordance with the GRI Standard 2021 approach for established identifying and prioritizing material issues. This process was designed to reflect the organization's significant impacts on the economy, the environment, and society, as well as the expectations of Onivia's stakeholders.

The methodology applied includes the following stages: collection of internal and external information, impact analysis, consultation with stakeholders, and validation of the results by management.

## Materiality matrix





# Preparation of the Sustainability Report in accordance with GRI Standards.

Involving Onivia teams and stakeholders to define what really matters.

The stakeholder consultation was carried out using a collaborative and structured methodology. First, potential ESG themes were identified and stakeholder groups were mapped. Subsequently, in a group session, impacts and ongoing projects were analyzed using the Manual Thinking methodology. Finally, the themes were prioritized by constructing the Materiality Matrix, balancing Onivia's priorities with those of the stakeholders.



Within the framework of the ESG plan, Onivia is committed to the Sustainable Development Goals (SDGs)



Onivia Experience, our program to promote the well-being and health of our employees.



Onivia Natural Connection, our commitment to the environment and biodiversity.



Closing the digital divide as an essential lever for access to quality education.



To be born and grow as a neutral network, with the aim of sharing infrastructure and reducing environmental impact. Focusing on innovative services that make responsible use of energy, such as Fibra Flex.



# ESG Governance

Our organizational structure is designed to drive the ESG Strategic Plan from within the company's legal department and ensure the adoption of best practices. This model is based on robust governance, which includes:

- Board of Directors: the highest supervisory body, which includes in its agendas a specific item to review and approve ESG matters.
- Sustainability Committee: a subcommittee of the Board, composed of representatives from all shareholders, the CEO, and various departments within the company. Its functions include:
  - (i) ensure the alignment of ESG strategies and objectives with corporate goals,
  - (ii) review the effectiveness of policies and practices,
  - (iii) establish strategic objectives, KPIs and goals, monitoring their fulfillment.It meets quarterly and submits its agreements to the Council.
- ESG commitment monitoring: responsible for the implementation of the Internal ESG Plan and operational monitoring. Reports directly to the Sustainability Committee and holds weekly meetings with the CEO, CFO, and key leaders.
- Tech Committee: addresses, among other topics, Cybersecurity and the business continuity plan, reinforcing corporate resilience.





# ESG Governance

The CEO actively participates in the ESG agenda, at the express request of the shareholder, reinforcing the strategic relevance of the issue. Onivia *Legal Counsel* coordinates regulatory and compliance matters aspects, ensuring regulatory consistency. Furthermore, Onivia is supported by *WSP Global*, a renowned independent consultancy, to monitor and work towards the Net Zero goal.

## Policies and Control Mechanisms

ESG governance is structured through policies approved by the Council, including the *Risk Management Framework*, which includes anti-corruption, human rights, cybersecurity and code of conduct, specific policies on biodiversity, diversity and inclusion, and stakeholder relations (adopted in 2025)

## Supervision and Transparency

Governing bodies oversee the implementation of ESG through:

- Periodic reports on the monitoring of ESG commitments.
- Continuous assessment of risks and opportunities arising from climate change and regulation.

This model ensures that sustainability is not an accessory, but a central component of corporate strategy and decision-making.





## 04. Natural Connection Onivia

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4.3 Biodiversity	29

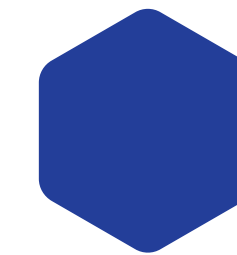


# Natural connection with Onivia



At Onivia, environmental protection is a core pillar of our business strategy. Through the **Onivia Natural Connection initiative**, we integrate environmental sustainability actions focused on combating climate change, promoting the circular economy, and protecting biodiversity. We work to reduce our carbon footprint through energy-efficient infrastructure and responsible resource and waste management, caring for the environment while optimizing our services.

Throughout 2025, we reinforce our environmental management, achieving key milestones in **climate change, energy, the circular economy, e-waste management, and biodiversity**. This action is framed within our *ESG Framework* and the roadmap defined in the *Net Zero Board Paper*, which guides Onivia towards operations aligned with the main standards and expectations of the sector.



Climate change and energy



Circular economy and electronic waste management



Biodiversity



# Climate change and energy

The Onivia strategy regarding climate change and energy management was significantly strengthened in 2025. As a starting point, **we completed our first Greenhouse Gas (GHG) emissions inventory** covering the years 2023 and 2024, including Pentacom and Uclés networks. This measurement exercise enabled us to establish a solid baseline for our carbon footprint.

The results showed that the **total carbon footprint for 2024 was 21,644 tCO<sub>2</sub>e**, confirming that the vast majority of our emissions are concentrated in Scope 3.

**In 2025, we consolidated and reinforced** this exercise through a rebaselining process and methodological improvements, expanding the scope of the Scope 3 calculation. As a result of this update, the total consolidated footprint for 2025 amounts to **28,616 tCO<sub>2</sub>e**.

This increase is mainly due to methodological improvements and updated emission factors. More than 99% of our emissions remain indirect, confirming that our greatest climate impact lies within the value chain and clearly guiding our reduction priorities

## Our climate commitment



**First** comprehensive GHG inventory (2023 and 2024) focused on Scope 3 emissions.

**Formal SBTi** accession process initiated.

Identification of Scope 3 as a **priority focus for reduction**

Preliminary roadmap to **NET ZERO 2050**

**“We consolidated our climate baseline and activated a reduction roadmap aligned with the SBTi and the global 1.5°C target.”**



# Carbon Footprint Calculation

GHG emissions (tCO <sub>2</sub> e)	2023	2024	2025
Scope 1	33	61	34
Scope 2 (market-based)	0.72	0.69	3.38
Scope 3	21,091	21,583	28,579
<b>Total</b>	<b>21,125</b>	<b>21,644</b>	<b>28,616</b>

The carbon footprint calculation has been carried out in accordance with the methodology of the **Greenhouse Gas Protocol (GHG Protocol)**, considering scopes 1, 2 (market-based approach) and 3. Emissions are expressed in tonnes of CO<sub>2</sub> equivalent (tCO<sub>2</sub>e) and include the main categories relevant to the organization's activities.

The **2024 emissions** include an extraordinary effect associated with the **acquisition of network assets from third parties**, accounted for under **Scope 3 – Capital Goods**, which temporarily increases the footprint reported for that year.

In **2025**, Onivia strengthened its emissions inventory through a **methodological update process (rebaseline)** and an **expansion of the Scope 3 boundary**, thereby consolidating the company's carbon footprint calculation.

