

QHSE Management System

T-MSIG

Integrated Management System Manual

Edition No 36



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History of changes

Document	T-MSIG Integrated Management System Manual	
Edition	Paragraph	Reason for change
18	General.	Adaptation to the new procedures for the control and supervision of works (TPS group).
19	General.	Adaptation of TYP SA's Occupational Health and Safety Management System to the OHSAS 18001 standard. Incorporation and adaptation of TYP SA's Occupational Health and Safety Management System to the TYP SA Group's Quality, Environment and R&D&I Management System.
20	0.1. Presentation. 1.2. Scope of application. 9.1. Process diagram.	The TEyS presentation is incorporated. It is included in the scope 'Services: Administrative File Procedures'.
21	0.1. Presentation. 9.6. List of procedures.	The presentation of MEXTYP SA is incorporated. The list of procedures of the Integrated Management System is updated.
22	General. 9.6 List of procedures	The presentation of MEXTYP SA is included. The list of procedures of the Integrated Management System is updated.
23	1.3. Organisational context. 7.3.7. 9.6 List of procedures	Defining the context of the organisation. TPP-02 'Management of changes in design work' and TP0-34 'CAD Manager functions' are incorporated.
24	1.2 1.3 1.4 6.5 7.5.5. 7.6 Annex 9.1 Annex 9.5	The renewable energy activity is incorporated. SWOT analysis. Definition of stakeholder needs and expectations Definition of organisational knowledge. Definition of ownership of external providers. Definition of post-delivery activities. Updating of the Process Map. New TPO-10 Duties of the Chief Technical Officer.
25	5.5.2.	Redefinition of the management representative on OHSAS 18001.

26	7.2.3.	Update on communication of environmental performance to stakeholders.
27	General	System name change: QHSE Management System.
	0.1	Extension of OHSAS 18001 certification
	5.2	Responsibility for updating OSH legal requirements
28	General	Incorporation of integrity management aspects and requirements of ISO 37001.
29	General	Modifications necessary to cover issues identified in the first phase of the external audit of the anti-bribery management system. The external and internal issues relevant to the Management System are updated, incorporating public officials and the sector in which the company operates (construction consultancy) as external factors, and developing, within the internal factors, the TYP SA Group's matrix organisational structure (divisions -technical management areas-, departments -technical production areas-, DDTT -geographical areas-, and the Group's Subsidiaries). Public bodies are included as external stakeholders.
	1.3	
30	1.2	Changes relating to ISO 37000 and UNE 166002 are incorporated.
	1.3	
	1.4	
	4	
	5.4.3	
	5.5.3	
31	General	Information security system requirements according to ISO 27001 are incorporated. Adaptation of TYP SA's Occupational Health and Safety Management System documentation to the ISO 45001:2018 standard.
	1.2	Subparagraph (f) is amended by adding "according to the statement of applicability (SOA) in force". The identification of stakeholder needs and expectations according to ISO 27001 is improved.
32	1.4	
	1.4	Stakeholder needs and expectations are updated within the context of the organisation with changes related to ISO 37001.
33	1.4	Stakeholder needs and expectations are updated within the context of the organisation with changes related to ISO 37001.
34	General	Changes relating to ISO/IEC 17020 are incorporated.
	4.	New TYP SA Group Management System scheme.
35	5.4.1	Definition of Senior Management for the purposes of the Management System.
36	General	Complete reorganisation of the Manual to bring it into line with the outline of the reference standards.

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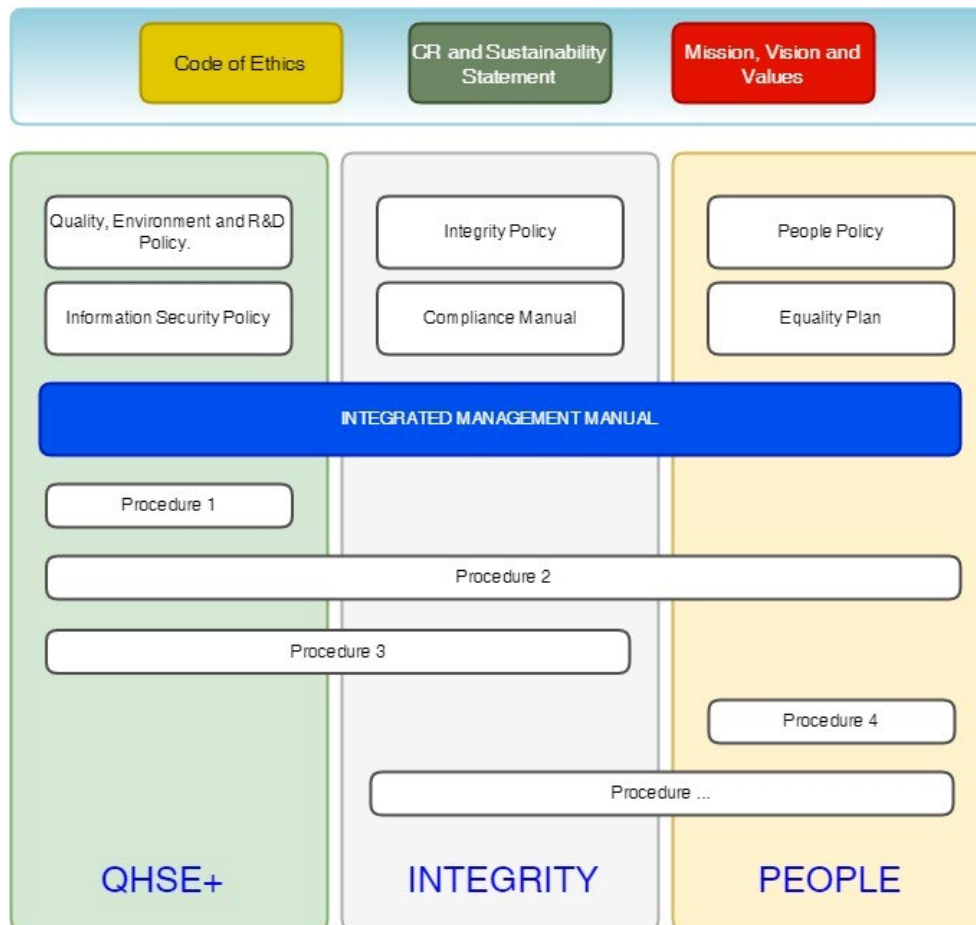
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Integrated Management System Manual

1. Integrated Management System

The TYP SA Group's Integrated Management System (hereinafter also TYP SA or the organisation) is made up of a Code of Ethics and a Declaration of Corporate Responsibility and Sustainability, an Integrated Management Manual, of a general nature and universal application, and the subsystems of Quality, Environment, Health and Safety, R&D&I and Information Security (hereinafter the QHSE System), Integrity Management (hereinafter the Integrity Management System), and People, all of which have their own independent body but are interrelated through procedures, QHSE System), the Integrity Management System (hereinafter, Integrity Management System), and the People System, all with their own autonomous body, but interrelated through procedures, which develop and describe the specific action guidelines to be followed, according to the process map attached as an appendix to this manual. These procedures respond to the requirements set out in the standards to be complied with, also covering the rules of good practice that have been consolidated over the years in the company. They also include the relevant formats, records and controls that demonstrate compliance.



In order to facilitate the knowledge and joint application of the UNE 166002, ISO 9001, ISO 14001, ISO 37001, ISO 27001, ISO 45001 and ISO 17020 standards, and given that their requirements are compatible, the requirements of these standards have been integrated into the Management System, with the following clarifications and observations:

- The chapters and sections of this manual have followed the table of contents of ISO 9001, incorporating the necessary requirements in each chapter or section, opening, where necessary, a sub-section;
- Some of the requirements of ISO 37001 are further developed in particular in the Integrity Management Manual, so that both the Integrity Management Manual and the Integrity Management Manual need to be taken into account, as they complement each other.
- The OSH aspects and requirements are further developed in the OSH-specific manual "T-MSGSSST-Manual of the Occupational Health and Safety Management System" (hereinafter T-MSGSSST).

1.1. Integrated Management System Principles

The system is in accordance with ISO 9001 (Quality), ISO 14001 (Environment), ISO 45001 (Health and Safety), UNE 166002 (R&D&I), ISO/IEC 27001 (Information Security), ISO/IEC 17020 (Inspections) and ISO 37001 (Anti-bribery Management).

In accordance with the principles developed in the aforementioned standards, the TYP SA Group's Integrated Management System is directed and focused towards:

- The client and stakeholders, analysing and providing solutions to their needs;

- Leadership from the point of view of its leaders and managers, both to create, direct, maintain and improve the Management System and to maintain the TYP SA Group as a leader in its field of action;
- Risk management;
- The staff, enhancing their professional development, involving them in the success of the company and providing them with the best possible means and conditions, including occupational health and safety (hereinafter OSH), for the best performance of their mission in the company;
- Knowledge management;
- The processes¹, treating them holistically and not as isolated or independent elements;
- Continuous improvement² in the fulfilment of its obligations, and in the development and execution of its "products"³ and "processes";
- Objectivity in decision-making and impartiality⁴ in the exercise of inspection, appraisal and evaluation of projects or products;
- Suppliers⁵, establishing mutually beneficial relationships;
- Adequate compliance with the legal requirements in force at each place and time, as well as with any other commitment voluntarily entered into by the TYP SA Group;
- OSH assurance and promotion⁶;
- The upright behaviour⁷ of the company and all its employees, respect for the law and the prevention of the commission of illegal activities within the scope of its activity.
- Environmental protection⁸, and sustainable development, seeking a balance between the environment, society and the economy.
- The improvement in environmental performance to be applied to the environmental aspects of its activities, considering the life cycle perspective.

¹ **Process:** A set of mutually related or interacting activities that transform inputs into outputs.

² **Continuous improvement:** Recurrent process by which objectives are set and opportunities are identified to enhance the ability to meet quality, environmental and OSH requirements on an ongoing basis through audit reports and findings, data analysis, management review or other means, and generally leading to corrective or preventive action.

³ **Product:** Result of a process. In ISO 9001 and in this document, the term "product" applies only to a product intended for or requested by a customer.

⁴ **Impartiality:** Presence of objectivity. Absence of conflicts of interest, so as not to negatively influence the activities of the inspection body.

⁵ **Supplier:** an organisation or person who provides a product to the TYP SA Group.

⁶ **Occupational Safety and Health (OSH):** Conditions and factors that affect, or could affect, the health and safety of employees or other workers (including temporary workers and contract staff), visitors or any other person in the workplace. NOTE: Organisations may be subject to legal requirements on the health and safety of people beyond the immediate workplace, or who are exposed to workplace activities.

⁷ **Behaviour of integrity:** Honest and upright conduct, governed by ethical principles and values that guarantee responsible and respectful behaviour in accordance with current legislation and the ethical rules that apply in the field of its activity.

⁸ **Environment:** The environment in which an organisation operates, including air, water, soil, natural resources, flora, fauna, humans and their interrelationships. NOTE 1: The environment can range from within an organisation to the local, regional and global system. NOTE2: The environment can be described in terms of biodiversity, ecosystems, climate or other characteristics.

- Provide an information security framework⁹ with the objective of protecting the confidentiality, integrity and availability of data in information systems from any threat and from anyone with malicious intent.

The work carried out by TYPESA Group companies has an impact on the environment in two ways:

- a) Through the results of the work of the office or works supervision, identifying the legal environmental requirements and establishing or influencing the necessary measures to minimise the negative environmental impacts and enhance the positive ones during the execution of the planned works, which is a substantial part of its quality¹⁰, and is therefore assured by compliance with the ISO 9001 standard.
- b) Through office work, in fixed or temporary worksites, in which consumption and waste are controlled, aiming to improve environmental performance. In addition to compliance with legal requirements, correct environmental management is ensured through compliance with the ISO 14001 standard.

Furthermore, as part of TYPESA's commitment to society, the TYPESA Foundation for Cooperation was created in 2008. The Foundation aims to contribute to improving the living conditions of the most disadvantaged communities by providing them with the means to help them create the capacity to develop themselves.

1.2. Documentation of the Integrated Management System.

The Integrated Management System is developed and documented¹¹ at:

- a) The Code of Ethics, policies, statements and plans,
- b) Management manuals,
- c) The plan for the prevention of occupational hazards¹² (hereinafter, PPRL) and its essential management and application instruments, which are the risk assessment¹³ and the planning of preventive activities^{14 15} ;
- d) Integrated Management System procedures,
- e) Objectives and targets,

⁹ **Information security:** Preservation of the confidentiality, integrity and availability of information. NOTE: May also include other properties such as authenticity, accountability, non-repudiation and reliability.

¹⁰ **Quality:** the set of characteristics of an entity that give it the ability to meet stated and implicit needs.

¹¹ **Document:** minimum self-sufficient information for a given purpose, contained in any medium, generated by a person and relating to a single entity or logical grouping of several entities. The medium of support may be paper, magnetic, optical or electronic disk, photograph or standard samples, or a combination of these.

¹² **Occupational Risk Prevention Plan (applicable in Spain):** this is the tool through which the TYPESA Group's preventive activity is integrated into its general management system and its occupational risk prevention policy is established.

¹³ **Risk assessment:** the process of evaluating the risk(s) arising from a hazard(s), taking into account the adequacy of existing controls, and deciding whether or not the risk(s) are acceptable.

¹⁴ **Occupational risk assessment:** A process aimed at estimating the magnitude of those risks that could not be avoided, obtaining the information necessary for the employer to be able to take an appropriate decision on the need to adopt preventive measures and, if so, on the type of measures to be adopted.

¹⁵ **Planning of the preventive activity:** establishment, design and programming of all those activities and measures, including the necessary human, material and economic means, to be adopted in order to eliminate or control and reduce the risks that the risk assessment determines to be unavoidable.

- f) Memoranda, minutes, instructions, communications and guidelines,
- g) Lists and summaries of the legal requirements applicable to each of the TYP SA Group's workplaces,
- h) Registrations.

The documented procedures of the Integrated Management System are listed in the Annex. 9.6 These procedures may be supplemented by written mandatory instructions or other documents (memoranda or minutes of meetings). In order to provide guidance on certain aspects, the system is supplemented by guides, which have the character of recommendations;

The documents that make up the QHSE System are considered, in any case, basic regulations, shaping and sustaining the entire Integrated Management System in the general and transversal aspects.

The TYP SA Group's General Policy of the QHSE System and this Integrated Management System Manual, as well as the public documents related to the Integrity System can be freely consulted on the website, www.typsa.com.

All other documents, including procedures and due diligence, are for internal use and are available to staff, under access control, on the Group's intranet (page www.typsa.net), where this Manual is also available. The current versions of the System are only available on the intranet.

The procedures of the Integrated Management System shall be applied in the R&D&I activities under its responsibility.

The general procedures that apply to a contract may be reviewed by the customer at TYP SA Group offices and the procedures specifically developed for a contract are included in its quality and environmental plan in accordance with the provisions of 6.1.

Whenever possible, and in order to reduce paper consumption, documents will be disseminated and consulted by computer, and will be published on paper only when indispensable.

1.3. Starting data.

In the drafting of this document, the requirements and definitions contained in:

- ISO 9001 "Quality management systems. Requirements";
- ISO 9000 "Quality management systems. Fundamentals and vocabulary";
- ISO 14001 "Environmental management systems. Requirements with guidance for use";
- ISO 14004 "Environmental management systems. General guidelines on principles, systems and supporting techniques";
- ISO 10005 "Quality management systems. Guidelines for quality plans";
- UNE 166000 "R&D&I Management. Terminology and definitions of R&D&I activities";
- UNE 166002 "R&D&I Management: Requirements for an R&D&I QHSE Management System".
- ISO 45001 "Occupational safety and health management systems - Requirements with guidance for use";
- ISO 37001 "Anti-bribery management systems; Requirements".
- ISO 27000 "Information security management systems; Overview and vocabulary".

- ISO 27001 "Information security management systems; Requirements".
- ISO 27002 "Information technology. Security techniques. Code of practice for information security controls".
- ISO 17020 "Requirements for the operation of different types of inspection bodies".

The definitions of the concepts contained in the standards ISO 9001, ISO 9000, ISO 14001, ISO 45001, ISO 37001, UNE 166000, UNE 166002, ISO 27000, ISO/IEC 27001, ISO 27002 and ISO/IEC 17020 (hereinafter and in abbreviated form "basic standards") and, adapted to the characteristics and peculiarities of the work developed by the TYP SA Group, are defined at the bottom of the page on which they first appear and are listed, in alphabetical order, in the Annex. 9.7. In particular, it should be noted that the broad meaning given by ISO 9001 to the term "customer¹⁶ ", which is assumed in its entirety by the TYP SA Group, includes purchasers and users of the products and services provided by the TYP SA Group.

Consistent with the above, the terms "product" and "process" apply both to those generated to satisfy customer needs and to those resulting from any of the TYP SA Group's activities that may affect the environment, OSH or R&D&I activities.

Where reference is made to the term "product", it may also mean "service", as specified in ISO 9001.

1.3.1. Control of documents.

The TYP SA Group has and applies procedures TPD-01 "Identification of documents and records", TPD-02 "Control of QHSE System documentation", TPD-04a "Storage of project documentation" and TPD-04b "Storage of works documentation". These procedures set out the methods of general application to ensure that the general QHSE System documents and those specifically related to site management, control and supervision work, all of which are listed in Annex 9.6, are stored in the QHSE System. 9.6 comply with the requirements of the basic standards.

The application by TYP SA Group personnel of the aforementioned procedures ensures their control.

In accordance with 1.21.2, the control of documents that apply exclusively to TYP SA's laboratories is set out in its own manuals and procedures.

The General Management Systems Directorate, the General Technical Directorate, the members of the Compliance Committee and the Personnel Area identify and keep permanently updated on the website <http://www.typsa.net> the Manual, procedures and general formats of the QHSE System, and those of TYP SA's laboratories, as well as those of the Integrity Management System, thus guaranteeing the dissemination and updating of the modified documents.

Its review and approval¹⁷ is carried out by the persons stipulated in this document or in the procedures that develop it.

¹⁶ **Customer:** *organisation or environment that receives or is affected by the products or processes carried out by the TYP SA Group.*

¹⁷ **Approval:** *Formal action by which a formally authorised body authorises the use of a Document, service or process in a given area and for a given use.*

The TYP SA Group does not undertake to keep uncontrolled copies of Integrated Management System documents up to date.

1.3.2. Control of records.

Procedure TPD-03 "Records" and procedure TPD-01 "identification of documents and records" establish the general requirements for the identification, collection, codification, filing, storage, protection, retention time, retrieval and final destination of the records of the Integrated Management System.

In general, and without the following list being exhaustive, the TYP SA Group keeps records of:

- Checking¹⁸ and approval of QHSE System documents;
- Management reviews of the Integrated Management System and the actions arising from it;
- The education, training, skills and experience of staff;
- The baseline data¹⁹ of the design and development;
- Review and verification of design and development and validation, where possible;
- Changes to study and project documents approved by the client;
- The nature of the non-conformities²⁰ and any subsequent action taken, including concessions²¹ ;
- Waste generated;
- Identification of environmental aspects;
- Consumption of natural resources;
- Waste removals.
- Communications, appeals²² , complaints²³ or customer complaints;
- Unique product identification, where traceability²⁴ is a customer requirement;
- Remedial²⁵ , corrective²⁶ or preventive actions²⁷ ;

¹⁸ **Checking (review) of a document:** examination of a document or logical grouping of documents to ensure that it has no overlaps, gaps or contradictions, that it has no conceptual or formal errors, and that the instructions received for its preparation have been complied with and that it is consistent with its source data.

¹⁹ **Starting data:** Starting data of a work or of the design and development: conditioning factors external to the work and whose knowledge is necessary and obligatory for its execution, such as: requirements issued by other interested parties, applicable legislation, ordinances and regulations in force, requirements stipulated by the client, physical, environmental or socio-economic characteristics of the surroundings and, when necessary, environmental impact study.

²⁰ **Non-conformity:** non-compliance with a specified requirement.

²¹ **Grant:** authorisation to use a non-compliant document or product or to proceed to the next stage of a non-compliant process.

²² **Appeal:** Request by the supplier of the inspection item to reconsider the decision made by the inspection body in relation to the inspection item.

²³ **Complaint:** An expression of dissatisfaction, other than an appeal, submitted by an individual or organisation, related to TYP SA's activities, for which a response is expected.

²⁴ **Traceability:** the ability to reconstruct the history, application or location of an entity by means of recorded identifications.

²⁵ **Remedial action or Repair:** action taken on a non-conforming product to reduce the non-conformity to acceptable values, even if it does not conform to the originally specified requirements.

