

NON-FINANCIAL
INFORMATION
STATEMENT

2019

SABA

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1. Non-financial information statement

This non-financial information statement (NFIS) was prepared in accordance with Spanish Non-Financial Information and Diversity Law 11/2018, of 28 December, amending the Commercial Code, the Consolidated Limited Liability Companies Law approved by Legislative Royal Decree 1/2010, of 2 July, and Spanish Audit Law 22/2015, of 20 July (preceded by Royal Decree-Law 18/2017, of 24 November).

The Global Reporting Initiative's sustainability reporting guidelines (GRI Standards) were used to prepare this NFIS. Saba's aim with the NFIS is to report on matters related to the environment, society, respect for human rights, combating corruption and bribery, and personnel.

The reporting scope of this NFIS is the same as that of the consolidated financial statements and consolidated directors' report for the year ended 31 December 2019. In relation to 2018, it should be noted that in December Saba acquired from Indigo all the shares of various companies that manage car parks in the UK, Germany and Slovakia and completed the transaction in January 2019 with car parks in the Czech Republic. However, given the date of their incorporation and the fact that they are not included in Saba's consolidated financial statements for 2019, the figures for 2018 correspond primarily to the non-financial information of the countries in which Saba operated extensively throughout 2018 (Spain, Italy, Chile, Portugal and Andorra), which accounted for all its operations that year. The information corresponding to 2018 that is provided outside this reporting scope is explicitly identified.

2. Business model

Saba is a benchmark industrial operator in the development of solutions in the field of urban mobility, specialising in car park management. Saba carries out its activity from an industrial perspective in all areas of the car park sector and has excellent locations, the result of a policy of selective growth to guarantee the highest standards of quality, innovation and experience. All this under the guiding principle of customer service as a central pillar, Saba's differentiating factor.

Following the acquisition concluded in December 2018, Saba has a workforce of 2,409 people, (2018: 2,328 people) operates and is present in 188 cities (2018: 170 cities) in nine European and Latin American companies and manages 1,231 car parks (2018: 1,175 car parks) and 403,003 parking spaces (2018: 378,000 parking spaces).

Saba's goal is to become a leading European operator in public urban mobility services and infrastructure management through continuous, selective and sustainable growth. Upholding an industry profile committed to, responsible for and that actively participates in management is part of Saba's operating and development philosophy, and it therefore adopts a long-term approach to the development of its business interests.

Saba has a combination of assets in various stages of their lifecycle, the majority of which are at an advanced stage thereof and generate high margins, a circumstance that makes it possible to finance the assets which are being developed. The average contract term is 21 years (2018: 23 years) and this secures Saba's future.

Saba's business model is also based on the privileged geographical location of its assets, the excellent quality of its service and its business approach, in addition to the proactive introduction of technology, the management of its contracts and maintaining an appropriate size that enables efficiency, competitiveness and internationalisation.

Saba has continued its policy of adopting the most cutting-edge innovation and new business strategies, incorporating in this way smart services related to the mobility of people and vehicles. Saba was the first to install VIA T and to accept payment using QR-code technology and has rolled out a website and an app in those countries where it has a presence, which can be used to purchase 100% digital products. In addition, Saba has promoted new control systems, automated ATM discounts, automatic number plate recognition when entering and exiting car parks and the development of other services associated with cars, in particular in relation to electric vehicles, and car parks (3G coverage, etc.) as well as new activities in the field of sustainable last mile urban micro distribution. The objective, therefore, is to understand car parks as service hubs, at the service of sustainable urban mobility. The foregoing is within a framework of actions focusing on energy efficiency that result in greater savings and optimised management.

Saba is also aware that the best results are obtained through the best practices. Progressing towards sustainable and socially responsible competitiveness is a challenge for leading companies. It is by advancing towards these sustainable and socially responsible criteria that Saba will attain an appropriate level of excellence that enables the Company to consolidate its position as the leader that it is and aims to continue being.

Saba considers all matters relating to corporate social responsibility as a factor inherent to decision-making. The sustainability of, and commitment to, society are included in internal management processes, and are afforded the same level of importance as other factors such as project profitability, the cost of financing, commercial strategy or information technologies, among other matters.

Saba is a member of the UN Global Compact and supports the ten principles it promotes. It is a benchmark for human rights, labour rights, the environment and the fight against corruption. Saba also carries on its activity within the framework of the United Nations Sustainable Development Goals (SDGs), especially those concerning climate action, along the lines of actions to combat climate change and its effects; sustainable cities and communities, with the development of urban mobility solutions; and innovation and enhancement of technology of infrastructures.

Mission, vision and values

Saba's mission, vision and values are the pillars that underpin the management principles of SABA as a whole.

- **Mission:** To address sustainable mobility needs by offering parking space and complementary services to customers.
- **Vision:** To be a world leader in the car park and sustainable mobility service industry, distinguished for its service quality, innovation and technology.



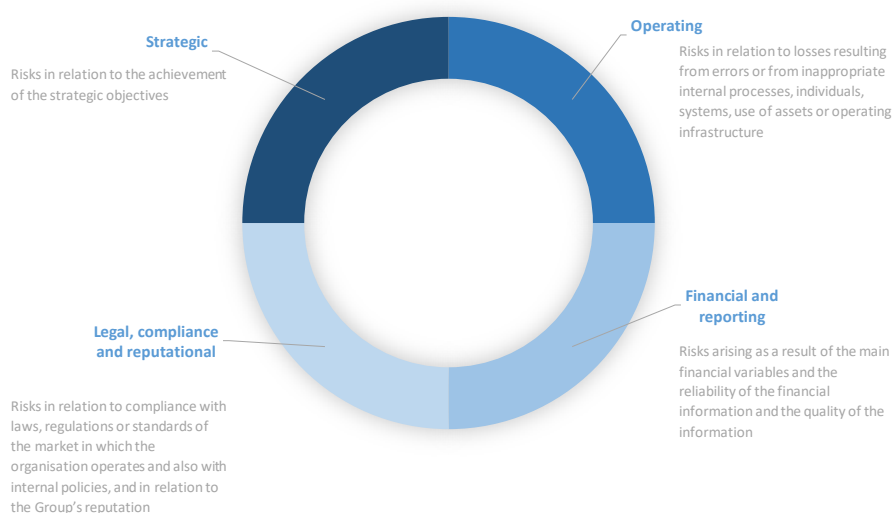
The Group's management and development philosophy is as follows:

- Forward-looking perspective and vision in managing its businesses and developing new investments.
- Maintaining an industrial profile, with commitment, responsibility and involvement in management. Consequently, the Group does not engage in financial investments.
- Efficient management optimising management know-how by pinning down best practices and achieving economies of scale.
- Excellence in service quality and customer service.
- Territorial and local relations: dialogue with and responsiveness to local authorities and potential incorporation of local partners.

2.1. Main risks

Saba has a Corporate Risk Management (CRM) model in place to ensure that all the related managers are **informed of Saba's risks** and establish control measures in order to anticipate and mitigate their impact.

The risk identification process detects any risks that might prevent the achievement of Saba's corporate objectives, paying particular attention to the most significant risks. Risk identification comprises the following risk categories:



The Corporate Risk Management (CRM) model integrates **control activities** designed to **mitigate the risks** identified, thus ensuring the existence of a comfort environment in the performance of corporate activities that entail significant risks for Saba. Specific professionals are assigned with responsibilities in relation to the control activities and they include those responsible for performing the control on a day-to-day basis, those in charge of overseeing its actual performance, as well as others who control the frequency, type (preventive or detective control) and effectiveness of the control activity through regular audits of the control activity and its supporting evidence.

All control activities must be **documented** and **reported** appropriately and will be carried out by those areas responsible for their performance as defined in the performance *deadlines*.

The main risks identified in relation to the business model are as follows:

- **Mobility ecosystem:** Identifying and performing Saba's role in the current mobility ecosystem. Changes in the authorities and zoning policy in cities (new urban zones, traffic restrictions in central areas, etc.) and also changes in people's mobility and movement patterns (new alternative transportation services, electric vehicles, car sharing, etc.).
- **Maturity of agreements:** Risks as a result of the ageing of the concessions and agreements in the portfolio and the ability to replace them with new business opportunities that ensure growth.
- **Technological innovation:** Proactive medium- and long-term development of technological innovation in line with the corporate strategy and taking into account the needs of all of Saba's departments.
- **Customer definition, identification and management:** Aligning the Company's products and value proposal with customer's needs in each country and ensuring the required levels of quality.
- **Competition:** Ensuring business sustainability taking into account competitors offering existing alternative products (car parks).

3. Information on environmental matters

3.1. Saba policy

Climate change is one of the biggest challenges of our time and greenhouse gases are the primary cause of the environmental degradation blighting our planet. CO₂ emissions are causing global warming that must be checked as quickly as possible. Aware of this need, Saba Group integrates climate change as part of its business strategy, driving initiatives that help advance towards ecological transition and the adoption of low-carbon economy.

In particular, Saba is committed to the Sustainable Development Goals (SDGs), more specifically to SDG 11 - *Sustainable cities and communities* and SDG 13 - *Climate action*.

This serves to strengthen Saba's position in terms of the environment and energy efficiency through its integrated management system (IMS) and the achievement of ISO14001:2015 – Environmental management systems certification in Spain, UK, Italy, Portugal and Chile and ISO 50001:2011 – Energy management certification in Spain, Italy and Portugal, with implementation in the UK and Chile envisaged in the medium-term.