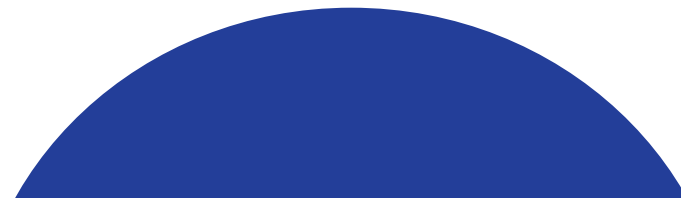


# Energy and water

In 2024 and 2025, the energy reporting boundary was consolidated, integrating the electricity consumption of new operational units together with that of offices. This expansion of the scope provides a more complete and representative view of the organization’s energy performance. As a result, total energy consumption evolved as follows:

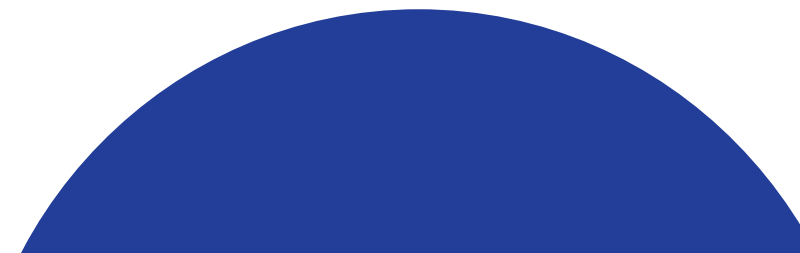
## Total consumption Energy (kWh )

5,208 kWh



2023

424,337 kWh



2024

1,144,023 kWh



2025

This increase is mainly due to the expansion of the calculation boundary and not to a proportional increase in the energy intensity of operations.

## Water

During the analyzed period, total water consumption has been reduced from 91 m<sup>3</sup> to 57 m<sup>3</sup>, a **-37%**, reflecting an improvement in the efficiency of water resource use.

The reduction in water consumption has been achieved through efficiency measures in the use of facilities and greater internal awareness of the responsible use of resources.

Description	Extent	2024	2025
Water collected by source	m <sup>3</sup>	0	0
Water discharged by destination	m <sup>3</sup>	57	1,241
<b>Total Water Consumption</b>	<b>m<sup>3</sup></b>	<b>57</b>	<b>1,241</b>



# Sustainable offices: efficient, accessible and responsible spaces



At Onivia, we understand that sustainability also begins with the work environment. Our offices are located in the Ática XIX Building (Building 1), in the Ática Business Park in Pozuelo de Alarcón (Madrid), a complex with LEED Gold international certification, which guarantees efficient and environmentally friendly design. It also holds BREEAM certifications at the "Very Good" and "Good" levels, highlighting its performance in energy efficiency, waste management, and interior comfort.

In 2025, we continue to improve energy efficiency. Our office features energy-efficient LED lighting.



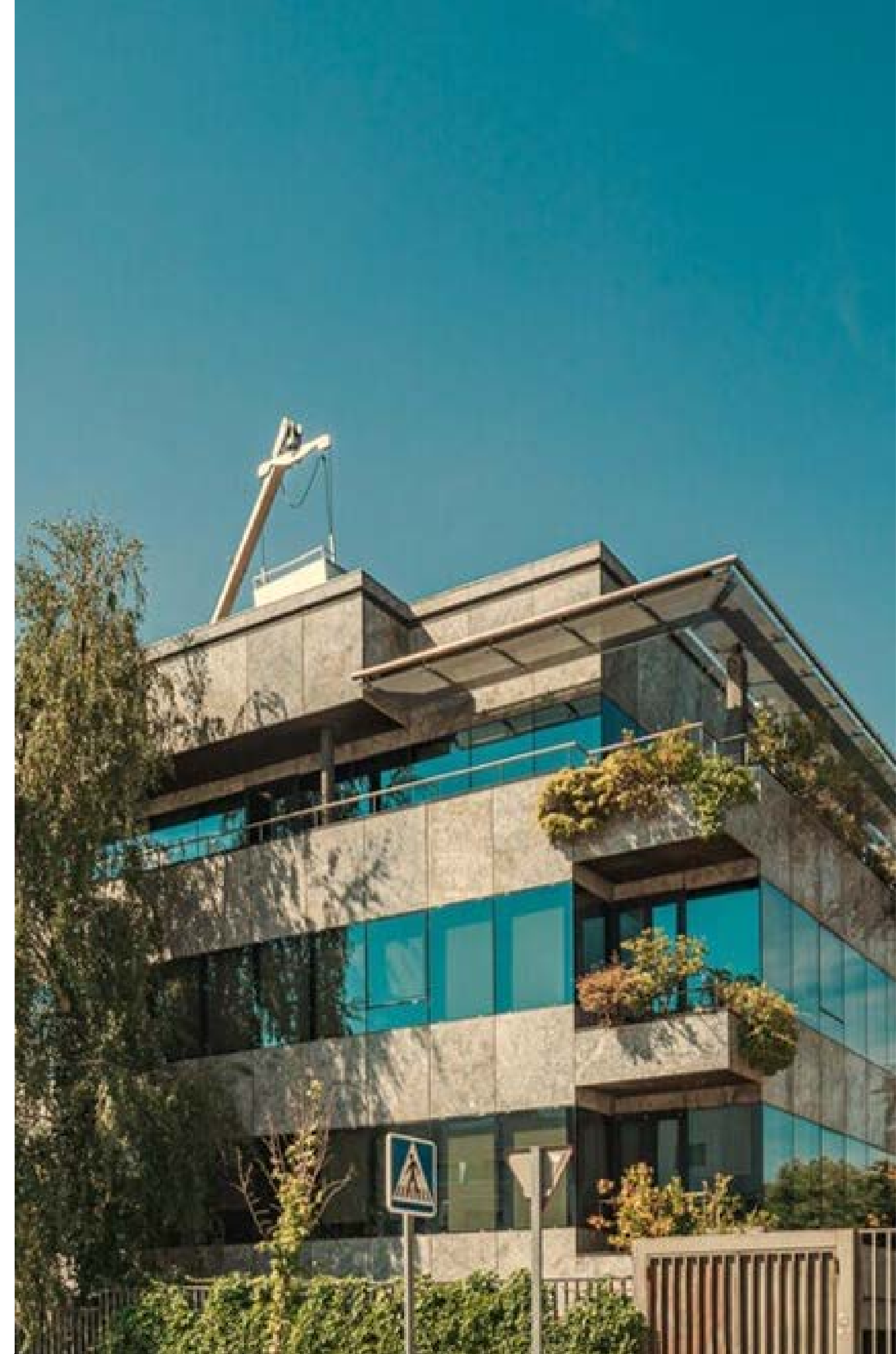
**It has sustainable measures in air conditioning, materials, lighting and access.**



**Building with energy efficiency, responsible design and indoor environmental quality.**



**It is integrated into a landscaped environment and has sustainable transport less than 5 minutes away on foot.**





# Promoting an environmental culture from within the company



Our commitment to sustainability is also reflected in everyday actions we take as a team. That's why **we promote an active environmental culture** among our people, based on awareness, shared responsibility and commitment to the environment.

Throughout 2025, we continued to reinforce small actions with a big impact: in our offices, we installed **separate containers** to facilitate the **selective separation of waste (paper, packaging, and organic waste)**, and we placed visible signage reminding us of **simple actions** such as **turning off the lights or closing the windows when leaving**. These guidelines are part of a responsible routine that reduces energy consumption and improves our daily environmental behavior.

Our offices are also designed to facilitate **more sustainable mobility**. We have bicycle parking and immediate access to public transport—with bus and light rail lines less than a five-minute walk away—allowing our teams **to travel more efficiently and with a smaller carbon footprint**. Furthermore, we promote carpooling among colleagues as a conscious alternative to individual transportation.

also **manage special waste properly, such as batteries and small electronic devices**, and develop internal awareness campaigns that reinforce the efficient use of resources on a daily basis.