²⁶ **Corrective action:** action taken to eliminate the causes of a detected non-conformity, defect or any other existing undesirable situation, in order to prevent its recurrence.

²⁷ **Preventive action:** action taken to eliminate the causes of a potential non-conformity, defect, or other undesirable situation, in order to prevent its occurrence.

- Audit reports;
- The inspection reports and other records set out in the specific procedure for this task;
- The results of calibration and checking or verification²⁸ of measuring equipment;
- The validity of the measurement results, where the measuring equipment is found not to be in conformity with the requirements;
- The different OSH activities and actions (documentation of accidents, incidents, health surveillance, delivery of personal protective equipment, OSH meetings, etc.).
- Complaints and their investigation files, within the framework of the implementation of the Integrity Management System, their results and records.

Except in cases where longer retention periods have been established with the client, the minimum retention period for environmental and quality records begins at the end of the contract and shall be three years as a general rule, with the specificities provided for in the procedures for some records in each case.

2. Integrated Management Manual

This manual and the procedures and documents that develop it establish and describe the minimum requirements of the Integrated Management System that TYP SA Group companies must comply with in order to:

- a) Demonstrate their ability to deliver, within the framework of full performance, products that meet the requirements:
 - Applicable laws and regulations;
 - Specified by the customer, including the requirements of the contracted products and services;
 - Not established by the customer, but necessary for the specified or intended use, where known to the TYP SA Group;
 - Additional to the above and determined by the TYP SA Group, by the rules voluntarily assumed by it;
- b) Increase customer satisfaction.
- c) Identify and manage risks and opportunities.
- d) Strengthening R&D&I tasks.
- e) Protect the environment.
- f) Promote the consideration of social development, economic and environmental sustainability aspects in the development of our work.
- g) Promote and ensure OSH by implementing measures and activities necessary for the prevention of occupational hazards.
- h) Ensure information security and confidentiality, where this is a requirement.

²⁸ **Verification of measuring equipment:** confirmation by examination and provision of objective evidence that the specified requirements have been met.

- i) To ensure independence, impartiality and integrity in the performance of inspection services, in accordance with ISO/IEC 17020.

2.1. Organisational context.

2.1.1. Internal and external issues relevant to the organisation.

2.1.1.1. Description of the organisation.

The TYPESA Group is an **independent** group of engineering, architecture and consultancy services companies, leaders in infrastructure, energy, environment and city solutions.

Since it was founded in 1966, it has participated continuously in the development of all kinds of infrastructures and facilities in Spain and in countries all over the world, contributing with its work to create better living conditions for citizens.

The TYPESA Group's international experience extends to countries on all continents. At present, international work represents a very large percentage of the Group's total work.

The TYPESA Group has highly specialised multidisciplinary teams with a workforce of over 3,000 professionals, 70% of whom are engineers, architects and other university graduates. It has established itself as one of Spain's leading consulting engineering and architectural firms in the drafting of reports, studies and projects (hereinafter referred to as "cabinet work"²⁹) and in the management and control of works in the different branches of engineering, building, architecture and the environment, with a wide national and international presence. It also has its own laboratories for the quality analysis of materials and the environment, both chemical and bacteriological.

Our business model is therefore based on offering quality solutions in design, construction, maintenance and improvement of infrastructures to various industries, organisations and government entities. This includes budgeting, hiring highly specialised personnel and investing in technology and equipment to deliver high quality services. In our case, where we also provide consultancy and technical advisory services, we require the hiring of experts in different disciplines.

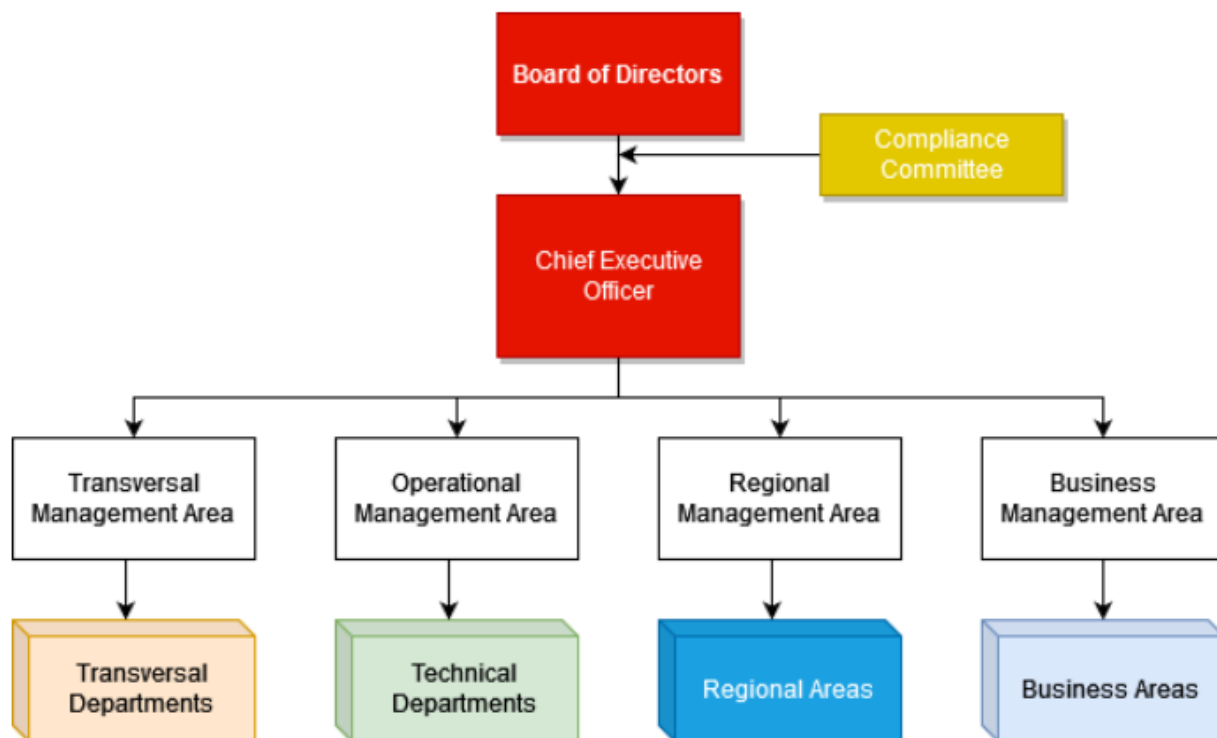
In short, we must identify market needs in order to offer specialised services in various sectors of the economy, which requires an investment in highly qualified personnel, technology and equipment to offer a quality service and personalised attention to clients.

TYPESA's organisational structure is described in procedure TPO-01.

TYPESA, as a multidisciplinary engineering company, is structured, in its productive scheme, in what we call a **Three-Dimensional Matrix Organisation**, which is made up of Management Areas, where the divisions are located, Production Areas, where the departments are located, and Territorial Areas.

It also has Transversal Support Areas, which provide horizontal service to the rest of the areas.

²⁹ **Cabinet work**: includes a) information processing: work whose purpose is to compile and organise information. b) studies: work resulting in conclusions or recommendations. They may include sketches, diagrams and economic estimates. c) projects: work by means of which the quality, characteristics and budget of the works or products to be built, installed or assembled are defined and determined; inspection and assessment of engineering projects.



TYP SA's production structure is divided into **divisions** (within Activity Divisions), **technical departments** and **territorial divisions**.

- **Divisions**

The divisions are areas mainly oriented towards the management and direction of contracts, responsible for TYP SA's main interlocution with its client and for the direction and coordination of the production of works. The divisions are grouped by Business Divisions.

- **Technical Departments**

Highly qualified, responsible for production. Each department is specialised in a particular discipline or area of technical knowledge, coordinated by one person in a division. The members of each department form a single cohesive group, with members spread across the different workplaces.

- **Addresses Territorial General Directorates**

These correspond to the geographical areas in which we operate. TYP SA is present where its clients live, creating capacities in its territory, with local personnel who have perfect knowledge of the circumstances and needs of the environment.

- **Transversal Areas**

In addition to this basic production structure, TYP SA has transversal support structures that provide horizontal corporate services to all production and management units.

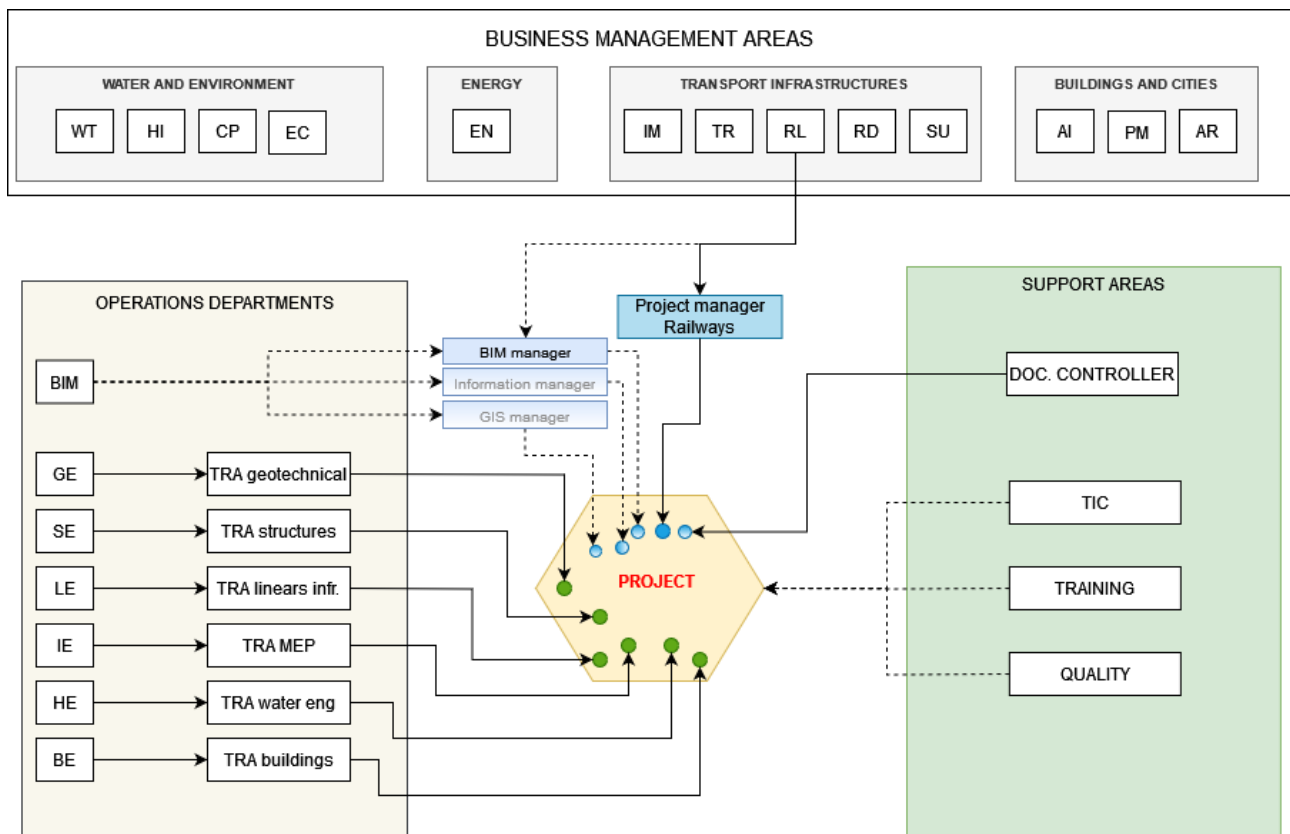
2.1.1.2. Description of the functioning of the Group

The coordinated operation of the territorial divisions with the divisions and departments makes it possible to bring all the company's international experience and know-how to bear on local problems. The harmonious functioning of the three areas allows us to provide services of the highest technical quality adapted to the conditions of each specific region or country, capturing the needs and sensitivities of the client.

- **Work organisation in studies and project work**

TYPESA's systematic approach to project development is based on what we call a "matrix" structure, where work is distributed by specialised technical areas, which we call departments - geotechnical, structures, water engineering, linear works, installations and building - and is coordinated by a management division, where the person in charge of the work (Project Manager in TYPESA's management system terminology) is located. The management divisions are general technical areas, organised in accordance with the company's main lines of business, known as general activity divisions, and focused on the client, in accordance with the main infrastructure to which the project in question refers.

All work is led by a Project Manager (PM) with extensive experience in the business area. Each activity or discipline involved in a job has a Responsible Activity Technician (TRA), responsible for the organisation, planning, coordination, execution and control of the tasks in the project related to their activity.

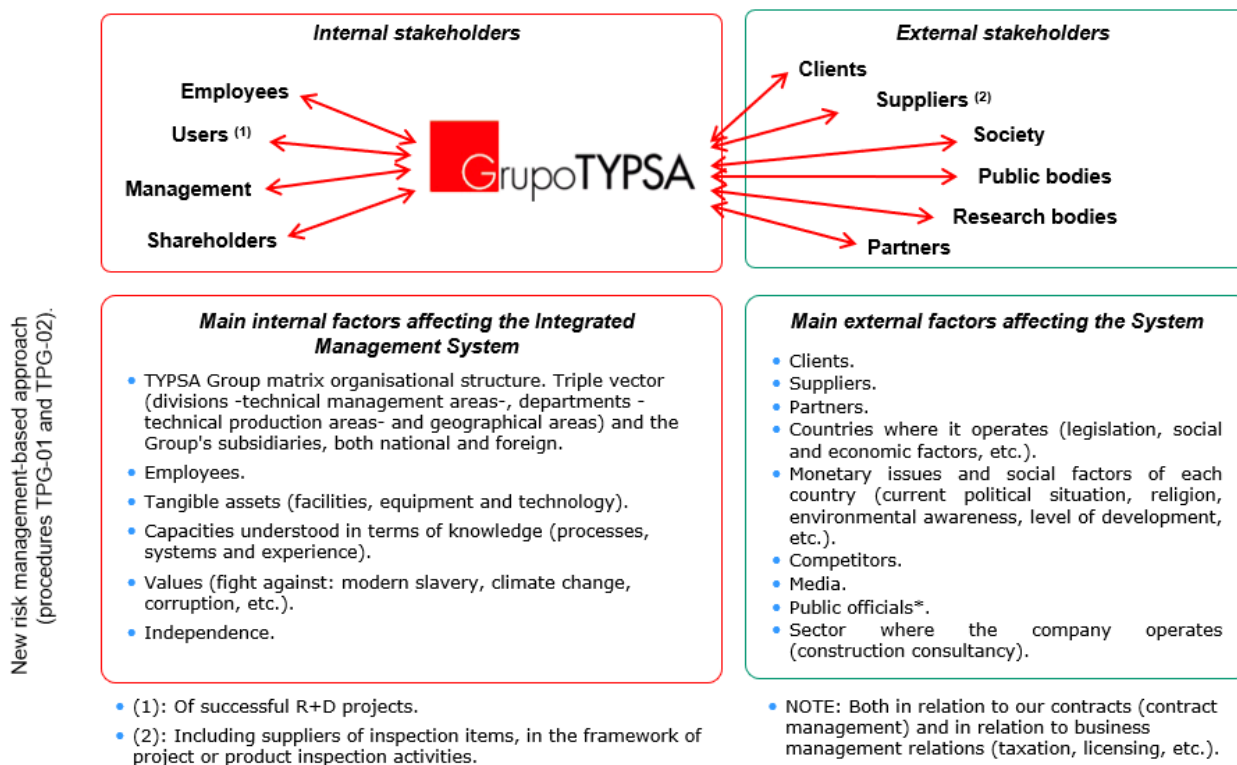


- **Organisation of work in supervision, direction or management of construction sites**

In contracts where the work entrusted to TYPESA consists of technical assistance for the direction, supervision or management of works (sometimes including the bidding process and project management), an ad hoc work team is set up, headed by the Head of Unit (JU), who is responsible for leading TYPESA's team and maintaining the relationship with the client at all times. The work centre is usually located where the work to be directed, supervised or managed is located, and the whole team travels to the site to carry out their duties.

The JU is appointed by the Director of the Division in which the infrastructure to be managed or supervised is located. All the tasks and functions of the team are planned at the outset by the JU, who is responsible for drawing up the quality plan for the contract and explained to the team at the start of the work. The quality plan is drawn up on the basis of TYP SA's quality system supervision procedures.

2.1.2. Stakeholders



2.1.2.1. Stakeholder needs and expectations

Management: Seeks to legitimately have information available for decision-making, and with it, to generate profitability, benefit and sustainability, both for the company itself and for all the people who participate in its organisation and operation; it also seeks prestige and national and international leadership in the market in which we participate, as well as to contribute to the general good of our society. It pursues excellence by ensuring the quality of our processes and products, and by promoting innovation in the search for solutions with high added value. To guarantee the good name of the company, and to demonstrate its commitment to upright behaviour, respectful of the law and scrupulous in the fulfilment of its obligations and the observance of ethical principles of conduct, becoming a model of reference both internally and externally. In order to achieve these aims, its goal is to build customer loyalty and guarantee their satisfaction. On the other hand, Management requires the successful implementation of an information security strategy aligned with TYP SA's business strategy in order to safeguard and protect information while maintaining the confidentiality, availability and integrity of data, in the face of possible attacks that could hinder business continuity.

In relation to the environment, the Management pursues a responsible commitment to the sustainability of the environment, thus contributing to the enhancement of well-being and genuine progress, going beyond compliance with legal obligations. It seeks environmentally friendly business practices that contribute to the minimisation of environmental impacts. In addition to working on the impacts that the TYP SA Group's activity may produce, directly or indirectly. This responsible commitment is articulated along three main lines; the

responsible use of resources, the correct management of our waste and the demand for environmentally correct practices for employees and suppliers.

TYP SA has two main strategies to combat climate change:

On the one hand, from a corporate point of view, it has been calculating and verifying its carbon footprint since 2013, having them, moreover, registered in the National Carbon Footprint Register of the Ministry for Ecological Transition, achieving not only recognition for its calculation, but also for having achieved its reduction over these years.

On the other hand, a strategy developed in the field of projects by the Sustainability and Environmental Assessment Division, integrating the climate change variable in all phases of the projects, with the aim of achieving both mitigation of GHG emissions and incorporating measures to adapt to climate change, with the sole objective of developing resilient infrastructures.

With regard to OSH, assumes full responsibility and accountability, makes decisions and ensures the necessary resources and means to prevent any type of human, material or economic loss that could occur due to work-related health and safety damage in the organisation in its areas of influence and/or through the activities, processes, products and services that are under the control or influence of the organisation itself. Assumes the requirements of leadership and commitment with respect to the OSH Management System in all aspects determined by ISO 45001 and especially in the participation and consultation of workers.

Employees: They aspire to professional recognition and to be adequately compensated for their work; to have, during their professional life at TYP SA, opportunities to enhance their skills and broaden their knowledge and experience necessary for their professional development. They seek a safe and integrated working environment and also to have the possibility of constructive feedback from management on their job responsibilities. They aspire to feel a sense of ownership and pride in belonging to a leading and ethically exemplary business group, and to be satisfied with their job performance. They require a full explanation of all company policies; they want to be involved in the business project and for the organisation to recognise commitment to integrity as a relevant factor in performance appraisal. They aspire to be involved and consulted in all aspects of OSH that may affect them. Employees shall have the necessary mechanisms in place to ensure the availability, integrity and confidentiality of the information they handle for the performance of their duties and the protection and confidentiality of their personal data.

With regard to information security, employees are an active part of it with appropriate policies, systems and training, where security awareness and good practices are the basis for TYP SA's continuity and good reputation.

Shareholders: They seek the profitability of the company and its long-term survival, within a framework of sustainable business development that guarantees the security of the information that underpins TYP SA's business. They aspire for TYP SA to continue to maintain its prestige, leadership and reputation as a company that seeks technical excellence in accordance with the highest ethical standards and conduct.

Users: In relation to the product of successful IDi projects, they pursue that the same enable them to have better tools or working methods that reduce or minimise the commission of errors, or allow them to undertake work in new fields, or tackle known jobs with more reliability and investing less time, and/or also satisfy their expectations of security of the information generated. In this way, to improve their skills or knowledge of new techniques or ways of solving the problems they face in their professional work. All of this while knowing and respecting the system's information security policies, the Code of Ethics and the Corporate Integrity Policy, with which the organisation's business strategy must be aligned.