Saba identifies the environmental issues caused by its activities, performing an in-depth analysis of its process map, and determines their impact through the calculation, and subsequent verification by a qualified third party, of the carbon footprint in accordance with internationally recognised standards.

This procedure makes it possible to outline the most suitable goals and implement initiatives that combat climate change with regard to sustainable mobility, energy efficiency and the environment, in general. Among the initiatives undertaken, the following are of particular note:

- The implementation of an energy efficiency system.
- The commitment to sustainable mobility through the adaptation of parking spaces in our car parks for use by sustainable vehicles and also our fleet of vehicles.
- The implementation of efficient lighting systems.
- Training and awareness raising actions for our employees in relation to sustainability and energy efficiency.
- Efficient management of hazardous and non-hazardous waste.
- Implementation of devices to reduce water consumption.
- Preparation of a manual that integrates eco-design in our car-park construction guidelines.
- Renewal of ventilation equipment with more energy efficient models.

Each year Saba establishes environmental sustainability and energy efficiency objectives. In this regard, the objectives established, and the goals for 2019, are detailed below:

1.- Monitoring:

Saba has a system in place to control and manage usage through more efficient remote monitoring systems, as well as through the implementation of a system to measure energy use and analyse the characteristics of the energy supply, especially electricity. This objective, which had already been adopted in Spain and Italy in previous years, was implemented in Portugal in 2019 and is scheduled for launch in Chile in 2020.

This system provides real-time data on each of the management parameters, using online software (a web platform) with various ranges and distinct levels of access to the various types of information selected.

To obtain this data, Saba installs smart meters in all its car parks and three-phase system analysers which use an energy manager to connect to the Saba network and transmit the data to the web server. Once these elements have been installed, the web platform will be configured to enable monitoring of all the electricity parameters of the network analysis systems.

All the data on retailer billings will also be regularly uploaded to the web platform.

Once the stored data is available and the selected alerts and ratios have been configured, the parameters are analysed, the most significant of which are as follows:

- Daily, monthly and annual energy consumption (kWh): historical lows, averages and highs of each car park.
- Daily, weekly, monthly and seasonal usage trends (comparison of day vs night, week days vs weekend, summer vs winter).
- Analysis of deviations and comparison with historical series to establish corrective measures (e.g. misuse, impact of construction and maintenance work, supervisory support, etc.).
- Voltage and current: grouping of voltages by phase; detection of irregular voltages that could lead to electrical and electronic equipment failure; and grouping of currents by phase and alerts for imbalances that could lead to power line and equipment failure.

This control system enables adequate cost and consumption control and, moreover, places the responsibility for containing and reducing costs and consumption, both in purely energy-related terms and in monetary terms, in the hands of each centre's staff.

2.- Energy efficiency system:

Saba implements a continuous improvement policy that includes an energy efficiency system. This objective, which had already been adopted in Spain and Italy in previous years, was implemented in Portugal in 2019 and is scheduled for launch in Chile in 2020.

3.- Training and awareness:

Saba has prepared an *e-learning* course for all personnel on the environment and energy efficiency which is available online in each country. The geographical dispersion of Saba's car parks requires that it commit to digital transformation in order to train all its employees.

The training programme includes content on the environment, biodiversity, energy efficiency, waste management and sustainable mobility. The system is currently in place in Spain and will be rolled out in Portugal and Italy in 2020.

Various awareness raising campaigns were also conducted in the main workplaces of the countries where Saba has a presence to promote more sustainable behaviour, in particular conducts relating to the use of plastic and the recycling of waste.

4.- Energy saving:

In line with the steps already taken in Spain, Italy and Portugal, measures with a direct impact on reducing electricity consumption were taken in Chile in 2019. The most important measures were as follows:

- Transition to LED lighting
- Installation of highly energy efficient lifts
- Capacitor batteries
- Renewal of ventilation equipment with more efficient models

These measures have proven to be efficient in those countries where they had been implemented earlier, achieving excellent energy savings.

5.- Sustainable mobility and emission reductions:

In 2019 Saba set a target for a 5% reduction in emissions from the fleet in the UK through the replacement of the old fleet of vehicles with energy efficient vehicles as well as using more electric vehicles.

In addition, Saba launched an electric mobility model in cooperation with a third party in Spain in 2019 to provide customers with parking spaces for electric vehicles. Saba envisages extending this cooperation model to Italy and Portugal.

6.- Facility design:

Saba has a construction guidebook that needs to be updated to include energy efficiency improvements that will have an impact on energy performance, consumption reduction and climate change.

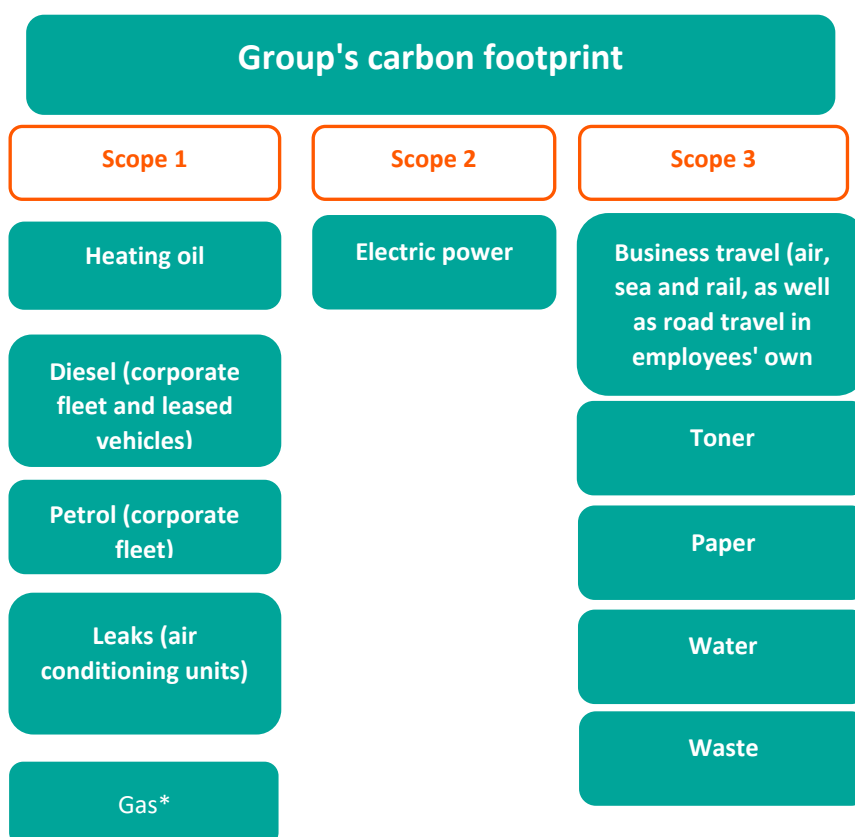
This "META" project began in 2018 and will be rolled out over the following three years.

Environmental impact

Saba calculates the carbon footprint of its activity every year to ascertain its environmental impact and engage its stakeholders in reducing it, and groups the sources of emissions (consumption) into scopes on the basis of the impact that its activity may have on each:

- Scope 1: heating oil, diesel for the vehicle fleet and refrigerant gases.
- Scope 2: electricity consumption.
- Scope 3: purchases of goods and services (water, paper and toner consumption), hazardous and non-hazardous waste, business travel and transport and distribution.

Saba has calculated its carbon footprint since 2011 and verified it since 2016.



Scope 1 includes gas consumption for the first time in 2019 (*).

The Environment and Certifications Office, which forms part of the People and Organisation Department, manages all the certifications mentioned above and drives Saba's environmental policy through regulations, awareness raising initiatives and training courses.

Furthermore, Saba includes environmental and energy efficiency matters in its procedures through process mapping. For example, the Technology Department implements measures that include transitioning to more efficient lighting, and the Procurement Department includes environmental standards in its tenders.

3.2. Risks identified

The most significant environmental impact in terms of car park usage, confirmed by the carbon footprint calculation, is energy consumption (Scope 2), which accounts for ~95% of Saba's emissions. As the Group's car parks are open 24 hours a day, it has implemented energy efficient LED lighting in its car parks, along with other measures to mitigate climate change.

Other measures with less of an impact on emissions are also being taken, such as those relating to efficient water use (Scope 3). In terms of the services provided to customers, the self-closing taps have been replaced and the standard flushing system in the toilet cisterns has been replaced with a dual-flush system.

Saba is driving sustainable mobility initiatives to attempt to reduce negative externalities, particularly air pollution. Notable initiatives include the provision of electric vehicle spaces for customers, electric bicycles, motorcycles and scooters in Barcelona city car parks and urban micro-distribution partnerships.

No changes are planned in the locations where the Group operates due to environmental impacts.

The ISO 14001 and ISO 50001 management systems implemented include audits to measure compliance with environmental standards. No fines have been received to date in relation to environmental standards. Saba has recognised no provisions or guarantees for environmental risks.

Saba has taken out third-party environmental liability insurance policies which cover environmental damage, legal defence costs, clean-up costs and third-party claims for damages.

The aforementioned risks are included in Saba's risk map as sustainability risk, in accordance with SABA's risk management model.

3.3. Environmental management and performance

The Group has put in place an energy efficiency system to be implemented in the countries where it has consumption monitoring systems. The energy efficiency system and consumption monitoring system, which were implemented in previous years in Spain and Italy, will be roll out in Portugal in 2019.