**As part of our environmental commitment**, in 2025 we have begun the **assessment to join the United Nations Global Compact**, aligning our vision with the principles of global sustainability and the Sustainable Development Goals (SDGs).

**“Small changes are powerful”**



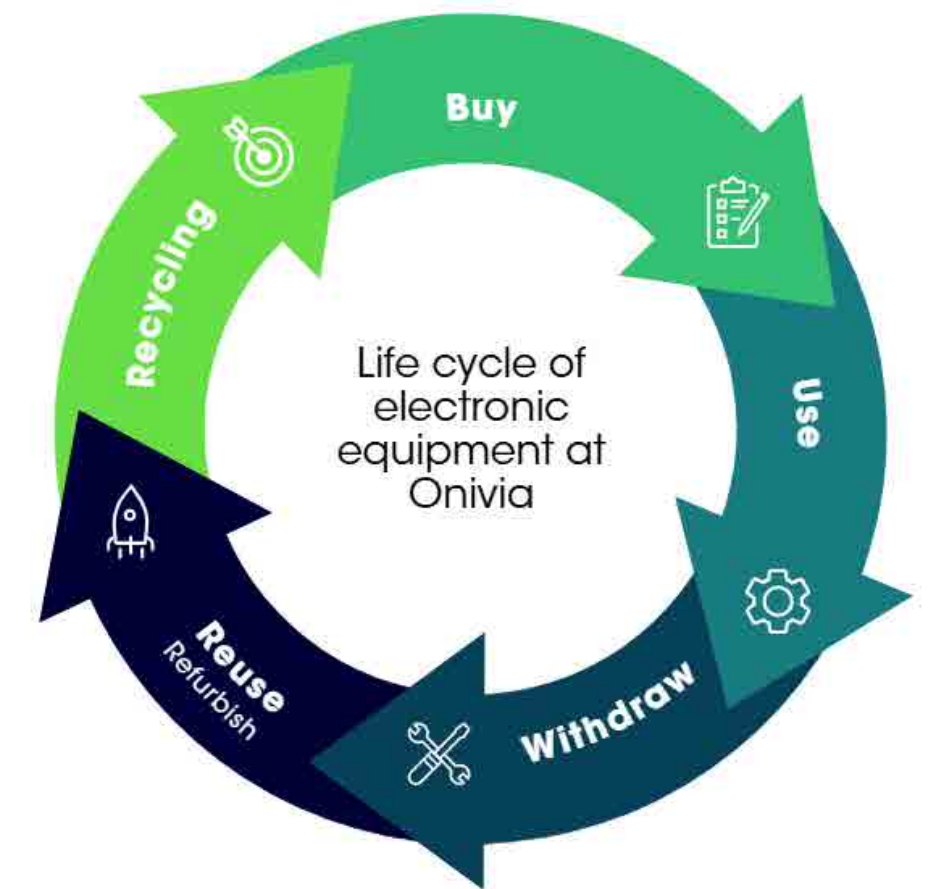
# Circular economy and electronic waste management

In 2025, we have strengthened our **focus on the circular economy** with the aim of **reducing electronic waste and maximizing the lifespan of equipment**. We have made progress in **assessing the life cycle** of network equipment and have prioritized the redistribution or upgrading of equipment before its replacement. In parallel, we have **developed specific ESG indicators for the circular economy**, laying the groundwork for annual monitoring of waste and reuse, and for the first time, circular economy KPIs have been integrated into the ESG framework, with the support of external specialists.

Computers and mobile phones have also been distributed to employees and routers to customers —the latter under a model in which the equipment remains in the customer's possession, although Onivia is working to implement reverse logistics processes in the future.

As part of the sector's commitment, Onivia joined the **TELCO CAT Protocol**, a collaboration agreement between the Government of Catalonia and telecommunications operators to **establish a stable framework that promotes improved connectivity in the Catalan territory**.

The TELCO CAT Protocol is a sectoral agreement promoted by the Government of Catalonia to encourage a more sustainable, coordinated, and environmentally friendly network deployment.



We work to reduce the impact associated with the life cycle of our network, prioritizing the reuse and recovery of equipment.



# Biodiversity

- 1 Biodiversity Policy approved in 2025**
- 2 Territorial footprint analysis: rural areas, sensitive ecosystems**
- 3 Identify the most sensitive geographical and environmental areas**
- 4 Incorporation of environmental criteria into planning**

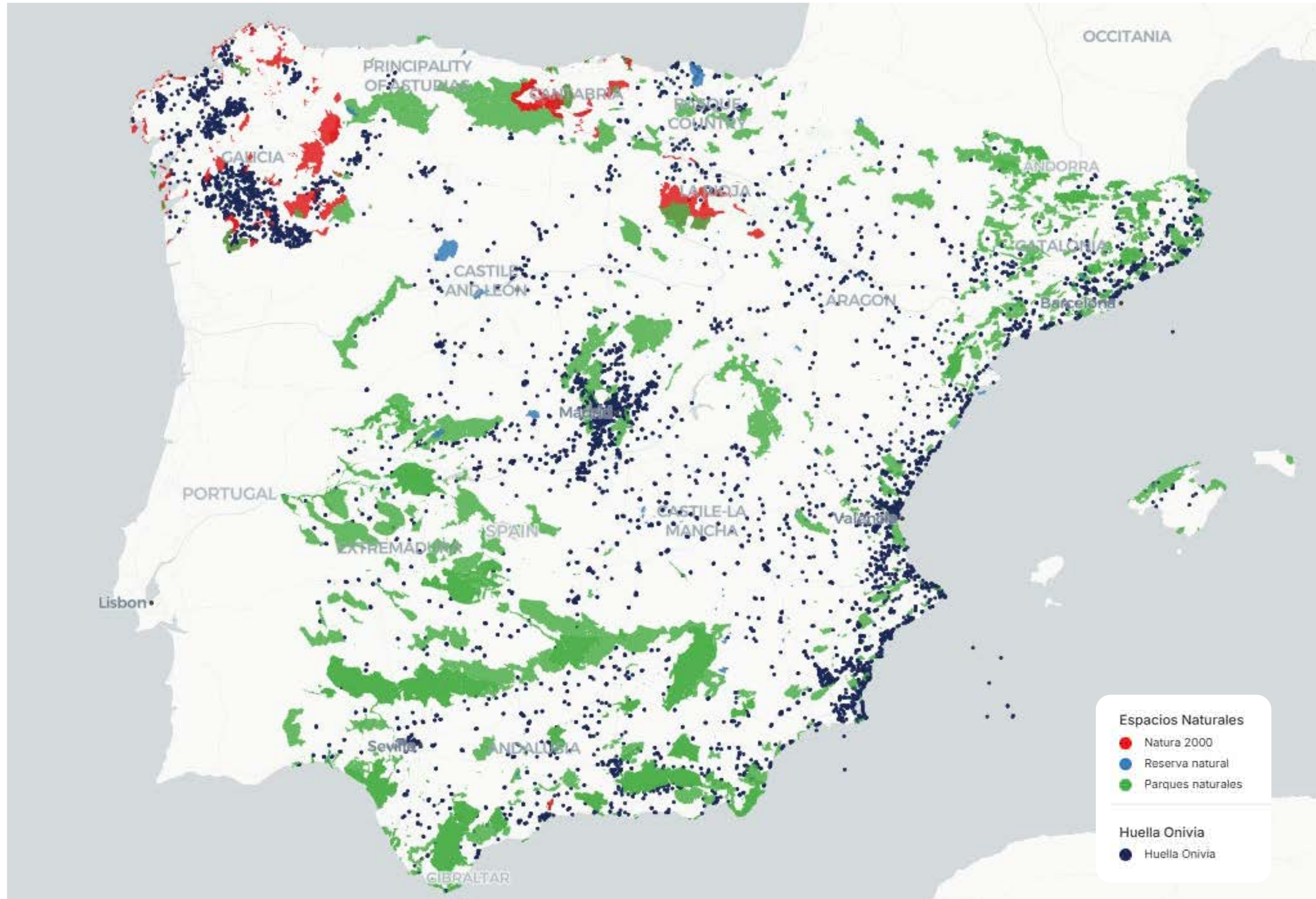
Biodiversity protection was explicitly incorporated into Onivia's environmental management in 2025, recognizing the importance of preserving the natural environment in our network deployment operations. In June, we approved our first **Biodiversity Policy**, which establishes principles and guidelines to avoid, minimize, and offset (where necessary) the impact of our activities on sensitive ecosystems. As a first practical step, we conducted a **territorial footprint analysis** to map the municipalities where we operate, including rural areas and towns with fewer than 1,000 inhabitants.