Clients: They require us to meet their expectations, and solve their problems, complying with the law and their own commitments in relation to integrity and ethical behaviour, where available. They aspire to see us as their partners, that we are able to identify and meet their requirements and needs, providing them with appropriate and sustainable solutions. They expect us to be highly qualified professionals to carry out the work entrusted to us, to anticipate any problems that may arise and to provide them with a high quality service, with dedication and punctual fulfilment of the commitments made. They expect us to provide not only the service for which they formally contract us, but also the service they really need. They demand honesty, trustworthiness, integrity and loyalty. Sometimes, they also demand additional measures in terms of objectivity, impartiality and independence in the development of our services, as project or product evaluators and also corporate social responsibility and/or TYP SA's commitment to safeguard and guarantee the security of information with the ultimate aim of preserving the confidentiality, availability and integrity of data. They expect to receive services with guaranteed health and safety in all production processes and product use and to obtain products guaranteed in terms of health and safety.

Research organisations: They aim to promote and develop research work resulting in a product - understood as the outcome of the research process, which may consist of a physical object or system or an intangible or intellectual product - that improves people's lives, either directly or indirectly.

They expect us to environmentally comply with legal requirements and apply our efforts to minimise risks and negative impacts on the natural and social environment. They also expect us to guarantee information security and to preserve the confidentiality, availability and integrity of the information and data related to the research projects in which TYP SA participates. They also demand that the entire process is carried out in accordance with the requirements that the company has voluntarily adopted and which are set out in the Code of Ethics and the Corporate Integrity Policy, applying the procedures and due diligence required by the system.

Society: TYP SA expects its involvement to contribute to the general good and progress of society, the improvement of living conditions, health and safety, sustainability (actively fighting climate change), compliance with current legislation and behaviour in accordance with national and international ethical standards. They expect transformational leadership that allows companies to generate a social, economic and environmental impact that lasts over time. All of this while following the highest information security requirements to strengthen the importance of information in the eyes of society.

Partners: They seek the long-term profitability and sustainability of the company, as well as TYP SA's compliance with the client's requirements and expectations for the work to be carried out jointly. In addition, they seek to preserve and guarantee the security of information and data, both related to the work to be carried out and those provided by their organisation and its employees. They expect to partner with companies that have prestige and reputation and that have and act in accordance with ethical principles that are known within the organisation itself and to third parties through publication in the relevant media.

Suppliers: They aspire to adequate and justifiable remuneration, in accordance with the work carried out. They expect TYP SA to provide them with the necessary requirements and information to be able to fulfil their commitments in an orderly and timely manner. They expect to be selected not only on the basis of their technical capability but also according to criteria of sustainability and actively combating climate change, innovation and commitment to integrity. They may have expectations of loyalty to TYP SA. They are aware of TYP SA's QHSE Management System policies, the Code of Ethics and Corporate Integrity Policy, as well as the information security requirements necessary to preserve the confidentiality, availability and integrity of information and data.

In relation to suppliers of items for inspection, they expect the inspection to be carried out with objectivity, impartiality and integrity, by an independent and fully qualified body, and to agree to reconsider its decision if requested to do so in a timely manner.

Public bodies: They expect TYP SA to comply with its legal obligations in the administrative field (proper processing of permits, licences, settlement and payment of taxes, rates and public prices, etc.), as well as with the highest ethical standards and information security requirements to guarantee the confidentiality, availability and integrity of information and data.

Civil servants: They aspire to exercise the public function without pressure, in a transparent and honest manner and in full compliance with the law.

In addition to what is indicated for each of them, all identified stakeholders expect to have mechanisms to communicate any query, suggestion, complaint or incident, without fear of reprisals of any kind, provided they do so in good faith.

In addition to the general stakeholders identified in this manual, a document with the identification of OSH-specific stakeholders and a document with an OSH-specific SWOT analysis is kept up to date in the OSH Management System documentation.

2.1.3. Scope³⁰.

2.1.3.1. Subjective scope

The TYP SA Group consists of a parent company, Técnica y Proyectos SA (TYP SA), with its registered office at C/ Gomera 9, 28703 San Sebastián de los Reyes (Madrid).

The TYP SA Group has a worldwide presence through its network of subsidiaries and branches, which can be consulted on the Group's website (www.typsa.com). In addition, in 2008, the TYP SA Foundation for Cooperation was created with the aim of contributing to improving the living conditions of the most disadvantaged communities by providing them with the means to develop their own capacities.

This document is binding on all persons working for or on behalf of the TYP SA Group.

2.1.3.2. Target Scope

This document sets out the general framework for the development and implementation of the Integrated Management System in the development of :

- a) The management and direction of the Integrated Management System.
- b) Consultancy, studies and projects, of:
 - Treatment and supply of drinking water, sanitation and treatment of urban and industrial waste water;
 - Water quality;
 - Noise and vibration control;

³⁰ The determination of the scope of the Integrated Management System takes into account relevant internal and external issues, the needs and expectations of interested parties (employees and others) and applicable legal and other requirements.

- Management and treatment of solid urban and industrial waste;
 - Pollution control;
 - Investigation and remediation of contaminated land;
 - Environmental remediation and regeneration;
 - Environmental impact assessment;
 - Spatial planning;
 - Statistics, surveys and censuses;
 - Management of expropriation procedures;
 - Administrative file processing services;
 - Architecture;
 - Waters, ports and coasts;
 - Transport infrastructure;
 - Agronomy;
 - Industrial installations;
 - Renewable energies.
 - Environmental and forestry engineering;
 - Information and communication systems;
 - Environmental laboratory (chemical and microbiological tests and analyses);
 - Health and safety;
 - R&D&I.³¹
- c) Management, direction, supervision, control and monitoring of building, hydraulic, transport infrastructure and industrial installation works.
- d) Management and maintenance of infrastructures and facilities.
- e) Health and safety coordination in the design phase and in the execution phase.

³¹ In particular, the scope of R&D&I projects will be as follows:

- *Computer technology (design of calculation systems and computer applications applied to the life cycle of transport, water, energy and building infrastructures).*
- *Building technology (organisation and digitisation of information, building information modelling (BIM) and building and city technology).*
- *Mobility, transport planning and engineering (urban planning, ports, airports and linear infrastructures).*
- *Planning and hydraulic engineering in the integral water cycle (catchment, regulation and storage, transport and distribution infrastructures).*
- *Environmental engineering and technology (circular economy; urban waste and wastewater reuse).*
- *Renewable energy generation, transmission and distribution (solar and wind energy).*

- f) The information security systems that support them according to the Statement of Applicability (SOA) in force.
- g) Inspections of railway projects for infrastructure and control, command and signalling subsystems, within the framework of UNE-EN 50126, UNE-EN 50128 and UNE-EN 50129, UNE-EN-ISO/IEC 17020, implementing regulation (EU) No 402/2013 on the adoption of a common safety method for risk evaluation and assessment and implementing regulation (EU), all according to the requirements of a type C inspection body³² established by ISO/IEC 17020.
- h) Capacity building in the most disadvantaged communities, through the provision of engineering and consultancy services and/or any other activity included in the corporate purpose of the TYPESA Foundation for Cooperation.

Similarly, they also apply the System's requirements to the corporate management areas and transversal services (Directorate General Administration, Directorate General Corporate, Directorate General Management Systems and Directorate General Technical).

In accordance with the annexes of ISO 9001, ISO 14001, ISO 45001, ISO 37001, UNE 166002, ISO/IEC 27001, and ISO/IEC 17020, each in their respective fields of application, the TYPESA Group combines in this document its quality, environmental, OSH, R&D&I, integrity management and information security management systems, in such a way that it is complete and consistent with these standards. All manuals, procedures, memoranda, formats, records or any other documents constituting or forming part of the systems referred to herein are governed by this manual, and shall be interpreted in a manner consistent with what is set out herein. The provisions of this manual and the rest of the documents of each system are mutually complementary, all of them forming a coherent and complete set of documents.

The Quality System of TYPESA's laboratories is constituted by what is indicated in its own manuals and procedures³³ in accordance with the ISO/IEC 17025 and 17020 standards.

Regardless of the formal certification of new permanent work centres which, in order to be assessed by certification or accreditation bodies, as appropriate, require a minimum period of operation, it is the TYPESA Group's policy and vocation that all its permanent centres should have certifications or accreditations in quality, environmental, health and safety and crime prevention management.

2.2. General processes.

The processes and tools that the TYPESA Group considers necessary for the development and application of its Integrated Management System have been grouped and classified as follows:

- Direct or production³⁴.
- Indirect, auxiliary or support³⁵.

³² As the activities related to section b) transport infrastructure consultancy, studies and projects, and the activity of section g) railway project inspections, may involve a conflict in the field of impartiality, the Integrated Management System imposes that, although it is admissible to carry out an inspection of a design in which TYPESA has participated in its preparation, the technicians involved in such inspection must not have been involved in it.

³³ **Procedure:** a specified way, whether documented or not, of carrying out an activity or process

³⁴ Processes linked to the contract and directly influencing the product delivered to the customer.

³⁵ Processes needed to perform and measure operational processes efficiently.

- Address³⁶, management or strategic.

The sequence and interaction of the above processes are presented in the process diagram annex; those related to the performance and control of tests and analyses by TYP SA's laboratories are identified and developed in their manuals and procedures.

The documented procedures set out in the Integrated Management System are accessible on the Group's intranet (www.typsa.net).

The environmental scope is defined in point 2.1.3 of this manual.

3. Leadership

3.1. Governing body

In the case of the Integrity Management System, the role of the governing body, which is responsible for:

- Ensure that TYP SA's strategy and Anti-Bribery Policy (Corporate Integrity Policy) are aligned;
- Be informed of and approve the risk threshold that the company is willing to tolerate through the approval of the Risk Map prepared by the Compliance Committee in accordance with the adopted methodology;
- Approve the Corporate Integrity Policy, the Code of Ethics, and its amendments, as well as other relevant system documents such as the Integrity Management Manual;
- Appoint and dismiss the members of the Compliance Committee;
- Exercise overall supervision over the content and operation of the Integrity Management System (IMS) by studying and analysing the periodic reports received from the Compliance Committee and Senior Management, as well as any specific reports that may be received from them as a result of any event or circumstance which, in accordance with the System, must be reported to them;.
- Require that the necessary resources are allocated and distributed, including approval of the annual budget for the implementation of the Integrity Management System.

3.2. Senior Management Commitment ³⁷

Senior Management fully embraces the principles of the Integrated Management System and conveys its full support to all persons working for or on behalf of the TYP SA Group, and evidences³⁸ its commitment and compliance with the requirements stipulated in the basic standards through:

³⁶ Processes necessary to establish and measure compliance with the TYP SA Group's quality and environmental objectives.

³⁷ For the purposes of the Management System, Senior Management consists of the Chief Executive Officer, the Chief Administrative Officer and the Chief Production Officer. In subsidiaries, the Senior Management may be defined by agreement of the governing body.

³⁸ **Evidence:** information that can be objectively demonstrated to be true because it is based on facts obtained by observation, measurement, testing or other means.

- a) The definition and dissemination of the Policy (see point 5.3.2.1). 5.3) and objectives for quality and environment, OSH, R&D&I, integrity management and information security management;
- b) Promoting the use of the process approach and risk-based thinking;
- c) The transmission and dissemination, to all persons working for the TYP SA Group or on its behalf, of the commitment to satisfy the needs of its customers and other interested parties;
- d) The allocation of sufficient and adequate resources for the effective functioning of the systems, and in particular by providing;
- e) Assuming responsibility and accountability for the effectiveness of the Integrated Management System;
- f) Assuming full responsibility and accountability for the prevention of work-related injury and ill-health and the provision of safe and healthy workplaces and activities;
- g) Promoting continuous improvement;
- h) Promoting an appropriate anti-bribery culture within the organisation;
- i) Ensuring the integration of the requirements of all systems affected by this manual into the organisation's business processes;
- j) Attending and leading meetings to set objectives and to monitor and review³⁹ their effectiveness and that of the Integrated Management System;
- k) Assigning directors, managers and decision-makers the technical means and authority to:
 - Demonstrate leadership in the prevention and detection of bribery as it applies to their areas of responsibility.
 - Initiate actions to prevent the occurrence of nonconformities relating to the Integrated Management System.
 - Acknowledge, report, record and process any non-conformity, complaint, appeal or grievance issued by customers or any other interested parties, affecting quality, environment, OSH, integrity management or information security and communicate it to the director, manager or person in charge affected, in accordance with the channels and conditions and scope established in the System itself, ensuring that there will be no reprisals for such information.
 - Monitor the handling of non-conformities and complaints until the deficiency has been corrected or the unsatisfactory situation has been resolved.
- l) Leading and supporting people to contribute to the effectiveness of the Integrated Management System, protecting them in this work and establishing and implementing the processes deemed necessary for the consultation and participation of workers in OSH matters.⁴⁰

³⁹ **Review:** Activity undertaken to ensure the suitability, appropriateness and effectiveness of the subject matter under review, in order to achieve stated objectives.

⁴⁰ Including health and safety committees.

- m) In terms of customer focus, as indicated above in chapter 1.1.1. 1.1The TYP SA Group understands this to mean, from an environmental point of view, society in general; from a quality and R&D&I point of view, any organisation that contracts, applies or is affected by its products or services (hereinafter, interested parties); from an OSH, integrity or information security point of view, in addition to the above, its own employees and all personnel who carry out work activities for the Group or act under its control or influence. In chapter 6.2Chapter 6.2 sets out the measures established in the TYP SA Group to ensure understanding and compliance with customer, legal and regulatory, environmental, OSH and information security requirements and those assumed by the organisation itself. Also, requirements relating to the identification, satisfaction and continuous improvement of customer needs, ensuring that risks and opportunities that may affect the conformity of products and services are identified and considered.

For the legal requirements applicable to environmental matters, the QHSE System has the procedure TPA-01 "Identification and assessment of environmental aspects and legal requirements" which describes the system used by the TYP SA Group to identify:

- Environmental legislation and its requirements applicable to the Group's activities and services.
- Other requirements, including those arising from environmental commitments that the TYP SA Group has signed up to.

It also describes the method used to carry out the periodic assessment of legal compliance.

With regard to OSH, those ultimately responsible for the different organisational units (territorial management, delegations, works units, fixed work centres, etc.) shall be responsible for the identification of legal requirements, with the advice and support of the corresponding OSH Services and managers. The identification and permanent monitoring of the applicable legal requirements and the control of their compliance must be reviewed and updated periodically.

3.3. Quality policy, Integrity, Environment, OSH, R&D&I and information security.

The Chairman, as a member of Senior Management, determines the Integrity Policy and the Quality, Environment, OSH, R&D&I and Information Security Policies. The application of this Manual and the procedures ensures compliance with these policies, in accordance with the following basic principles:

- a) The assignment of appropriately trained, motivated, trained and adequately equipped personnel for each job;
- b) Knowledge and understanding of this document, and those that develop it, are essential for all TYP SA Group employees to be aware of the importance of quality, the commitment to protect the environment, OSH, R&D&I and information security, all in compliance with and respecting the ethical principles of honesty and honesty established in the integrity management system. To this end, the policy, manual and general procedures of the Integrated Management System are disseminated to all personnel;
- c) All personnel are responsible for knowing and applying the parts of the Integrated Management System that affect their work;
- d) Managers and supervisors are responsible for ensuring that their personnel carry out work that may affect quality, OSH, significant environmental impact, or information security, in accordance with the manual, procedures or instructions in force at the time of signing the contract and under appropriate OSH conditions;

- e) Responsibilities for integrity management are set out in its own manual as well as in the OPT procedures, which define the roles and responsibilities of the relevant positions in the organisation.
- f) Responsibility is not delegated. Any person delegating functions always retains responsibility for them.

The review of the Integrated Management System includes, as a permanent aspect to be considered, the review of the content of its policies, checking their suitability for the organisation's purposes, the inclusion of the commitment to comply with the aforementioned requirements and the improvement of the effectiveness of the Integrated Management System itself, and sets the benchmarks for defining the objectives. The main policies are disseminated to all staff and interested parties by making them available on the TYP SA Group's website, on the intranet page, as well as by making the documentation available to all new employees of the Group.

3.4. Responsibility and authority.

The organisation chart in procedure TPO-01 shows the TYP SA Group's organisation. Each of its organisational units has a director, manager or person in charge, whose authority and responsibility for managing and applying the requirements of the Integrated Management System to the assigned tasks is set out in this manual and in the Integrated Management System documents.

The TYP SA Group considers that the same person may perform several technical or management functions as long as they do not interfere or represent a conflict of interest with the assigned functions of monitoring, supervision, review or verification.

The specific roles and responsibilities for personnel managing, performing or verifying any work related to quality management, environment, OSH, R&D&I, information security, or integrity management are set out in this document, in the Integrity Management Manual, in the general procedures cited in the Annex. 9.6 or in the work-specific ones set out in the quality plans cited in 6.1.

The Chairman assigns to the TYP SA Group's General Manager of Management Systems the responsibility and authority corresponding to the Management representative in matters of quality management ISO 9001 and environmental management ISO 14001; to the Director of the Personnel Area, the responsibility and authority corresponding to the Management representative in accordance with the provisions of ISO 45001, and to the Technical General Manager, the responsibility and authority corresponding to the Management representative, mentioned in section 5.3 of UNE 166002, as well as in section 5.3. of ISO 27001. The functions and responsibilities of the Compliance Committee in integrity management matters described in the Integrity Management Manual are attributed directly by the Board of Directors. It provides all of them with the necessary technical and financial means to comply with its requirements:

- Ensure that the QHSE System complies with the applicable and current ISO 9001, ISO 14001, ISO 45001, ISO/IEC 17025, ISO 37001, UNE 166002, ISO/IEC 27001, ISO 37001 and ISO/IEC 17020 standards;
- Ensure compliance with this Manual and the procedures and other documents that complement it;
- Ensure that the processes necessary for the development and implementation of the Integrated Management System are established, implemented and maintained and that they are generating the expected outputs;

- Ensure that the Integrated Management System complies with the basic standards in force and legal regulations at all times and in all places;
- To ensure the TYP SA Group's permanent commitment to continuous improvement in everything related to quality, the environment, OSH, R&D&I, information security and integrity.
- Periodically analyse and evaluate the Integrated Management System and report to the Chairman, as representative of Senior Management, and to the other members of the Quality Committee on the environmental performance, effectiveness and efficiency⁴¹ of the Integrated Management System and any necessary improvements;
- Ensure that awareness of customer requirements is promoted at all levels of the TYP SA Group;
- Report to the Presidency and to the general managers on the functioning and effectiveness of the QHSE System and on the improvement needs of the areas under their responsibility;
- Stop the delivery or execution of a product with critical or major non-conformities (see 8.11.1) until the non-conformity has been corrected or reduced to levels acceptable to the customer;
- Verify the selection and implementation of corrective or preventive actions and validate their effectiveness;
- To deal appropriately with appeals and complaints that arise in the course of the work;
- Maintain the Integrated Management System manual and procedures up to date, ensuring that the integrity of the system is maintained when changes are planned and implemented;

The Quality Committee appoints the Quality Management Coordinators⁴² and Environment⁴³, respectively, and the Management appoints the members, coordinators and collaborators of the Prevention Service, providing all of them with the necessary authority to analyse and investigate the compliance and effectiveness of the System, and to provide the Technical General Manager, General Manager of the Management System or Manager of the Personnel Area, as appropriate, with the necessary information to carry out their work.

In the area of integrity, the roles and responsibilities of the compliance committee are set out in the integrity management manual.

4. Planning.

⁴¹ **Efficiency:** *the relationship between the result achieved and the resources used.*

⁴² **Quality Coordinator:** *Responsible for the Quality management of the assigned work centres, responsible, in the Territorial Directorates to which they belong, for carrying out internal audits, providing support in matters of quality in the development of projects and preparation of tenders; maintaining the System in their Territorial Directorate and adapting it, where appropriate, to their particularities; manage proposals for improvement, incidents and non-conformities affecting or involving people from the Territorial Directorate; give training courses on the QHSE Management System to personnel of the Territorial Directorate who request it; inform the Directorate General for Quality of the degree of implementation of the System and of the data required for the review or monitoring of the QHSE Management System.*

⁴³ **Environmental Coordinator:** *Person in charge of the environmental management of the assigned work centres. His/her work consists of identifying environmental aspects, controlling consumption, identifying environmental legislation and evaluating the degree of compliance with its requirements, documenting waste management, managers (such as suppliers); defining specific objectives and periodically evaluating their compliance, stimulating the interest of all personnel in environmental issues, especially those related to saving energy, water and reducing waste. Carry out internal audits and prepare reports for the monitoring and review of the system.*

4.1. Actions to address risks and opportunities

The context and external and internal issues affecting the organisation shall be analysed by the management⁴⁴ on an annual basis at the System Review, and eventually at the System Monitoring meetings. Also, in the event of a significant change in the organisation's structure or activities. To this end, a SWOT analysis will be carried out in order to ascertain the real situation of our Organisation in relation to its weaknesses, strengths, threats and opportunities that are foreseen, and to plan a strategy for the future.