The table below shows the Group's energy savings and reductions in emissions of greenhouse gases.

Country	Initiative	ENERGY SAVINGS				REDUCTION OF GREENHOUSE GASES			
		Energy efficiency programme implemented	Energy savings (calculated, estimated, etc.)	Unit of measurement (GJ, kWh)	Base year	Variation of greenhouse gases	Emissions (CO ₂ , SO ₂ , NO)	Base year	Methodology
Spain	Various	Systems implementation	11%	kWh	2019	14%	CO ₂	2019	Carbon footprinting
Portugal	Various	Systems implementation	9%	kWh	2019	73%	CO ₂	2019	Carbon footprinting
Italy	Various	Systems implementation	8%	kWh	2019	1	CO ₂	2019	Carbon footprinting
UK	Various	Not implemented	N/A*	kWh	2019	N/A*	CO ₂	2019	Carbon footprinting
Germany	Various	Not implemented	N/A*	kWh	2019	N/A*	CO ₂	2019	Carbon footprinting
Chile	Various	Systems implementation	-8	kWh	2017	-5%	CO ₂	2019	Carbon footprinting

*UK and Germany were incorporated in 2019, thus it does not apply. Czech Republic and Slovakia are not included in the scope

The increase in emissions in Portugal relates an increase of more than 25% in the emission factor published with respect to 2018 and an increase in the reporting scope in terms of the number of car parks. A Seinon platform was also launched in 2019 to increase the reliability of electricity consumption readings.

3.3.1. Circular economy and waste prevention and management

Saba manages hazardous and non-hazardous waste in accordance with the law in force in all the countries in which it operates. The climate change initiatives implemented help to reduce the quantity of waste that requires treatment. The table below shows the amount of hazardous waste managed and the treatment method.

HAZARDOUS WASTE MANAGED							
EWC 150202 ABSORBENTS (kg)	EWR 160504 GASES IN PRESSURE CONTAINERS (kg)	EWR 080318 DISCARDED COMPONENTS AND EQUIPMENT (kg)	EWR 140602 USED SOLVENTS (kg)	EWR 200121 FLUORESCENT TUBES (kg) PT (EWL 200121)	EWR 200133 BATTERIES AND ACCUMULATORS (kg) PT (EWL 160601)	CER 080111 WASTE PAINT, VARNISH, INKS AND ADHESIVES PT (EWL 160216) (kg)	CER 150110 MIXED CHEMICAL WASTE (kg)
332	5	286	40	1749	1703	976	476

Czech Republic and Slovakia are not included in the scope

The table below shows the amount of reused products and packaging.

NON-HAZARDOUS WASTE MANAGED			
EWR 200101 PAPER AND CARDBOARD (kg) PT (EWL 150101)	EWR 200301 MIXED MUNICIPAL WASTE (kg) PT (EWL 150102 and EWL 200301)	EWR 160103 CONSTRUCTION AND DEMOLITION WASTE (kg) PT (EWL 170107)	CER 200136 DISCARDED ELECTRICAL AND ELECTRONIC EQUIPMENT(kg) PT (EWL 160214 and EWL 160216)
24458	2838	7324	3729

Czech Republic and Slovakia are not included in the scope

3.3.2. Sustainable use of resources

Global energy consumption was 34,398,477 kWh and the energy intensity ratio was 155.5kW/space. Water consumption amounted to 84,207 m³.

The increase in global energy consumption is mainly due to the increase in scope in terms of the countries, since the UK and Germany were included in 2019.

Country	Intensity Factor (m ² , billings, etc.)	ENERGY					REFRIGERANT GASES (leaks)		WATER	
		Electricity Consumption (kWh)	Gas Consumption for Heating	Heating Oil Consumption Elect. Groups (l)	Fleet Diesel Consumption (l)	Fleet Diesel Consumption (l)	Consumption in kg	Type of Refrigerant Gases	Consumption of Water from Supplier (m ³)	Consumption of Recycled or Reused Water (m ³)
Spain	CALCULATED	17.926.543	0	705	2902	8176	19	Various	25869	n/a
Italy	FOR GLOBAL	5.871.931	0	34969	6031	16059	0		43347	
Portugal	GROUP (SEE	3.092.796	0	2149	5306	11327	1		4329	
UK	CLIMATE	2.139.445	967.387	0	37929	135032	0		0	
Germany	CHANGE	1.757.464	0	0	16060	0	0		0	
Chile	SHEET)	3.610.268	0	310	0	503	0		10662	

Czech Republic and Slovakia are not included in the scope

30,155 kWh of the electricity consumption reported in Spain in the foregoing table, were used to charge electric vehicles parked in our car parks.

3.3.3. Climate change

The table below shows the intensity of direct GHG emissions (in tCO₂eq):

Scope 1 emissions	Scope 2 emissions	Scope 3 emissions
1009	13,306	1743

Czech Republic and Slovakia are not included in the scope

The increase in emissions is due to the increase in reporting scope which results in a general increase in all the emission scopes. It also illustrates that the inclusion of the UK led to a considerable increase in CO₂ emissions due to the substantial increase in the fleet of vehicles. In addition, the inclusion of the UK in the carbon footprint calculation meant that gas consumption for heating was considered for the first time.

The increase in carbon footprint is also due to the inclusion of Germany.

The emission intensity was calculated on the basis of the kg/CO₂/space ratio.

The emission intensity factor was 72.5 kg CO₂/space.

All the Aparcamientos España Group's service vehicles are electric.

4. Information on labour and personnel matters

4.1. Saba policy

Saba, like any other company in the current context, is undeniably immersed in a process of constant evolution and transformation. In this process of change, people, processes and technology are crucial to achieving the required transformation.

The challenge consists of having the necessary talent, being able to transmit knowledge and develop the required skills and competences, and last, but by no means least, of creating a flexible and responsive organisation capable of bolstering the business and the corporate strategy.

Saba's People Management and Organisational Development Model is based on reference models of excellence, which enable the conversion of Saba's strategy (set out in its Mission, Vision and Values) into efficient operations and activities, while consistently ensuring the development of the Company's workers and the processes they perform, as part of a systematic vision.

Saba's Organisational Model is designed to be in line with the main strategies of Operating Efficiency, Continuous Innovation and Growth, under the premise of "Think globally, Act locally", due to the nature of our business and the geographical dispersion that characterises us.

Saba's organisational structure is based on a symmetrical deployment of the various Functional Areas in the different Territories in which it operates, facilitating functional alignment and flexibility to encourage growth in the various countries in which the Company operates and maintain focus on the Customer and Service.

The eight strategic lines of action in relation to people management are as follows: talent acquisition and development; organisational development and transformation; continuous improvement and knowledge management; change communication and management; employer's reputation or branding; remuneration and benefits; occupational health and safety; and labour relations.

4.2. Risks identified

The main risks identified in this area are as follows:

- Saba's ability to communicate and implement the defined management model, to provide a system of processes, procedures and functions that is aligned with the aforementioned model in all the countries in which Saba operates (systems that ensure the desired level of control across the entire organisation, operating processes, etc.) and to disseminate knowledge of relevant issues and Saba's strategy throughout the organisation/countries.
- Organisational transformation: The entire organisation's ability to assume the digital challenge and adapt to the current context of technological transformation which entails a cultural change within the organisation, a definition of the change strategy to be implemented and a pool of human resources to assume this task, and management of a transformation project with multiple cross-cutting effects.
- Talent management: The organisation's ability to secure talent, taking into account the attraction, retention, training and promotion processes in place, and also to identify key personnel and their succession plan; the degree of maturity of the initiatives in order to avoid undesired staff turnover, to promote workforce mobility and encourage the integration of new generations with existing personnel.

Also, given the level of geographical dispersion and the distinct management models found within Saba due to the inclusion of new countries, Saba has identified the implementation of the desired level of standardisation across processes, procedures, functions and culture, including internal communication, as a risk.

The aforementioned risks are set out in Saba's risk map and are therefore in accordance with Saba's risk management model.

Also, with the commitment to accompanying the organisation and facilitating the achievement of the Company's business objectives and improving corporate development, the milestones to be achieved in this area are as follows: transformation of the organisational culture; knowledge-based development of organisation talent; establishment of a leadership model enabling the achievement of future goals; more flexible and responsive organisational structures to facilitate adaptation; encouragement of innovation throughout the organisation; and, lastly, the implementation of new technologies and work tools.

4.3. Corporate management and performance

4.3.1. Employment

The distribution of employees by country and gender is as follows:

	2019			2018		
	Men	Women	TOTAL	Men	Women	TOTAL
Spain	643	343	986	659	341	1.000
Italy	175	35	210	187	36	223
Chile	150	121	271	138	164	302
Portugal	96	33	129	38	13	51
UK	537	156	693	523	162	685
Germany	49	8	57	46	7	53
Slovakia	18	3	21	16	2	18
Czech Republic	30	6	36	-	-	-
Andorra	2	4	6	2	4	6
Total	1.700	709	2.409	1.609	729	2.338

The distribution of employees by gender at global Group level consisted of 71% men (2018: 69%) and 29% women (2018: 31%).