This study allowed us **to identify the most sensitive geographical and environmental areas** within our footprint, so that we can **prioritize precautions in the deployment and maintenance of the network in these environments**. Environmental criteria are now considered in the planning of new infrastructure, avoiding routes through protected areas or areas of high ecological value whenever possible, and establishing environmental control measures during construction.





# Biodiversity



**99% of our Real Estate Units do not overlap with natural areas**

- Natura 2000 (2,400 UUII | 0.02% total)
- Nature reserve (1,900 UUII | 0.02% total)
- Natural park (74k UUII | 0.87% total)



## 05. Our commitment to people: Internal team and contribution to society

5.1 Talent, diversity and inclusion	33
5.2 Social Action and Commitment	37
5.3 Digitization	40



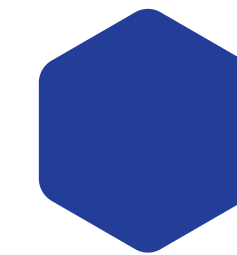
# Our commitment to people

In the social sphere, our commitment is to people: to those of us who are part of Onivia and to all those we support through our services and volunteer initiatives.

In a sector as demanding as technology, creating an environment where people feel heard and supported is a daily challenge. At Onivia, we work every year to boost professional development through tailored training and to promote well-being with our **Onivia Experience plan**, which encompasses physical, emotional, and mental health, as well as the quality of internal relationships. This effort has once again been recognized by Great Place to Work, which has awarded us Best Tech Workplaces 2025. Furthermore, we have made progress in creating people-centered policies and processes, supported by the addition of our Director of People & Culture. This year, we have published key policies on equity, diversity, and inclusion, as well as on digital disconnection.

Our social commitment remains strong: we have collaborated with volunteers and technological solutions to support various communities.

In the field of digitalization, 2025 has been a year of great progress: the implementation of the Factorial platform for employees, the evolution of NEXO for our clients and for advancing our purpose of connecting towns with lower population density, offering equal opportunities.



Action and social commitment



Talent, diversity and inclusion



Digitization



We take care of those who make it possible to connect society.



We believe that people's well-being is the source of positive impact. Our commitment is embodied in a holistic model of well-being and development that balances health, purpose, and growth.

To achieve this, we have a Strategic People Plan, structured around pillars that drive:

- Attracting **and retaining talent** , with a competitive benefits package and a positive culture.
- training **and development** , including leadership programs, technical training and languages.
- Diversity **and inclusion** , with policies that promote equal opportunities and intergenerational integration.
- **Comprehensive well-being** , with initiatives for physical, mental and emotional health.
- Technology **applied to HR** , which allows for more agile, digital and efficient processes.
- Evaluation **and recognition** , ensuring continuous and transparent feedback.



# Equity, diversity and inclusion

Diversity and inclusion, genuine work-life balance, integration, and young talent. These principles reinforce an open, flexible, and inclusive culture that puts people at the heart of Onivia's development.

In 2025, Onivia launched a **tailored Training Plan** designed to strengthen the team's key competencies and support professional growth. This plan includes **identifying high-potential talent**, **leadership** development programs, **English language training**, and **modules on technical and compliance skills**.

Simultaneously, we are working on a talent retention plan that fosters intergenerational collaboration and promotes the recruitment of young talent.

In 2025, the Diversity, Equity, and Inclusion (DEI) Policy was approved, reinforcing our commitment to an ethical, equitable, and discrimination-free work environment. This policy establishes the principles that guide our organizational culture and strengthens the pillars of our ESG model:

- Equal opportunities, eliminating barriers to access, promotion and training.
- Non-discrimination, through anonymous tracking systems, universal accessibility, and continuous training on unconscious bias.
- Diversity and representation, promoting the participation of women, people with disabilities and senior profiles in the technology sector.
- Inclusive environment, with intergenerational mentoring programs, flexible schedules, and inclusive language in all communications.
- Commitment to the community, collaborating with educational and social entities to promote the digital and professional inclusion of vulnerable groups.

This policy applies to the entire Onivia ecosystem —employees, suppliers, partners and customers— and is reviewed periodically to ensure its suitability to the regulatory context and the company's sustainability strategy.



# Training

On average, 16.6 hours of training have been provided per employee. Onivia's training plan includes some mandatory modules and others that are tailored to each employee's needs.

Mandatory training includes compliance (2 hours), cybersecurity (9 hours), a language proficiency test, and some skills training depending on the role. Technical skills development is provided through customized training programs.

In 2025, we designed the Onivia Grows Up program. This company-wide Development & Culture program includes 45 hours of training to be delivered throughout 2026. Topics covered will include leadership models, teamwork, and company values.

## List of training courses offered

- Training in workplace harassment
- Compliance training
- Training in digital disconnection
- DEI training in onboarding (in anticipation)
- Cybersecurity training
- Language training

We develop initiatives and events that strengthen our close-knit and collaborative culture. Through joint training sessions, team-building activities, and shared experiences, we foster cohesion, motivation, and a sense of belonging.

These experiences reinforce our values and help us grow as a team, connecting beyond the day-to-day.





# Benefits and work-life balance

Onivia has entered the Top 10 of the Best Workplaces in Technology ranking as one of the best companies in the ICT sector to work for in Spain, according to Great Place to Work®.

This recognition is special because it stems from something very simple yet very valuable: the trust and real-world experience of the people who make up Onivia.

In a sector as demanding as technology, building an environment where people feel heard, supported, and empowered to drive growth, innovation, and excellence is a daily challenge. And this result proves that we are on the right track.