Based on the SWOT analysis, risks are identified and an action plan is established to mitigate them. The effectiveness of these actions is assessed in subsequent System Reviews.

The assessment of the bribery risk shall take into account the risk map based on the methodology developed for this purpose.

4.2. Quality, environment, OSH, R&D&I, information security and integrity management objectives

Based on the above, the TYP SA Group's Senior Management establishes annual objectives consistent with the policies defined, with the legal requirements and other requirements subscribed to by the TYP SA Group and with the specificities of each General Directorate, Territorial Directorate, Delegation and/or Division and Department.

The degree of compliance with the qualitative objectives is reviewed at the (annual) review meetings of the QHSE System, which are attended by the Quality Committee⁴⁵ and chaired by the Chairman. The monitoring of R&D&I objectives is carried out within the R&D&I committee, chaired by the Technical Director General in accordance with the provisions of 7.5.

Compliance with the integrity objectives is reviewed annually by the Compliance Committee and senior management, preceded by an annual report in which the Compliance Committee reports on relevant circumstances and events during the year, the status of previous review actions, changes in the organisational context, the performance of the system, the effectiveness of controls as well as recommendations and suggestions for improvement.

This Committee shall in turn report to the Board of Directors an executive summary of the annual review of the Integrity Management System.

4.3. Planning of changes to the Integrated Management System.

During review or follow-up meetings, the following are established:

- a) The persons or areas responsible for the implementation of the Integrated Management System and the objectives;
- b) Timetable or implementation programme;
- c) Specific and measurable human, financial and material means necessary to achieve them.

⁴⁴ In the area of integrity management, the System Review is carried out by the Compliance Committee and senior management.

⁴⁵ **Quality Committee:** executive and control body comprising the Chairman, the Chief Executive Officer, the business general managers and the regional general managers.

Changes to the basic documents that make up the Integrated Management System are approved at the System review meetings, and eventually at the System monitoring meetings, regardless of the fact that, for reasons of urgency, the General Management Systems Directorate or Compliance Committee may issue memorandums relating to particular aspects of the System that must be complied with.

The specific planning for carrying out a particular contract or job is set out in points 6.1.1 and 6.2. 6.1 y 6.3.1.

With regard to OSH, the Annual Preventive Activity Planning (PAAP), which includes the general planning of OSH for the entire annual period, is presented annually to Senior Management in a specific document for approval. Specific planning is also carried out in each company or Territorial Directorate, which is approved by the corresponding General Managers or Delegates. In addition to this, in each work centre and for each activity, hazards are specifically identified and risks are assessed, as established in procedure TPH-02 "Hazard identification and risk assessment", and the necessary planning is then carried out to correct all those aspects that have been detected that may pose some type of OSH risk.

5. Support.

5.1. Provision of resources

5.1.1. General

Depending on the workloads and needs expressed by the staff under their charge, the various managers and heads communicate to their immediate superior the needs for economic, human or material resources required to direct, execute, verify or audit the work, implement the Integrated Management System, meet the objectives and satisfy the needs of the clients.

The Director concerned reviews and resolves requests. If new staff are needed, he/she coordinates with the Director General of Human Resources for their recruitment.

The human resources necessary for the performance of the work or products required by its customers and/or stakeholders are set out in the quality plans, in accordance with the provisions of 6.1.

In the area of information security, OSH and integrity management, management allocates the resources necessary to achieve the objectives set out in its policy, both material (including technological and financial) and human. In terms of occupational risk prevention, these resources are specified in the T-MSGST Manual, in the PPRL and are programmed annually in the Annual Planning of Preventive Activity. In the area of integrity management, the budget allocated to it is determined at the annual meeting of the Compliance Committee with Senior Management.

5.1.2. Persons

The TYP SA Group's personnel are its most valuable asset and it is therefore in the best interest of its management to ensure that they have the knowledge, skills and experience necessary to carry out their duties, as well as their personal and professional satisfaction, in order to ensure the fulfilment of the company's objectives in accordance with its policies.

In accordance with the above and with the aim of motivating and exciting the company's personnel and promoting awareness among all of them of the importance of satisfying customer needs, respecting the environment, promoting OSH, complying with the Integrity Management System, information security and seeking innovative solutions, the Senior Management holds meetings with all personnel and has established a system for assigning prizes to people who stand out for their innovative ideas and proposals. This

encourages the participation of all personnel, fostering their creativity and teamwork, by means of the R&D&I tools specified in the UNE 166002, and which are included in section 6.6 of this document.

The TYP SA Group has adopted the concept of integrated OSH, which implies the participation of all personnel in preventive tasks, with all of them assuming obligations and responsibilities in prevention matters. Even so, for the technical part of OSH management, we have our own Occupational Risk Prevention Services, Agreed Prevention Services and company personnel who collaborate with these services. The OSH organisational structures and the main resources available are specified in the T- MSGSST Manual and in the PPRL.

5.1.3. Infrastructure, facilities and equipment.

Except for TYP SA's laboratories and for those R&D&I activities also related to laboratories, which require equipment and facilities specific to their speciality, and which are included in their corresponding manuals, procedures and instructions, the infrastructure necessary to carry out other TYP SA Group work is limited to those specific to consultancy work: office automation facilities, air conditioning, ergonomic work stations, etc.

Maintenance of computer equipment, network infrastructure, backup support infrastructure and management software is entrusted to the ICT department, which has an inventory of the programs, versions and licences in use. Any failure or deficiency in the equipment, network or software must be reported to ICT through the incident tool, available on the intranet.

The specific material resources for certain control and measurement tasks, commonly used in site supervision, are subject to the requirements of the procedure for the control of measuring equipment, the application of which ensures the reliability of the results obtained.

In the case of R&D&I activities not included in the previous point, if any other infrastructure is required, its acquisition or the adaptation of other existing ones will be determined.

5.1.4. Working environment.

Except for TYP SA's laboratories, and for those R&D&I activities also related to laboratories, which require certain environmental conditions to carry out certain tests and which are included in their corresponding manuals, procedures and instructions, for the rest of the work carried out by the TYP SA Group, the fundamental element for the development of the work is the human element, so the necessary working environment⁴⁶ is that of offices and offices, already considered in the previous section.

5.1.5. Monitoring and measurement

5.1.5.1. General and traceability of measurements

As indicated in the following sections, the methods and procedures developed by the TYP SA Group for the monitoring, measurement, analysis and continuous improvement of its Integrated Management System and of the services provided to our clients and stakeholders are based fundamentally on the continuous control of the work and activities carried out (see sections 6.2.1 and 6.3). 6.2.1 y 6.5.1) and in the periodic review of the Integrated Management System carried out as indicated in paragraph 7.5.

⁴⁶ **Work environment:** *The set of conditions under which work is performed. Conditions include physical, social, psychological and environmental factors (such as temperature, recognition schemes, ergonomics and atmospheric quality).*

The methods for the appointment of persons responsible for the performance of work and verification of conformity of products and services, and the verification of the adequacy of products and services are described in the System procedures.

The use of statistical techniques is limited to inspection and testing tasks carried out during and at the end of the work units carried out by the contractor, during the management, supervision or control of the work.

The methods and parameters (sample sizes and characteristics, test rates, etc.) necessary for the application of statistical control techniques for works supervision and monitoring are set out in the inspection point programme included in the quality and environmental management plan referred to in section 6.1.1. 6.1.

5.1.6. Organisational skills.

Knowledge is the accumulation of personal experience and information learned, acquired, produced or accessed by employees during their professional life. It includes learning from successes and failures, as these reinforce or enhance one's professional skills.

Knowledge management is the process by which we convert the personal knowledge of the members of the organisation into a shared asset that is accessible to all. It facilitates the transmission of information and skills among employees in a systematic and efficient way.

The TPO-10 procedure defines the functions and responsibilities of the Technical General Management in the field of organisational knowledge management, necessary for the product or service provided by the TYP SA Group.

The TPV-02 procedure describes the main utilities that make up the TYP SA Group's Knowledge Management System, which directs and manages the talent and experience accumulated to offer solutions adapted to the specific needs of the Client. Its focus on our vital business processes results in a significant improvement in the efficiency and quality of our services, ultimately providing value to our Customers.

5.2. Competence, training and awareness.

Procedure TPR-01 "Training" establishes the necessary qualification, training and experience requirements for personnel to carry out the work assigned to them according to their respective roles, as well as the measures of general application in the TYP SA Group to detect, identify and meet the training needs of personnel, ensuring that they are aware of the need and importance of their activities, how they contribute to achieving the objectives of the Integrated Management System and the potential consequences of not following the procedures or lack of knowledge or experience for the performance of the work assigned to them. To this end:

- a) Directors and managers analyse the competence, experience and training needs of their staff, assess the effectiveness of the training provided and propose training plans⁴⁷ to their general managers;
- b) On joining, the Human Resources Department distributes the TYP SA Group orientation guide and the list of documents of the Integrated Management System that must be read;
- c) The General Management Systems Department, the Prevention Services and the ICT department provide, respectively, the general and specific training on quality, environment, R&D&I, OSH and

⁴⁷ This includes mentoring, i.e. performing functions under the supervision of more experienced people in the organisation.

information security, necessary for TYP SA Group personnel to carry out their work in accordance with the QHSE System;

- d) Compliance with procedure TPR-01 "training" ensures that all TYP SA Group personnel have adequate training and information, and therefore competence and awareness, in OSH and integrity management;
- e) The Training Directorate keeps constantly updated records of staff qualifications, experience and training, as well as the minimum qualification required for the various jobs.

Evaluation of the effectiveness of the training provided is carried out:

- a) By the attendees themselves, by means of surveys at the end of the training action;
- b) By the direct managers or persons in charge of the participants, within a period not exceeding one year from the end of the training action, by analysing the application of the course by the participants during the performance of the work and the aspects in which it has helped them to improve their effectiveness in their work.

The results of the above tasks are forwarded to the Training Directorate as indicated in 5.3.

In addition, the TPO organisational procedures set out the roles of division, department, section, project manager, technical coordinator, unit manager and divisional coordinator, including the following:

- a) The directors, coordinators and the Technical Directorate General coordinate to communicate the acquisition of books and journal subscriptions, training needs, availability or need for means and resources, and the tasks inherent to knowledge management;
- b) To contribute to the training of their staff, disseminating their knowledge and experience, in order to keep them up to date with the latest developments and the most current practices within their field of activity;
- c) Feed the Integrated Knowledge Management System with the innovations and noteworthy activities of the projects developed;
- d) Participating in associations, attending congresses, publications and conferences to maintain the TYP SA Group's image of excellence in the market.

Regarding the Integrity Management System, all aspects related to the recruitment process of staff, including specially exposed staff, are defined in the TPR and TPE family of procedures.

5.3. Communication

5.3.1. Internal communications

Relevant information on the Integrated Management System is transmitted to all TYP SA Group personnel by:

- a) The Administration General Management, the Human Resources General Management and the Prevention Service, on joining the Group, by means of the information and documentation provided to the new employee;
- b) The General Management Systems Directorate, the General Technical Directorate, and the Compliance Committee through the courses they give on the Integrated Management System, through the publication of the System's documentation on the website <http://www.typsa.net/>, through memos, through the dissemination of the minutes of the QHSE System review and follow-

up meetings to the entire management body, and through e-mails with news on the Integrated Management System;

- c) Managers or superiors themselves during the performance of their duties and through the dissemination of information regarding the Integrated Management System that they receive from their superiors to the teams they lead;
- d) The Chairman, at the annual general meeting on the state of the TYP SA Group and at the regular System monitoring meetings held with the management and departments;
- e) The Directorate General, through annual meetings with each Division, Department, Area, Territorial Directorate or Delegation;
- f) Workers' representatives, where they exist.

Staff participation in the identification of weak points and in the proposal of ideas or suggestions for improvement and innovation on any aspect affecting the efficiency, quality or sustainable development of the work is encouraged through the application by the Presidency and Directorate Generals of a dynamic system of acknowledgements and awards, as well as through staff meetings with the Directorate General, which are held annually with each work team (divisions, departments, territorial directorates and delegations).

Any employee of the Group may make proposals for improvement through the incidents, improvements and queries tool on the intranet, through the Internal Information Channel for reporting irregular situations or issues affecting the Integrity Management System, through the equality mailbox, available on the intranet, for any suggestion relating to this aspect, in addition to any other direct communication channel with their hierarchical superior or by raising them at the annual meetings with the General Management.

R&D&I proposals are received and processed in accordance with procedures TPV-01 and 02.

TYP SA Group personnel have been informed through training courses and talks that they are free to transmit or request, to any of their hierarchical superiors, to the General Technical Director, to the Management Systems Director, or to the quality and environmental management coordinators or to the prevention managers and delegates, the information they consider relevant when they consider that:

- a) Their suggestions for improvement have not been taken into account;
- b) You need information on the Integrated Management System;
- c) The methods or measures for the application and implementation of the Integrated Management System are not effective.

In addition to all of the above, the participation and consultation of all workers in OSH matters is ensured through their representatives and prevention delegates, where they exist, and especially through the Health and Safety Committees of the different work centres.

In the case of queries about the Integrity Management System or the reporting of irregular situations, the Integrity Management Manual sets out the procedure for managing this information.

With regard to integrity management, the following internal communication activities are additionally established:

- To the Board of Directors.

The Chairman of the Compliance Committee shall report to the Board meetings on the progress and developments of the integrity management system, submitting changes to the integrity management system for approval. Board meetings are held, barring exceptional circumstances, every three months.

In addition, two reports will be drafted annually for the Board, one from the Compliance Committee reporting on the annual review of the system and one from senior management with its conclusions on the review of the system.

- To Senior Management.

The Compliance Committee shall keep senior management promptly informed of any relevant issues affecting the Integrity System. Senior Management is also informed on a quarterly basis by means of the reports that the Committee prepares for submission to the Board. The Committee will also inform senior management of the most relevant aspects of the review of the Integrity System through a meeting held once a year.

- To the staff of TYP SA and its branches.

The Committee shall be responsible for ensuring that any significant changes, which are generally reflected in the Manuals, are announced.

The Committee shall also coordinate with the Directorate General Management Systems to ensure that the System documentation is kept up to date in the Integrity section of the Intranet, in all languages in which it is available.

When changes are of particular importance (e.g. to the code of ethics, the integrity policy, or the whistleblowing channel), the Committee will inform all employees by email.

At the Annual Christmas Conference, the CEO, through feedback from the Committee, reports on the progress made during the year. This conference is broadcast live to all staff of the organisation in December.

At least one article per year will be included in the Newsletter, with issues of interest related to the Management System. The Newsletter is distributed to all employees in English and Spanish by the Image and Communication Department, and is also published on TYP SA's website.

New employees will be provided access to the online training and assessment platform, where they will be able to access the system documents (Code of Ethics, Corporate Integrity Policy, Gift Policy, Policy on SII and Whistleblower Protection, Annual Declaration of Modern Slavery), the extract of the Handbook and the summary of steps and procedures required to pass the training examination appropriate to the position held. In addition, on this platform, all employees must sign the express Declaration of knowledge, understanding and commitment to comply with the Integrity System.

- To the staff of the subsidiaries.

The responsibility for establishing the subsidiary's communication needs lies with the subsidiary's compliance body/compliance officer, keeping the Compliance Committee informed by means of a mutually agreed reporting format.

You will also receive the above information through the Annual Christmas Conference, the Newsletter and relevant emails.

- To the shareholders

The status of the Integrity Management System will be reported in the Annual Report distributed to the General Meeting of Shareholders. This report is delivered in paper format at the June meeting and is available in Spanish and English. Digital versions are published on TYP SA's website, in the "About TYP SA" section.

5.3.2. External communications.

The following are established in the field of integrity:

- To business partners and subcontractors.

Before entering into an agreement with a partner, it is necessary to investigate their integrity situation and track record and inform them of the existence of our system, in accordance with the terms of the TPG-01 Bid Control procedure.

Freelancers must be informed of the existence of our Integrity System through the mechanisms established for this purpose, i.e. by signing the TYP SA model contract which includes the integrity clause.

- To customers and society.

The Newsletter, which is published on the website, is publicly accessible, available in English and Spanish, and will report on relevant developments in the Integrity System as they occur.

The covers of the offers must include a *disclaimer* informing of the existence of our Integrity Management System and the communication channel enabled, and this information is also included in the general contracting clauses included in the offers (TPG-01). Likewise, each time a contract is entered into, the corresponding JP must inform the client of this by means of an e-mail, a model of which is provided in procedure TPG-02.

The Compliance Committee shall respond to or provide the necessary assistance in responding to any enquiry, complaint, suggestion or proposal made through the website communication channel.

- Non-financial information.

The non-financial information required by Law 11/2018 will contain information that reflects TYP SA's situation with respect to the Integrity Management System. This report is drafted annually and is filed together with the annual accounts at the Madrid Mercantile Registry in June. The Spanish version of this document is also available on TYP SA's website, at the link:

<https://www.typsa.com/> in About us / Annual Report

5.3.3. Documented information.

The identification of documents generated by the TYP SA Group is carried out in accordance with the TPD family of procedures.

6. Operation.

6.1. Planning and operational control

The general methods followed by the TYP SA Group for work planning, risk management in the contractual and operational phase, the determination of requirements for products and services, the criteria for their acceptance, and the implementation of process control in accordance with the criteria, are defined in procedure TPP-01 "Design and development control", and in the TPS family of procedures, the determination of the resources necessary to achieve conformity with the requirements of products and services are defined in procedure TPR-01,

the identification of environmental aspects and impacts are defined in the procedures ", TPA-01 "Identification and assessment of environmental aspects and legal requirements", TPA-02 "Operational control" and those specific to each contract are defined and documented in its quality and environmental management plan, which is drafted in accordance with TPG-03 "Quality plans".

The quality objectives pursued in the development of work within the scope of a contract are to have identified at all times the requirements to be met by the service to be provided, and the procedures to be applied by all personnel involved for this purpose. In this way, the ultimate aim is to satisfy the client both during the development of the work and once it has been completed, complying objectively and with documentation on the contractually committed services, as well as demonstrating to all the organisations involved the TYP SA Group's technical solvency in the area covered by the contract. Also, to learn and improve on future occasions, detecting possible mismatches and specific non-compliances in our daily work, or procedures or solutions that may lead to improvements in future work, providing feedback to the organisation through the appropriate reports.

The operations and activities associated with the hazards and risks considered in OSH are detected and analysed by means of hazard identification and risk assessment⁴⁸ , on the basis of which the necessary controls are established to manage them, eliminate them or avoid their undesired consequences, reducing them as much as possible. On the basis of these assessments, corrective action planning is carried out, which determines the activities and controls necessary to avoid risks, including those related to purchased goods, equipment or services.

Modifications or exceptions to this manual, if any, as a result of the scope of services, legal requirements, regulations, customer needs or TYP SA Group requirements for the work, are included or referenced in the quality plans.

The quality plan is structured on the basis of the organisation and procedure manuals of the contract.

The organisational manual contains or references:

- a) The definition of the work, where the product or service requirements are identified, containing or referring to:
 - The TYP SA Group's scope of services or works (e.g. tender documents or similar documents; the TYP SA Group's offer and the contract signed with the client);
 - Generic or job-specific agreements between the TYP SA Group and its potential partners;
 - Reference to the documents containing the definition of the scope of services and scope of works of the other parties involved: client, contractors, independent inspection agencies, etc.;
 - Other baseline data, derived from legal or regulatory standards or requirements applicable to the work.
- b) The work planning, which establishes the tasks necessary for the development, execution, control and approval of the office work or project phases, the technical documentation to be generated, the

⁴⁸ The provisions of procedure TPH-02 "Hazard identification and risk assessment" shall be followed. See also section "Hazard identification and risk assessment" of the Manual T-MSGSSST.

partial deliveries to the client, including those for checking documents and those for verification, review and validation of the design and development, those responsible for carrying them out, as well as all those milestones at which the client's approval or comments are expected. This schedule is kept constantly updated.

- c) The organisation and media it contains or references:
 - The general organisation chart and the interrelationships between the various parties involved: client/owner, TYP SA Group or other companies (engineering companies, independent inspection agencies, etc.);
 - The TYP SA Group's nominal organisation for work;
 - The bodies outside the TYP SA Group with which interfaces are maintained⁴⁹ and the scope of these interfaces.
- d) Suppliers participating in the work;
- e) The special IT equipment, measuring equipment, mobile equipment or other equipment to be used by the TYP SA Group during the performance of the contract.