The distribution by gender and age group is as follows:

	2019			2018		
	Men	Women	TOTAL	Men	Women	TOTAL
<30 years old	224	107	331	201	122	323
30-44 years old	612	259	871	573	281	854
45-54 years old	463	232	695	474	226	700
<55 years old	401	111	512	361	100	461
Total	1.700	709	2.409	1.609	729	2.338

The distribution by gender and professional category is as follows:

	2019			2018		
	Men	Women	TOTAL	Men	Women	TOTAL
Management positions	7	3	10	7	3	10
Middle management	123	48	171	119	55	174
Other employees	1.570	658	2.228	1.483	671	2.154
Total	1.700	709	2.409	1.609	729	2.338

For these purposes, it is understood that executive positions refer to all the directors and similar executives who discharge their management functions under the direct supervision of the CEO.

4.3.1.1. Employees by type of contract

The distribution of employees by type of contract at the end of the reporting period is as follows:

	2019	2018
Permanent contract	2.009	2.041
Temporary contract	400	297
Total	2.409	2.338

For these purposes, a permanent employment contract is defined as any contract for an indeterminate period while temporary contract relates to all other contracts.

The average number of permanent, temporary, full or part-time work contracts by year and gender is as follows:

	2019			2018		
	Men	Women	TOTAL	Men	Women	TOTAL
<u>Permanent contract:</u>	1.318	546	1.864	768	432	1.200
Full time	1.185	443	1.628			
Part time	133	103	236			
<u>Temporary contract:</u>	189	85	275	157	62	219
Full time	114	54	168			
Part time	75	32	107			
Total	1.508	631	2.139	925	493	1.418

For these purposes, a full work contract is defined as an employment contract that implies working 100% of the total number of working days while a part-time contract relates to all the other contracts.

The average number of permanent, temporary, full or part-time work contracts by year and age group is as follows:

	2019					2018				
	<30 years old	30-44 years old	45-54 years old	>55 years old	TOTAL	<30 years old	30-44 years old	45-54 years old	>55 years old	TOTAL
<u>Permanent contract:</u>	166	669	599	430	1.864	107	430	386	277	1.200
Full time	134	592	544	359	1.628					
Part time	32	77	56	71	236					
<u>Temporary contract:</u>	100	104	47	23	275	80	83	37	19	219
Full time	56	71	28	13	168					
Part time	44	34	19	10	107					
Total	266	773	646	453	2.139	186	513	423	295	1.418

The average number of permanent, temporary, full or part-time work contracts by year and professional category is as follows:

	2019				2018			
	Management positions	Middle management	Other employees	TOTAL	Management positions	Middle management	Other employees	TOTAL
Permanent contract:	10	172	1.683	1.864	10	75	1.115	1.200
Full time	10	166	1.452	1.628				
Part time	0	5	231	236				
Temporary contract:	0	2	273	275	-	-	219	219
Full time	0	1	167	168				
Part time	0	1	106	107				
Total	10	173	1.955	2.139	10	75	1.334	1.418

4.3.1.2. Number of dismissals

The number of dismissals by professional category and age group is as follows:

	2019					2018				
	<30 years old	30-44 years old	45-54 years old	>55 years old	TOTAL	<30 years old	30-44 years old	45-54 years old	>55 years old	TOTAL
Management positions	-	-	-	-	-	-	-	-	-	-
Middle management	2	1	1	1	5	-	-	1	-	1
Other employees	32	38	18	24	112	11	22	13	10	56
Total	34	39	19	25	117	11	22	14	10	57

The number of dismissals by professional category and gender is as follows:

	2019			2018		
	Men	Women	TOTAL	Men	Women	TOTAL
Management positions	-	-	-	-	-	-
Middle management	3	2	5	1	-	1
Other employees	83	29	112	38	18	56
Total	86	31	117	39	18	57

4.3.1.3. Average remuneration

The average remuneration by gender and professional category is as follows:

	2019			2018		
	Men	Women	TOTAL	Men	Women	TOTAL
Management positions	245.071	170.884	222.815	240.210	164.262	217.425
Middle management	69.017	69.775	69.395	83.326	69.931	78.070
Other employees	24.258	23.705	24.095	23.000	20.477	22.114
Total	28.406	27.487	28.136	27.312	23.998	26.143

The average remuneration by age and professional category is as follows:

	2019					2018				
	<30 years old	30-44 years old	45-54 years old	>55 years old	TOTAL	<30 years old	30-44 years old	45-54 years old	>55 years old	TOTAL
Management positions	-	267.786	204.151	228.752	222.815	-	249.177	218.360	204.972	217.425
Middle management	42.018	54.888	84.394	67.889	69.395	38.753	62.870	86.332	134.474	78.070
Other employees	19.011	22.926	27.032	25.720	24.095	12.828	20.337	26.153	26.023	22.114
Total	19.428	25.629	34.407	29.514	28.136	12.955	23.124	33.053	29.742	26.143

The calculation of the above-mentioned average remuneration includes all the items of remuneration existing at the organisation (fixed, variable, bonuses, employee benefits, incentives and other items).

4.3.1.4. Gender pay gap

In recent years positive advances have been made in terms of gender equality in the labour market with increases in women's participation rates and reductions in the pay gap between men and women; however, a lot of work is still required to promote real equality between the two groups in terms of their social inclusion in general and in the labour market in particular.

There are three fundamental factors which explain this pay gap between the men and women who work at Saba. Firstly, as Saba is a company with over 50 years of history, the late incorporation of women in the workplace still has a significant influence within the Group. The second relates to the greater need to achieve a work-life balance exhibited by women compared to men, with the result that part-time contracts are more common among women than men. Lastly, men have a higher presence in positions of greater responsibility.

The gender pay gap in terms of the consolidated companies, understood to be the difference between the salaries of men and women, expressed as percentage difference with respect to the salary of men, was 3% at Saba in 2019. This percentage reduces the pay gap reported by Saba's companies in 2018 (12%) by 9 points, to below the average for Spain and Europe, which stand at 15% and 16%, respectively.

The 2019 gender pay gap results improved in each of the three reference categories, and of particular notes were the significant reductions in the pay gap at middle management level (17% reduction in pay gap) and among the other employees (9% reduction in pay gap). Two basic issues contributed to the improvement in the gap; on the one hand the inclusion of the new countries in Saba's consolidation process and on the other, the measures adopted in the 2019 salary review processes in which Saba made wage adjustments designed to close the gender wage gap.

Despite the various initiatives that Saba has been implementing in recent years, always in line with its commitment to equal opportunities and transparency, we are aware that there is room for improvement in this area, which we will address in the coming years.

4.3.1.5. Remuneration of identical job positions or average remuneration at the Group

The ratio of the entry-level wage and the local minimum wage by gender is as follows:

2019	Men			Women		
	Entry-level wage	Local minimum wage	Ratio (Entry level/local)	Entry-level wage	Local minimum wage	Ratio (Entry level/local)
Spain	13.799	10.303	1,34	13.799	10.303	1,34
Italy	21.888	NA	NA	21.888	NA	NA
Portugal	8.561	8.400	1,02	8.561	8.400	1,02
Chile	4.593	4.593	1,00	4.593	4.593	1,00
UK	19.455	17.360	1,12	19.455	17.360	1,12
Germany	19.200	17.645	1,09	19.200	17.645	1,09
Slovakia	8.773	6.240	1,41	8.773	6.240	1,41
Czech Republic	7.266	6.259	1,16	7.266	6.259	1,16
Andorra	15.000	12.605	1,19	15.000	12.605	1,19

2018	Men			Women		
	Entry-level wage	Local minimum wage	Ratio (Entry level/local)	Entry-level wage	Local minimum wage	Ratio (Entry level/local)
Spain	13.143	10.303	1,28	13.143	10.303	1,28
Italy	21.154	NA	NA	21.154	NA	NA
Portugal	10.000	8.120	1,23	10.000	8.120	1,23
Chile	7.130	4.446	1,60	7.130	4.446	1,60
IUK	NA	NA	NA	NA	NA	NA
Germany	NA	NA	NA	NA	NA	NA
Slovakia	NA	NA	NA	NA	NA	NA
Czech Republic	NA	NA	NA	NA	NA	NA
Andorra	16.129	12.209	1,32	16.129	12.209	1,32

4.3.1.6. Average remuneration of directors

In 2019 and 2018, the remuneration of all the members of the Board of Directors for the performance of their duties as directors was identical in every case, notwithstanding the additional remuneration they may receive for their work for the Company.

4.3.1.7. Implementation of work disconnection measures

Saba does not currently have a common policy in place to govern employee work disconnection; however various initiatives exist and have been implemented in certain countries. It should not be forgotten that Saba's main business activity is to provide our customers with car park management services 24-hours a day, 365 days a year. However, it should be noted that, for the purpose of regulating work organisation, Saba implements, and duly notifies all employees of, regulated annual timetables in those countries where they are required which establish the work starting and finishing times and the flexibility measures in each case.

4.3.1.8. Employees with disabilities

Employees with disabilities are those defined in accordance with the legislation in force in each country and the percentage of Saba's employees with disabilities amounted to 2.3% (2018: 1.0%) of the total workforce. These figures correspond to 55 employees in 2019 and 24 in 2018.

4.3.2. Work organisation

4.3.2.1. Organisation of the working time

Saba's work organisation encompasses all of the aspects that determine, in a broad sense, the work to be performed, the manner in which it is performed and the conditions under which it is performed. We are aware that a work organisation proposal should contain elements that ensure significant matters for employees, such as: work, family and personal life balance; the working environment, in terms of offering possibilities for the development and internal promotion of employees; offering challenges and a working environment that facilitates development and sharing of decision-making at all levels based on the responsibility profile of each employee.