We foster internal relationships and a strong company culture. Our offices are open spaces designed for dialogue and collaboration, with areas dedicated to teamwork and sharing, such as our book exchange corner. We celebrate individual and collective achievements, as well as birthdays, because we believe in recognizing and celebrating every success together. We also organize team-building activities to strengthen cohesion and bonds among the entire team.





# Benefits and work-life balance

## Flexibility and work-life balance

- Flexible teleworking: Mondays and Fridays remotely.
- Additional allowance of 10 days per year for personal errands or work-life balance (max. 2/month).
- 25 days of vacation + birthday day + December 24th and 31st.
- Possibility of flexible scheduling in special cases.
- Special permits according to agreement

## Physical, mental and emotional well-being

- Office with ergonomic improvements
- Fresh fruit available
- Digital disconnection protocol, communicated via email and factorial, with training for all staff.
- Training sessions in neuroleadership are planned.

## Economic and social benefits

- Sanitas health coverage for all employees and their immediate family members
- Parking for all employees
- Flexible compensation plan (meal, childcare, transport, training)
- Retirement savings insurance (November 2025)

“We work to offer maximum well-being and balance to our team.”





# Action and Social Commitment

“ Connecting also means caring.  
At Onivia, we promote initiatives that generate a real impact on people and the community.”

## Comedor Social Santa María Josefa

More than 70% of the Onivia team participated in a volunteer day to support the Comedor Social **Santa María Josefa**, which provides daily meals to more than 400 people and distributes food to 250 families in Madrid.

Throughout the morning, the Onivia teams organized themselves to:

- To promote a charity market with more than 300 donated items.
- Sort and store more than 200 kg of food.
- Prepare portions of homemade empanadas for the dining room.

## Fundación AVA Charity Dinner 2025

**Fundación AVA** is an organization dedicated to improving the quality of life of children with neurological disorders and their families. We participated in the AVA 2025 Charity Dinner, whose objective was to raise funds to finance therapies, support programs, and specialized resources for these children.

Our contribution adds to Onivia's commitment to inclusion, equal opportunities and support for vulnerable groups.

## Furniture donation after the DANA storm

As part of the relocation of one of our offices, we have donated office equipment to an educational center affected by the DANA storm.





# Action and Social Commitment

## Connected to care (technology project)

Onivia is developing an initiative aimed at improving the quality of life for older adults living independently. By analyzing Wi-Fi signals in the home and inferring usage patterns with artificial intelligence, the project enables solutions that contribute to strengthening the safety, well-being, autonomy, and social connection of older adults.

In 2025, a pilot project was launched in collaboration with Fundación Grandes Amigos, an organization specializing in providing support to older adults. This initiative has been recognized with the **Macquarie Shared Value Award** from the **Macquarie Group Foundation** for its shared value perspective and its approach to creating business solutions to social problems.



## Companies that inspire

For the second year in a row, we have collaborated with the **Bertelsmann Foundation** and **DigitalES** on the "**Companies that Inspire**" initiative, which aims to connect the educational and professional worlds through career guidance. This year, we opened our doors to explain how a real network is managed, share knowledge, and offer an inside look.



# Action and Social Commitment

**In collaboration with Fundación Aladina, the solidarity initiative "200 Wishes of Light" was carried out to bring joy and hope to children and teenagers supported by the Foundation.**

Onivia launched its first solidarity initiative together with the Fundación Aladina, mobilizing its employees to collect 200 children's books for children and teenagers with cancer.

For several weeks, the team participated by donating books related to the Aladdin universe, which were given out along with a magic lamp as a symbol of a wish for light and hope for each shared story.

The initiative included a collaborative moment of assembling the solidarity kits and culminated with the official delivery at Fundación Aladina, reinforcing Onivia's commitment to people and to a connection that goes beyond technology.





# Digitization

Digitization is one of the material issues identified by Onivia, and a key axis to guarantee operational efficiency, information security and service quality.

Onivia was born as a digital company **by design**, with no legacy systems to transform. This has allowed us to integrate digitalization from the outset as a driver of efficiency and agility. This DNA translates into the continuous evolution of the platforms used by our clients and suppliers, as well as the constant improvement of our internal processes.

We are committed to innovation not only in our connectivity solutions, but also in the digitization of corporate processes, especially in the people area.

In 2025 we are making progress in implementing digital tools that allow for more agile, efficient and transparent management, fostering a better experience for our teams and a greater capacity to adapt to new needs.

Furthermore, all our operational services rely on cloud infrastructure, which optimizes resource usage, reduces the need for physical hardware, and facilitates scalability, contributing to a more efficient and sustainable management of the organization.



# Digitization

## Internal digitization of HR and corporate processes

- Migration of the main People processes to the Factorial platform.
- 100% digital onboarding and selection automation.
- Expense and document management integrated into Factorial.
- Electronic signature implemented with Signaturit.
- SAP Implementation

## Connectivity for essential services

- We are present in 838 rural towns with fewer than 20,000 inhabitants, contributing to closing the territorial digital divide.
- We contribute with our infrastructure to enable digital public services, strengthening territorial cohesion and access to basic rights.
- We help SMEs with “Fibra Empresas”, an FTTH solution geared towards the professional environment and designed to deliver a robust, reliable service with specialized support.

## Partnerships with institutions

- Collaboration with public administrations in regional rural revitalization programs .
- We are part of the **Digital Transformation Advisory Council** whose objective is to help the Community of Madrid become a leading European region in digital transformation at the service of citizens and economic growth by making available our experience, independence and collaboration in the development of the digital transformation program.



## 06. Good Governance, Ethics and Transparency

6.1 Ethics, transparency and regulatory compliance	45
6.2 Cybersecurity	46
6.3 Operational Resilience	47



# Our responsibility as an essential and critical service

The events of 2025 have highlighted the importance of ensuring the resilience of our infrastructure.

This is not limited to having a solid business continuity plan, but also involves collaboration between administrations and companies to ensure that the necessary means, regulations and capabilities exist to respond to exceptional situations.

At Onivia we work to generate a positive impact, aligned with our code of ethics, acting with transparency and complying with current regulations.

Our commitment is to minimize any negative impact and offset it with actions that add value. In this vein, in 2025 we approved our Biodiversity Policy, integrating environmental criteria into risk management and the deployment of critical infrastructure, thereby strengthening our resilience and responsibility towards the environment.



Ethics, transparency and regulatory compliance



Cybersecurity



Operational Resilience



# Ethics, transparency and regulatory compliance

The policies approved by the Board of Directors are:

- Code of Ethics
- Anti-bribery and anti-corruption policy
- Anti-fraud policy
- Criminal compliance policy
- ESG Policy
- Human rights policy
- Data protection policy
- Cybersecurity policy
- Policy on equality, diversity and inclusion.
- Stakeholder engagement policy.
- Digital disconnection policy
- Biodiversity policy
- Work-life balance policy
- Purchasing policy

Onivia has a complaint channel [ <https://onivia.factorial.es/complaints> ] and an associated process.