The procedures manual contains or references the documented procedures applicable to the work and in particular those:

- a) Procedures required by the basic standards and which form part of those developed by the TYP SA Group;
- b) Procedures provided by the client or specific procedures that have been redrafted or adapted because a necessary aspect is not covered by those indicated in the previous point;
- c) Inspection point programmes⁵⁰ of the contractor and TYP SA Group, in the control and surveillance works;
- d) The expected environmental aspects;
- e) Legal environmental requirements;
- f) OSH aspects and their legal requirements;
- g) Information security requirements.

In particular, if there is another company that shares the work with the TYP SA Group, the Project or Unit Manager, as appropriate, will define the scope and responsibilities of each of them. In these cases, all matters relating to OSH are regulated through compliance with the provisions of procedures TPG-04 "Subcontracting and Purchasing" and TPH-03 "Coordination of Business Activities".

In the cabinet work, this scope is realised:

⁴⁹ **Interface:** Information shared by two or more agencies. It includes the document that enables the relationship between them.

⁵⁰ **Inspection:** Measurement, examination, testing or comparison with a standard of one or more characteristics of an "entity" and comparison of the results obtained with the specified requirements, in order to determine whether conformity has been obtained for each of these characteristics.

- a) In work planning, which is included or referenced in the quality and environmental management plan;
- b) In the list of deliverables, which lists the specialities involved and the BIM documents and models that they have to generate for the fulfilment of the contract and the quality and environmental requirements.

The exact nomenclature of the documents mentioned in this diagram may vary depending on the requirements of the specific technical specifications of the contracts.

In the case of TYP SA's laboratories, the methods for planning their work are set out in their own procedures.

The records necessary to provide evidence that the realisation processes and the resulting product meet the requirements are specified in the corresponding procedures.

In the case of the Integrity Management System, the planning and operational control of the system is carried out through the table of financial and non-financial controls, which are managed and monitored by the Compliance Committee.

All financial controls governing the risk of bribery are defined in the family of procedures TPG, and TPE as well as in the gift policy and in those other procedures that are directly managed by the Directorate General Administration and Finance.

Due diligence with business partners, subcontractors, internal or external personnel (collaborators, agents, etc.) of the organisation is regulated in the TPG, TPR and TPE family of procedures.

The company's approach to the adoption of an Integrity Management System by controlled entities is defined in the Integrity Management System Manual.

Anti-bribery commitments are managed, in relation to employees, through the documentation made available for reading and signing in the corresponding internal application and, in relation to third parties as well as through the use of specific clauses contained in contractual documents.

All matters relating to gifts, hospitality and similar benefits are detailed in the TYP SA Group's gift policy.

For the communication of any complaint, query, doubt or suggestion, the Internal Information Channel must be used. The procedure for managing the internal information system, including the process for processing and investigating complaints, as well as the disciplinary regime, are regulated in the Integrity Management Manual.

6.2. Requirements for products and services.

6.2.1. Customer communications

The Bid Manager, in the pre-contracting process, and the Project or Unit Manager, in the contract phase, is responsible for providing information on the products and services and for dealing with any queries made by the client.

Changes required to the services by the customer are processed in accordance with procedure TPG-01 (in the offer phase) or TP-P02 in the contract phase.

Any person receiving any oral or written communication from the customer or interested parties, relating or directly related to a given contract (e.g. information on service or work performance, modifications, customer

satisfaction and mood, including complaints, etc.) forwards it to the project manager as appropriate, for recording, analysis and response, in the shortest possible time.

If the communication or enquiry is related to the Integrated Management System, the project manager reports the result of the analysis and the corresponding actions to the management, which, after the corresponding analysis, makes the final decision on the need and scope of the response, which will be carried out by the project manager.

The TYP SA Group systematically transmits information on its Integrated Management System to the outside world (customers or potential customers, external stakeholders and society in general) via its website and the Annual Management Report, which is edited by the Corporate General Manager.

Information is provided on the following aspects of quality management, environmental management and integrity management:

a) General

- Certifications of the systems implemented in the Group,
- Average assessment of performance obtained through internal audits.

b) Quality

- Average rating obtained in the customer satisfaction survey,
- Evolution of the average supplier rating,
- Training actions during the year,
- Number of internal audits carried out.

c) Environment

- Carbon footprint,
- Consumption of electricity, water and paper in their offices.

d) Integrity

- Improvements made to the Integrity Management System,
- Evolution of the average success rate in training exams for particularly exposed staff and other employees,
- Number of incidents and/or queries received,
- Number of files processed by the Committee.

In relation to integrity, the Compliance Committee is obliged to report to the competent authorities any situations that represent or may represent indications of criminal activity, as described in the manual itself. Likewise, it has the duty to inform and cooperate in the investigation of an external agent in any matter related to files opened by said agent in matters of integrity management.

In the event that, within the framework of an open investigation file, it is concluded that there has been a breach of the postulates of the management system that affect the client, the resolution with the proposed sanction will be sent to the legal counsel and to the competent general manager, so that they may adopt the appropriate measures. All aspects relating to external relations and communications in OSH matters are established in the "External communications" section of the T-MSGSSST Manual and in the different

procedures of the Integrated Management System, and especially in TPH-03 "Coordination of business activities".

Aspects concerning external relations and communications on Information Security matters are set out in the Information Security Policy Manual and in specific procedures.

The measurement and evaluation of customer feedback is defined through the provisions of the TPM family of procedures.

Given the nature of the services provided by the TYP SA Group, TYP SA Group clients do not supply physical products to be included in the work contracted. They can supply documents, criteria or data whose control is carried out according to their nature and origin in the manner indicated in 6.3.2.

In the event that any other goods or services covered by this section of ISO 9001 are supplied by a customer in the future, the TYP SA Group will define and document in the quality plan, the methods necessary to ensure their control, as well as to ensure the security of the information according to ISO/IEC 27001.

The control of samples delivered by customers to TYP SA's laboratories for analysis is carried out in accordance with the requirements of the ISO/IEC 17025 standard.

In the risk assessment processes in the tender and contract phase, contingencies are identified and the measures to be taken in each case are indicated, in accordance with procedures TPG-01 and TPG-02.

6.2.2. Determining service-related requirements

The determination of the technical, environmental, quality, integrity management, OSH, information security, cost and deadline requirements related to the service requested by customers or stakeholders is initiated during the bid drafting phase, with the tasks and records related to this activity being specified in procedure TPG-01 "Bid control". In the case of R&D&I projects, it is carried out during the idea selection process, according to procedure TPV-01.

In this phase, the Division Director or Territorial Director of the area concerned or, where appropriate, the R&D&I Management Committee appoints the author, who analyses the needs and requirements expressed by the client or interested party in its request for proposal or work, in order to identify:

- a) The areas of the TYP SA Group that will participate in the tasks of drafting the offer or the analysis and selection of R&D&I ideas;
- b) The needs of the client or stakeholder and the scope of the work to be carried out;
- c) Work to be carried out directly by the TYP SA Group, and work to be subcontracted to third parties;
- d) Work-related legal and regulatory requirements;
- e) Environmental requirements related to the site where the work is to be carried out and the nature of the work;
- f) Work-related OSH requirements;
- g) the integrity management requirements of the client, such as express declarations of compliance with its code of ethics, confidentiality and data protection agreements, etc.
- h) Information security requirements;
- i) Additional requirements determined by the TYP SA Group;

- j) The methods or processes necessary to satisfy the above requirements.

The author drafts the offer in accordance with the instructions contained in the client's tender document or request for quotation, whether oral or written.

The identification of the environmental aspects of the activities, products or services that the TYP SA Group can control and over which it has influence and which can generate significant impacts on the environment are included in sections 6.1 y 6.5.1 and in procedures TPA-01 "Identification and assessment of environmental aspects and legal requirements" and TPA-02 "Operational control".

Before identifying the hazards that may affect the processes and activities carried out by the TYP SA Group and determining which of these hazards occur in each specific process or activity, it is necessary to take into account that OSH affects the TYP SA Group's processes in the following areas:

- a) OSH as another product that the TYP SA Group offers its clients in the design or execution phases of their projects, developing the analysis, planning, control and monitoring or coordination of OSH, by means of carrying out OSH studies, OSH monitoring and controls or OSH coordination;
- b) In all aspects of OSH, all aspects related to ISO 9001 quality and ISO 14001 environmental standards are applied, with TYP SA Group professionals contributing all their experience and knowledge of OSH, including OSH management in accordance with ISO 45001 standards;
- c) OSH as it affects its own activity with reference to its own personnel.
- d) The TYP SA Group considers essential aspects for OSH;
- e) Any aspect or occupational factor that may harm or cause any detriment to the health of its employees or other persons (e.g. personnel performing activities for the Group);
- f) Comply at all times with current OSH legislation;
- g) Prevent damage and losses in production and profits resulting from poor OSH management;
- h) Avoid damage to the TYP SA Group's public image;
- i) Continuous improvement of OSH conditions in the TYP SA Group.

The TYP SA Group's processes and their interactions are described in the following section. 6 of this manual, where the responsible parties are determined and the measures foreseen in the Integrated Management System necessary to ensure that:

- a) The operation and control of the processes are effective;
- b) The necessary resources and documents are in place to support the operation and monitoring of these processes;
- c) These processes are monitored, measured and analysed;
- d) The necessary actions are implemented to achieve the planned results and the continuous improvement of these processes;
- e) The purchase or subcontracting of any goods or services that may affect the product or compliance with the Integrated Management System is controlled.

Procedure TPH-02 "Hazard Identification and Risk Assessment (IPER)" identifies the hazards and risks of the processes and activities carried out by TYP SA Group personnel that may affect health and safety, and

explains how the activities associated with these risks are to be identified, the assessment criteria to be followed and the control measures necessary to eliminate or reduce them. As a general rule, the types of OSH risks for the TYP SA Group have the following characteristics:

- a) Safety risks (accidents): almost all the TYP SA Group's work and production activity, including a large part of the work and activities on site, takes place inside offices, so the possible risks generated are those typical of administrative, technical and management work which is normally carried out in closed workplaces, with controllable and programmable safety conditions, and therefore with minimal risks of accidents and a low incidence of accidents. Some activities, such as topographical work, surveillance of site work, inspections and data collection, etc., which are carried out in the field or on site, involve greater risks from the safety point of view and require a great deal of travel, with the additional risks that this entails;
- b) Ergonomic and psychosocial risks (fatigue or dissatisfaction): almost all the activities carried out by TYP SA Group staff tend to generate a high mental workload and most of them take place in offices, so the main risks associated with them are ergonomic and psychosocial;
- c) Hygiene risks: with the exception of work in TYP SA's laboratories and work in the field and in Site Units, the activities of TYP SA Group personnel are carried out in fairly controlled conditions, so hygiene risks usually relate to the control of environmental conditions in enclosed workplaces.

The hazards and risks that may be generated with respect to critical aspects, such as those referring to particularly sensitive personnel, are regulated in specific sections of the corresponding procedures, such as the "Risk assessment of particularly sensitive personnel" in procedure TPH-02 "Hazard Identification and Risk Assessment (IPER)". On the other hand, those aspects that require special controls for their management, such as those referring to change management, are regulated through the different procedures of the QHSE System. Risk assessments are carried out by competent technical personnel in accordance with the legal requirements at each place and time. On the basis of these risk assessments, corrective action planning (CMP) is developed.

The TYP SA Group shall define the aspects originating from new work, activities or tasks that may affect OSH, in order to determine the risks or hazards that these may produce.

6.2.3. Review of service-related requirements.

Once the offer has been drafted, the author:

- a) Checks that the requirements of the product or service to be supplied have been clearly defined and that the TYP SA Group has the capacity to meet the established requirements and that the offer meets the requirements of the specifications - or equivalent document - or, if not, that exceptions to the same have been indicated, applying a bid revision sheet which, once completed, is filed together with the offer;
- b) Send the offer together with the offer revision sheet to the relevant senior proxy to sign both documents.

If the offer is accepted and prior to signing the contract, the project manager, unit manager or laboratory manager, as appropriate (hereinafter referred to as project manager⁵¹) checks that no situations have arisen that affect the TYP SA Group's ability to fulfil the conditions of the contract and that there are no additional commitments in the contract with respect to the offer submitted.

If this is not the case, the project manager informs his or her General or Territorial Director, who can either take them on or negotiate directly with the client.

The signature of the contract by the proxy provides evidence of its review, without prejudice to what is set out in the System's procedures for specific cases.

Changes to legal requirements or to quality and environmental regulations generated during the development of the work are recorded and approved by the project manager, are communicated to the client and are not executed unless the corresponding authorisation has been received, except in cases where they are the responsibility of the TYP SA Group, as it is in charge of the optional management.

The Integrated Management System provides for a continuous review of OSH hazard identification and risk assessment through:

- a) Initial hazard identifications and risk assessments;
- b) Analyses carried out to prepare the Annual Preventive Action Plans (PAAP);
- c) Continuous monitoring of corrective action plans and controls in place;
- d) Periodic reviews of risk assessments;
- e) Assessments of the effectiveness of the integration of preventive activities in annual reports;
- f) The results of the monitoring activities of the different aspects of OSH established in the procedures of the QHSE System (emergencies, accident investigation, order and cleanliness, etc.);
- g) Annual management reviews of the Integrated Management System.

6.3. Design and development.

Procedure TPP-01 "Control of design and development" establishes the general control measures applicable during the drafting of projects, studies and reports⁵², procedure TPP-03, those corresponding to consultancy services, and in procedure TPP-04, those relating to inspection work on railway projects.

Any person involved in drafting a project performs his or her task in accordance with:

- a) This document;
- b) Procedures TPP-01, TPP-03 or TPP-04, as appropriate to the scope of the service;

⁵¹ The figure of the head of unit includes that of the Project Manager, when this has been assigned to the TYP SA Group by the client.

⁵² For works management and supervision work, the TPS procedures describe the methodology to be applied in the control of service provision. It is considered that these works do not, in general, have a design load attributed to them. When they include the drafting of projects (modified, complementary, etc.), or other work involving design load, then the requirements of TPP-01 must be followed.

- c) The procedures, guidelines or instructions established in its quality plan, and with the legal requirements and standards defined in the specific technical specifications of the contract or selected by the TYP SA Group from among those applicable.

6.3.1. Design and development planning.

Design and development planning is initiated at the bid writing stage by the bid author and is updated and kept up to date after award by the Project Manager in the project's quality and environmental management plan (see 6.1).

During this planning, the information security requirements for the correct development of the project will be taken into account.

6.3.2. Input elements for design and development.

The control and updating of the design and development baseline data is the responsibility of the Project Manager. From the start of the work, the documentation relating to these data or the indication of where they can be consulted will be available to all personnel in a computer directory created by the Project Manager for this purpose, in accordance with procedure TPD-04a "Storage and processing of project documentation", which is kept permanently updated.

In environmental matters, the project manager shall identify the applicable legislation and requirements as set out in procedure TPA-01.

From the design phase itself, the project manager shall collect background information, baseline data and aspects to be considered in order to identify hazards and assess OSH risks that may be present in the subsequent implementation of the project or product development, so that they can be eliminated or at least minimised from the very moment of design and conception of the project or product.

The Project Manager will inform the technicians responsible for the activity of any changes in the initial data and, fundamentally, those coming from the client, for their application, after analysing their impact both on the work carried out and on the work still to be carried out.

Finally, the Project Manager collects the baseline data in the project report or equivalent document in the case of studies.

6.3.3. Results of the design and development and the R&D&I process.

In cases where the subject of the contract is the drafting or management of a project, the final results of the design and development are set out in the report, annexes, plans, specifications and budgets.

Depending on the characteristics and requirements of the customers or stakeholders of the R&D&I projects, the Project Manager selects one or more of the methods required in point 5.3.1.1. 5.3.1 to inform the Head of Division.

6.3.4. Design review and development.

Design and development reviews⁵³ are carried out in accordance with procedure TPP-01 "Control of design and development" by an expert (hereinafter Design and Development Review Manager), at a meeting with the Project Manager and the heads of the technical specialities involved.

From a list of personnel trained as Design Reviewers, the Project Manager determines the Project Reviewer and establishes in the quality and environmental management plan the phases or milestones at which design and development reviews are to be carried out.

In cases where the design is of very low complexity and where there is experience of similar work and the lead time is very short, the design and development review can be carried out in conjunction with the design verification described in point 6.3.5. 6.3.5. Where any design phase overlaps with the construction phase, the design review shall be carried out prior to acceptance of the work by the client.

In all cases, the Reviewer may request such technical support as he/she deems appropriate.

Design and development reviews are carried out with the help of checklists and their results are documented in the form of minutes, in which the comments and actions requested are recorded.

Defects⁵⁴ or non-conformities that directly affect the quality of the work are corrected in accordance with the provisions in 8.1. Notable aspects of the design and development and the actions necessary to avoid the repetition in other projects of non-conformities, problems or weak points encountered during their execution are disseminated among the personnel concerned to improve efficiency in future work, in accordance with the provisions of 5.3.1 y 7.5.1.3as appropriate.

6.3.5. Outlets for design and development

During the drafting of studies and projects, the verification of the design and development⁵⁵ is carried out in two stages. In the first stage, the technical documents generated are "checked" by a technician, different from the author and with the same or higher technical training than the latter, verifying that the documents satisfy their initial data, including those derived from the applicable environmental legislation, that they are coherent and complete and that the interrelationships⁵⁶ have been satisfactorily resolved. Subsequently and prior to the delivery of the documentation to the client, the TRA of the activity subject to verification together with the TRAs with whom he/she has interfaces, the Project Manager and the project quality manager, in cases where this position has not been assigned to the Project Manager, check that changes in the source data and interrelationships that have occurred after the check date⁵⁷ have been satisfactorily resolved.

⁵³ **Design and development review:** systematic, documented and complete examination of the evidence generated in the different phases of design and development, carried out at least at the end of the same, to evaluate and confirm a) compliance with cost, time, quality and environmental requirements; b) the effectiveness of the production process and of the actions aimed at minimising environmental impact; c) customer satisfaction with the work carried out and with the treatment received and to identify and solve problems if they exist, and to propose corrective or preventive actions.

⁵⁴ **Defect:** non-compliance with a requirement or reasonable expectation related to an intended use, including those related to safety.

⁵⁵ **Design and development verification:** confirmation, through examination and provision of objective evidence, that the outcome of a project stage satisfies the requirements of the baseline data for that stage.

⁵⁶ The check releases the document internally, which means that the technical area responsible for it validates it for integration into the project as a whole.

⁵⁷ Verification has as a positive result the approval of the product (set of documents that constitute a project or part of it corresponding to a phase or delivery).

If necessary, during the check or verification, the following may be carried out:

- Alternative calculations;
- Mock-ups or model tests, in which case the verification includes checking the studies, calculations and reports generated.

The above tasks are performed with the help of checklists according to TPP-01 "Design and Development Control".

The results of the check and verification are recorded in the deliverables lists or on the document itself when the client allows it. If during the check or verification defects, faults or shortcomings are detected that may affect other project documents, the Project Manager or the Technician Responsible for the Activity, if applicable, informs the affected personnel and determines the necessary actions to solve them.

6.3.6. Validation of design and development.

In cases where the scope of work is limited to the drafting of the project, the TYP SA Group understands that the concept of design and development validation⁵⁸ is covered by the design and development verification and review discussed in the previous sections.

In cases where the TYP SA Group is responsible for the drafting of the project and the management, control or supervision of the work, the validation of the design and development is carried out by the Head of Unit through reports sent to the General Technical Management, who will analyse and filter them, forwarding them to the areas that can benefit from their contents. These reports include both the shortcomings or faults detected in the project and in the results of the final tests and trials and possible improvements to be implemented in future works (known as feedback reports).

The recommendations and actions requested shall be documented and recorded in proposals for remedial, corrective or preventive actions as indicated in point 8.

6.3.7. Control of design and development changes.

Any change or modification to the contract between the Client and TYP SA (technical scope, deadline or budget) is managed in accordance with procedure TPP-02 'Management of changes to design work'. This procedure defines the management and technical activities to be carried out in relation to the Client when circumstances arise that may or will affect the price of the services or the execution deadlines, in order to keep the client informed in time and at all times of any eventualities that may alter their expectations, and allow them to know in advance the effects that these circumstances may have on the final service, its price and delivery deadline, facilitating decision-making.

It also establishes the methodology to ensure that the contract budget is kept under control throughout the production process, and that it is always in line with the scope and the price and deadline conditions approved by the Client, providing the process with adequate documentary traceability.

⁵⁸ **Validation of design and development:** confirmation through the provision of evidence that the implemented project meets the requirements for its intended use or application.

The Project Manager shall ensure that changes are communicated to all affected staff and that appropriate records are issued.

6.4. Shopping.

6.4.1. Purchasing process.

The generic term "purchasing" refers to all those businesses in which the TYP SA Group uses a supplier for the acquisition of goods or services related to its activity.