In general, Saba's annual working hours are set by the provisions of the applicable collective agreements or, in the absence thereof, the prevailing legislation in the respective countries. However, Saba has various initiatives aimed at increasing the flexibility of working time, based on the needs of the employees.

In view of the needs identified, Saba has launched various measures aimed at improving rest periods during working days, offering flexible starting and finishing times, flexible working days at certain times of the year -in particular to coincide with school holiday periods- improvements to paid and unpaid leave and leaves of absence.

Saba is currently undergoing a process of digitalisation which will favour the implementation of more flexible working hours aimed at improving employees' work-life balance.

4.3.2.2. Number of hours of absenteeism

The total number of hours of absenteeism in 2019 was 197,820 hours (2018: 156,312 hours).

The hours of absenteeism were calculated taking into consideration all absences from the workplace during working day hours, within the legal working day. The absences considered included, among others, the following: common illness, unjustified absences, general and specialist medical appointments and paid leave.

4.3.2.3. Measures aimed at facilitating work-life balance

At Saba achieving a work, family and personal life balance forms part of the strategy to facilitate the achievement of effective equality for men and women. For historical reasons mainly of a social and economic nature, until recently mainly women were required to try and combine their working and family/personal life. Saba is committed to redressing this imbalance, fostering co-responsibility between men and women.

Accordingly, all the measures adopted by the Company are established without gender bias, encouraging equal opportunity in all spheres of the work environment (remuneration, training, promotion, development, occupational risk prevention, etc.). It should be mentioned that, where possible, more flexible starting and finishing times have been established; leave of absence is offered to enable employees to attend to their families and an initiative has been launched to enable Saba's employees to adapt their working hours during school holiday periods to work on intensive work timetables. At most Saba group companies, Fridays are considered to be intensive working days throughout the year not just during the summer. We are convinced that initiatives of this nature promote the achievement of a work-family and work-life balance. At Saba we are also aware that measures of this kind strengthen employee commitment to the Company and motivation, in addition to reducing absenteeism and promoting employee health.

Also, the digital transformation currently underway at Saba will result in the adoption of measures promoting more flexible working hours in the short to medium term.

In 2019 mobility profiles have been defined which will provide all core employees with the equipment required to enable remote connection within two or three years.

	2019	2018
Total number of employees who had the right to parental leave	49	43
Total number of employees who took parental leave	49	43
Total number of employees who returned to work in 2019 after completing parental leave	39	34
Total number of employees who returned to work in 2019 after completing parental leave who were still employed employees 12 months after returning to work	35	32
Rates of return to work and retention of employees who took parental leave	79,6%	79,1%

4.3.3. Health and safety

Saba assumes occupational health and safety as one of its priority strategic pillars, as well as a duty in all its actions, on the basis of the fundamental principle that all individuals, whether they are employed by Saba or collaborating entities, should be protected while undertaking their activities at Saba's facilities.

Saba goes beyond compliance with occupational health and safety regulations, adopting measures that exceed the minimum legal requirements and striving to achieve the greatest possible efficiency within the process of continuous improvement.

The objective is to guarantee safe and healthy working conditions in the performance of Saba's various production activities, through activities that promote and protect health and the identification of hazards, and the assessment and control of occupation risks, which contribute to employees' physical, mental and social well-being of workers, for the purpose of avoiding accidents at work and occupational illnesses.

In accordance with our commitment with the health and well-being of our employees, Saba has been developing a yearly programme which includes various initiatives aimed at encouraging and implementing a healthy workplace model. Our Healthy Company Scheme has been implemented in Spain and Chile and is under development in the other countries in which Saba operates. In conclusion, the action plan used in Spain will be rolled out in the future in all the other countries in which Saba operates. This scheme clearly contributes to the promotion of good health and well-being among Saba's employees, in addition to reducing rates of absenteeism. The initiatives undertaken include, among others, the following:

- Educating employees about correct posture
- Programmes to promote healthy eating habits
- Preventive employee health campaigns: glaucoma
- Campaigns to encourage healthy habits: prevention of smoking, physical exercise

Accidents at work, defined as incidents causing days away from work:

	2019			2018		
	Men	Women	TOTAL	Men	Women	TOTAL
Occupational accidents	25	15	40	15	12	27
Occupational illnesses	-	-	-	1	-	-
Frequency rate	8,97	12,45	10,02	8,90	13,3	
Severity rate	0,19	0,36	0,24	0,20	0,50	

4.3.4. Labour relations

Saba as a company is committed to respecting fundamental rights, trade union freedom, collective bargaining and the ongoing search for agreement, as well as respecting workers' representatives chosen freely in all the countries in which Saba is present.

In general, the Spanish labour relations system establishes various types of workers' representation at companies: union representation through works councils or workers' representatives. The collective agreements include various channels of communication with representatives, through works councils, to address various and multiple matters of general and specific interest, although ad hoc meetings are held as required by the two parties in order to deal with relevant and necessary matters at any given time.

Employee consultation and participation mechanisms are implemented and in Spain these take the form of regular meetings, some of which relate to health and safety, although various meetings are usually held in order to ascertain the opinion and sensitivities of the employees with respect to the matters of interest.

It should be noted that Saba's model for relations with workers' representatives, in those countries where such a figure exists, is based on forging a relationship of trust and maintaining a continuous channel of contact, in the knowledge that these players have a key role in the achievement of business objectives.

The percentage of the total employees covered by the collective bargaining agreements, by country, is as follows:

	2019	2018
Spain	100%	100%
Italy	100%	100%
Chile	57%	-
Portugal	100%	100%
UK	-	n/a
Germany	-	n/a
Slovakia	-	n/a
Czech Republic	-	n/a
Andorra	-	n/a

The percentage of workers represented on joint health and safety committees is as follows:

2019				2018			
No. committees	Total headcount	Participating employees	% / total headcount	No. committees	Total headcount	Participating employees	% / total headcount
21	2.409	1.136	47%	16	2.338	1.154	49,4%

4.3.5. Training

Training and the personal and professional development of the workers is one of the fundamental strategic pillars for the creation of value at Saba.

In line with this approach, Saba has established annual Training Plans in which the training activity to be performed each year is specified, planned and prioritised in response to the training, integration and professional and personal development needs of employees.

These needs are established taking into account both the business projects that collectively affect the various functional and organisational groups, and the individual improvement and professional development actions that are established annually in the appraisal process for all the workers. This is a very valuable tool for Saba, since it ensures and facilitates the implementation of the Company's strategy more effectively.

Saba requires a flexible, knowledge-based organisation with people capable of working in a highly changeable and competitive environment. In this context of transformation, developing the necessary competences, knowledge and skills is essential, and has become one of the elements that contributes to guaranteeing our Company's success.

The Training Policy pursues the following main objectives:

- Promote identification with and integration in our corporate culture, values and objectives.
- Ensure the acquisition and development of the necessary knowledge, professional competences and skills to effectively manage the challenges that each job position entails and provide each employee with greater satisfaction in the performance of their work.
- Optimise approaches to work, cooperation and relations between the various areas of the Company.
- Identify and develop personal and professional potential in order to contribute to the improvement of our Company's results.
- Focus on excellence: always in pursuit of continuous improvement.
- Foster promotion and internal mobility.

Anticipate and adapt to the needs of the environment, as a clear competitive advantage of Saba in the market.

The following table details the hours of training by professional category:

2019				2018			
Management positions	Middle management	Other employees	TOTAL	Management positions	Middle management	Other employees	TOTAL
660	1.644	25.668	27.972	1.155	1.359	22.239	24.753

An appraisal of employees' skills is carried out each year in Spain, Italy, Portugal and Chile, which includes a development/training plan proposal to be followed on the basis of its outcome.

4.3.6. Accessibility

Through its various policies, Saba guarantees access for disabled people to its facilities. It is Company policy to implement actions to ensure that both customers and employees can access the centres and offices on this basis.

In this way, actions are undertaken so that customers can access our car parks and have accessible vehicle spaces according to their needs; these spaces are always located at the point closest to pedestrian entrances with a lift. The number of spaces for people with reduced mobility complies with current legislation.

The car parks are also being fitted out so that they all have lifts to ground level so that people with reduced mobility can access their vehicles when they are parked. Thus, in Spain, the majority (90%) of car parks have lifts to ground level.

Other facilities installed to facilitate accessibility include adapted toilets for customers. All new facilities are equipped with adapted toilet services for people with reduced mobility and whenever older car parks are refitted, these measures are included.

4.3.7. Equality

Saba is a group committed to promoting equal opportunities and diversity, by fostering an environment that favours inclusion, transparency and non-discrimination on the basis of gender, race, religion and/or beliefs, colour, nationality, age, sexual orientation, disability, pregnancy or trade union representation.

Based on this commitment, Saba has drawn up an orderly set of measures, aimed at achieving equal treatment and opportunities for women and men and at eliminating discrimination on the basis of gender at Saba.

Saba's values are based on respect for and the appreciation of diversity of talent, and the Company is convinced that the sum of its singularities favours the creation of a more satisfying, flexible and innovative workplace, which facilitates the achievement of Saba's objectives.

In this connection, Saba has established various standardised policies and guidelines shared across the whole organisation to ensure equal opportunities. These policies and guidelines are related to professional selection and promotion criteria, staff training, occupational risk prevention and safety, remuneration and labour relations.

In Spain, Saba has an Equality Plan for SABA Infraestructuras and Saba Aparcamientos.