Ethics, transparency, and regulatory compliance are material issues of great importance to us and our stakeholders. For this reason, the company's employees and suppliers subscribe to the **Risk Management Framework (RFM)**, a structured framework for identifying, assessing, managing, and monitoring risks. Its objective is to provide consistency and transparency in risk management, ensuring that risks are handled systematically and aligned with strategic and regulatory objectives. The RFM is updated annually.

## Communication and training in commitments and policies

All policies are communicated to employees digitally so they can sign them. Onivia's main suppliers are legally obligated to sign the RFM. At Onivia, we place great importance on raising awareness and training our staff on ethics, regulatory compliance, and conduct. In 2025, the entire Onivia team completed *compliance training*. Cybersecurity audits were also conducted in conjunction with obtaining ISO 27001 certification. The ESG policy, as well as the company's strategic plan, has been communicated and worked on with the people of the company.

## Internal audit and occupational health and safety mechanisms

Two significant advances have been achieved: the implementation of outsourced medical examinations through Eurocontrol, guaranteeing the health and safety of the staff, and the implementation of a digital Access Control (AC) system that requires any company or person who wants to access our facilities to register beforehand and prove compliance with the requirements of occupational risk prevention, thus reinforcing security and regulatory control.



**Onivia was rated by GRESB in 2025 with a score of 95/100**



**ISOs available in Onivia: 9001 and 27001**



# Cybersecurity

Cybersecurity is a strategic priority for the company and our stakeholders. Since network and infrastructure sharing is part of our business model, we have obtained **ISO 27001 certification**, which guarantees data protection and information security across all our operations.

We have a Cybersecurity Policy that both suppliers and customers must subscribe to, ensuring compliance with international standards and responsible information management.

Furthermore, our employees receive ongoing training in digital security and undergo regular audits, reinforcing our corporate culture of protection against technological risks. This commitment is integrated into our ESG strategy and reflects the principles of transparency and trust with all stakeholders.





# Operational Resilience

We view operational resilience as a strategic priority to ensure business continuity in the face of threats such as blackouts, cyberattacks, or natural disasters.

**Real resilience is built through networks**, with sharing, alternative routes, cooperation models, and common governance that allows for coordinated action. For Onivia, this debate is key because resilience is no longer just a technical challenge; security determines the trust of the ecosystem, and the future of the ecosystem depends on services capable of adapting to each context without losing efficiency or stability.

During this year we have participated in sector debates such as TELCOM25 organized by FENITEL or our own #WholesaleSpain Forum in which we dealt with these issues of network security and resilience as a strategic element for the country.

**Business Continuity Plan** was implemented during 2025. This project was designed to analyze the company's critical processes, assess associated risks, and define the necessary strategies to guarantee operational continuity in contingency scenarios. The plan was developed following international best practices and the applicable regulatory framework. This milestone ensures the resilience and continued delivery of the organization's essential services. Furthermore, customer support was strengthened by extending the hours of operation at the Network Operations Center (NOC).

## Milestones 2025

Business Continuity Plan

Improvements to the NOC in the areas of availability and accessibility

Participation in sector forums on the resilience of digital infrastructures



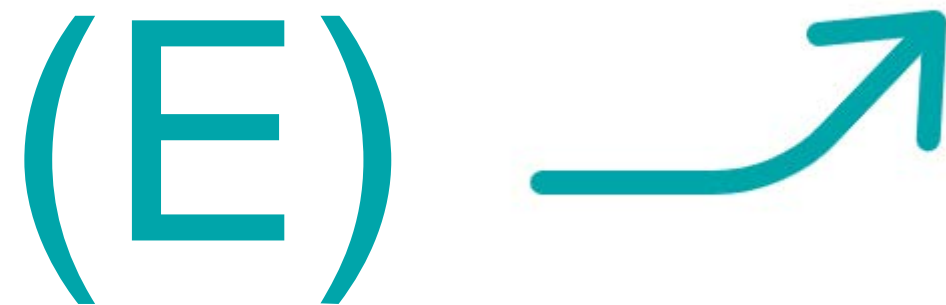
# Annex 1 – KPIs Table





# KPIs 2025

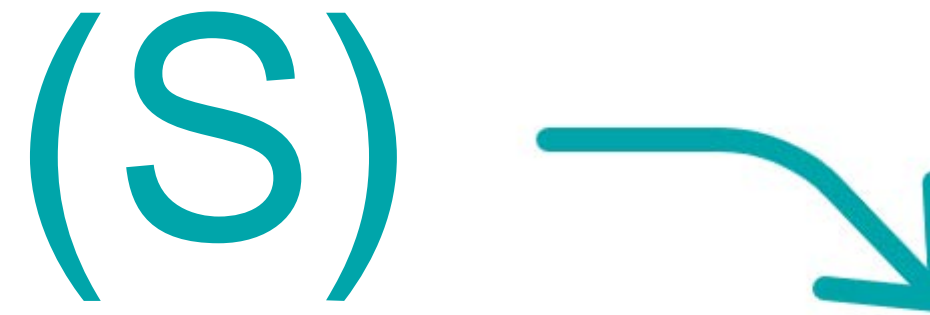
	INDICATOR	UNIT	2023	2024	2025
ENVIRONMENT	Scope 1 GHG emissions	t CO2	33	61	34
	Scope 2 GHG emissions	t CO2	0.72	0.69	3,38
	Scope 3 GHG emissions	t CO2	20,070	9,286	28,579
	Total GHG emissions	TCO 2	21,125	9,348	28,616
	Total energy consumption	K WH	5,208	6,640	1,144,023
	% renewable energy consumption	%	0.58	0.62	0
	Total Water consumption	M3	91	57	1,241
	Total water withdrawals & source	M3	0	0	0
	Total water downloaded & source	M3	91	57	1,241
	Hazardous waste & radioactive waste	TONNES OF WASTE/ EUR	0	0	0
	Non- hazardous waste	TONNES OF WASTE	10,965	12,900	20,64
	Investigations relating to environmental compliance incidents	No.	0	0	0



\* The KPIs described are obtained from the sum of the data of the following vehicles that make up Onivia: PENTACOM INVESTMENTS SPAIN OPCO SL, UCLES INFRACO, SL and SOTA INVESTMENTS (SPAIN) OPCO, SLU  
 \*\* Methodological note: Revision of Scope 3 and total emissions for 2024 due to rebaselining and the expansion of the electricity reporting boundary (inclusion of SOTA BUs)



# KPIs 2025



INDICATOR	UNIT	2023	2024	2025	
Unadjusted gender pay gap	%	30.67	22.79	19	SOCIAL RESPONSIBILITY
Total number of board members	No.	7	7	7	
Number of women board members	No.	3	2	2	
Was the entity involved in the manufacture or sale of controversial weapons (landmines and cluster bombs)?	Y/N	N	N	N	
Rate of employee accidents	No.	0	0	0	
Fatalities of employees	No.	0	0	0	
Recordable injuries employees	No.	0	0	0	
Violations of UN Global Compact principles and Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	No.	0	0	0	
Incidents of discrimination	No.	0	0	0	

\* The KPIs described are obtained from the sum of the data of the following vehicles that make up Onvia: PENTACOM INVESTMENTS SPAIN OPCO SL, UCLES INFRACO, SL and SOTA INVESTMENTS (SPAIN) OPCO, SLU