In this process, two typologies are distinguished, according to the contractual relationship that regulates the acquisition, and two categories, depending on the connection or dependence of the product or service acquired in relation to the services or products that the Group has committed to its customer.

Depending on the type of contract, a distinction is made between service leasing contracts and contracts for the purchase and sale of goods. Depending on whether they are linked to the Group's contract with its customer, we speak of subcontracts, if the product or service provided is part of the contract between the Group and its customer, or (conventional) contracts, in cases where this is not the case.

In the meaning given to the term "purchasing" in the ISO 9001 standard, and in accordance with the nature of the goods and services provided by the TYP SA Group to the market, the Integrated Management System attaches special importance to the subcontracting process, since, as service providers, and with a view to customer satisfaction, the product received by a subcontractor must satisfy the requirements established by the latter.

Suppliers are selected on the basis of their ability to comply with the requirements of the order (including those relating to quality, environmental or OSH management), demonstrated historically, either in relation to the TYP SA Group or through their general references, maintaining an up-to-date database of acceptable suppliers (which serves as a criterion for selection, evaluation and re-evaluation, leaving a record of the same) in accordance with that indicated in procedure TPG-04 "Subcontracting and Purchasing". Criteria relating to integrity management must also be taken into account.

6.4.2. Purchasing information.

The project manager or the technician responsible for the activity, as appropriate, determines the products or services to be procured, the deadline, the quality, environmental and OSH requirements, the acceptance criteria and designates the person responsible for drawing up the purchasing documentation. The person responsible for procurement must communicate to the selected supplier the requirements for the products to be provided by the latter, the competence or qualification requirements of the team, as well as the conditions for the control and monitoring of performance and the approval of the work by including them in the contract. In cases where the client or TYP SA Group wishes to verify the product or service at the supplier's facilities, this is communicated to the supplier by means of the purchase documentation.

In the event that during the application of goods or services acquired by the TYP SA Group significant environmental impacts may be generated and suppliers do not have ISO 14001 or EMAS certifications, they are informed of the environmental procedures and requirements that must be applied.

The verification of products and services that may generate a significant environmental impact during their manufacture or application is carried out in accordance with section 6.2.2.1.1. 6.2.2.

The Prevention Services will provide those responsible for purchasing with the necessary advice and information on OSH for the purchase of any product or contracting of any service, always bearing in mind that these must comply with the legal requirements for their commercialisation and use.

Health and safety risk assessments shall determine in their assessment criteria the aspects and requirements for work equipment and machinery. Purchases more related to OSH issues are dealt with in a special way in some of the procedures of the QHSE System, especially those related to emergencies or personal protective equipment.

The subcontract models to be used for the contracting of a service or product that forms part of the order received by the TYP SA Group from its client contain specific information and requirements in terms of quality, environment, integrity and OSH that are generally required of the supplier.

6.4.3. Verification of purchased products and services.

The application of this section of the standard in TYP SA's laboratories is set out in its own procedures.

In the phase of analysis and selection of R&D&I projects, the products or services to be purchased, as well as their requirements and inspection criteria, will be determined and assessed.

In the case of studies and projects or the part of them that is subcontracted, the verification is carried out in accordance with 6.3.5 as a design activity.

The verification of the remaining products (test equipment, consumables, cleaning services, maintenance, etc.) that may affect the quality of the service, OSH or generate an environmental impact is carried out before they are made available to the customer by the user and are subject to periodic checks, where appropriate, by a TYP SA Group technician in accordance with what is indicated in the purchase documents and in 6.5.1 or by an independent team approved to carry out such checks.

In the event that the contracted service is susceptible to division into homogeneous parts, and that these are received separately, it shall be left to the discretion of the project manager, if it is intended for a contract, or to that of the technician responsible for the procurement, if it is a good or service of general application, taking into account the type of product supplied, the use to be made of them and the possibility of making partial verifications.

If, for reasons of urgency, a product that could affect quality, OSH or generate a significant environmental impact is used without having carried out the inspection or control indicated in the previous sections, the product is identified directly or indirectly by the technician responsible for the acquisition, ensuring its traceability and the possibility of recovering and replacing it in the event that the result of the controls is negative.

In all cases, the degree and intensity of control depends on the capacity and experience of the supplier, the inspections⁵⁹, controls and tests previously carried out and the evidence provided. Corresponding records are generated in accordance with the provisions of 1.3.2 and the supplier database is updated.

⁵⁹ *Inspection: Measurement, examination, testing or comparison with a standard of one or more characteristics of an "entity" and comparison of the results obtained with the specified requirements, in order to determine whether conformity has been obtained for each of these characteristics.*

6.5. Production and delivery of services.

6.5.1. Control of production and service delivery.

The design and development control measures for projects are those already set out in sections 6.3.4.1 and 6.3.4.2, 6.3.4, 6.3.5 y 6.3.6.

The control of the works management, control or supervision of the works is carried out in accordance with procedures TPS-01 "Initial works in control and supervision of works", TPS-02 "Quantitative control of deadlines", TPS-03 "Qualitative control", TPS-04 "Control of the contractor's documentation, management of modified and additional documents", TPA-01 "Identification and assessment of environmental aspects and legal requirements" and TPA-02 "Operational control", once they have been adapted to the contract in the corresponding quality and environmental management plan.

The control of consultancy works is described in its specific procedure TPP-03, and that of inspection works in TPP-04.

The control of subcontracted work for the integration or testing of systems or equipment designed by the TYP SA Group is carried out following procedures equivalent to those described above.

In all cases the specific control measures for the production and service delivery and processes associated with a given contract are set out in its quality plan cited in 6.1.

The control of the analyses and tests carried out by TYP SA's laboratories is carried out in accordance with their own manuals and procedures.

The impact on the environment during the construction of the planned works is minimised by incorporating environmental concepts during the project verification and review, as indicated in section 6.3.

The work carried out by the TYP SA Group or by bodies under its control is associated with environmental aspects⁶⁰ that may generate one or more of the following environmental impacts⁶¹ :

- Heat or cold generation;
- Alteration of the landscape, vegetation or fauna;
- Alteration of historical, artistic or cultural heritage;
- Disturbance or pollution of air, soil, surface water and groundwater;
- Consumption of water, energy, natural resources and manufactured products;
- Emission of light, noise, vibrations or odours;
- Emission of gases into the atmosphere;
- Discharges to soil, sewage systems or surface water;
- Generation of gaseous, liquid or solid waste (in normal or accident situation);
- Radioactive contamination (in normal or accident situation);

⁶⁰ **Environmental aspect:** *element of an organisation's tasks, products or services that can interact with the environment.*

⁶¹ **Environmental impact:** *any change to the environment, whether adverse or beneficial, resulting in whole or in part from an organisation's activities, products and services.*

- Noise pollution (in normal or accident situation).

The TYP SA Group considers significant environmental impacts to be those that can:

- Give rise to criminal or administrative sanctions;
- Damage the public image of the TYP SA Group;
- Lead to an increase in the cost of the insurance contracted, due to the likelihood of occurrence;
- Become very important, in terms of type, amount or duration.

The relationship between tasks, aspects and their environmental impacts is presented in the annex 9.2. The environmental aspects during the construction, operation and dismantling of the projected work, system or equipment are analysed and the impact generated during the drafting and construction of its projects is minimised through the identification in the design and development documentation of the environmental legal requirements, the drafting of environmental impact studies or declarations or environmental integration annexes, and the incorporation in the specifications of control measures for their application during the execution of the work, all in accordance with the provisions of section 6.3.

Other aspects to be controlled during the execution of the works are direct environmental aspects affected by the TYP SA Group's own activity, such as the waste generated in its offices or by the consumption of the vehicles it uses for its activity, or the consumption of natural resources.

In point 6.2.2 sets out the procedures followed to identify environmental aspects. Section 6.2.2 sets out the procedures for identifying environmental aspects. 6.3 of this manual describes the processes and their interactions, identifies the responsible parties and presents the measures foreseen in the QHSE System necessary to ensure that the environmental aspects are identified:

- a) The operation and control of the processes are effective;
- b) The necessary resources and documents are in place to support the operation and monitoring of these processes;
- c) These processes are monitored, measured and analysed;
- d) The necessary actions are implemented to achieve the planned results and the continuous improvement of these processes;
- e) The purchase or subcontracting of any goods or services that could have a significant environmental impact or affect the quality of the services requested by its customers is controlled.

The TYP SA Group will define the environmental aspects arising from new works or tasks over which it may have control, in order to determine those that may have significant impacts.

As indicated in section 1.1.1 of this document, the TYP SA Group, during the review meetings of the QHSE System by the Management, analyses the environmental aspects over which it can have control, originated by new works or tasks, in order to determine those that can produce significant impacts.

In section 6.2 specifies the types of controls used by the QHSE OSH System.

6.5.1.1. Control of monitoring and measuring devices.

Procedure TPM-03 "Control of measuring equipment" establishes the necessary methods for:

- Relate the tests or measurements carried out to the instruments used;

- Ensure that measuring equipment provides reliable measurements by identifying the equipment and establishing maintenance, calibration and control programmes;
- Generate and keep records of the status and calibrations of measuring equipment.

In the event that any measuring equipment is found to be non-compliant during the periodic adjustment, monitoring or calibration processes, the procedure foresees actions to be taken:

- Identify the tests whose measurements have possibly been affected;
- Justifiably assess the effect on acceptance of the elements tested;
- Make appropriate arrangements or take corrective action, if found necessary;
- Record the whole process.

In the processes of management, control or supervision of works, inspection or monitoring of manufacturers or integration or testing of systems or equipment, the TYP SA Group ensures that the contractor or supplier, as appropriate, has and follows procedures equivalent to those described above, always within the scope assigned by the client.

6.5.2. Identification, traceability and preservation

All matters relating to the identification of outputs to ensure the conformity of services, their status and the retention of the documented information necessary to enable their traceability are covered in section 1.3.1.1. 1.3.1 y 1.3.2.

6.5.3. Ownership of customers or external suppliers.

Given the nature of the services provided by the TYP SA Group, TYP SA Group clients do not supply physical products to be included in the work contracted. They may supply documents, criteria or data whose control is carried out according to their nature and origin in the manner indicated in 6.3.2.

In the event that any other goods or services covered by this section of ISO 9001 are supplied by a customer in the future, the TYP SA Group will define and document in the quality plan, the necessary methods to ensure their control, as well as to ensure the security of the information according to ISO/IEC 27001.

The control of samples delivered by customers to TYP SA's laboratories for analysis is carried out in accordance with the requirements of the ISO/IEC 17025 standard.

TYP SA Group suppliers do not provide TYP SA with physical products for the development of subcontracted services.

They may provide documents, criteria or data which are checked according to their nature and origin in the manner indicated in point 6.3.2.1. 6.3.2. y 6.3.5 (design and development control).

The intellectual property of all documents, models, samples, programmes and, in general, all work instruments and documentation created by the supplier especially for TYP SA, on the occasion of the development of the work under TYP SA's contract with its Client, is safeguarded by the subcontract signed between TYP SA and said supplier, which establishes that all work carried out by the subcontractor is considered TYP SA's property from the moment of its production.

6.5.4. Validation of production and service delivery processes

In studies and projects, the so-called special processes⁶² are mainly carried out during the execution of the drilling campaigns necessary to obtain the geotechnical data for the project. These campaigns are subcontracted in accordance with the indications in section 6.4 and their execution is directly controlled by qualified personnel from the Geotechnical Department.

The validation⁶³ of the tests performed by TYP SA's laboratories is carried out in accordance with their own manuals and procedures.

In works of management, control or supervision of works, integration or maintenance of equipment or systems, special processes are carried out by the works contractor, designated by the client or by the supplier selected by the TYP SA Group.

Where necessary, the TYP SA Group supervises the execution and commissioning of special processes and checks that they are carried out:

- a) In accordance with current regulations or procedures reviewed and approved by the contractor, the client or TYP SA Group, as appropriate. Special processes not covered by these standards or procedures will be evaluated prior to their use on site by analysing the information supplied by the contractor. The results will be documented, recorded and identified as quality records;
- b) By personnel trained and assessed by one of the methods set out in section 5.2.1. 5.2 or similar, in the case of contractor's or supplier's personnel;
- c) With equipment set up and checked as often as required in the instructions for use of the equipment.

In all cases the control of contractors or suppliers is carried out in accordance with the provisions of section 6.4.3.

6.5.5. Product preservation.

Given that the "products" provided by the TYP SA Group are the documents themselves that constitute the projects, studies or reports, their control is carried out in accordance with the provisions indicated in 1.3.1 y 6.3.5.

6.5.6. Post-delivery activities.

TYP SA is aware of the responsibility that lies behind the provision of its services. With this philosophy in mind, TYP SA has taken out Civil Liability Insurance. The aforementioned insurance covers operating, cross, employer's and professional civil liability arising from personal injury, material damage and its consequences (damages) that may be caused by any cause with respect to the work carried out by TYP SA, and which are the object of the insured activity, with the scope of its coverage being worldwide.

⁶² **Special process:** a production or service process in which the quality of the product depends primarily on the skill of the operator and the equipment used and where inspections or controls during or at the end of product realisation cannot guarantee that deficiencies will not occur after the product is in use or the service has been rendered. Special processes shall be subject to supervision and shall be carried out: a) by qualified personnel, b) according to approved procedures, c) with approved equipment and materials.

⁶³ **Validation:** confirmation by examination and provision of objective evidence that the particular requirements for a specific intended use have been met.

The insured amounts or limits are those adequate for the protection against any type of claim concerning the aforementioned coverage. Likewise, the following have the condition of insured persons:

- a) TYP SA, together with its national and international subsidiaries and branches;
- b) Sub-contractors, employees with service leasing contracts;
- c) Clients and/or Public Administrations (when it is a requirement established in the contract or its specifications, and without losing their status as third parties);
- d) Also, on an exceptional basis, "ad hoc" for specific projects are included for joint venture or consortium partners.

The TPG-05 procedure on information security with external collaborators shall be taken into account in particular for the closure of the work.

Independently of the direct contact that the customer's representative has with the Project Manager assigned to each contract, any customer complaint regarding the quality of the service provided may be formulated by e-mail to the address calidad@typsa.es.

TYP SA also carries out an annual customer satisfaction survey with work in progress and work completed during the year, in order to find out what our customers think of the work carried out and, in general, of our company, and to detect any signs of dissatisfaction that have not reached us by any other means. We also use this survey to capture market trends, detecting opportunities for improvement.

Procedure TMP-04 describes the system used by the TYP SA Group to provide feedback to interested parties, including our customers.

The questionnaires offer customers the possibility of expressing their opinion openly and in as much detail as they deem appropriate, adding suggestions and any weaknesses detected that justify the reasons for their assessment.

After the corresponding analysis of the responses received by the General Management Systems Directorate, a report is issued, which is reported in the QHSE System Review. The most relevant data obtained in this survey is also sent to all customers surveyed, regardless of whether they have answered or not.

Special treatment is given to dissatisfactions received, which are analysed and may give rise to non-conformities or risk situations in the System, activating as a consequence the necessary remedial, corrective and/or preventive actions to solve the aspect indicated and prevent its recurrence.

All indications of dissatisfaction received from our customers are registered in the 'Queries, incidents and improvements' programme, a web application that facilitates their management and registration, allowing us to monitor them in an agile and efficient manner.

Once the actions have been resolved and their effectiveness evaluated, either the Management Systems General Management or the corresponding General Management contacts the Customer who is the object of the dissatisfaction to inform him/her of the result and provide him/her with the evidence deemed appropriate.

The survey is sent online in the Customer's primary language, with a link that is uniquely linked to the Customer's email address.

Through this tool, Customers can send any recommendation or suggestion for improvement that will strengthen good relations and mutual trust.

6.5.7. Monitoring of changes

The management of changes in the provision of services is regulated in the procedure TPP-02 (see section 6.3.7.1). 6.3.7).

6.6. R&D&I activities not included in the previous points

This manual and the procedures of the R&D&I management group, Group V, contain the general methods for the correct management of the R&D&I system and the development of R&D&I projects. It also ensures that the functions of the R&D&I Committee and the project teams are fulfilled, including the following:

R&D&I COMMITTEE

- Use of R&D&I tools (technology watch, technology foresight, creativity, external and internal analysis).
- Identification, analysis and evaluation of risks, problems and opportunities of the R&D&I system.
- Analysis and selection of R&D&I ideas.
- Planning, monitoring and control of the project portfolio and its risks.
- Technology transfer and competitive intelligence, understood as the process of obtaining, analysing, interpreting and internally disseminating information of strategic value on industry and competitors.
- Monitoring, control and use of procedures for documenting results.
- Protection and exploitation of results.
- Measurement, analysis and improvement.

R&D&I PROJECT TEAMS:

- Use of R&D&I tools (technology watch, technology foresight, creativity, external and internal analysis).
- Identification and assessment of risks in the R&D&I projects in which they participate.
- Execution of R&D&I projects according to quality criteria.
- Knowledge generation and transfer.
- Development of new technologies and/or improvements to existing technologies.

6.6.1. Tools

The application of the R&D&I tools is ensured by training of staff, in accordance with the provisions in 5.2 and in procedure TPR-01 and the monitoring and coordination of the work is carried out by the R&D&I Management Committee and the Project Manager and the TRAs of the R&D&I project team, who determine the most appropriate tools for the characteristics of the project, as indicated in procedures TPV-01 and TPV-02, in the guide R&D&I Activities and SWOT analysis.

6.6.2. Internal and external analysis

The result of the external analysis to assess and compare the TYP SA Group's innovative ideas with other organisations is included in the 'strengths' and 'weaknesses' aspects of the SWOT analysis and that of the internal analysis in the 'threats' and 'opportunities' factors.

Senior management sets out in its strategic plan the methods for implementing technology transfer.

In order to protect the results obtained, the following control measures have been established and implemented:

- a) All TYP SA Group personnel are obliged and formally committed to maintaining professional secrecy regarding any information obtained in the performance of their tasks in the provision of services as well as in the administrative tasks of processing the data obtained as a result of the work carried out, and must sign the confidentiality agreement attached to the employment contract;
- b) All information received, regardless of the medium used, will be treated as confidential;
- c) No information provided by the client or interested party may be reproduced in whole or in part for purposes other than those of the work commissioned, without the express authorisation of the Technical Directorate-General;
- d) The documents generated during a job are the property of the TYP SA Group or the client, in accordance with the stipulations of the contract, and must be treated confidentially and may not be reproduced without the client's authorisation;
- e) TYP SA's intellectual property on the material produced is registered before a notary public.

In accordance with the scope of the work carried out by the TYP SA Group, the exploitation of the products and results obtained focuses on the drafting of projects or studies for external clients, in which the knowledge acquired during the R&D&I work is applied.

6.7. Release of products and services

The release takes place after the verification process described under 6.3.5.

The results of the check and verification are recorded in the lists of documents and activities or on the document itself when the client allows it. If during the check or verification defects, faults or shortcomings are detected that may affect other project documents, the Project Manager or the Technician Responsible for the Activity, if applicable, informs the affected personnel and determines the necessary actions to solve them.

6.8. Control of non-conforming product.

Within the scope of TYP SA Group services, processes and products that do not comply with the requirements of the Integrated Management System or with the requirements defined and agreed with customers are mainly detected during:

- During the tender phase, search and contracting of nominated partners or subcontractors;
- The hiring of staff or freelancers;
- The review or verification of design and development;
- The contracting or supervision of subcontracted work;
- The receipt of products that may have a significant environmental impact;
- The permanent supervision of the works, carried out by the directors or chiefs;
- Internal, customer or independent inspection agency inspections or audits;
- Analysis of relevant internal and external environmental communications;

- Analysis of customer complaints, directly or through external agents;
- Accident and incident investigations;
- Internal incident analysis;
- Investigations of integrity complaints.

Procedure TPM-01 "Control and resolution of non-conformities" establishes the general methods applied by the TYP SA Group to ensure that non-conforming products are identified and controlled, both from a quality and environmental or OSH point of view, to avoid their inadvertent use and that the corrected goods or services are inspected again. Likewise, that processes or actions that violate the prescribed integrity management obligations are identified.

It also gives rise to possible non-conformity reports and, where appropriate, subsequent corrective actions,

- In desk-based work, where the "products" are documents, the treatment of "non-conformities" is correction and re-editing;
- In the management, control or supervision of works, in any of its modalities, non-conforming products - meaning omitted or incorrectly performed tasks for which the TYP SA Group is responsible - are dealt with according to their nature and in accordance with the provisions of the quality plan for the work. In the case of non-conforming goods or services supplied by the contractor, the TYP SA Group's responsibilities for establishing and monitoring their correction vary according to the type of supervision and are defined in the contract, TYP SA Group's quality plan for the work, quality management scheme or similar document, if it exists.