This Equality Plan envisages an ordered set of measures aimed at managing Saba's employees so as to ensure equal treatment and opportunities for the women and men who form part of the Company and, at the same time, detecting any situation of gender-based discrimination that may exist. It should also be noted that Saba has a Protocol for Prevention and Action in relation to Harassment at Work and/or Sexual Harassment, the primary aim of which is to ensure respect for equality and non-discrimination.

In the UK, Saba has an equality policy and procedures to ensure equal opportunities and non-discrimination.

In the other countries in which Saba is present, it is preparing equality plans, in addition to protocols for the prevention and control of harassment at work and/or sexual harassment. In all those countries, the commitment to Equal Opportunities is governed by the same principles as those implemented in Spain.

Sexual harassment protocol:

All Saba's female and male employees have the right to have their dignity respected and in the same way they have the obligation to treat the people they come into contact with for work reasons with respect (customers, suppliers, external partners, etc.).

In accordance with these principles, Saba declares that any type of harassment at work, sexual, psychological (moral or mobbing) harassment and harassment for gender reasons will not be permitted or tolerated under any circumstances, will not be ignored and will be strongly penalised.

To achieve this purpose, Saba requests that each person in the organisation, and especially those with authority over others, assume their responsibilities:

- Avoiding actions, behaviour or attitudes of a sexual nature, with sexual connotations, or that are adopted because of a person's gender that are or may be offensive, humiliating, degrading, annoying, hostile or intimidating to someone.
- Acting in an appropriate and responsible manner in the face of such behaviour or situations, in accordance with the guidelines set out in this declaration of principles: not ignoring them, not tolerating them, not allowing them to be repeated or exacerbated, making them known and asking the right people for support.

Saba undertakes to:

- Disseminate regulations and provide information opportunities for all its members and, in particular, the management team to help create greater awareness of this issue and knowledge of the rights, obligations and responsibilities of each individual.
- Provide support and tailored assistance to people who may be suffering from these situations, forming a management team with the necessary training and skills for this function.
- Draw up and explain the various channels for solving these situations within the company.
- Ensure that all complaints and grievances are handled thoroughly and processed fairly, promptly and confidentially.
- Guarantee that no reprisals are allowed against the person being harassed who files an internal complaint or grievance, or against persons who participate in any way in the resolution process.
- Act decisively against (intentional) false testimony in complaints.

In order to prevent and standardise action in these cases, Saba has furnished all employees in Spain with a Protocol for Prevention and Action against Harassment at Work and/or Sexual Harassment. This protocol has been appropriately distributed among employees and is available on the Intranet.

5. Information on respect for human rights

In order to analyse the human rights area, Saba based its analysis on the provisions of the United Nations Guiding Principles on Business and Human Rights and Chapter V of the OECD Guidelines for Multinational Enterprises. In relation to the area of labour rights, which evaluates information on commitments to basic labour rights and quality in employment, Saba based its analysis on the main conventions of the International Labour Organisation and also on the legal requirements of the Spanish labour law system and other international labour standards.

Respect for human rights is one of the main obligations that Saba assumes when performing its operations and taking actions in general. In order to ensure this respect Saba has developed procedures, and has made commitments to avoid, prevent and mitigate the negative effects that its operations/actions may have on people's rights.

Saba's Corporate Values have enabled it to define its philosophy and fundamental principles, which govern the internal behaviour of the Company, as well as its relationship with suppliers, customers and shareholders. These values have been communicated to all employees, as well as how to channel reflections on their meaning and how to make them a reality in the Company's daily life. The values are as follows: Commitment, Cooperation, Trust in People, Innovation, Continuous Improvement, Customer Service, Proactivity and Focus on Results.

Saba also has a Code of Ethics which establishes the ethical framework that should govern the behaviour of Saba and its employees. The Code of Ethics is available on the website <http://saba.eu/es/informacion-corporativa/codigo-etico>

Saba encourages the subsidiaries and investees of Saba Infraestructuras S.A. to be governed by patterns of conduct and values similar to those established in the Code of Ethics, notwithstanding any adjustments that may be made to the Code in order to respect the specific legislation of each of the countries in which these companies are located.

The Code of Ethics has been approved by the managing bodies of the various Saba companies, shared with the trade union representatives of the various Works Councils in existence, and given to all Saba employees in Spain, Portugal, Italy and Chile for their information. It is binding on all employees. All employees must fully respect the current legislation in force anywhere in the world where Saba operates.

As established in Article 5 of the Code of Ethics, Saba is committed to acting at all times in accordance with prevailing legislation and respecting human rights and people's freedom.

Specifically, with regard to human rights, Article 6 of the Code of Ethics states that Saba does not accept any behaviour in dealings with customers and third parties that could be interpreted as discrimination on the grounds of race, ethnicity, gender, religion, sexual orientation, trade union membership, political beliefs, convictions, social origin, family status or disability.

Also, with regard to workers' rights, Article 5 states that in working relationships Saba does not tolerate any abuse of authority or any behaviour that may offend or intimidate another person. In this connection, various protocols have been put in place in order to ensure the correct application of the commitment to respect workers' rights, while seeking to prevent or avoid causing damage and, lastly, so that in those cases in which damage has occurred, the victim has access to a possible remedy. The protocols available are as follows: Protocol for Prevention and Action against Harassment at Work and/or Sexual Harassment. This protocol is available to all employees on the Intranet, for consultation and activation should it be needed.

In addition to guaranteeing equal opportunities and non-discrimination among its employees, both in direct dealings and in communications, special attention must be paid to written and visual language, which must be respectful, balanced and inclusive.

No significant risks relating to human rights were detected. There were no complaints or infringements of human rights at Saba in 2018 or 2019. Should this occur, they would have to be handled using the established channels. All sensitive conduct in the business activity that could lead to the risk of criminal exposure is included in Saba's risk management model for criminal risk.

6. Information on fighting corruption and bribery

6.1. Principal policies

Saba's Code of Ethics establishes the fundamental pillars for fighting corruption and bribery.

In this connection, Article 9 of the Code of Ethics regulates Saba's relations with public authorities, prohibiting any conduct aimed at obtaining illicit favours from the authorities or that may induce a lack of integrity and transparency in the authorities' decisions.

This Article establishes that Saba employees may not offer or deliver gifts or remuneration of any other kind to an authority, public official or person who participates in the exercise of public duties.

Likewise, Saba employees may not influence a public official or authority, or take advantage of any situation arising from their personal relationship with the latter or with another public official or authority, in order to obtain a favourable resolution for Saba employees or for a third party.

In addition, the Code of Ethics states that Saba employees may not promise, offer or grant to the directors, administrators, employees or collaborators of a third party any unjustified benefit or advantage to favour Saba's own employees or a third party over others. Similarly, neither Saba employees, nor any intermediary established by them, may receive, request or accept an unjustified benefit or advantage for the purpose of favouring, to the detriment of third parties, the person and/or the entity to which they belong which grants or expects the benefit or advantage.

Although Saba is not an obliged entity under the Spanish anti-money laundering law, Article 18 of the Company's Code of Ethics states that goods may not be acquired, possessed, used, converted or transferred, knowing that they have arisen from criminal activity committed by an employee himself/herself or by a third party. Also, any other act to hide or conceal their unlawful origin, or to aid the person who participated in the offence or offences to avoid the legal consequences of his/her acts is prohibited.

The principles of the Code of Ethics include Saba's approval of the Regulations for the prevention of corruption and for relations and interaction with the public authorities and with third parties in order to establish the rules that the companies comprising Saba must comply with in their dealings with the public authorities and both Spanish and foreign public officials and authorities, as well as in their relations with other companies. The main objectives of the aforementioned regulations are as follows:

- Establish principles of conduct for employees in their dealings with public authorities and private companies.
- Protect the process of free trading and competition in all public calls for tender in which Saba companies may be involved.
- Protect free trading and competition in the acquisition and/or supply of goods and/or services.
- Apply the concept of zero tolerance of corruption for both government and private business relationships.

Both the Code of Ethics and the regulations on the prevention of corruption and on relations and interaction with the public authorities and third parties apply to all the employees of the companies in Spain, Italy, Portugal and Chile in which Saba has a controlling interest or exercises control, without prejudice to any adjustments that may be made to the regulations in order to respect the specific legislation of each of the countries in which those companies are located.

In the specific case of recently incorporated countries (the UK, Germany, Slovakia and Czech Republic), the Code of Ethics is currently awaiting approval by the respective managing bodies.

6.2. Main risks

All sensitive conduct in the business activity that could lead to a risk of criminal exposure (money laundering, bribery, influence peddling, etc.) is also covered by Saba's risk management model, which reinforces the control system established at Saba in order to prevent the commission of possible criminal offences.

In the case of Spain, the criminal risk prevention model is structured around the following:

A) Crime prevention manual

The Crime Prevention Manual was approved by the **Board of Directors of Saba Infraestructuras, S.A.** on 29 March 2017 and updated on 15 March 2019.

The fundamental objectives of Saba's prevention model included in the manual are as follows:

- Establish a prevention and control system aimed at reducing the risk of crimes being committed.
- Expressly and publicly record Saba's categorical condemnation of any type of illegal behaviour, and/or behaviour contrary to the ethical principles deemed to be Saba's key values.
- Establish appropriate control measures that enable Saba to prevent crimes from being committed.
- Monitor the controls implemented in order to verify the sufficiency thereof.
- Periodically update the model, either due to organisational changes within Saba or as a result of changes in current legislation.
- Make the governing body and all the directors and employees of Saba aware of the importance of complying with the criminal risk prevention model and the ethical principles contained in Saba's Code of Ethics.
- Provide adequate training to raise awareness of the prevention model.