# KPIs 2025

	INDICATOR	UNIT	2023	2024	2025
GOVERNANCE	Anti- bribery & anti-corruption	Y/N	Y	Y	Y
	Anti-competitive practice policy	Y/N	Y	Y	Y
	Code of ethics	Y/N	Y	Y	Y
	Conflict of Interest Policy	Y/N	Y	Y	Y
	Environmental Policy	Y/N	N	N	Y
	Fraud & money laundering policy	Y/N	Y	Y	Y
	Human Rights policy	Y/N	Y	Y	Y
	Modern slavery policy and procedure	Y/N	Y	Y	Y
	Health & Safety Policy	Y/N	Y	Y	Y
	Whistleblower channel / policy / procedure	Y/N	Y	Y	Y
	Data & Cybersecurity policy	Y/N	Y	Y	Y
	Anti-bribery and corruption incidents	No.	0	0	0
	Number of all cyber security and/or data breaches	No.	0	0	0
	Number of reportable breaches in cyber security and/or data privacy	No.	0	0	0
	Disclosure of ESG information	Y/N	N	Y	Y



\* The KPIs described are obtained from the sum of the data of the following vehicles that make up Onivia: PENTACOM INVESTMENTS SPAIN OPCO SL, UCLES INFRACO, SL and SOTA INVESTMENTS (SPAIN) OPCO, SLU



# Annex 2 – GRI

## Table 2



## GRI 2: General Content 2021

GRI Standard	Content	Location, direct response, or omission
<b>General Contents</b>		
<b>GRI 2: GENERAL CONTENTS 2021</b>	<b>The organization and its reporting practices</b>	
	2-1 Organizational Details	Chapter 2.2 Corporate organization and stakeholders
	2-2 Entities included in the sustainability reporting	Onivia Group: PENTACOM INVESTMENTS SPAIN OPCO SL   UCLES INFRACO SLU   SOTA INVESTMENTS (SPAIN) OPCO, SLU
	2-3 Reporting period, frequency and point of contact	Period: 2025. Frequency: Annual. Point of contact: Director of Corporate Governance and Communications
	2-4 Information Update	Annual frequency
	2-5 External verification	No
	<b>Activities and workers</b>	
	2-6 Activities, value chain and other business relationships	Chapter 02. Meet Onivia
	2-7 Key quantitative data on the workforce	Chapter 2. Meet Onivia. Page 9
	2-8 Workers who are not employees	Not applicable   Not available   Incomplete

## GRI 2: Contents General Elections 2021

GRI Standard	Content	Location, direct response, or omission
<b>General Contents</b>		
<b>GRI 2: GENERAL CONTENTS 2021</b>	<b>Governance</b>	
	2-9 Governance structure and composition	The company has a Board of Directors as its highest governing body and an Executive Management Committee responsible for daily management and the implementation of the Board's decisions.
	2-10 Designation and selection of the highest governing body government	The members of the Board of Directors are appointed in accordance with the company agreements and applicable regulations, taking into account criteria of suitability and experience.
	2-11 President of the highest governing body	The Board of Directors has a chairman who coordinates its operation and directs its work.
	2-12 Role of the highest governing body in supervising the management of impacts	The Board of Directors oversees the management of impacts and risks, including ESG risks, and periodically reviews the Risk Management Framework.
	2-13 Delegation of responsibility for managing impacts	The operational management of the impacts is delegated to COMEX, with escalation to the Board of Directors when appropriate.
	2-14 Role of the highest governing body in sustainability reporting	The Board of Directors oversees the frameworks and policies that underpin the company's sustainability reporting.
	2-15 Conflicts of interest	The company has policies and procedures for the identification, declaration and management of conflicts of interest, with mechanisms for escalation to the Board of Directors.
	2-16 Communicating concerns about ethical conduct	The company has a <b>reporting channel and a</b> whistleblowing procedure that allows for the confidential and, if desired, anonymous communication of concerns about ethical conduct.

## GRI 2: Contents General Elections 2021

GRI Standard	Content	Location, direct response, or omission
<b>General Contents</b>		
<b>GRI 2: GENERAL CONTENTS 2021</b>	<b>Governance</b>	
	2-17 Collective knowledge of the highest governing body	The Board of Directors collectively possesses knowledge and experience in business management, finance, infrastructure, regulation, and corporate governance.
	2-18 Evaluation of the performance of the highest governing body	Not applicable   Not available   Incomplete
	2-19 Remuneration Policies	The remuneration policy for senior management and the Board is governed by corporate agreements and applicable regulations.
	2-20 Process for determining remuneration	Not applicable   Not available   Incomplete
	2-21 Annual total compensation ratio	Not applicable   Not available   Incomplete
	<b>Strategy, policies and practices</b>	
	2-22 Declaration on the sustainable development strategy	The company integrates sustainability and ESG risk management into its strategy and management model, under the supervision of the Board of Directors.
	2-23 Commitments and policies	6.1 Ethics, transparency and regulatory compliance



## GRI 2: Contents General Elections 2021

GRI Standard	Content	Location, direct response, or omission
<b>General Contents</b>		
<b>GRI 2: GENERAL CONTENTS 2021</b>	<b>Strategy, policies and practices</b>	
	2-24 Incorporation of commitments and policies	Chapter 6.1 Ethics, transparency and regulatory compliance
	2-25 Processes to remedy negative impacts	Chapter 6.1 Ethics, transparency and regulatory compliance
	2-26 Mechanisms for requesting advice and raise concerns	Chapter 6.1 Ethics, transparency and regulatory compliance
	2-27 Compliance with legislation and regulations	Chapter 6.1 Ethics, transparency and regulatory compliance
	2-28 Membership in associations	Chapter 02. Meet Onivia
	<b>Stakeholder participation</b>	
	2-29 Approach to the participation of groups of interest	Chapter 3.2 Methodology for identifying material topics.
	2-30 Collective bargaining agreements	Not applicable   Not available   Incomplete



## GRI 3: Material Topics 2021

GRI Standard	Content	Location, direct response, or omission
<b>General Contents</b>		
<b>GRI 3: TOPICS MATERIALS 2021</b>	3-1 Process of determining the material issues	Chapter 2.2 Methodology for identifying material topics.
	3-2 List of material topics	Chapter 2.2 Methodology for identifying material topics.

Following the materiality analysis carried out in accordance with GRI 3, the organization determined that the impacts related to economic performance (GRI 201) and market presence (GRI 202) are not material, given that they do not generate significant impacts on stakeholders or the local economic environment compared to other priority issues.