In addition to the control of non-conformities in OSH, the Integrated Management System has a procedure TPM-04 "Investigation of accidents and incidents" that establishes and determines the actions necessary to investigate accidents and incidents that occur at work in order to take the necessary measures to prevent their recurrence.

In order to prevent accidents and OSH incidents and to ensure the capacity to respond to them, the TYP SA Group has emergency plans or measures in place at its work centres, as established in procedure TPH-04 "Emergency".

In order to limit the environmental impacts generated and ensure the capacity to respond in the event of an accident, environmental emergency plans are in place, drawn up in accordance with procedure TPA-03 "Emergency plans".

With regard to integrity management, the Integrity Management Manual sets out the procedure for managing incidents channelled through the Internal Information Channel.

In order to limit deviations in the expected results of R&D&I projects, the Group V Monitoring procedure is applied.

7. Performance evaluation.

7.1. Monitoring, measuring, analysing and evaluating performance

The System establishes continuous monitoring and measurement through:

- External audits,
- The internal audits described in point 7.4.1.1. 7.4,

- The handling of appeals, complaints and non-conformities,
- Accident investigation,
- Emergency reports,
- Accident statistics and reports,
- Health surveillance,
- Tidiness and cleanliness checks and reports,
- Continuous monitoring of corrective action plans and controls in place,
- Periodic reviews of risk assessments,
- Assessments of the effectiveness of the integration of preventive activities in annual reports,
- Annual reviews by the System Management.

During and at the end of the work, project and unit managers report to their immediate managers on the client's degree of satisfaction with the work carried out by the TYP SA Group. The measures to be adopted in each particular case will be determined by the management director, informing the General Management Systems Department if the client is dissatisfied with the work carried out, giving rise to the corresponding incident. All written compliments received are reported to the General Management Systems Directorate, to be included in the monitoring and review reports on the system.

7.1.1. Monitoring and measurement of processes.

The Directorate General Management Systems compares the methods established for the monitoring and measurement of the QHSE System processes with those actually applied, by means of audits, which shall be carried out and documented in accordance with paragraph 7.4 "Internal System Audits".

The project or site managers or heads analyse and evaluate the capacity of the processes to achieve the expected results and report to their respective general or territorial managers, who report to the corresponding Committee, which and in accordance with the indications in section 7.5.1. 7.5 evaluates the effectiveness and efficiency of the QHSE System processes and establishes the necessary remedial, corrective and preventive actions, as indicated in section 7.6. 8 and in points 8.1 y 8.2 respectively.

In the area of integrity management, the Compliance Committee receives the results of the audit reports on the integrity sections of the QHSE system audits and, together with the results obtained in its own internal audits, analyses and assesses the degree of compliance and effectiveness of the Integrity System. The results of this analysis lead to conclusions on performance, indicators and actions for improvement, all of which are set out in half-yearly monitoring reports and in the annual Integrity System review report.

In addition to these internal OSH audits, the required legal audits of the OSH Management System are carried out periodically, in which, among other aspects, compliance with legal requirements and all those voluntarily assumed by the TYP SA Group are checked.

Every year, in the annual report of the Prevention Services, the effectiveness of the preventive activity is assessed and the accident rates are presented, which enable the suitability of the processes and their validity in achieving the objectives set to be evaluated.

Finally, the degree of compliance with OSH-related processes is monitored in annual management reviews.

7.1.2. Product tracking and measurement.

The monitoring and control of the studies is carried out by means of a check, and of the projects, in addition to the check, the verification, revision and validation of the design and development, cited in 6.3. The monitoring and control of site management and controls and surveillance is established in the inspection point plans in accordance with the indications in procedure TPS-03, of inspections, in its specific procedure, and laboratory testing is established in its own manuals and procedures. These control measures are complemented by internal audits.

The key characteristics of the operations that may have a significant impact on the environment are monitored and controlled by the Committee at the QHSE System monitoring and review meetings, in accordance with the provisions of section 7.5. 7.5.

As indicated in point 7.4 on OSH, internal and legal audits of the OSH Management System are carried out periodically, in which, among other aspects, compliance with legal requirements and all those voluntarily assumed by the TYP SA Group are checked.

The degree of compliance with OSH development is monitored in annual management reviews.

The monitoring and control of R&D&I-related activities are carried out by checking the project portfolio and its exploitation. These control measures are complemented by the results of audits.

The verification of conventional and R&D&I projects constitutes the record of product release to the customer.

7.2. Customer satisfaction

In addition, customer satisfaction surveys are carried out annually for the most significant projects. These surveys are formulated through the Directorate General of Management Systems and sent by post or e-mail to the clients indicated by each of the management directors for each project in the current or immediately preceding year. The survey campaign begins in July and the letters are sent out in September, in order to obtain and process the data in time for the review of the system. All those with negative results are analysed in a separate file and considered as customer complaints, where appropriate.

7.3. Data analysis.

The Quality Committee determines, collects and analyses the data indicated in the process sheets included in section 7.5.1. 7.5 to evaluate and demonstrate the suitability and effectiveness of the QHSE System, to identify processes or activities that can be improved and to provide information on:

- a) Customer and stakeholder satisfaction (see 7.2);
- b) Conformity to product requirements (see 6.2.2);
- c) Process and product characteristics and trends, including opportunities for preventive or improvement actions (see 8);
- d) Suppliers (see 6.4).

All OSH-related data, such as accident statistics, audit results, etc., are analysed in annual reviews to assess the effectiveness of OSH integration and implementation and serve to determine short- and long-term policy and objectives.

7.4. Internal audits of the system

Procedure TPM-02 "Audits" contains the general methods for auditing:

- System: To assess its monitoring, effectiveness and adequacy;
- Management: To assess the monitoring of the system by Divisional and Delegation managers and the achievement of the qualitative objectives for which they are responsible;
- Contract: To assess the monitoring, effectiveness and adequacy to the System of the work performed by the audited area in ongoing or terminated contracts;
- Environmental: To assess the degree of compliance in the fixed work centres with the obligations derived from the Environmental Management System;
- OSH: To assess the degree of compliance with the obligations derived from the OSH Management System in each of the work centres.
- R&D&I: To assess the degree of compliance with the obligations derived from the R&D&I Management System.
- Information security: To assess the degree of compliance with the obligations arising from the Information Management System.

All of them take into consideration aspects related to integrity management, which are also dealt with autonomously.

These procedures include the selection of auditors, independence requirements and the launch, conduct and documentation of audits and audit results.

Audits of the QHSE System and the Integrity Management System are carried out at least every three years and include those points of the standard not covered by the project and management audits. In addition, and depending on their importance, complexity and the requirements of the client or interested parties, specific project audits are carried out. Their planning, performance and documentation are set out in procedure TPM-02 'Audits'.

Project and management audits are scheduled every six months and the audit schedule is published in the annexes to the minutes of the QHSE Management System monitoring or review meetings. Each year, at least one contract audit is carried out for each division, department or delegation, and one environmental audit for each permanent work centre.

TPM-02 defines responsibilities and requirements for planning and conducting audits, establishing records and reporting results.

7.5. Management review.

7.5.1. QHSE System Review

7.5.1.1. Periodicity and content.

The Quality Committee, by order of the Top Management, carries out the review of the QHSE System once a year in a meeting under the direction of the Chairman:

- a) The effectiveness of the QHSE System and compliance with legal requirements, customer commitments and commitments to other stakeholders is analysed and reviewed;
- b) Opportunities for improvement and the need for changes to the QHSE System, policy, objectives and targets are assessed;

- c) The objectives and targets of the QHSE System are reviewed and the new objectives and targets are incorporated;
- d) Human, material and financial means and actions, including maintenance, are planned to ensure that they are carried out under the specified conditions necessary to achieve them.

This review is complemented by other follow-up meetings (at least once a year), dedicated exclusively to the monitoring of the QHSE System and its objectives.

Independently of the meetings indicated above, the General Manager of Management Systems, the Technical General Manager and the Director of the Personnel Area permanently evaluate the effectiveness of the QHSE System and the fulfilment of the objectives, informing the other members of the Committee in accordance with the provisions of point 5.3.1. If significant deviations are detected, the Chairman and the person responsible for the affected area are informed and an extraordinary meeting is called to establish the necessary corrective measures and actions.

Minutes of these meetings are kept and disseminated to all staff through TYP SA's intranet.

7.5.1.2. Information for review.

The General Management Systems Directorate, together with the General Technical Directorate and the Personnel Area Directorate, provide the following information in the corresponding report for the review of the QHSE System:

- a) The results of audits and assessments of compliance with legal requirements and other requirements subscribed to by the TYP SA Group;
- b) The results of participation and consultation;
- c) Feedback from customers, other stakeholders and their communications, appeals, complaints and grievances;
- d) The execution and conformity of processes and products;
- e) The status of non-conformities, accident investigations, corrective actions, preventive actions and recommendations for improvement;
- f) Follow-up of actions resulting from previous management reviews;
- g) Changes in circumstances, TYP SA Group organisation, scope of work or requirements, including legal and other requirements, that may affect the QHSE System;
- h) The extent to which objectives and targets have been met;
- i) The type and scope of products provided by customers;
- j) Environmental and OSH performance ⁶⁴⁶⁵ ;

⁶⁴ **Environmental performance:** measurable results of an organisation's management of its environmental aspects.

⁶⁵ **OSH performance:** measurable results of an organisation's management of its OSH risks. NOTE 1: Measurement of OSH performance includes measurement of the effectiveness of the organisation's controls. NOTE 2: In the context of OSH management systems, results may be measured against the OSH policy, the organisation's OSH objectives and other OSH performance requirements.

- k) The maintenance of facilities and vehicles and the monitoring of operations or processes that may generate a significant environmental impact;
- l) Relevant environmental communications from external stakeholders;
- m) Process and product characteristics and trends;
- n) Recommendations for improvement.
- o) Results of the risk assessment and the status of the risk treatment plan of the information security system.

7.5.1.3. Results of the review.

During the review of the QHSE System, the following are established:

- a) The maintenance or modification of the Policy and other QHSE System documents;
- b) Actions arising from changes to the Policy (if applicable);
- c) The necessary corrections for the adequate compliance and adaptation of the legal and regulatory requirements applicable and in force in each place and time and in each specific area of the QHSE System.
- d) The action plan to mitigate the identified risks;
- e) Quality, environmental, OSH, R&D&I and information security objectives and targets;
- f) Changes in the organisation of the TYP SA Group or in the scope of the services offered;
- g) The standards and requirements applicable to the QHSE System and the services offered;
- h) Actions required when quality, environmental or OSH objectives have not been achieved;
- i) Follow-up of actions resulting from previous management reviews;
- j) The resources required and their adequacy to maintain an effective Management System.

The Committee documents the results and actions derived from the reviews, issuing the corresponding reports or minutes with the relevant conclusions, which will be considered records of the Integrated Management System.

7.5.2. Review of the Integrity Management System

7.5.2.1. Periodicity and content.

The Compliance Committee, together with Senior Management, reviews the Integrity Management System once a year at a meeting under the direction of the Chairman.

- a) The effectiveness of the Integrity Management System and compliance with legal requirements is analysed and reviewed;
- b) Opportunities for improvement and the need for changes to the Integrity Management System, policy, objectives and targets are assessed;
- c) The objectives and targets of the Integrity Management System are reviewed and the new objectives and targets are incorporated;

- d) Human, material and financial means and actions, including maintenance, are planned to ensure that they are carried out under the specified conditions necessary to achieve them.

This review is complemented by other regular follow-up meetings of the Committee itself, as indicated in the Integrity Management Manual, as well as any extraordinary meetings as required, all in accordance with the provisions of the Integrity Management Manual.

7.5.2.2. Information for review.

The Compliance Committee provides the following information for the review of the Integrity Management System in the corresponding report:

- a) The results of audits and the effectiveness of the controls in place;
- b) The status of previous actions including training, internal or external communications, improvements or changes made, and relationship with controlled entities.
- c) Changes in circumstances or in the TYP SA Group's organisation, including legal and other requirements, which may affect the Integrity Management System;
- d) Information on system performance, including the status of non-conformities, corrective actions, preventive actions and recommendations for improvement;
- e) The category and number of complaints, with relevant details and an indication of the status of the proceedings opened during the year and the decisions taken.
- f) e) The follow-up of actions resulting from previous management reviews; The extent to which objectives and targets have been met;
- g) Recommendations for improvement.
- h) The accountability of the material and human resources required and the proposal for the following year.
- i) The proposed audits for the following year.

In order to evaluate performance in integrity management, the Committee will establish a series of indicators that will be analysed on a half-yearly and/or annual basis, relying on the different areas of the company to obtain some of them (e.g. Human Resources, DG Administration, etc.).

Results of the review.

During the review of the Integrity Management System, the following are established:

- a) The maintenance or modification of the policy and other documents of the Integrity Management System;
- b) Actions arising from changes to the policy (if applicable);
- c) The necessary corrections for the adequate compliance and adaptation of the applicable legal requirements in force at each place and time and in each specific area of the Integrity Management System;
- d) Objectives and targets in relation to integrity management;
- e) Changes in the organisation of the TYP SA Group;

- f) The standards and requirements applicable to the Integrity Management System and the services offered;
- g) Actions required when objectives have not been achieved;
- h) The necessary resources.

The Committee documents the results and actions derived from the reviews, issuing the corresponding reports or minutes with the relevant conclusions, which shall be considered records of the Integrated Management System and are made available to the Board of Directors, which is informed of the main results of these in an executive summary report.

8. Improvement.

8.1. Non-conformity. Corrective actions.

Procedure TPM-01 "Control and resolution of non-conformities" establishes the general methods applied by the TYP SA Group for the detection, processing and resolution of non-conformities, in order to document them, their possible causes and corrective actions, when necessary, as well as the monitoring of their implementation and effectiveness.

In addition to this, the OSH procedure TPM-04 "Investigation of accidents and incidents" aims to establish and determine the necessary actions to investigate accidents and incidents that occur at work in order to take the necessary measures to prevent their recurrence.

In the area of integrity management, in the event that system non-conformities are detected during the investigation process, these are handled in accordance with procedure TPM-01, independently of the investigated file.

8.2. Preventive actions.

Procedure TPM-01 "Control and resolution of non-conformities" establishes the general methods applied by the TYP SA Group so that, based on the examination of the non-conformities recorded, the **monitoring of the work and its peculiarities**, possible situations can be deduced which, due to similarities with the above, may give rise to potential risks for quality, the environment, integrity or R&D&I activities.

Once the situation in which these hazards may occur has been identified, the process of establishing and controlling preventive actions is similar to that of corrective actions.

With regard to OSH, procedure TPH-04 "Emergency" is in place to respond to potential emergency situations, prevent and mitigate their consequences should they occur and avoid accidents and incidents or act appropriately should any occur.

The compliance and effectiveness of the above actions is ensured through the implementation of the following sections 5.1.5, 6.2.2, 6.2.3 y 6.3.5 and is complemented by the client's ability to access via <http://www.typsa.com>, by means of a password, to updated information on a project (documents, plans, calculations and measurements, bibliography, etc.), as well as on supervisions and work controls (progress, periodic reports, certifications, photographs, etc.).

8.3. Continuous improvement.

The commitment to continuous improvement is evidenced by the Chairman in his Policy, developed and applied by the Committee through the analysis of the data contained in the process sheets and is

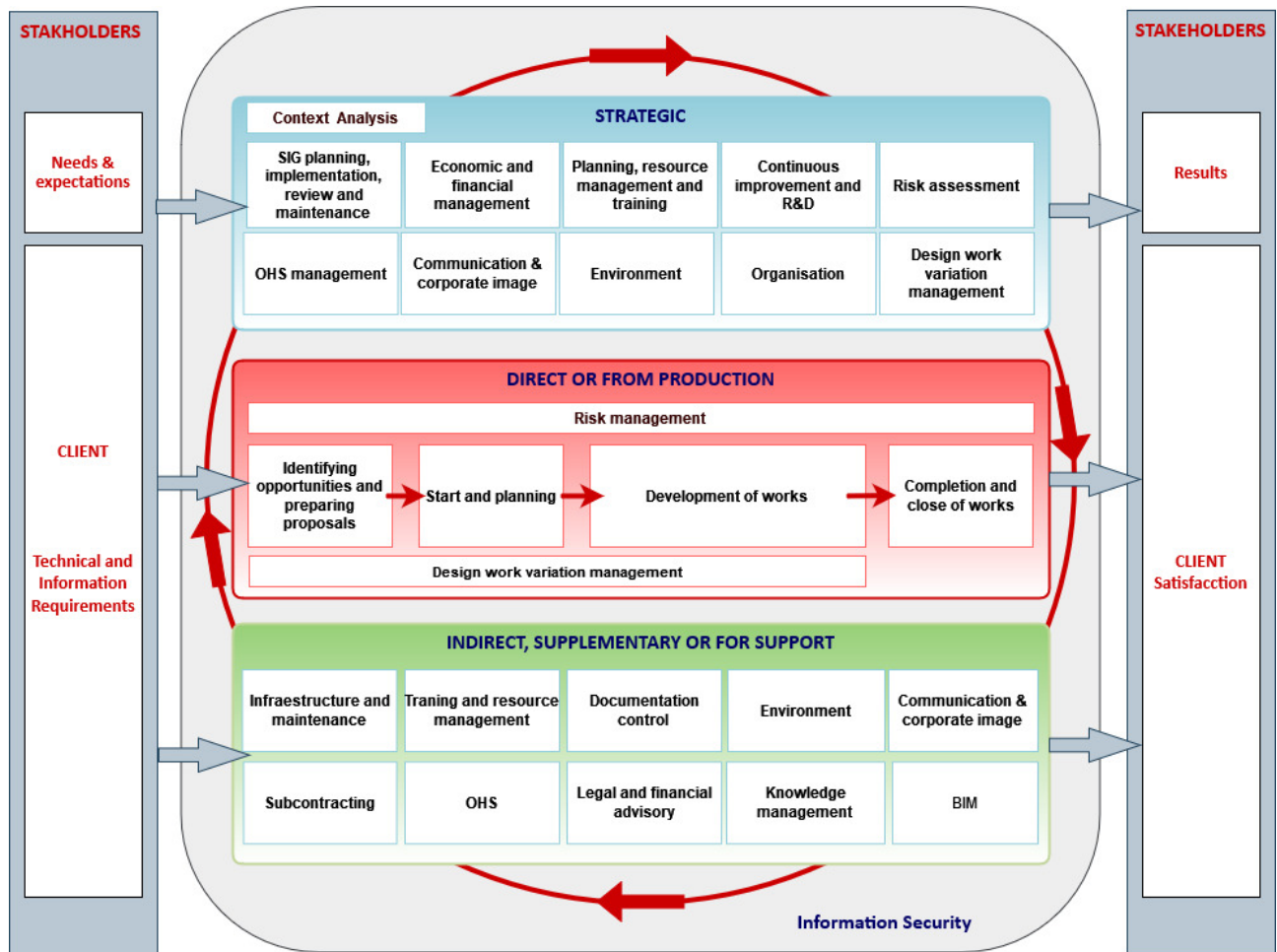
complemented by the application of an incentive system for TYP SA Group employees for activities or ideas that, directly or indirectly, contribute to improving quality, the performance of innovative activities and the efficiency of the work carried out, respect for the environment and improvements in OSH conditions.

Continuous improvement is one of the fundamental aspects of the Integrated Management System, carried out through annual reviews and promoted through the control of non-conformities, the application of the system of internal and external audits and the different controls of the different aspects of the Integrated Management System.

9. annexes.

- 9.1 Annex. Process diagram.
- 9.2 Annex. Environmental aspects.
- 9.3 Annex. Organisation chart.
- 9.4 Annex. Management System Policies
- 9.5 Annex. Information security policy manual.
- 9.6 Annex. List of general procedures of the QHSE System that develop and complement this Manual.
- 9.7 Annex: Abbreviations and definitions.
- 9.8. Annex: Integrated Management System Certifications.

9.1. Annex. Process diagram⁶⁶.



⁶⁶ For the map of R&D&I processes, see TPV-01.

9.2. Annex. Environmental aspects.

See procedures 'TPA-01 Identification and assessment of environmental aspects and legal requirements' and 'TPA-02 Operational control'.

9.3. Annex. Organisation chart.

See under the Organisation tab of

<https://typsa.net/calidad/DocSistema.html>, section 'Organisation'.