B) Control structure of the criminal risk prevention model

The pillars of the control structure of Saba's Criminal Risk Prevention Model are:

- (i) the **Board of Directors**, as the senior decision-making body, and
- (ii) the **Ethics Committee**, as the body responsible for monitoring the functioning and effectiveness of, and compliance with, the crime prevention model, for promoting a preventive culture based on the

principle of "absolute rejection" of unlawful acts and for periodically checking the prevention model.

The Ethics Committee is composed of the following members:

- People and Organisation Management (Chairman)
- Communication and IR Department
- Risk Officer (RO)
- General Secretary and Legal Advisory Office (Secretary's Office)

The Ethics Committee holds regular meetings. Five ordinary meetings were held in 2019. In 2018, four ordinary meetings and one extraordinary meeting were held in order to analyse a complaint received, as discussed below, in relation to the whistleblowing channel.

The Ethics Committee reports annually to the Board of Directors of Saba Infraestructuras, S.A. regarding the activities carried out during the year, including: the review of the Model and/or the breaches of the Model that come to light during the periodic reviews of the Model.

- (iii) To reinforce the efficiency of control, Saba also has a **Criminal Risk Prevention Committee** which supports the Ethics Committee and is responsible for certain controls in the different areas of the company.
- (iv) It is also worth noting the work performed by Saba's Chief Risk Officer (CRO) and the Internal Audit Department to prevent, among others, the commission of potential criminal offences.
- (v) Lastly, it should be noted that the Organisation area, through the development of the Integrated Management System, ensures Saba's processes are implemented correctly.

C) Ethics Channel:

Saba also has an Ethics Channel through which indications or suspicions of illegal behaviour and/or a violation of the Code of Ethics can be reported.

In 2019 no complaints were received via Saba's whistleblowing channel. In 2018 one complaint was received.

D) Training

During the preparation phase of the Crime Prevention Model, meetings were held with each of the members of the management committee in order to detect potential risks arising from their existing scope of action, processes and controls.

Since the implementation of the Crime Prevention Model, training sessions have been held for persons designated as Controllers (those designated by each area of the Company who collaborate with the Crime Prevention Committee to check the effectiveness of existing controls in the Company).

Specifically, in 2019, 11 face-to-face training sessions were held (2018: 10), which were attended by 30 people (2018: 27).

Also, Saba has an e-learning platform accessible to all employees in Spain through which training is provided on the basic principles of the Code of Ethics.

E) ASCOM (Spanish Compliance Association).

Saba became a member of ASCOM in 2018 and since then the members of the Criminal Risk Prevention Committee have participated in training sessions that keep them up to date. ASCOM is a not-for-profit professional society that was formed in response to the need to create a common space for compliance professionals in Spain.

Similarly, Portugal, Chile and Italy (the latter, through the "Modello di organizzazione" provided for by Legislative Decree 231/2001) have a prevention model adapted on the basis of the possible offences applicable in each of the jurisdictions and controls existing in each country, as well as their own whistleblowing channels. In addition, there are local Ethics Committees, which also meet regularly and report to the Ethics Committee in Spain.

In the case of the UK, it has a specific channel for reporting the corresponding complaints that might occur.

6.3. Contributions to foundations and not-for-profit entities

In accordance with Article 24 of the Code of Ethics, direct or indirect donations may not be made to political parties or organisations linked thereto, such as party foundations.

Companies always collaborate in projects linked to the territory in which Saba is located. Actions relating mainly to the environment, support for disadvantaged groups and urban mobility are studied and chosen. Similarly, participation in cultural and social projects located in the communities in which the company operates is valued, in line with reinforcing the company's commitment to contributing to the progress and growth of cities in which Saba companies are present.

Within the framework of this type of project, any type of collaboration with NGOs and public authorities is permitted, provided that the amounts or aid provided have been granted in a transparent manner and without seeking to affect the impartiality of a public official.

In accordance with the aforementioned criteria, in 2019 Saba entered into cooperation agreements with not-for-profit foundations and associations amounting to EUR 86 thousand.

7. Information on the Company

7.1. Saba policy

Saba's policy integrates commitment, responsibility and active participation with society and the territory as an essential part of the company's management and development philosophy.

The organisation as a whole participates and collaborates, to the extent possible, in the implementation of the CSR culture that has been established. Saba's approach to work is a shared project of commitment that translates to customer service, involvement and responsibility with the territories in which it operates while playing an active role in the progress of the cities. The foregoing, together with the company's brand identity, and the corresponding social and ethical aspects, are what sets Saba apart. The inclusion and consolidation of the CSR policy in the business enables Saba to increase transparency and properly manage stakeholders. In fact, the roadmap that establishes the sustainability strategy is aligned with the GRI standards.

For Saba, creating value for society and the environment is a priority. That is why it strives to maintain a sound sustainability strategy and to ideally manage the most significant economic, environmental and social matters. In 2019 the Company reiterated its support for projects such as the UN Global Compact, the largest voluntary initiative in the field of corporate social responsibility in the world, with more than 13,000 entities in 170 countries.

The 2030 Agenda arose as a specific part of this Compact; it outlines the objectives of the international community over the 2016-2030 period in relation to the eradication of poverty and the promotion of sustainable and egalitarian development. Saba operates within the framework of the UN's Sustainable Development Goals (SDG) to maximise positive and minimise negative impacts. For yet another year the Company worked to ensure these principles form part of its strategy, culture and the business's day-to-day actions, as well as to engage in cooperative projects that contribute to the UN's broader development goals.

Due to the specific nature of the business, Saba's activities are carried on with special regard to the goals relating to combatting climate change and its effects; sustainable cities and communities, with the development of urban mobility solutions; and innovation and enhancement of technology of infrastructures.

However, in order to have a comprehensive vision of the future and continue with the sustainable business model to which the Company aspires, it is necessary to take into account the other goals as well. The health and well-being of workers, customers and associates, reinforcing the prevention of occupational risks and the installation of resources such as defibrillators; aiding the most disadvantaged groups, constitutes Saba's commitment to ending poverty. In addition, the Equality Plan guideline to achieve gender parity; getting involved with society by offering decent work, opting for permanent contracts to promote economic growth; and benchmark alliances to achieve the proposed goals, such as joining the Spanish Compliance Association (ASCOM). In short, social innovation and development are part of Saba's DNA and, therefore, compliance with the SDGs is the best way for the Company to be truly socially responsible.

7.2. Main risks

Saba's risk map includes sustainability risk in the form of the environmental and social impact of the activities carried on and of Saba's business operations, in accordance with Saba's Risk Management model (see 2.1).

7.3. Company management and performance

7.3.1. The Company's commitment to sustainable development

As cities and society constantly evolve, so too does Saba. Saba is permanently immersed in a process of review, reformulation and development to adapt to the needs of customers and citizens, at all times focussed on service quality and the cohesion of the territories in which it operates.

Since its inception, Saba's style has always been committed to participating in the development of cities and contributing to sustainability and corporate responsibility. In this line of action, the company collaborates with corporate social responsibility projects that operate in the countries where it has assets. In addition to support for projects in the cultural and social field, Saba works with the most disadvantaged groups and organisations that work to improve living conditions in cities.

Together with the public concession arrangements and the public-private partnership, the relationship with the territories in which it operates is one of the basic pillars governing Saba's policies. A sound relationship between Saba and its environment makes it possible to establish an appropriate dialogue with the stakeholders with which it cooperates –public authorities, institutions and individuals– in order to gain an understanding of their needs and implement formulas for progress thanks to a highly committed human team. This association is reflected in the Company's presence in industry and business associations, and also in the field of education and study, through which it works for the future of the territory, as well as in Saba's participation

in various sponsorship actions in order to strengthen ties with its environment and stakeholders, always in projects and activities that reinforce Saba's public positioning.

In 2019 Saba contributed EUR 215,000 to sponsorship actions and association fees in accordance with the aforementioned criteria.

Shareholders:

Saba has a Shareholders' Office which has a series of tools that, in addition to maintaining regular contact, provide relevant information on Saba, especially on those aspects such as activities, results or news that may be of interest to the shareholders. The Shareholders' Office operates with a clear focus on service quality and in 2019 responded to 295 queries (2018: 610 queries), mostly related to providing tax data for personal income tax returns.

Customers/Consumers:

Since February 2018 Saba has been present on social networks (Twitter, Facebook and WhatsApp) in Spain, thereby contributing a new customer service channel that improves the service offered to one of the Company's key stakeholders. This service was enhanced in 2019 and became one of the most valued ways for customers to interact with Saba. In 2019, approximately 19,000 requests were received via social networks, with WhatsApp standing out as the preferred channel. It is estimated that more than 80% of these interactions relate to queries about our facilities, products and services. In the specific case of the UK, Saba is present on Twitter mainly to provide customer services.

Also, each year Saba conducts a customer satisfaction survey and a "*Mystery Shopping*" study in order to evaluate and monitor customer satisfaction with the services rendered at the car parks, and plans improvement actions in order to increase customer satisfaction. The same car parks are normally evaluated each year in order to be able to compare historical data, and the inclusion of all the areas of the car park network is guaranteed. If new car parks of a significant size are included in the scope, their inclusion in the survey is assessed.

