



Habitat Inmobiliaria –Stakeholders’ relationship Policy

Rev 0

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1.- Introduction

The Management Board of PROMOCIONES HABITAT, S.A.U., (hereinafter, together with its subsidiaries and investees, referred to as “HABITAT” or the “Company”) is responsible for the non-delegable task of determining the Company’s strategy and corporate policies, and for the supervision of its internal control systems. The Management Board, in the exercise of its duties and in accordance with our Code of Ethics, adopts the present Stakeholders’ relationship Policy as a commitment to the groups of people with whom HABITAT relates and to its social environment.

1.1.- Purpose

The purpose of the present Policy is to establish HABITAT’s overall framework with regard to the relations with its Stakeholders in all its activities and operations in order to: i) understand the needs and expectations of its Stakeholders (defined as individuals and organisations directly or indirectly affected by the activities of the Company); ii) build lasting relationships, through constant communication and dialogue; iii) identify and manage the risks and opportunities derived from such relations more effectively in order to develop a business model based on a sustainable, shared and reliable value generation.

1.2.- Scope

The present policy is applicable to all activities undertaken by HABITAT and must be complied with by all employees (permanent and temporary), managers and members of the Board of Directors, (hereinafter, referred to together as “Subject People”).

1.3.- Definitions

For the purpose of this policy, HABITAT’s Stakeholders are defined as: employees, clients, investors or shareholders, suppliers, local communities, public administrations and media.

2.- General Principles of Action

In accordance with the present policy, the principles that will guide the action undertaken by HABITAT and the Subject People are:

2.1.- Integrity, Transparency and Objectivity

HABITAT’s activity is undertaken honestly and responsibly in accordance with high standards of ethics and professionalism. HABITAT has a zero tolerance policy with regard to behaviours that are not in line with our principles. The information transmitted is rigorous, truthful, complete, timely and transparent in all our action areas and will not be unduly influenced by personal or third-party interests.

We assure our Stakeholders the responsible use of the information provided and the confidentiality of their data.

2.2.- Human Value

HABITAT's business activity is developed in accordance with the most advanced principles with regard to human rights and public freedoms included on the Universal Declaration of Human Rights, and to safety and well-being at work. Furthermore, we ensure the respect for our employees by implementing employment practices in accordance with the fundamental conventions of the International Labour Organisation, which prohibit forced labour in all its forms and promote non-discrimination in employment and freedom of association and collective bargaining.

2.3.- Sustainable Value Creation

HABITAT seeks to add value to the Stakeholders in the regions where it operates, through a business model that contribute to its sustainable development; and is committed to prevent and mitigate the economic, social and environmental risks derived from its activities that could affect its local stakeholders.

2.4.- Needs and Expectations

HABITAT undertakes to provide the viable resources at its disposal in order to satisfy the needs and meet the expectations of the Stakeholders, and will include the most relevant of those needs and requirements in its business model and will have mechanisms to gather, register and to address enquiries and complaints.

2.5.- Communication and Response

HABITAT offers appropriate and accessible channels to its stakeholders, ensuring an omnichannel strategy which enables the opportunity for stakeholders to choose the channel that best fits its needs and convenience to send us its suggestions, needs, expectations, opinions and complaints. These channels are also used to provide transparent, truthful and rigorous information on the fulfilling of the commitments made to the Stakeholders and the results of our business management.

As part of this communication strategy, HABITAT is committed to sharing its sustainability culture to its Stakeholders in order to be certain that it is present at all organizational levels of the company.

2.6.- Participation and Engagement

In order to facilitate the participation and engagement of Stakeholders in property developments, HABITAT actively promotes voluntary consultation processes or similar interaction channels, which include consultations with local stakeholders in relation to its products and services.

2.7.- Customer Experience

HABITAT provides a long-haul customer experience, which begins at the time the customer shows interest in one of our developments and continues until the we provide our after-sales service. This experience focuses on the customer and is shared across the organisation.



2.8.- Safe Environment

HABITAT shall ensure, at all times, a safe and healthy work environment and the respect for the applicable rules related to all the work centres where the Company undertakes its business activities. HABITAT updates and constantly improves its preventive measures.

2.9.- Monitoring and Continuous Improvement

HABITAT seeks continuous improvement, through the periodic evaluation of its available relational channels. Such evaluation reveals the degree of satisfaction of Stakeholders and what topics they are most interested in. It is also used to report on the performance of the company in relation to the identified aspects and to establish actions to improve management in the relations with Stakeholders.

3.- Approval, Review and Distribution

3.1.- Approval and Review

The approval and review, if applicable, of the present Policy is a responsibility of HABITAT's Management Board.

3.2.- Distribution

The present Policy will be made available on HABITAT's corporate web page and on its Intranet.