9.4. Annex. Management System Policies.

See in:

<https://www.typsa.com/>

<https://typsa.net/calidad/DocSistema.html>

<https://typsa.net/raiz2/intranet/#/procedures/Integridad>

9.5. Annex. Information security policy manual

See in:

<https://typsa.net/calidad/DocSistema.html>

9.6. Annex. List of general procedures that develop and complement this Manual.

GROUP O: ORGANISATION

TPO-01	Organisational charts of the TYP SA Group
TPO-10	Duties of the Chief Technical Officer
TPO-20	Functions of the Divisional Manager
TPO-22	Duties of the Area Technical Director
TPO-24	Duties of the Global Tunnel Director
TPO-25	Functions of the Head of Department
TPO-26	Duties of the Head of Section
TPO-27	Functions of the Divisional Coordinator
TPO-28	Duties of the Director of Contract Management
TPO-29	Functions of the Sustainability Coordinator
TPO-30	Functions of the Project Manager
TPO-31	Functions of the Information Manager
TPO-32	BIM Manager functions
TPO-33	Functions of the GIS Manager
TPO-34	CAD Manager functions
TPO-35	Functions of the Head of Unit
TPO-36	Functions of the GIS Leader
TPO-37	Document Controller Functions
TPO-39	Duties of the Planning Officer
TPO-40	Functions of the Technician Responsible for Activity
TPO-42	BIM Leader Roles
TPO-45	Duties of the Coordinating Technician
TPO-50	Vehicle Management
TPO-60	Roles and responsibilities in preventive matters
TPO-70	Information security roles and responsibilities
TPO-80	Organisation, functions and responsibilities of the Railway Projects Inspection Section'.
TPO-90	Functions of the Fire Safety Coordinator Technician'.

GROUP D: DOCUMENTATION CONTROL

TPD-01	Identification of Documents and Registers
TPD-02	Documentation and data control
TPD-03	Records
TPD-04a	Storage and processing of project documentation
TPD-04b	Storage and processing of site documentation

GROUP G: GENERAL REQUIREMENTS. WORK PROCESS

TPG-01	Tender control
TPG-02	Starting and planning work

- TPG-03 Quality plans
- TPG-04 Subcontracting and procurement
- TPG-05 Closure of works

GROUP P: STUDIES AND PROJECTS

- TPP-01 Design and development control
- TPP-02 Change Management in Design Work
- TPP-03 Consultancy Work
- TPP-04 Inspection

GROUP S: SITE SUPERVISION

- TPS-01 Initial works in control and surveillance of construction sites
- TPS-02 Quantitative and deadline control
- TPS-03 Quality control
- TPS-04 Review of the contractor's documentation. Management of modified and complementary documents.
- TPS-05 Direction of building works

GROUP C: INTEGRATED MANAGEMENT

- TPC-01 Procurement Management
- TPC-08 Risk Management

GROUP M: MEASUREMENT AND IMPROVEMENT

- TPM-01 Control and resolution of non-conformities
- TPM-02 Audits
- TPM-03 Control of measuring equipment
- TPM-04 Feedback
- TPM-06 Proposals for improvement

GROUP R: RESOURCE MANAGEMENT

- TPR-01 Training
- TPR-02 Procedure for the prevention of discrimination
- TPR-03 Registration of employees and collaborators
- TPR-04 Non-automatic employee registration
- TPR-05a Confidentiality undertaking, duty of secrecy, general obligations and rules for the use of means - Employees
- TPR-05b Confidentiality undertaking duty of secrecy, general obligations and rules for the use of means - Contributors
- TPR-06 Recruitment of staff
- TPR-07 Payroll
- TPR-08 Internal promotion
- TPR-09 Competence management
- TPR-10 External recruitment of particularly exposed staff

GROUP A: ENVIRONMENTAL MANAGEMENT

- TPA-01 Identification and assessment of environmental aspects and legal requirements
- TPA-02 Operational control
- TPA-03 Environmental emergency plans

GROUP V: R&D&I MANAGEMENT

- TPV-01 R&D&I Management
- TPV-02 Technological Surveillance

GROUP H: HSE MANAGEMENT

- TPH-01 Control and handover of individual work equipment
- TPH-02 Hazard Identification and Risk Assessment (IPER)
- TPH-03 Coordination of business activities
- TPH-04 Emergency
- TPH-05 Accidents

GROUP I: INFORMATION SECURITY MANAGEMENT

- TPI-01 Management of information and communications technology administrators.
- TPI-02 Methodology for information security risk analysis
- TPI-03 Information security contingency plan
- TPI-04 User account creation and deletion
- TPI-05 Information and communication technology change management
- TPI-06 Information security incident management

GROUP E: INTEGRITY MANAGEMENT

- TPE-01 Powers of attorney
- TPE-02 Emails and telephone conversations
- TPE-03 Declaration by Managers
- TPE-04 Dividends
- TPE-05 Donations and sponsorships

The registers⁶⁷ indicated in paragraph 1 and in the rest of the Integrated Management System documents.
External communications related to the Integrated Management System.

⁶⁷ **Record:** a document that presents results obtained or provides evidence of activities performed.

9.7. Annex: Abbreviations and definitions.

9.7.1. Abbreviations.

DQA: Directorate-General for Management Systems.

DD.GG: General addresses.

TLD: Territorial Directorates.

EMAS: Eco-Management and Audit Scheme.

JJ.AA: Generic term to designate jointly the directors or heads of division, department, project or work unit, affected or responsible for any of the actions or processes.

RD: Design Review Manager.

SW: Software.

TRA: Technician Responsible for Activity.

Corrective action: action taken to eliminate the causes of a detected non-conformity, defect, incident or any other existing undesirable situation, in order to prevent its recurrence.

Preventive action: action taken to eliminate the causes of a potential non-conformity, defect, incident or any other undesirable situation, in order to prevent its occurrence.

Remedial action or repair: action taken on a non-conforming product to reduce the non-conformity to acceptable values, even if it does not conform to the originally specified requirements.

R&D&I activities: are those related to Research, Technological Development and Innovation, as defined in this standard.

Work environment: the set of conditions under which work is performed. Conditions include physical, social, psychological and environmental factors (such as temperature, recognition schemes, ergonomics and atmospheric quality).

Approval: Formal action by which a formally authorised body authorises the use of a Document, service or process in a given area and for a given use.

Quality assurance: a set of planned and systematic actions implemented within the quality system, and demonstrable if necessary, to provide adequate confidence that an entity will meet requirements for quality.

Environmental aspect: element of an organisation's activities, products or services that can interact with the environment.

Threat: The potential cause of an unwanted incident, which may cause damage to a system or an organisation.

Attack: Attempt to destroy, expose, alter, disable, steal or gain unauthorised access to or make unauthorised use of an asset.

Auditor: a person competent to conduct an audit.

Internal audit: a systematic, independent and documented process for obtaining 'audit evidence' and evaluating it objectively to determine the extent to which 'audit criteria' are met.

Authentication: Assurance that a claimed characteristic of an entity is correct.

Authenticity: The property that an entity is what it claims to be.

Quality: the set of characteristics of an entity that give it the ability to meet stated and implicit needs.

Checking or review of a document: examination of a document or logical grouping of documents to ensure that it is free of overlaps, gaps or contradictions, that it is free of conceptual or formal errors and that the instructions received for its preparation have been complied with and that it is consistent with its source data.

Client: organisation or environment that receives or is affected by the products or processes carried out by the TYP SA Group. In accordance with the broad meaning given by UNE-EN-ISO 9001 to the term "Customer", this term is considered to include both the environment and the purchasers and users of the products and services provided by TYP SA Group.

Quality Committee: executive and control body composed of the Chairman, the Chief Executive Officer, the general managers, territorial managers and coordinators of the QHSE System.

R&D&I management committee: executive and control body chaired by the Technical Director General, the general directors, territorial directors and the R&D&I management coordinators.

Environmental performance: measurable results of the environmental QHSE System, relating to an organisation's control of its environmental aspects, based on its environmental policy, objectives, policies and targets.

Innovative performance: Measurable results of the R&D&I QHSE system, relating to an organisation's control of its aspects, based on its technology policy, objectives and targets.

Verification: confirmation by examination and provision of objective evidence that the specified requirements have been met.

Grant: authorisation to use a non-compliant document or product or to proceed to the next stage of a non-compliant process.

Confidentiality: Property of information whereby it is kept inaccessible and not disclosed to unauthorised individuals, entities or processes.

Consultation: seeking opinions before a decision is taken. Note 1: Participation includes engaging health and safety committees and workers' representatives, where they exist.

Internal context: The internal environment in which the organisation seeks to achieve its objectives.

External context: The external environment in which the organisation seeks to achieve its objectives.

Access control: means to ensure that access to assets is authorised and restricted according to business and security requirements.

Quality control: operational techniques and tasks used to fulfil the requirements for quality.

Quality Coordinator: responsible for the Quality management of the assigned workplaces (review).

Environmental Coordinator: person in charge of the environmental management of the assigned work centres. His/her work consists of identifying environmental aspects, controlling consumption, identifying environmental legislation and evaluating the degree of compliance with its requirements, documenting waste management, managers (such as suppliers); defining specific objectives and periodically evaluating their compliance, stimulating the interest of all personnel in environmental issues, especially those related to

saving energy, water and reducing waste. Carry out internal audits and prepare reports for the monitoring and review of the system.

Starting data of a work or of the design and development: conditioning factors external to the work and whose knowledge is necessary and obligatory for its execution, such as: requirements issued by other interested parties, applicable legislation, ordinances and regulations in force, requirements stipulated by the client, physical, environmental or socio-economic characteristics of the surroundings and, when necessary, environmental impact study.

Defect: non-compliance with a requirement or reasonable expectation related to an intended use, including those related to safety.

Development of own technology: use of own knowledge and experience for the production of new materials, devices, products, processes, systems or services, or for their substantial improvement, including the realisation of prototypes and pilot installations.

Technological Development: application of the results of research, or of any other type of scientific knowledge, for the manufacture of new materials or products, for the design of new processes, production systems or service provision systems, as well as the substantial technological improvement of pre-existing materials, products, processes or systems. This activity shall include the materialisation of research results in a plan, scheme or design, as well as the creation of non-marketable prototypes and initial demonstration projects or pilot projects, provided that they are not converted or used in industrial applications or for commercial exploitation.

Environmental performance: measurable results of an organisation's management of its environmental aspects.

OSH performance: measurable outcome related to the effectiveness of preventing injuries and health deterioration for workers and providing safe and healthy workplaces.

Engineering design or industrial design: successive stages of design involving the conception and preparation of plans, drawings and supports to define the descriptive elements, technical specifications and performance characteristics necessary for the manufacture, testing, installation and use of a product.

Availability: Property of being accessible and ready for use on demand by an authorised entity.

Document: minimum self-sufficient information for a given purpose, contained in any medium, generated by a person and relating to a single entity or logical grouping of several entities. The medium of support may be paper, magnetic, optical or electronic disk, photograph or standard samples, or a combination of these.

Effectiveness: The degree to which planned activities are carried out and planned results are achieved.

Efficiency: the relationship between the result achieved and the resources used.

In the case of R&D&I projects, they have a common interest in the performance of the project organisation and the environment in which it operates. In this case the stakeholders may be: (a) the customer, recipient of the project product, (b) the consumer, as user of the project product, (c) the owner, as the originating organisation of the project; (d) the partner, e.g. in a consortium (each entity participating in a joint project); (e) the financier, as a financial institution; (f) the subcontractor, organisation providing products to the project organisation; (g) society, e.g. jurisdictional or regulatory bodies and the general public; (h) TYP SA Group's internal staff, as members of the project organisation.

Personal Protective Equipment (PPE): any equipment intended to be worn or held by the worker to protect him from one or more risks that may threaten his safety or health at work, as well as any complement or accessory intended for that purpose.

Risk assessment: the process of evaluating the risk(s) arising from a hazard(s), taking into account the adequacy of existing controls, and deciding whether or not the risk(s) are acceptable.

Occupational risk assessment: a process aimed at estimating the magnitude of those risks that could not be avoided, obtaining the information necessary for the employer to be able to take an appropriate decision on the need for preventive measures and, if so, on the type of measures to be taken.

Evidence: information that can be objectively demonstrated to be true because it is based on facts obtained by observation, measurement, testing or other means.

Management of quality, environment, OSH and R&D&I: all tasks of the general management function that determine the policy, objectives and responsibilities for quality, environment, OSH and R&D&I, and are implemented by means such as planning, control, assurance and continuous improvement of all these aspects within the framework of the General Management System. Quality management includes quality assurance and quality control.

Hazard identification: the process of recognising that a hazard exists and defining its characteristics.

Environmental impact: any change to the environment, whether adverse or beneficial, resulting in whole or in part from an organisation's tasks, products and services.

Documented information: information that an organisation has to control and maintain, and the medium in which it is contained. NOTE 1: Documented information may be in any format and medium, and may originate from any source. NOTE 2: Documented information may refer to the management system, including related processes; information created for the organisation to operate; evidence of results achieved (records).

Innovation: activity that results in new products or processes, or substantially significant improvements to existing ones.

Technological innovation: the activity of incorporating existing basic technologies available on the market into the development of a new product or process.

Innovation in technology: activity of generating and fine-tuning new technologies in the market which, once consolidated, will begin to be used by other innovative processes associated with products and processes.

Fundamental or basic research: extension of general scientific and technical knowledge not directly linked to industrial or commercial products or processes.

Industrial or applied research: research aimed at acquiring new knowledge with a view to exploiting it in the development of new products or processes, or to bring about major improvements in existing products or processes.

Management innovation: improvements related to the way resources are organised to achieve innovative products or processes.

Inspection: Measurement, examination, testing or comparison with a standard of one or more characteristics of an "entity" and comparison of the results obtained with the specified requirements, in order to determine whether conformity has been obtained for each of these characteristics.

Integrity: property of accuracy and completeness.

Interface: information shared by two or more agencies. It includes the document that enables the relationship between them.

Research: original and planned enquiry aimed at discovering new knowledge and understanding in science and technology.

Innovation activities are: incorporation of material and immaterial technologies, industrial design, industrial equipment and engineering, launching of manufacturing, commercialisation of new products and processes.

Workplace: a place under the control of the organisation where a person needs to be or to go for work purposes. NOTE 1 - The organisation's responsibilities under the OSH management system for the workplace depend on the degree of control over the workplace.

Environment: the surroundings in which an organisation operates, including air, water, land, natural resources, flora, fauna, humans and their interactions.

Continuous improvement: process of optimising the Integrated Environmental and OSH Management System to achieve improvements in the overall performance of the same, in accordance with the organisation's environmental and OSH policy.

Continuous improvement: a recurring process by which objectives are set and opportunities are identified to enhance the ability to meet quality, environmental and OSH requirements on an ongoing basis through audit reports and findings, data analysis, management review or other means, and usually leading to corrective or preventive action.

Environmental target: a detailed performance requirement, quantified where possible, applicable to an organisation or part of an organisation, which is derived from environmental objectives and which must be set and met in order to achieve those objectives.

Quality, environmental, OSH and R&D&I target: a detailed performance requirement, quantified where possible, applicable to an organisation or part of an organisation, which stems from the quality, environmental, OSH or R&D&I objectives and which must be set and met in order to achieve these objectives.

Non-conformity: non-compliance with a specified requirement.

New products or processes: those whose characteristics or applications, from a technological point of view, differ substantially from those existing previously.

Environmental objective: a general environmental goal consistent with an organisation's stated environmental policy.

Organisation: a company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether or not corporate, public or private, having its own functions and administration.

Stakeholder: a person or group, inside or outside the workplace, who has an interest in or is affected by the quality, environmental or OSH performance of an organisation or by the R&D&I performance of an organisation.

Participation: the action and effect of involvement in decision-making. Note 1: Participation includes engaging health and safety committees and workers' representatives, where they exist.

Hazard: a source, situation or act with the potential to cause harm in terms of human injury or health impairment, or a combination of these.

Quality, environmental and R&D&I management plan: a document that sets out the processes, procedures, resources, human and material, and sequence of specific tasks aimed at establishing, achieving and measuring the objectives and requirements for quality, environment and R&D&I, as well as who, when and where all of the above should be applied to a specific product, project or contract.

Occupational Risk Prevention Plan: this is the tool through which the TYP SA Group's preventive activities are integrated into its general management system and its occupational risk prevention policy is established.

Planning of the preventive activity: establishment, design and programming of all those activities and measures, including the necessary human, material and economic means, to be adopted in order to eliminate or control and reduce the risks that the risk assessment determines to be unavoidable.

Quality, environmental, OSH and R&D&I policy: general intentions and guidelines of an organisation related to the quality of its products, environmental performance and R&D&I as formally expressed by top management and providing a framework for its actions and for setting its objectives and targets.

Procedure: a specified way, documented or not, of carrying out an activity or process.

Prevention: all the activities or measures adopted or planned at all stages of the company's activity in order to avoid or reduce the risks arising from work.

Special process: a production or service process in which the quality of the product depends primarily on the skill of the operator and the equipment used and where inspections or checks carried out during or at the end of product realisation cannot guarantee that deficiencies will not occur after the product is in use or the service has been rendered. Special processes shall be subject to supervision and shall be carried out (a) by qualified personnel, (b) according to approved procedures, (c) with approved equipment and materials.

Process: a set of mutually related or interacting activities that transform inputs into outputs.

Product: result of a process.

Supplier: an organisation or person who provides a product to the TYP SA Group.

Information processing resources (facilities): any information processing system, service or infrastructure, or the physical locations that house them.

Record: a document that presents results obtained or provides evidence of activities performed.

Design and development review: systematic, documented and complete examination of the evidence generated in the different phases of design and development, carried out at least at the end of the design and development, to evaluate and confirm a) compliance with cost, time, quality and environmental requirements; b) the effectiveness of the production process and of actions aimed at minimising environmental impact; c) customer satisfaction with the work performed and with the treatment received and to identify and solve problems if any, and propose corrective or preventive actions.

Review: activity undertaken to ensure the suitability, appropriateness and effectiveness of the subject under review, in order to achieve stated objectives.

Risk: The combination of the probability of a hazardous event or exposure occurring and the severity of the damage or impairment of health that the event or exposure may cause.

Occupational risk: the possibility that a worker suffers a certain harm as a result of work. In order to classify a risk in terms of its seriousness, the probability of the harm occurring and the severity of the harm are assessed together.

Occupational health and safety: conditions and factors that affect, or could affect, the health and safety of employees or other workers (including temporary workers and contract staff), visitors or any other person in the workplace. NOTE: Organisations may be subject to legal requirements on the health and safety of people beyond the immediate workplace, or who are exposed to workplace activities.

OSH Management System. part of an organisation's management system used to develop and implement its OSH policy and manage its OSH risks.

Information system: Applications, services, processes, IT assets and other components to manage information.

QHSE system for quality, environment, OSH and R&D&I: the set of policy and objectives for quality, environment, OSH and R&D&I, the methods to achieve them and the material and human resources necessary to carry them out. It includes quality assurance and control actions.

R&D&I QHSE system: part of the overall management system that includes the organisational structure, activity planning, responsibilities, practices, procedures, processes and resources for developing, implementing, carrying out, reviewing and updating the organisation's R&D&I policy.

Intangible technologies: means the acquisition of technology in the form of patents, unpatented inventions, licences, know-how reports, trademarks, designs, utility models, purchase of R&D services and other services with a technological content.

Material technologies: this refers to the acquisition of machinery and equipment with a technological content that is related to product or process innovations introduced by the organisation.

Cabinet work: includes (a) information processing: work whose purpose is to compile and order information; (b) studies: work resulting in conclusions or recommendations. They may include sketches, diagrams and economic estimates; c) projects: work by means of which the quality, characteristics and budget of the works or products to be built, installed or assembled are defined and determined.

Technology transfer: the process of transmitting scientific and technological information, knowledge, means and exploitation rights to third parties for the manufacture of a product, the development of a process or the provision of a service, contributing to the development of their capacities.

Traceability: the ability to reconstruct the history, application or location of an entity by means of recorded identifications.

Validation: confirmation by examination and provision of objective evidence that the particular requirements for a specific intended use have been met.

Validation of design and development: confirmation through the provision of evidence that the implemented project meets the requirements for its intended use or application.

Verification: confirmation by examination and provision of objective evidence that specified requirements have been met.

Design and development verification: confirmation, through examination and provision of objective evidence, that the outcome of a project stage satisfies the requirements of the baseline data for that stage.

Technology Watch: an organised, selective and systematic process to capture information from outside and within the organisation on science and technology, select it, analyse it, disseminate it and communicate it, to convert it into knowledge in order to make decisions with less risk and to be able to anticipate changes.

Vulnerability: A weakness in an asset or control that can be exploited by one or more threats.

9.8. Annex: Integrated Management System Certifications.

See in:

<https://typsa.net/calidad/CertificacionesP.html>