The Customer Satisfaction Survey has been conducted since 2005. Customer satisfaction is analysed in order to ascertain the customers' actual perception of the services rendered and to discover what variables should be acted on in order to improve it. To do so, face-to-face surveys are conducted with actual customers (pay-as-you-go and subscribers) at a sample of car parks.

The "*Mystery Shopping*" activity has been carried out since 2006 and reflects the findings of an evaluation of various parameters related to the quality of the service (image and services, facilities and customer service), where mystery shoppers pretend to be normal customers at the car parks. It makes it possible to measure how the established processes work and the quality of the service offered by means of an authentic and objective evaluation in order to establish the lines of action in order to improve it. Worthy of mention is the specific Mystery module for customer services in Spain, which analyses the quality of services rendered through the various channels available (intercom, mail, 902 telephone, social media).

Since 2017, both customer satisfaction surveys and "*Mystery Shopping*" activities have been conducted in Spain, Italy, Portugal and Chile in accordance with Saba's standardised model questionnaire and methodology. Each year in the UK, "*Mystery Shopping*" studies are conducted in the main car parks in order to evaluate customer experience and to prevent fraud. From 2020 onwards a sample of car parks in the UK, Germany, Slovakia and Czech Republic is scheduled to be included in Saba's model questionnaire and methodology.

The detail of the results obtained in relation to the "*Mystery Shopping*" activities performed is as follows:

	2019	2018
Spain	89%	91%
Italy	85%	83%
Chile	80%	72%
Portugal	84%	83%

The following table shows the degree of customer satisfaction based on the face-to-face surveys conducted.

	2019	2018
Spain	7,9	7,7
Italy	8,0	7,8
Chile	7,5	7,4
Portugal	8,3	7,7

Saba strives to be a leader in areas such as efficiency, technological innovation and proactive sales. Our Customer Service and Control Centre (CAC in Spanish) provides a transversal response to the Company's leadership position. The CAC has led to an improvement in the level of customer service, acting not only as a remote management centre, but also as a fully-fledged sales call centre that allows Saba to increase the quality of service to its customers.

In 2019 Saba's CAC continued to consolidate its role as a leader in areas other than remote car park management, in the never-ending pursuit of service quality. In this connection, 2019 witnessed the consolidation of the internationalisation of the CAC, which commenced in 2017 and continued to develop in 2018, with 199 car parks connected in Spain, Italy and Portugal, compared to 159 car parks connected in 2018.

Saba received 158,517 queries related to the sales and customer service activity through its various communication channels in Spain, Italy, Portugal, Chile and the UK. The CAC also answered 1,669,078 calls from the intercoms at the car parks in Spain, Italy and Portugal, which represents an average of 4,500 calls a day, resolving all manner of incidents remotely, seven days a week, 365 days a year. Also, the CAC answered 72,306 queries relating to products by mail in Spain.

Consumer health and safety measures

Saba analyses the Stakeholders' needs and expectations, which include measures relating to health and safety, the environment, energy efficiency, etc., and implements the measures that have the greatest impact. Therefore, for example at the request of one of the aforementioned stakeholders, certain car parks were equipped with semi-automated external defibrillators (SAED). Early defibrillation is a fundamental component of the treatment of a sudden cardiac arrest. These devices, which are certified for use pursuing the legislation in force, are able to analyse the person's heart rate, and determine when it is necessary to defibrillate and administer the shock at the required strength to restore the patient's normal heart rate after suffering a cardiac arrest. In Saba's cardio-protected areas a person who has suffered a cardiac arrest can be treated independently and emergency services can be notified. Saba's employees have been given the training required to use these defibrillators safely. In addition, regular technical inspections are carried out on our equipment to ensure all the facilities provide their users with maximum safety guarantees.

Throughout the year, evaluations are also conducted of the requirements to be met as part of the process of obtaining the certifications held by Saba, which are ISO9001:2015; ISO 14001:2015, OHSAS 18001:2007 and ISO50001:2011.

Outsourcing and suppliers:

Saba's procurement activity is regulated by Saba's Procurement Model, which covers Spain, Italy, Portugal and Chile. This model establishes the need to first define the tender guidelines including technical, economic, legal, environmental, risk prevention, labour and safety at work criteria.

The Procurement Model also identifies the Supplier Accreditation and Assessment transversal process, which requests and validates information on suppliers, with information on environmental and occupational health and safety-related matters. Specifically, information is requested in relation to ISO 14001 and OSHAS certifications.

In relation to the supervision and audit of procurement processes, the Procurement Model regulates the participation of the procurement area in these processes and of management control, as well as the required approvals. The outcome is reported for the purpose of its monitoring by the related committees. Lastly, the supervision and audit processes performed by the Internal Audit Area include Saba's Procurement Process within its scope.

Saba works with supplier companies that promote the social integration of disabled people who are at risk of social exclusion, etc.

7.3.2. Tax information

The detail of the profit (loss), by country, in accordance with IFRSs as detailed in the notes to Saba's consolidated financial statements is as follows:

in thousand of euros

	2019	2018
Spain	7.559	8.745
Portugal	3.105	2.381
Italy	2.640	(1.423)
Czech Republic	1.340	-
Slovakia	215	-
Andorra	167	149
Germany	(29)	-
Chile	(1.300)	(630)
UK	(3.731)	(1.167)
	9.965	8.055

Saba paid EUR 6,833 thousand (2018: EUR 657 thousand) in income tax.

Saba received EUR 370 thousand in government grants.

8. Events after the end of the reporting period

Given the recent events in relation to the coronavirus epidemic (COVID-19) and the impact it may have on the people and the Group activities, the necessary action protocols have been established both to guarantee the continuity of its operations, as well as to ensure the health of its employees and their families. On the other hand, the Group is constantly monitoring the situation and the possible impacts, both financial and non-financial, that the spread of the virus could have. Therefore, the Group is carrying out a continuous review process of the situation according to the best information available to assess the effects on the following issues related to non-financial information: i) business model, ii) environmental issues, iii) personnel issues, iv) health and safety issues, v) supply chain issues, and vi) business continuity. Lastly, it should be highlighted that the Group's Management will continue to constantly monitor the evolution of the situation, in order to successfully face any possible impacts, both financial and non-financial, that may occur.

Report methodology

Contents of Law 11/2018 on non-financial information	Pages	GRI Disclosure
Reporting option used	4	GRI 102-54
Business model		
– Activities, brands, products, and services	4	GRI 102-2
– Markets served	4	GRI 102-6
– Location of operations	4	GRI 102-4
– Scale of the organisation	4	GRI 102-7
– Key impacts, risks, and opportunities	7	GRI 102-15
Environmental topics		
– Management approach	9	GRI 103-2 GRI 103-3 GRI GRI 102-15 GRI 102-11
– Key impacts, risks, and opportunities	14	GRI 102-29 GRI 102-30 GRI 307-1
– Environmental management and performance	15	GRI 302-4 GRI 302-5
– Emissions	16	GRI 103-2 GRI 302-4 GRI 302-5 GRI 305-5
– Circular economy	16	GRI 103-2 GRI 303-1 GRI 103-2 GRI 301-1 GRI 301-3
– Sustainable use of resources	17	GRI 102-2 GRI 302-1 GRI 302-2 GRI 302-3 GRI 302-4 GRI 302-5 GRI 103-2
– Climate change	17	GRI 305-1 GRI 305-2 GRI 305-3 GRI 305-4 GRI 102-15 GRI 305-5

Information on labour and personnel-related topics		
– Management approach	18	GRI 103-2 GRI 103-3 GRI 102-35
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– Employment		
• Number of distribution of employees by country, gender, age and professional category	20	GRI 102-7 GRI 102-8 GRI 405-1
• Distribution of employment contracts and annual average by gender, age and professional category	21	GRI 102-8
• Annual average number of permanent, temporary and part-time contracts by gender, age and employee category	21	GRI 102-8
• Number of terminations by gender, age and employee category	22	GRI 404-1
• Average remuneration by gender, professional category and age	23	GRI 405-2
• Gender pay gap	23	GRI 405-2
• Remuneration of identical job positions or average positions at the company	24	GRI 202-1
• Average remuneration of directors and executives	25	GRI 102-35 GRI 102-36 GRI 201-3
• Implementation of policies for employees to disconnect from work	25	Qualitative
• Percentage of employees with disabilities	25	GRI 405-1 b
– Organisation of the work		
• Organisation of working time	25	GRI 102-8 c
• Absenteeism	26	GRI 403-2
• Measures to facilitate work-life balance	26	GRI 401-3
– Health and safety		
• Occupational health and safety conditions	27	GRI 103-2
• Accident rates	28	GRI 403-2 GRI 403-3
– Labour relations		
• Organisation of labour/management dialogue	28	GRI 102-43
• Percentage of employees, by country, covered by collective agreements	29	GRI 102-41
• Assessment of collective agreements in the area of health and safety	29	GRI 402-1 GRI 403-1 GRI 403-4
– Training		
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• Training indices	31	GRI 404-1 GRI 404-2
– Universal accessibility for people with disabilities	31	GRI 103-2
– Equality		
• Measures adopted to promote equal treatment and opportunities between men and women	31	GRI 103-2
• Equality plans	31	GRI 103-2
• Measures adopted to promote employment	31	GRI 103-2 GRI 404-2
• The integration of, and universal accessibility for, people with disabilities	31	GRI 103-2
• Anti-discrimination policy and, where applicable, diversity management	31	GRI 103-2 GRI 406-1
• Protocols against sexual and gender harassment	32	GRI 103-2

Respect for human rights		
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