## GRI 3: Material Topics 2021

GRI Standard	Content	Location, direct response, or omission
<b>Environmental issues</b>		
<b>Climate change and energy</b>		
<b>GRI 3: TOPICS MATERIALS 2021</b>	3-3 Management of material issues	Chapter 4.1 Climate change and energy
<b>GRI 302: ENERGY 2016</b>	302-1 Energy consumption within the organization	Appendix 1 KPIs Table
	302-2 Energy consumption outside the organization	Not applicable   Not available   Incomplete
	302-3 Energy intensity	Not applicable   Not available   Incomplete
	302-4 Reduction of energy consumption	Not applicable   Not available   Incomplete
	302-5 Reduction of energy requirements of products and services	Not applicable   Not available   Incomplete
<b>GRI 305: EMISSIONS 2016</b>	305-1 Direct GHG emissions (scope 1)	Appendix 1 KPIs Table
	305-2 Indirect GHG emissions from power generation (scope 2)	Appendix 1 KPIs Table
	305-3 Other indirect GHG emissions (scope 3)	Appendix 1 KPIs Table
	305-4 Intensity of GHG emissions	Not applicable   Not available   Incomplete



### GRI 3: Material Topics 2021

GRI Standard	Content	Location, direct response, or omission
<b>Environmental issues</b>		
<b>Climate change and energy</b>		
<b>GRI 305: EMISSIONS 2016</b>	305-5 GE Emissions Reduction	Not applicable   Not available   Incomplete
	305-6 Emissions of ozone-depleting substances (ODS)	Not applicable   Not available   Incomplete
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx) and other significant emissions to the air	Not applicable   Not available   Incomplete



## GRI 3: Material Topics 2021

GRI Standard	Content	Location, direct response, or omission
<b>Environmental issues</b>		
<b>Circular economy and waste management.</b>		
<b>GRI 3: TOPICS MATERIALS 2021</b>	3-3 Management of material issues	Chapter 4.2 Circular Economy and Electronic Waste Management
<b>GRI 306: WASTE 2020</b>	306-1 Waste generation and impacts significant related to waste	Chapter 4.2 Circular Economy and Electronic Waste Management
	306-2 Management of significant impacts related to waste	Chapter 4.2 Circular Economy and Electronic Waste Management
	306-3 Waste generated	Appendix 1 KPIs Table
	306-4 Waste not intended for disposal	Not applicable   Not available   Incomplete
	306-5 Waste intended for disposal	Not applicable   Not available   Incomplete
<b>Biodiversity</b>		
<b>GRI 401: Biodiversity</b>	401-1 through 401-8	Chapter 4.3 Biodiversity



## GRI 3: Material Topics 2021

GRI Standard	Content	Location, direct response, or omission
<b>Social issues</b>		
<b>Talent, Diversity and Inclusion.</b>		
<b>GRI 3: TOPICS MATERIALS 2021</b>	3-3 Management of material issues	Chapter 5.1 Talent, diversity and inclusion
<b>GRI 401 – EMPLOYMENT</b>	401-1 Hiring of new employees and staff turnover	Chapter 2.2 Corporate organization and stakeholders
	401-2 Benefits for Time Employees full benefits that are not given to part-time or temporary employees	Not applicable   Not available   Incomplete
	401-3 Parental permission	Chapter 5.1 Talent, diversity and inclusion
<b>GRI 403: HEALTH AND WORK SAFETY 2018</b>	403-1 Occupational health and safety management system	Chapter 5.1 Talent, diversity and inclusion
	403-2 Hazard identification, risk assessment and incident investigation	Chapter 6.1 Ethics, transparency and regulatory compliance
	403-3 Occupational Health Services	Health insurance for employees and their families, and voluntary annual medical examination for employees.



### GRI 3: Material Topics 2021

GRI Standard	Content	Location, direct response, or omission
<b>Social issues</b>		
<b>GRI 403: HEALTH AND WORK SAFETY 2018</b>	403-4 Worker participation, consultation and communication on occupational health and safety	5.1 Talent, diversity and inclusion
	403-5 Training of workers on health and workplace safety	5.1 Talent, diversity and inclusion
	403-6 Promotion of workers' health	5.1 Talent, diversity and inclusion
	403-7 Prevention and mitigation of the impacts on health and safety at work directly linked through commercial relationships	Not applicable   Not available   Incomplete
	403-8 Health management system coverage and workplace safety	Not applicable   Not available   Incomplete
	403-9 Workplace Accident Injuries	Not applicable   Not available   Incomplete
	403-10 Occupational illnesses and diseases	Not applicable   Not available   Incomplete
<b>GRI 404: TRAINING AND EDUCATION 2016</b>	404-1 Average number of training hours per year per employee	Chapter 5.1 Talent, diversity and inclusion
	404-2 Programs to develop employee skills and transition support programs	Chapter 5.1 Talent, diversity and inclusion
	404-3 Percentage of employees who receive periodic performance and career development evaluations	Not applicable   Not available   Incomplete



## GRI 3: Material Topics 2021

GRI Standard	Content	Location, direct response, or omission
<b>Social issues</b>		
<b>GRI 405: Diversity and Equal Opportunities 2016</b>	405-1 Diversity of governing bodies and employees	37.5% of employees are women   15.6% of employees in management positions are women compared to the total workforce
	405-2 Ratio between basic salary and remuneration of women and men	Appendix 1 KPIs Table
<b>Action and social commitment</b>		
<b>GRI 3: TOPICS MATERIALS 2021</b>	3-3 Management of material issues	Chapter 5.2 Social Action and Commitment
<b>GRI 413: LOCAL COMMUNITIES 2016</b>	413-1 Operations with local community participation programs, impact assessments and development	Not applicable   Not available   Incomplete
	413-2 Operations with significant negative impacts – actual or potential – on local communities	Not applicable   Not available   Incomplete
<b>Digitization</b>		
<b>GRI 3: TOPICS MATERIALS 2021</b>	3-3 Management of material issues	The social impacts of digitalization are addressed through the material themes 'Talent, Diversity and Inclusion' (GRI 404), 'Social Action and Engagement' (GRI 413), and 'Cybersecurity' (GRI 418). Therefore, no additional specific thematic standard is reported.



## GRI 3: Material Topics 2021

GRI Standard	Content	Location, direct response, or omission
<b>Topics of good governance, ethics and transparency</b>		
<b>Cybersecurity</b>		
<b>GRI 3: TOPICS MATERIALS 2021</b>	3-3 Management of material issues	Chapter 6.2 Cybersecurity
<b>GRI 418 – CUSTOMER PRIVACY</b>	Content 418-1 Substantiated claims relating to violations of customer privacy and loss of customer data	None
<b>Operational Resilience</b>		
<b>GRI 3: TOPICS MATERIALS 2021</b>	3-3 Management of material issues	Operational resilience is managed through business continuity systems and contingency plans. This topic is not associated with a specific GRI thematic standard, as there is no standard that directly addresses this impact.
<b>Ethics, Transparency and Regulatory Compliance</b>		
<b>GRI 3: TOPICS MATERIALS 2021</b>	3-3 Management of material issues	Chapter 6.1 Ethics, transparency and regulatory compliance



### GRI 3: Material Topics 2021

GRI Standard	Content	Location, direct response, or omission
<b>Topics of good governance, ethics and transparency</b>		
<b>GRI 205: Anti-Corruption 2016</b>	205-1 Operations assessed based on corruption-related risks	Not applicable   Not available   Incomplete
	205-2 Communication and training on anti-corruption policies and procedures	Chapter 6.1 Ethics, transparency and regulatory compliance
	205-3 Confirmed corruption incidents and measures taken	Appendix 1 KPIs Table
<b>GRI 206: Unfair Competition 2016</b>	206-1 Legal actions related to unfair competition and monopolistic practices and anti-free competition	Not applicable   Not available   Incomplete



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