

**DECLARATION OF COMPLIANCE WITH THE CRIMINAL AND ANTI-CORRUPTION REGULATIONS OF THE BOARD OF DIRECTORS OF ACS, ACTIVIDADES DE CONSTRUCCIÓN Y SERVICIOS, S.A.**

The Board of Directors of ACS, Actividades de Construcción y Servicios, S.A. recognizes that corruption is an extremely damaging practice, which erodes the competence and reputation of those public and private organizations that are involved in it. This statement of compliance demonstrates our commitment to prevent corruption and fostering a culture of legal compliance. Acting with integrity is a core part of our policy and we will not tolerate any form of corruption or criminal practice. At ACS we implement and apply effective systems to combat corruption and carry out any criminal behavior.

We have adopted a Criminal Compliance and Anti-Bribery Policy that establishes the processes designed to prevent any person related to us from carrying out an act of corruption.

At ACS we apply in all aspects of our business all national and international regulations related to the management of criminal compliance and the fight against corruption.

In accordance with Spanish regulations, acts of corruption carry a prison sentence of up to six years for individuals and legal entities, in addition to fines of up to five times the benefit obtained, an incalculable reputational damage. That is why we take our legal responsibilities very seriously. Any criminal act, be it corruption or otherwise, committed by a member of this organization will lead to the adoption of disciplinary measures and will be dealt with severely by the Board of Directors. We demand that all business partners associated with our organization demonstrate, in order to do business with us, that they have a commitment similar to ours to prevent corruption.

We firmly believe that a zero tolerance for corruption and criminal acts supports our reputation as an entity that acts ethically and honestly. It also inspires confidence in the recipients of our services and the general public.

As part of our commitment to prevent corruption and the commission of criminal acts within our organization, the Board of Directors has established a series of Compliance Policies and Procedures, part of which are available on the corporate website [www. grupoacs.com](http://www.grupoacs.com), the most relevant being the Criminal Compliance and Anti-Bribery Policy and the Code of Conduct for Business Partners.

The Board of Directors counts on the implementation of the criminal compliance management and anti-bribery management system, with the assistance of the Compliance Committee, which reports to the Audit Committee of the Board of Directors, whose functions include the development, implementation, monitoring and review of internal crime prevention processes.